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Colusa



**STOREFRONT RETAIL DISPENSARY & DELIVERY
COMMERICAL CANNABIS BUSINESS APPLICATION**

Colusa Responsible and Compliant Retail LLC
DBA Embarc Dispensary / Embarc Colusa



January 30, 2026

Dear Selection Committee,

Thank you for the opportunity to submit Embarc's application to operate a cannabis retail business in the City of Colusa. We appreciate the City's thoughtful approach to evaluating cannabis operators and the care you have taken to balance economic opportunity with public health, safety, and community integrity.

We are Lauren Carpenter and Dustin Moore, husband and wife, founders of Embarc, and lifelong Californians who live just over an hour away in Sacramento—where our company is also proudly headquartered. Embarc was founded with a simple but deeply held belief: that cannabis, when responsibly regulated and thoughtfully operated, can be a positive force for public health, local economies, and community connection.

For Dustin, this work is deeply personal. In the early 1990s, his father survived multiple life-threatening brain aneurysms and began a long journey toward wellness. Like so many others, he discovered cannabis as a meaningful part of that journey. That experience instilled in Dustin a lasting respect for this plant and a conviction that safe, legal access matters—especially in communities that have historically had limited access to regulated cannabis.

That conviction guided our paths long before Embarc existed. Dustin worked directly on medical cannabis policy in California and later served as Deputy Campaign Manager for Proposition 64, helping to build the regulatory framework that governs today's legal market. Lauren's background spans public affairs, operations, and community engagement. Together, we founded Embarc to bring those experiences into a retail model rooted in trust, accountability, and civic responsibility.

Since opening our first store in June 2020, Embarc has grown to 16 retail locations across California, all awarded through competitive local application processes and all operating in close partnership with our host communities. We have succeeded not by doing the bare minimum, but by demonstrating how cannabis retail can—and should—enhance the communities it calls home. From day one, we have prioritized civic engagement, public education, and collaboration with local stakeholders. Our community-forward approach has made Embarc a welcome presence in neighborhoods that were once hesitant about cannabis—not just because we listen, but because we show up, follow through, and operate with transparency.

We understand the responsibility that comes with operating in cities permitting cannabis storefronts for the first time. In communities across California, we have earned the trust of local governments by pairing strong customer care with rigorous regulatory compliance and proactive communication. That same standard of operational excellence will guide our work in Colusa.

Our proposal is supported by a leadership team with decades of experience across cannabis, retail, public health, and other highly regulated industries. In addition to our founders' role in shaping California's legalization framework, our team includes leaders with experience from Fortune 500 companies, public safety agencies, and complex supply chain operations. This depth of expertise allows us to operate responsibly, adapt quickly, and remain compliant as regulations evolve.

Community partnership remains central to how we operate. Each Embarc location is supported by a local Community Advisory Board to ensure ongoing dialogue and accountability. Through our 1% back

commitment, we reinvest directly into the communities we serve by supporting local nonprofits, civic programs, and community-led initiatives. We invest in our employees through competitive wages, comprehensive benefits, and strong labor partnerships. We take safety seriously, with security plans developed by public safety professionals, and we operate with humility—recognizing that participation in this industry is a privilege, not a right.

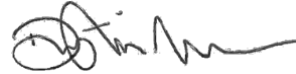
Because we live and work nearby, this opportunity is personal to us. We believe Embarc is uniquely positioned to offer Colusa a best-in-class cannabis retail experience that reflects the character and values of the community. We are not simply proposing to open a business—we are proposing to become a trusted neighbor and long-term community partner.

Thank you for your time, your consideration, and your commitment to a thoughtful process. We would be honored to earn the City of Colusa's trust.

Sincerely,



Lauren Carpenter
Co-Founder & Chief Executive Officer



Dustin Moore
Co-Founder & Chief Compliance & Strategy Officer

EXECUTIVE SUMMARY

Thank you for the opportunity to submit this proposal. We are enthused at the prospect of operating a local cannabis business that will serve as a true partner to the Colusa community.

Embarc was founded by Lauren Carpenter and Dustin Moore, a highly skilled wife and husband team with a passion for cannabis and a commitment to community-driven operations. Our team brings diverse backgrounds and professional experiences to this endeavor, but our shared belief in the importance of cannabis businesses that integrate into and ultimately benefit the community is what unites us.

Embarc is the leading independent cannabis retailer in California. Embarc is deliberate in its growth, focusing on community integration. We are known for our meaningful civic engagement, patient and customer education, and community support.

Embarc is not simply writing a check or undertaking a few hours of volunteerism at the front end of an application process—we have integrated community-orientation into our operations since the beginning, making Embarc the first ever operator to put local community stakeholders at the helm of our decision-making via a Community Advisory Board. Our track record is evident in our existing operations, which include **16 legally permitted cannabis retail storefronts in communities across California, as well as** several additional stores currently in development. We are more than just proven cannabis operators; we are trusted local partners in the communities we call home.

Ultimately, Embarc will bring Colusa the same commitment to compliance, customers, and the community that are hallmarks of our business model and evident in existing operations, including:

UNPARALLELED CANNABIS & TRADITIONAL BUSINESS EXPERIENCE: Embarc's team brings over three centuries of combined business experience in cannabis, retail, supply chain, and other highly regulated industries.

SOUND FINANCIAL PRINCIPLES: Embarc is well capitalized, operates with sound financial principles, and has a realistic plan to scale. Our growth to date has been thoughtful and deliberate to ensure we remain responsive to the communities we serve.

COMPLIANCE TEAM LED BY THOSE WHO ARCHITECTED CALIFORNIA'S LEGAL CANNABIS INDUSTRY: Embarc has significant expertise navigating the complex legal and regulatory framework for cannabis as our team members effectively wrote and implemented legalization. Embarc shaped and continues to refine the cannabis regulatory landscape in California.

BEST-IN-CLASS EMPLOYER WITH A TRACK RECORD OF EMPOWERING EMPLOYEES: Embarc has a proven commitment to its employees with industry-leading wages and benefits, meaningful education and training, and career advancement opportunities for its diverse workforce across existing operations. Our Collective Bargaining Agreements with UFCW ensure that our employees are represented fairly, transparently, and in the spirit of collaboration.

SAFETY AND SECURITY PLANS DEVELOPED BY LEADING EXPERTS IN PROTECTING PUBLIC HEALTH AND SAFETY: Embarc's Safety and Security Plans are developed by subject matter experts and tested through existing operations to ensure robust safety measures are at the forefront of operations.

A PROVEN BENEFIT TO NEIGHBORHOODS: Embarc's comprehensive Good Neighbor Policy has been proven through existing operations to proactively address community questions and concerns.

PHILANTHROPIC ETHOS WITH A TRACK RECORD OF COMMUNITY BETTERMENT: Embarc has developed meaningful partnerships with communities and has built engagement into our business model in significant ways. This results in tangible economic benefits for the City, its residents, and local nonprofit partners. The depth and breadth of our local Community Advisory Board will be a testament to this proactive approach and is bolstered by the commitment to this community's public health and safety.

OPERATIONAL LEADERS WITH SIGNIFICANT LEGAL CANNABIS RETAIL EXPERIENCE: Embarc is committed to bringing best-in-class practices and the experience of a team that has operated legal cannabis dispensaries since legalization. We have a proven track record of delivering on promises to residents, officials, community leaders, neighbors, patients, and customers.

THIS IS HOW CANNABIS RETAIL CAN AND SHOULD OPERATE IN COLUSA.

Embarc is a retail and delivery business that seeks to redefine the relationship between cannabis and the community by demonstrating through action that its business can seamlessly integrate into, and ultimately benefit, Colusa. Embarc achieves this goal in various ways, including the creation of a Community Advisory board comprised of longtime local residents and community leaders, a proven commitment to community engagement, a tangible benefits plan developed in coordination with members of this community, and through our fundamentally different approach to consumers—focusing on health, wellness, and approachability rather than the traditional emphasis on just “getting high.”

Embarc provides safe and reliable access to medical and adult use cannabis through a warm

and inviting retail expression and highly trained, professional staff. Our plans are designed to comply with Colusa Municipal Code, all applicable rules and regulations, and all State laws. It is a realistic model of operations developed through a collaborative process that leverages the expertise of our seasoned team, existing cannabis retail operations, and best practices from the cannabis industry and beyond.

Our team brings the most extensive experience managing operational and regulatory compliance plans in the cannabis industry and over three centuries of combined expertise in operations, finance, retail, supply chain, and management across cannabis and traditional industries, coupled with experience operating dispensaries since day one post-legalization. The depth and breadth of this experience uniquely equip our team to execute our plan and begin safely serving patients and customers efficiently and with more community sensitivity than other operators.

We will operate a world-class dispensary with core values rooted in our deep respect for and understanding of this community, including a focus on health, wellness, and community education.

Our track record is evidenced in our 16 existing licensed cannabis retail and delivery operations throughout California in South Lake Tahoe, Alameda, Martinez, Fairfield, Fresno, Sacramento, Redwood City, Chico, Ventura, Meyers, Tracy, Fontana, Madera, San Bruno, and Woodland—and in nearly half a dozen additional stores currently in development.

Mission Statement

Embarc redefines the relationship between consumers and cannabis, focusing on health, relaxation, recreation, wellness, and approachability rather than the traditional emphasis on “getting high.” We believe a cannabis company can do well while doing good, integrating into, and enhancing the local community while operating with integrity and transparency. We

effectuate this mission through three key values that serve as the basis for everything we undertake as a company:

ENRICH RATHER THAN ALTER: Whether a medical or adult use consumer, all cannabis is about wellness and is just one component of an individual's health and wellbeing journey. Whether using cannabis for a specific ailment, general aches and pains, anxiety, or sleeplessness, at its root, cannabis use is about enriching one's life. We believe in embracing that core truth through a focus on cannabis as a way of integrating into one's existing lifestyle rather than altering it. Our product types focus on high CBD, low THC ratios and a variety of topicals to address aches and pains. We will offer a highly curated selection of only consciously crafted cannabis products, ensuring the use of cannabis achieves our goal of enrichment of the self, one's lifestyle, and the broader community.

COMMUNITY FIRST: While cannabis has existed in communities for decades, legal, regulated cannabis is still an emerging market. Communities are grappling with how to best integrate commercial cannabis activities into neighborhoods, balancing the economic opportunity of this industry with a desire to protect public health and safety. Embarc understands that operating such a business is a privilege and not a right and that a successful business model is predicated on the ability to consistently engage the community to ensure communication, transparency, integrity, and collaboration. By putting the community first, Embarc ensures a positive relationship with government, community leaders, and the neighborhood, ultimately allowing us to give back to the community in meaningful ways.

EXPERIENCE MATTERS: Experience and best practices matter. Embarc has unparalleled experience operating compliant retail dispensaries and brings centuries of combined business and public health and safety experience and represents

the vision and operational track record of executive-level leadership in cannabis, retail, supply chain, and other highly regulated industries. This expertise is integral to the development and execution of a new type of cannabis dispensary—one that communities can be proud to host.

OWNER QUALIFICATIONS

While many of today's cannabis operators have participated in the regulatory development process either through lobbying or by providing public comment during the State's development of regulations, no team brings our unique combination of regulatory expertise in setting the foundation for legalization, writing and passing the law that legalized cannabis, and then working collaboratively with State agencies and local governments to ultimately further define and implement adult use cannabis in California.

After undertaking this policy development, team members then spent approximately two years founding, operating, leading, managing, and advising dozens of licensed commercial cannabis businesses across cultivation, manufacturing, testing, distribution, retail, delivery, events, on-site consumption, and technology to gain lessons learned from these first movers. Embarc was born out of these collective experiences and continues to be optimized and professionalized through our team's deep bench of traditional business experience. It is this combination that makes our team uniquely equipped to operate effectively in today's market.

Legalized Adult Use

Embarc's team members helped architect California's legal cannabis marketplace. Highlights of this experience include:

- Worked for then-Lieutenant Governor Gavin Newsom during the policy development of the Blue-Ribbon Commission on Cannabis, which led to the creation of Proposition 64;

- Assisted in the drafting and managed the passage of Proposition 64, The Adult Use of Marijuana Act, which legalized cannabis in California;
- Developed and continue to seek to refine the laws and regulations for cannabis in California;
- Advises local, State, and national governments on the development of cannabis regulations, including cities throughout California, and the countries of Canada and Mexico;
- Manages the compliance for over 200 cannabis licenses statewide including more than a million square feet of licensed cultivation; and
- Serve on Boards, Commissions, and Committees regarding responsible cannabis, including California's Track and Trace Advisory Committee.



Department of
Cannabis Control
CALIFORNIA

Lessons Learned

Embarc was built on a foundation of real-life experience. Through operating our own businesses and helping dozens of cannabis companies navigate within the regulatory framework we created, our team has a lifetime of lessons learned. Highlights of this experience include:

- Significant traditional retail experience including former CEO of The Gap, who spent more than five years architecting California's cannabis supply chain via one

of the State's largest full-service distributors;

- Former COO and CSO for fast growing retailer in Los Angeles;
- Former executives responsible for government, public, community, and regulatory affairs for some of the largest vertically integrated cannabis companies in the world;
- One of the most prolific brand builders in the cannabis industry, responsible for developing one of the State's top selling brands and executing the first legal consumption café in the country;
- Highly experienced supply chain executive with over 20 years of experience working with well-known global brands and startups in emerging industries, including one of California's leading cannabis supply chain distribution companies; and
- Former law enforcement officer currently under contract with the cities of Dixon and Benicia Police Departments, training city staff, police, and code enforcement personnel on cannabis regulations, crime prevention strategies, crime prevention through environmental design (CPTED), and assisting with facility design review, security plan review, and both site and compliance inspections.



Optimized & Executed

Embarc's business model is informed not only by the lessons learned from operating within California's cannabis industry, but also from centuries of combined experience in traditional industries. Highlights of this experience include:



These lessons have been applied to our execution of Embarc, which brings experience operating [16 retail storefront businesses](#) and several more on the horizon.

Embarc's Founders & Owners

Under the leadership of Lauren Carpenter and Dustin Moore, Embarc has successfully opened [16 legally permitted cannabis retail storefronts in communities across California](#). These locations demonstrate Embarc's comprehensive understanding of the nuanced requirements of different jurisdictions and the ability to operationalize cannabis retail businesses in a variety of communities. Lauren and Dustin are also currently operationalizing several additional retail and delivery licenses within the State.

Dustin and Lauren have assembled a leadership team with decades of combined experience in the legal cannabis market and more than a century of combined leadership in Fortune 500 companies. It is this experience that ensures we are historically the first of our cohort to open our doors in the communities where we operate today.

Embarc has established itself as a leading provider of compliant and reliable cannabis across

California, thanks to exceptional Standard Operating Procedures (SOPs) and vast experience in the market, both of which are used to continuously refine and optimize the business.

Lauren Carpenter – Owner & Chief Executive Officer

A Prolific Leader with a Proven Track Record of Cannabis Operations that Put Communities First

Lauren Carpenter is the co-founder and Chief Executive Officer of Embarc, a family of neighborhood cannabis shops that serve diverse communities across California. With more than 15 years of private-sector leadership experience spanning energy, education, technology, food and alcohol, retail, and now cannabis, Lauren has built her career on bridging complex regulatory environments with thoughtful community engagement. Her leadership reflects a deep belief that business success and social impact go hand in hand.

Before entering the cannabis industry, Lauren led strategic government, public, and community affairs efforts for more than a dozen Fortune 500 companies. She managed large-scale coalitions and statewide campaigns focused on highly regulated industries, overseeing multimillion-dollar budgets and diverse teams across political strategy, policy development, issue advocacy, and statewide ballot campaigns. These experiences taught her how to create alignment among business, government, and labor—including negotiating Project Labor Agreements, Collective Bargaining Agreements, and developing workforce programs that expanded access to STEM education and quality employment opportunities.

Lauren's understanding of government and regulation began early, when she interned in the California Legislature, which led to nearly a decade of direct collaboration with state regulatory agencies across multiple sectors. This experience honed her ability to navigate complex regulatory

landscapes, balancing compliance, innovation, and community priorities.

In 2018, after nearly a decade of traditional corporate work, Lauren turned her attention to cannabis. Having witnessed her husband, Dustin Moore, serve as campaign manager for Proposition 64, she recognized a rare opportunity to help shape a new legal industry. She viewed this as a chance to help destigmatize cannabis and build an industry that reflected her values of integrity, education, and community partnership.

She began her cannabis career as California Political Director and then Director of Government Affairs for Western States for MedMen, one of the world's largest vertically integrated cannabis operators at the time, where she was responsible for political, government, public, and community affairs strategies at the state and local levels across the Western United States. In this role, Lauren worked with governments throughout California and across the country to implement responsible cannabis regulations—expertise she continues to leverage today.

Lauren then served as Chief Strategy Officer for Los Angeles-based cannabis retailer Sweet Flower, where she was responsible for creating and executing corporate strategic initiatives across community, regulatory, political, and business arenas. As part of a five-person team, Lauren engaged in the operationalization of retail stores in Los Angeles while honing the company's licensing strategy, community engagement programs, and government affairs platform. This experience at a start-up contrasted dramatically with her prior experience at the world's largest cannabis company, providing unique lessons learned as the company transitioned from aspirational to operational.

Those experiences crystallized Lauren's vision for a different kind of cannabis company—one that put community at the center. Partnering with her husband, Dustin, she co-founded Embarc, driven

by the belief that cannabis businesses can do well by doing good. Under her leadership, Embarc has become one of California's most trusted independent cannabis operators, setting the standard for compliance, integrity, and community reinvestment. Every Embarc store donates one percent of gross sales to a Community Investment Fund, governed by a local Community Advisory Board that directs funding to youth, public safety, and social service programs in its own city. To date, Embarc has voluntarily reinvested more than \$2 million in California communities, on top of millions more in state and local tax revenue. In addition to direct funding, Embarc employees volunteer thousands of hours annually with local nonprofit partners, reinforcing the company's commitment to giving back in tangible ways.

As CEO, Lauren oversees Embarc's retail and delivery operations, finance, marketing, HR, legal and compliance, and community relations functions. She is deeply involved in every aspect of the company—from meeting with regulators and city officials to leading workshops with employees and visiting locations across the state. Her leadership style is hands-on, transparent, and people-first. She believes compliance and culture go hand in hand and has built systems that empower teams to live Embarc's values every day. Even as Embarc has expanded statewide, Lauren remains closely involved in daily operations and meets regularly with district managers, store teams, and local partners to ensure the company's community-driven values are lived out on the ground.

Lauren also co-founded Embarc Events, a trailblazing cannabis concessionaire responsible for integrating cannabis sales and consumption into some of California's most iconic events. Embarc Events has played a pivotal role in safely introducing cannabis at large-scale public gatherings, collaborating with major festivals such as Outside Lands in San Francisco, BottleRock in Napa, Cali Roots in Monterey, and the California State Fair in Sacramento. Since 2021, Embarc

Events has served as the official cannabis concessionaire for Outside Lands, seamlessly integrating cannabis through Grass Lands, a designated cannabis area within the three-day music festival attended by over 200,000 people. In 2024, Embarc Events further solidified its expertise by spearheading the introduction of onsite cannabis sales and a consumption lounge at the California State Fair for its 17-day run—the first time in history that cannabis sales and consumption were permitted at a U.S. state fair. Embarc’s founders were instrumental in developing the regulatory framework that made this milestone possible. In 2025, Embarc returned to the State Fair with a tenfold expansion, a 50,000-square-foot footprint that included enhanced educational exhibits and a significantly expanded experience. These groundbreaking activations have redefined how cannabis is safely and responsibly integrated into mainstream culture.

“We have an unwavering commitment to destigmatization,” Lauren says. “Our team puts in the work—sometimes for years—to push legalization forward in communities that have been slow to accept cannabis. We form coalitions with diverse stakeholders and create spaces where curiosity and education can replace stigma.”

Lauren’s work has positioned Embarc as a model for safe, community-driven cannabis retail. Through licensing Embarc’s 16 stores and multiple events, she maintains strong working relationships with the Department of Cannabis Control (DCC) and local regulators statewide. Under her direction, Embarc stores have hosted DCC inspectors for educational tours, collaborated on compliance training, and contributed to shaping a more transparent regulatory framework for California’s cannabis market.

A respected thought leader and advocate for an equitable, sustainable cannabis industry, Lauren frequently participates in state and national industry panels, speaks on policy and advocacy,

and mentors emerging professionals, particularly women in cannabis. She is an active member of the California Cannabis Industry Association’s Policy Committee and a participant in the Cannabis Executive Roundtable for C-suite leaders operating profitable enterprises across the industry. Her authenticity, transparency, and willingness to share both the highs and challenges of leading a cannabis company have made her a trusted voice among peers and policymakers alike.

Lauren also serves on the Board of the California Cannabis Industry Association and is a founding member of the California Cannabis Operators Association (CaCOA). Her previous leadership includes serving on the Fairfield-Suisun Chamber of Commerce Board of Directors and the UC Capitol Center Alumni Council. She continues to serve her local community as a board member of her neighborhood association. In recognition of her leadership and impact, Lauren was named one of the Sacramento Business Journal’s 40 Under 40 honorees in 2025.

A graduate of the University of California, Santa Barbara, Lauren holds a Bachelor’s degree in Public Policy and History. Beyond her professional life, she is a devoted wife and the proud mother of a one-year-old daughter—balancing the demands of entrepreneurship and motherhood with grace, determination, and purpose.

“It’s an incredible feeling,” she reflects, “to see people’s perceptions shift in real time—whether in a City Hall meeting, a neighborhood open house, or a music festival. That’s how change happens. That’s how cannabis becomes part of our communities, safely and responsibly.”

Dustin Moore – Owner & Chief Compliance & Strategy Officer

Responsible for Legalization—and Now Navigating the Landscape He Created

Dustin has been a driving force behind California’s efforts to legalize and regulate commercial

cannabis for a decade. In 2011, while working for the Speaker of the California Assembly, Dustin developed legislation for medical cannabis regulations that served as the foundation for the regulatory framework in place today. In 2014, he began working to develop and ultimately served as Deputy Campaign Manager for Proposition 64, the successful ballot measure that legalized adult use cannabis in California. No one is more familiar with Proposition 64's language and intended implementation than Dustin.

After Proposition 64 passed overwhelmingly in 2016 and having developed significant expertise about how to effectively regulate the cannabis industry, Dustin began working with local, state, national and international jurisdictions to assist in developing and implementing their regulatory and licensing programs, including in Canada, Mexico, and municipalities throughout California. Dustin is regarded as a subject matter expert whose advice and experience are sought by both the private and public sectors nationally and internationally. Dustin worked with Canada to develop their testing regulations and served as an advisor to the Mexican Senate in the development of Mexico's legalization legislation.

True to the intent of Proposition 64, Dustin specializes in policy development that prioritizes public health and safety. After nearly five years of cannabis policy development, Dustin became a founding partner at Axiom Advisors, the State's leading strategic consulting firm providing business and compliance services to professional cannabis associations, cannabis manufacturers, distributors, testing labs and retailers. The firm is responsible for managing compliance for more than 200 commercial cannabis license holders in California, including over three million square feet of licensed cultivation. Dustin is a highly regarded subject matter expert at countless cannabis events, panels, discussions, and conferences across the country.

Dustin's activism and volunteerism are a testament to values he believes are foundational to the spirit of the industry, starting when Dustin was engaged to assist in the drafting and passage of Proposition 64. Proposition 64 represents one of the largest systematic efforts in history to address the wrongs of the failed War on Drugs on low-income communities and communities of color. Proposition 64 enacted meaningful sentencing reform to expunge records for cannabis offenses and to provide significant funding for communities most harmed, which is a testament to his commitment to social equity.

Another critical component of creating equity in the industry is working to ensure space for small farmers. Dustin served as the volunteer Executive Director of the International Cannabis Farmers Association; a Northern California-based advocacy organization focused on creating equitable opportunity for California's small farmers.

Additionally, given his father has been a medical patient for decades, Dustin serves on the State of California's Track-and-Trace Advisory Committee, ensuring that safe, tested products are available in the legal market.

As Co-Founder and Chief Compliance & Strategy Officer at Embarc, Dustin plays a central role in guiding the company's growth, regulatory integrity, and long-term strategy. He leads Embarc's compliance, licensing, and government affairs efforts alongside the General Counsel, ensuring that all operations align with state and local laws. Dustin oversees the development and construction of new retail locations, from real estate site selection and entitlement to buildout and launch, ensuring each store meets stringent regulatory and community standards. He also drives operational efficiency across Embarc's supply chain, technology, and brand partnerships, leveraging his decade of relationships to create sustainable systems for growth.

Alongside Lauren, Dustin co-founded Embarc Events, a leading cannabis concessionaire responsible for integrating cannabis sales and consumption into large-scale public events across California. Drawing on his deep expertise in compliance, licensing, and public policy, Dustin has been instrumental in collaborating with the DCC, municipal authorities, and event organizers to bring cannabis experiences to life safely and effectively. His understanding of regulatory frameworks ensures that these events meet strict health and safety standards while aligning with State and local laws. Dustin's leadership has driven Embarc Events' success at high-profile events like Outside Lands, BottleRock, Cali Roots, and the California State Fair.

Since 2021, Embarc Events has seamlessly integrated cannabis into Outside Lands through the designated Grass Lands area. In 2024, Dustin played a pivotal role in launching onsite cannabis sales and a consumption lounge at the California State Fair—a groundbreaking moment in the showcasing of cannabis as part of California's agricultural landscape. In 2025, he helped lead the expansion of Embarc's footprint at the Fair to include an enhanced educational cannabis exhibit and larger-scale California Cannabis Awards, celebrating excellence in cultivation, innovation, and responsible production across the state's legal market. Through his extensive compliance background, Dustin ensures that Embarc Events operates responsibly, balancing public education, safety, and community engagement. His expertise helps demonstrate how cannabis can complement major events while generating economic benefits and maintaining a strong focus on public health and safety.

Dustin is a sought-after speaker and panelist on cannabis policy, compliance, and industry sustainability, frequently engaging with both policymakers and operators to promote practical, safety-driven regulation. He is also a founding Board Member of the California Cannabis Operators Association (CaCOA), an organization

committed to reshaping the regulatory and operational landscape for California cannabis licensees across the supply chain.

Dustin's work has earned national recognition. In both 2023 and 2025, they were honored on Forbes' "42.0" list, celebrating entrepreneurs transforming the cannabis industry through integrity, innovation, and community reinvestment.

Dustin holds a Bachelor of Science in Political Science from the University of California, Santa Cruz, and completed Public Policy coursework at the University of Southern California's Price School of Public Policy in Sacramento. Beyond his professional life, he is a devoted husband and proud father to a one-year-old daughter, finding balance and purpose in family life while helping lead one of California's most community-focused cannabis companies.

Leadership & Key Team Members

Although the prompt specifically asks for the experience of owners of the business, it is important to briefly touch on the robust corporate infrastructure that developed and continues to refine tools, processes, procedures, and resources for our Embarc retail teams. Embarc's team plays an important role in ensuring our local teams have the support and accountability they need to run the day-to-day components of the business. As such, and in deference to spatial constraints, brief resumes for key corporate infrastructure are included below.

Jeff Kirwan — Chief Operating Officer

Jeff brings more than 30 years of national and international experience developing and implementing best practices for some of the world's leading omni-channel retailers, including The Gap, Old Navy, and Target. He has held Senior Vice President, President, and CEO positions at Fortune 500 retailers and spent over 14 years with The Gap.

As the Global President and CEO of the Gap Division at The Gap, Inc. from December 2014 to February 2018, Jeff adeptly led a global team of over 45,000 employees, managing the brand across multiple channels and geographies with exceptional leadership and strategic vision.

Before becoming Global President and CEO, Jeff served as President of Gap Inc.'s Greater China business from 2011 to 2014, overseeing all brands and channels in mainland China, Hong Kong, and Taiwan. Under his leadership, the company's presence in China expanded to include Gap, Old Navy, and Gap Outlet brands, amassing over 100 stores across 25 cities within just four years. Jeff also managed e-commerce channels for Gap and Old Navy. Joining Gap Inc. in May 2004 as Senior Vice President of Stores & Operations for Old Navy in the U.S. and Canada, Jeff played a crucial role in driving operational advancements, including enhanced marketing, customer engagement, increased traffic, and improved sales and digital business growth. His experience showcases his expertise in developing and scaling retail operations in complex, ever-changing regulatory environments.

Before joining Gap Inc., Jeff served as the Regional Group Director for Target Corporation's Western Region. He served on the Board of renowned California cannabis operator HERBL Distribution and serves as the Executive Chairman for Maurices, a billion-dollar specialty retailer focusing on women's apparel.

In 2016, Jeff began his foray into the cannabis industry, serving as one of the founding members of HERBL Distribution. HERBL emerged as the largest full-service provider of distribution services and developed the only retail services arm in California cannabis distribution, customizing unique insights typically only used in scaled traditional retail environments to measure efficacy of procurement. He also served as a Board Member for HERBL Distribution, thereby continuing to develop and provide unique insights

into navigation of California's complex cannabis supply chain.

HERBL was a leading cannabis distributor, helping top brands and retailers grow and scale in the largest markets in the US, including California and Nevada. HERBL served 98% of all storefronts with more than 75% of retail customers within 100 miles. Their multi-state infrastructure and operations were designed for scale, featuring seven licensed distribution centers, a fleet of 45+ armored trucks, and over 200 employees. Importantly, HERBL invested in a cutting-edge technology platform utilizing a highly-scalable software stack and industry-leading supply chain solutions to navigate complex challenges. This approach is foundational to his perspective at Embarc.

In 2023, Jeff assumed the role of COO of Retail Operations at Embarc, demonstrating a hands-on leadership style that is pivotal to the company's day-to-day operations. Committed to engaging with employees at all levels, Jeff ensures that all critical business aspects function smoothly and effectively. With a comprehensive involvement in operational management, Jeff is responsible for guiding retail strategies while collaborating closely with senior management to uphold and enhance quality standards across the organization.

Jeff works in partnership with the President of Retail to operationalize new stores. Jeff's extensive network of brand partnerships within the California supply chain enables him to identify and secure suitable collaborations for Embarc. Besides reviewing and approving all marketing campaigns and materials, Jeff conducts weekly meetings with the General Manager and store management and holds office hours for employees. His unwavering commitment and proactive engagement exemplify his dedication to Embarc's success and growth, cementing his reputation as a responsive and attentive leader.

Jeff's impressive executive experience with multinational retailers, deep understanding of customer needs, and robust consumer marketing and sales expertise make him an invaluable asset to Embarc. With his exceptional traditional retail background and significant cannabis industry knowledge through his role at HERBL Distribution, Jeff brings a unique blend of experience to Embarc, where he oversees all retail operations.

Jeff holds a Bachelor of Arts degree in Business Communications from Rhode Island College and a Master of Business degree, focusing on Human Resource Management, from the University of Maryland.

Demonstrating a commitment to community support, Jeff encourages employee volunteerism and actively engages with numerous nonprofit organizations. His passion for giving back reflects his dedication to making a positive impact on the communities he serves.

Tessa O'Dowd – Chief Financial Officer

With a career spanning over two decades, Tessa O'Dowd combines her financial expertise with in-depth knowledge of California's regulated industries to drive Embarc's fiscal strategy. As CFO, Tessa's acumen is central to Embarc's fiscal health, guiding the company through the intricacies of the cannabis sector with adept financial reporting, insightful analysis, and comprehensive strategic planning.

Tessa has over five years of experience as a financial executive in the cannabis industry, beginning in 2018 with her role as Chief Financial Officer at Plus, a California cannabis edibles company. Following Plus, Tessa held the position of Interim CFO and Senior Vice President of Finance at Lowell Farms Inc. Her role entailed the strategic and executional leadership of financial functions such as accounting, controlling, treasury, finance, credit, and collections. Tessa focused on refining processes to enhance efficiency at the company's then-current scale, while also laying the

groundwork for future expansion. She played a vital role in overseeing the preparation of all financial statements, including reports for shareholders and government agencies. Adept at juxtaposing sales and profit projections with actual figures and budgeted expenses, Tessa ensured financial accuracy and accountability. Her proactive approach in reviewing and improving planning processes, coupled with her analytical prowess in identifying operational reorganization needs, supported the company's sustainable growth. Tessa's collaborative work with the President and other executives was key in aligning financial strategies with the broader organizational goals, studying long-range economic trends, and managing investments. Her financial expertise was pivotal in raising additional capital required for expansion, all while keeping the company abreast of technological advancements and trends in finance.

As the Controller at Bare Snacks, Tessa was a critical force in shaping the company's financial direction. In collaboration with the COO and CEO, she was responsible for driving financial management strategies that supported Bare Snacks' operational and growth objectives. Tessa adeptly worked on developing and implementing operational systems plans, preparing annual budgets, and continuously improving accounting SOPs. Her role also extended to managing significant external relationships, including audits, tax preparations with tax firms, and ensuring compliance with state and federal laws. Tessa maintained current knowledge of organizational policies, state and federal directives, and accounting standards, ensuring all financial activities met legal and regulatory standards. Internally, her focus on process enhancement included cash flow analysis, applying accurate depreciation rates to assets, and directing month-end and year-end closing processes in line with GAAP. She also managed off-shore accounting teams, aligning all financial department efforts, especially with the supply chain team, to ensure a

synchronized approach to Bare Snacks' financial management.

Tessa began her career in the wine industry in 2003 at JUSTIN Vineyards and Winery as the Inventory Control and Account Receivables Manager. She then moved on to the role of Controller at Cameron Hughes Wine, where she was responsible for overseeing various financial functions critical to the winery's success. Her role covered an expansive scope, managing financial accounting areas such as accounts payable, accounts receivable, payroll, sales, and inventory control, as well as supervising both direct and indirect reports, ensuring that daily financial operations were executed flawlessly. Tessa oversaw the cost accounting process, which is fundamental in the wine industry, ensuring the accuracy of costing for finished goods, winemaking, packaging, and handling. Her strategic management in this area included the successful transition of all cost accounting from a basic system to the industry-standard Wine Makers Database (WMDB). In collaboration with the executive team and department heads, she contributed to the preparation of annual budgets and financial forecasts. Tessa was responsible for the preparation and review of monthly and quarterly financial reports. She analyzed actual versus budgeted financial performance, held monthly meetings with the executive team, and managed all audits. She supervised the month-end and year-end closings, maintaining the general ledger, preparing journal entries, and ensuring the reconciliation of all ledger accounts. Tessa also managed asset classification and depreciation methods, reinforcing the company's financial integrity. Overseeing compliance with various regulatory and tax requirements was another facet of her role, including the preparation and filing of tax returns and compiling financial information for external tax preparers. In addition to her financial duties, Tessa also managed a range of human resource functions. She maintained policy and procedure manuals, coordinated performance appraisal systems, fostered staff development,

and oversaw changes to group health and Workers' Compensation policies, demonstrating her versatility and commitment to organizational excellence.

Tessa's academic credentials include a Bachelor of Science in Business Administration with a focus on Human Resource Management from California Polytechnic State University, and a Master's in Business with a specialization in Accounting from Keller School of Management. Her educational background provides a solid foundation for her strategic approach to financial management and her capacity to lead complex financial operations.

Courtney Zalewski – Chief Brand & Marketing Officer

Courtney serves as the President of Brand and Marketing for Embarc. Prior to joining Embarc, Courtney co-founded, and served as managing partner of The Cannabis Café, a first-of-its-kind fully licensed cannabis consumption space and restaurant. In her leadership role, Courtney assisted in capital fundraising and oversaw the build out and design of the establishment—successfully opening the Café's doors in just six months. The Café was first business of its kind to open nationwide and the first to open its doors in West Hollywood, a testament to her operational expertise.

Courtney was also responsible for hiring and assembling the team, overseeing the buying and menu curation, developing relationships with partner brands and vendors, creative direction, marketing and day-to-day operations of the Café and its 80+ employees. Courtney worked alongside retail, compliance and legal experts to develop first of their kind comprehensive SOPs for sales and consumption. Courtney's leadership ensured the Cannabis Café was operating smoothly, compliantly and profitably; as well as ensuring the company followed through on promises made in the initial application, including hiring a diverse staff and partnering with local businesses and purveyors.

Prior to The Cannabis Café, Courtney was a founding team member and served as the Vice President of Product and Design at Lowell Herb Co., one of California's most recognized brands. Courtney was responsible for the management and execution of all touchpoints of the brand including in-store marketing, digital marketing, branding and packaging. Her department was also responsible for product sourcing and development of new SKUs based on sales data and industry trends. During her time with the company, Lowell gained national praise for its design, creativity and impact within the cannabis industry which helped define the pre-roll market with elevated branding and packaging. Lowell also received recognition for its commitment to sustainability by using 100% recyclable and food-grade safe materials, something Courtney tries to incorporate in all design decisions. Her team created several media-worthy products and promotional items coveted by budtenders and influencers within the cannabis industry and helped raise the bar for what marketing in cannabis could look like.

Separately, Courtney and her wife co-founded and ran a creative studio dedicated to the cannabis industry and has worked with several the top selling brands within the State and country including Raw Garden (top selling extract company and one of the largest cultivators in California), 1906 (Colorado's top selling edible brand), West Coast Farms (one of the largest cultivators in Santa Barbara County), advising on brand development, strategy, marketing, packaging and product development. Courtney is fully entrenched in the cannabis industry and her expertise goes beyond marketing and design; her operational experience will help Embarc maintain best-in-class operations.

As an LGBTQIA+ woman, Courtney understands how difficult it can be to feel heard in the workforce. She is committed to mentoring and empowering underrepresented individuals interested in marketing, design and entrepreneurship. Through her design studio, she

employed six women fulltime, paid above market rate and continues to prioritize diverse hiring in her role at Embarc.

Courtney also boasts an impressive background in business operations, employee management, marketing strategies, creative direction, and UX design, making her a powerhouse in her field. Courtney has excelled in various roles, such as Director of UX at Pager, an early-stage healthcare start-up in New York City. There, she expertly managed consumer-facing products and internal tools for medical professionals, concentrating on chat and artificial intelligence technology. Courtney's efforts went beyond product design, driving the company's positioning, marketing, and branding to create an approachable, user-friendly, and effective product.

An accomplished creative director and graphic designer with over 18 years of experience, Courtney has led and managed the design and development of websites, printed magazines, books, and iPhone apps. Throughout her career, she has supervised teams of developers and designers, ensuring pixel-perfect design and quality assurance through user flows, user and admin interfaces, style guides, and design audits.

Courtney's academic credentials include coursework in graphic design, web design, and motion design from institutions such as the ArtCenter College of Design in Pasadena, California; the Art Institute of California, Los Angeles; and the College for Creative Studies in Detroit.

Eric Lightman – General Counsel

Eric has carved out an impressive career as a skilled attorney, representing technology companies and working in corporate finance. With a keen understanding of the complex legal and financial landscapes, Eric has provided valuable counsel to an array of clients and demonstrated an unwavering commitment to community service.

As West Coast counsel for the New York-based law firm Masur, Griffiths, Avidor, LLP (MGA), Eric served as outside general counsel to early and mid-stage growth technology companies based in San Francisco. In this role, he provided expert guidance on employment law, litigation matters, and financing transactions, helping these companies navigate their legal and financial challenges.

Before joining MGA, Eric honed his skills as a commercial litigator and labor and employment lawyer at a law firm in Oakland. His legal acumen was further complemented by his experience in corporate finance at leading companies such as The Boeing Company and Paramount Pictures.

Eric currently serves as General Counsel at Embarc, where he drives the company's dynamic growth strategy, risk mitigation, and ongoing legal affairs. Prior to joining Embarc, Eric served as General Counsel and later as Vice President of Legal at The Shryne Group (owner of the popular brand "STIIIZY"), where he was part of the legal team that helped to form the company in 2018.

As Shryne's first in-house attorney, Eric was tasked with supporting the company's growth from the ground up, developing the policies, practices, and procedures applicable to all areas of the business including compliance, retail operations, manufacturing, distribution, and human resources. During his tenure, the company went from a single store in Los Angeles with a handful of employees to the largest vertically integrated cannabis company in California with 20+ stores, 100+ cultivation licenses, distribution and manufacturing facilities throughout the State, and a staff of nearly 3,000 employees.

As head of legal at Shryne, Eric ensured that the day-to-day operations ran smoothly, compliantly, and without incident. He oversaw a legal team of six attorneys and five licensing analysts and staff to support the company in all respects, including day-to-day operational support, social equity program development, regulatory and compliance

monitoring, local and State licensure, community benefits and outreach, risk management, mergers and acquisitions, financing transactions, in and out of State expansion efforts, real estate financing, litigation, business development, and much more. It is this track record of hands-on leadership, in-the-trenches development, and sound business strategy through scale that Eric brings to Embarc, where he oversees legal, risk management, and regulatory affairs in much the same capacity.

Eric's dedication to community engagement has been a hallmark of his career. He is an active participant in the annual Constitution in the Classroom event sponsored by the American Constitution Society, where he helps educate elementary school students about the law and the Constitution. As a member of the Justice and Diversity Center, part of the Bar Association in San Francisco, Eric consistently advocated for immigrants' rights and low-income tenants during his time in the Bay Area.

Eric earned his Juris Doctorate degree from Santa Clara University School of Law and holds a Bachelor of Business Administration degree in Finance and International Business from Penn State University. Throughout his distinguished career, Eric has proven himself to be a dedicated legal professional with a passion for innovation, community impact, and social justice.

Jason Frie – Vice President of Vice President of Retail Stores & Operations

Jason is a seasoned retail executive with nearly two decades of experience leading high-growth, multi-unit retail organizations and building brands that balance operational excellence with exceptional customer experiences. As Vice President of Retail Stores and Operations at Embarc, Jason oversees the company's 16 retail dispensaries, guiding every aspect of operations—from store performance and team development to customer experience and sales.

In his role, Jason leads Embarc's district and store leadership teams, ensuring operational consistency across all locations. He plays an integral part in the company's expansion strategy, leading the hiring, training, and operationalization of new stores to ensure every location opens successfully and maintains Embarc's high operational standards. Jason works cross-functionally with the development and compliance teams to align operational practices with facility design and regulatory requirements, ensuring each new store launches efficiently, compliantly, and ready to deliver an exceptional customer experience. He also oversees employee development across the retail network, cultivating strong leadership pipelines and consistent performance across all locations. Under Jason's leadership, Embarc's retail operations embody the company's core values of integrity, inclusivity, and community partnership, with a focus on delivering safe, educational, and accessible cannabis retail experiences.

Before joining Embarc, Jason served as Head of Retail and Real Estate at The Great / Emily + Meritt, where he led the company's evolution from a single boutique to a nationally recognized lifestyle brand. During his tenure, he oversaw the expansion to seven retail locations, driving a tenfold increase in sales while managing all aspects of operations, visual merchandising, and real estate portfolio growth. His leadership emphasized not just expansion, but creating a customer experience that was both aspirational and deeply personal.

Prior to that, Jason held senior leadership roles with James Perse and rag & bone, two of the most respected names in luxury apparel. As Vice President of Brand Operations at James Perse, he directed global operations across retail, wholesale, e-commerce, and hospitality channels, and successfully launched the brand's flagship furniture concept store in Los Angeles. At rag & bone, he led Global Direct-to-Consumer Operations and Loss Prevention, where he

implemented omni-channel strategies that connected physical and digital retail experiences, developed operational playbooks for global consistency, and helped achieve some of the strongest inventory accuracy and shrink reduction results in the industry.

Earlier in his career, Jason held key operations roles at Tory Burch, Joe Fresh, and Club Monaco, where he managed large-scale store openings, developed leadership training programs, and streamlined operational frameworks across North America and Europe. His early experience building retail infrastructure from the ground up honed the skills that now define his leadership: a focus on people, process, and performance.

At Embarc, Jason brings this deep expertise in scaling and refining premium retail environments to the regulated cannabis industry. He is passionate about applying lessons learned from decades in traditional retail to streamline the cannabis customer experience—ensuring that Embarc stores operate with the same precision, service standards, and brand integrity expected of any leading retail organization.

Driven by a belief that operational excellence starts with empowered teams, Jason is deeply committed to mentoring and developing retail leaders across the organization. His hands-on leadership style emphasizes accountability, collaboration, and creativity, fostering a culture where store teams are supported, inspired, and set up for long-term success.

Jason's leadership has been instrumental in strengthening Embarc's statewide operations, integrating data-driven management systems, and enhancing store performance while maintaining a steadfast commitment to compliance and community engagement. His experience building global retail brands and his ability to translate that success into California's emerging cannabis market make him an invaluable member of Embarc's team.

Holly Schick - Head of Inventory Management

Holly is a seasoned retail and eCommerce executive with more than 25 years of experience leading merchandising strategy, operational planning, and supply chain excellence for globally recognized consumer brands. As Head of Inventory Management at Embarc, she oversees the company's statewide supply chain operations, ensuring every store maintains an optimal product mix that reflects both customer demand and regulatory compliance. Holly brings to Embarc a rare blend of creative merchandising intuition and analytical precision, enabling her to balance product diversity, profitability, and efficiency across the organization's 16 California locations.

Since joining Embarc, Holly has redefined how the company approaches inventory strategy and procurement. She leads the systems and processes that maintain consistent product availability and ensure that Embarc's shelves reflect the highest standards of quality and curation. Holly collaborates closely with the company's retail leadership, marketing, development, compliance, and finance teams to streamline purchasing workflows, optimize vendor partnerships, and build forecasting models that anticipate customer preferences and market shifts. Her leadership ensures Embarc's retail operations run smoothly from supply chain through point-of-sale.

Before joining Embarc, Holly spent more than two decades driving performance and innovation in the retail sector for leading global brands. As Director of Digital Experience and Operations at JCPenney, she led a large cross-functional team responsible for site experience, SEO, taxonomy, and digital content creation. Under her leadership, the company achieved an 11% increase in SEO conversion above site trend and improved online storytelling through strategic content hubs that elevated brand engagement and drove measurable growth in email and homepage conversion rates. Holly's ability to merge data

analytics with consumer psychology allowed her to create digital pathways that enhanced both brand visibility and the overall customer experience.

Prior to her work at JCPenney, Holly worked in another highly regulated industry as Director of Marketplace and Business Development at WineDirect, where she scaled marketplace revenue from \$27 million to more than \$50 million in under two years. She streamlined supplier onboarding, improved fulfillment processes, and worked across engineering and operations to optimize scalability. At Williams-Sonoma, Inc., she directed global franchise and Canadian eCommerce merchandising and operation teams, exceeding \$50 million in annual revenue and achieving 70% year-over-year growth by tailoring assortments to local markets and improving SKU productivity. Her leadership there included managing nine international eCommerce site launches across Mexico, the Middle East, and South Korea within just 15 months.

Earlier in her career, Holly held key merchandising and planning roles at Levi Strauss & Co., Macy's, Old Navy, and Gap Inc., where she refined her expertise in forecasting, assortment planning, and omni-channel retail strategy. Across these roles, she earned a reputation for her ability to unify data-driven insights with brand storytelling, enabling organizations to align operational decisions with evolving customer needs. Her cross-functional leadership style, shaped by years of collaboration across marketing, merchandising, finance, and logistics, continues to define her approach at Embarc.

Holly holds a Bachelor of Fine Arts in Art History from the University of Colorado Boulder and a Master of Fine Arts in Design from the Academy of Art University. She has also earned professional certificates in Project Management and Artificial Intelligence Business Strategies from the University of California, Berkeley, combining her creative roots with modern analytical and technological expertise. This academic foundation

underpins her ability to apply innovation, automation, and data modeling to inventory strategy and operational forecasting.

At Embarc, Holly plays an important role in strengthening the company's retail operations behind the scenes. She focuses on refining inventory systems, supporting store teams with efficient stock management, and building scalable processes to ensure product availability and assortment balance across all locations. She approaches her work with a philosophy rooted in both art and analytics, where thoughtful curation meets operational discipline. Her strategic mindset and collaborative approach have made her a trusted partner to cross-functional teams, and she continues to make meaningful contributions to Embarc's ongoing growth.

Kevin Schmidt – Head of Regulatory Affairs

Kevin Schmidt is a fourth-generation public servant with the institutional knowledge necessary to navigate California's complex political and regulatory landscape. Beginning his public service career with the California Senate Majority Leader, Kevin worked on a broad array of topics including agriculture, water, and energy. Kevin then served for five years as Policy Director for then-Lieutenant Governor Gavin Newsom, focusing on energy, natural resources, economic development, higher education, and other policy issues. Kevin represented Lt. Governor Newsom on the California Coastal Commission, the California State Lands Commission, and the Ocean Protection Council, and in those positions was responsible for decision-making on important statewide policies and multibillion-dollar State Budgets. During his time with the Lt. Governor, Kevin spearheaded the Blue Ribbon Commission on Cannabis and served as a senior advisor to the Proposition 64 campaign. Kevin has since become a founding partner of Axiom Advisors, the leading cannabis compliance, regulatory and political consulting firm in California. In this capacity, Kevin has developed deep relationships both within the cannabis

industry and within California government which are critical to his role as Head of Regulatory Affairs for Embarc.

Manisha Marquez – Director of Human Resources

Manisha has an extensive background in human resources and management, with experience spanning over a decade. She served as the Director of Human Resources at Avitek Recruit for over two years, where she collaborated with senior leadership to develop and implement staffing, recruiting, and retention strategies. Manisha was responsible for overseeing a wide range of HR functions, including compensation, benefits, performance management, and compliance with federal and state regulations. Prior to Avitek, she held multiple roles at HCRC Inc Skilled Nursing, including Business Office Director (HR) and Human Resources Administrative Assistant. In these positions, she managed HR operations, provided guidance to management on policy development, and ensured legal compliance. Throughout her career, she has demonstrated exceptional skills in human resources management, organizational strategy, and employee relations, making her a valuable asset.

Manisha also has four years of experience in the cannabis industry, having served as the Director of Human Resources at vertically integrated cannabis operator Perfect Union. In this role, she oversaw HR operations across California, New Mexico, and Rhode Island, managing a union workforce of over 350 employees. Manisha led various initiatives, including the development and implementation of competitive compensation, benefits, performance appraisal systems, and employee incentive programs. She also played a crucial role in negotiating Collective Bargaining Agreements and fostering strong partnerships with UFCW locals. Manisha was instrumental in implementing the WURK (cannabis payroll provider, dispensary workforce management, and cannabis compliance) human resources information system (HRIS) across all entities, including retail, grow, and

distribution divisions. Under her leadership, the organization saw improvements in talent management, organizational effectiveness, employee benefits, and HR compliance. Her skills in talent management, succession planning, HRIS database management, cannabis, and training and development make her a valuable expert in the rapidly expanding cannabis industry.

NEIGHBORHOOD RESPONSIBILITY PLAN:

A plan to address the adverse impacts of cannabis cultivation/manufacturing on the surrounding area, as required for a Conditional Use Permit (CUP), including how the exterior areas and surrounding public areas will be managed to avoid becoming a nuisance and having adverse impacts on neighbors and the surrounding community. Specifically, how the applicant will contribute to the surrounding community.

Embarc believes operating a cannabis business is a privilege and not a right and that a successful business model is predicated on the ability to consistently engage the community to ensure transparency, integrity, and collaboration. By putting the community first, Embarc ensures a positive relationship with the City, local leaders, and the neighborhood, ultimately allowing us to participate in—and give back to—the community in meaningful ways.

Our commitment to earning the community's trust is embodied in ways large and small, from neighborhood benefits and volunteerism to empowering community members to provide feedback and direction on our operational model.

Based on our experience operating compliant retail and delivery operations in other communities, we understand the importance of proactivity in resolving potential issues before they arise and that being accessible is vital to prevent concerns from escalating to issues. Embarc has a proven approach to neighborhood engagement and responsiveness, as well as a detailed plan to prevent and/or appropriately address community concerns to prevent them from rising to the attention of the City.

Embarc understands that this community has diverse perspectives about—and varying

familiarity with—retail cannabis businesses. As part of our community outreach and engagement efforts, Embarc is prepared to host an open house for community members and neighbors at the proposed location, providing an opportunity to meet our team, review renderings of the proposed retail experience, and ask questions in an open and transparent setting. We are happy to host this meeting at any point in the process and to coordinate with the City, if desired, to ensure the engagement is productive for all parties. Our intention is twofold: first, to be readily accessible to local residents seeking to understand the proposed project; and second, to ensure Colusa residents and stakeholders have the opportunity to hear directly from us rather than directing questions or concerns solely to City representatives. Based on initial local outreach, it appears this approach was recently successful in demystifying the proposed meat facility, and we believe it is a model that can be effectively replicated here.

Embarc Colusa will be maintained in accordance with the standards of the International Property Maintenance Code to ensure the licensed premises are safe, sanitary, and fit for occupation and use, and will utilize green business practices to ensure environmentally responsible operations.

We will proactively work with community members, neighborhood leaders, and local businesses to build a synergistic relationship based on respectful dialogue and ongoing approachability and have already identified and/or initiated meaningful partnerships that will ensure our reimagining of the proposed location serves as a net benefit to the neighborhood's health, safety, aesthetics, and economic viability, both for our proposed business and neighboring uses.

Ultimately, it is Embarc's intention to be a contributing and responsible force in the community, and we are committed to ensuring that our dispensary never poses a nuisance to the neighborhood. Below we describe specific

strategies, procedures, and equipment to ensure just that.

Proactively Addressing & Responding to Complaints

Embarc employs a protocol for addressing and responding to complaints related to its business, including any potential complaint concerning noise, light, odor, littering, vehicle and pedestrian traffic, parking, loitering, and public consumption. This protocol is critical to ensuring consistency in response and in providing the data we need to modify Standard Operating Procedures (SOPs) as needed to alleviate the likelihood of issue recurrence.

Embarc will implement comprehensive good neighbor and nuisance mitigation strategies to alleviate community concerns. Although we believe General Manager and the entire retail team will prevent these issues from arising by cultivating healthy and frequent communication with our neighbors, company policy will require that any staff receiving a complaint report the concern to their manager immediately.

We understand other potential impacts may arise from normal business operations which are not currently contemplated. Should that occur, we will work closely with community members, neighborhood leaders, and local businesses to document and resolve any issue. All necessary actions will be taken to resolve a complaint, and all records of complaints will be kept on-site. Should a complaint occur, employees will be required to adhere to the following written policies and procedures:

STEP 1 – DOCUMENT THE CONCERN OR COMPLAINT: Any employee receiving a complaint will first document the concern on a standardized form. The employee will record as much information as possible, including the source of concern and the length of time it has transpired. The employee will also ask for and record the individual's contact information for follow up.

Employees will be trained to ensure the complainant understands that we are sympathetic to the concerns and seek to address them immediately and transparently.

STEP 2 – IMMEDIATELY REPORT THE CONCERN OR COMPLAINT: Employees will be trained and required to immediately report any concern or complaint to the General Manager, CEO, and the leadership team by scanning and emailing the form with the subject line "FOR IMMEDIATE ATTENTION." Employees are encouraged to provide their suggested solutions and potential mitigation strategies. Once emailed, the employee is also directed to speak with the General Manager in person, or a Store Manager if the General Manager is not available. If the issue is truly urgent, our ownership team will be called immediately.

STEP 3 – DEVELOP & EXECUTE A PLAN OF ACTION: Next, the General Manager and employee will develop and execute an action plan to resolve the issue. The plan will articulate, and Embarc will implement, a short-term solution to alleviate the complainant's concern as well as a long-term solution to prevent the issue from arising in the future. Long-term solutions will be incorporated into our SOPs to prevent reoccurrence and employees will be trained on the new policy within one week of the solution being implemented.

STEP 4 – FOLLOW UP WITH COMPLAINANT: Our General Manager will personally follow up with the complainant to ensure the concern was adequately and efficiently resolved. During the conversation, Embarc will identify actions taken to mitigate the concern and protocols developed to prevent the issue from occurring again. Finally, we will inquire if there are any additional concerns the complainant would like rectified or if the issue was resolved to satisfaction.

STEP 5 – DOCUMENT THE INCIDENT AND RESOLUTION: Lastly, our General Manager or designee will create a complaint report of the incident that documents the following:

- Concern, complaint, or grievance;
- Reporting employee's information;
- Complainant's contact information;
- Action plan and resolution;
- Protocols that were implemented to prevent the issue from reoccurring;
- Follow up conversation with the complainant and their disposition of the resolution; and
- Trainings that occurred as a result of any newly developed SOPs .

Periodically, our ownership team will audit these complaint reports to certify the efficacy of the response and subsequent policy alterations. This report log will be available to the City upon request.

To address and respond to complaints, Embarc will operate and maintain a 24-hour landline telephone number, or hotline, at the premises for receiving complaints and other inquiries regarding the cannabis business as well as multiple 24/7 contacts. An Embarc manager engaged in the management of the cannabis business will be responsible for receiving, logging, and responding to these complaints and other inquiries daily following the protocol detailed in this section. The complaints will be logged and maintained in our business records in accordance with all local and State regulations. If any Embarc owner, manager, or employee logs any conduct which raises a reasonable suspicion of a violation of local or State regulations, Embarc will report the conduct to the Chief of Police, or their designee, within 24 hours of its discovery.

Embarc Colusa will provide the City Manager with the name and telephone number (both land line and mobile, if available) of an on-site employee or owner to whom emergency notice can be provided at any hour of the day.

Noise

Embarc Colusa is taking several precautions and implementing a variety of measures guaranteed to

combat and mitigate excessive noise. Embarc will never produce excessive or unnecessary noises that would detrimentally impact the public health, comfort, safety, welfare, or prosperity of the surrounding neighborhood and Colusa community. Embarc will comply with all applicable standards of city code.

All noise producing activities, including but not limited to construction, landscaping, and motor vehicle operation, will comply with all Colusa noise ordinances. No sound production or reproduction systems inside the facility will be maintained at a volume level higher than what is necessary for the convenient hearing of persons present, including receiving activities. We will prohibit use of horns or signal devices on any of our company or employee vehicles, except as a danger signal or to give warning.

To minimize our neighborhood impact during renovation, construction activities will only occur with a special permit from the City and between reasonable or preapproved hours. The premises, including the parking lot, will be monitored under constant video surveillance, and routinely patrolled by our guards to ensure no inappropriate noise is produced.

If any person or vehicle is identified as causing a disturbance or being excessively noisy, that individual will immediately be escorted off the premises and, if necessary, reported to law enforcement. We will ensure all motor vehicles on our premises adhere to appropriate sound level decibels. Motor vehicles exceeding established limits will be asked to leave the premises by our security team. Our Security Officers will also work to ensure no motor vehicle on our premises is left idling.

Light

Embarc will strictly adhere to the City's lighting standards to ensure safe vehicular operations in external spaces and parking areas and will obtain all required permits and approvals. As part of this

commitment, we will submit a comprehensive exterior lighting plan.

Embarc Colusa understands the community's desire for a safe and secure facility that blends seamlessly into the surrounding neighborhood, along with the ability to enjoy the night sky without obtrusive bright lights. In compliance with all regulations, the exterior of our facility, including the parking lot, will be adequately illuminated for security purposes while not posing a nuisance.

Exterior lighting will be balanced and will not result in glare on adjoining properties. It will complement the security systems and ensure that all areas of the premises and parking areas are visible while also providing increased lighting at all entrances to the premises. The exterior lighting required will be turned on from dusk to dawn.

Should facility lighting give rise to a complaint, we will work to develop a compliant lighting solution that accommodates neighborhood concerns without sacrificing security. Our security, maintenance, and operational teams will ensure that the electrical system and lighting comply with all applicable State and local laws, regulations, ordinances, and other requirements, are maintained in good repair, and do not present an electrical shock or fire hazard.

Odor

In compliance with Colusa Municipal Code and through a combination of high-tech air scrubbing and carbon filtration systems, negative air pressure, and other odor mitigating techniques, Embarc Colusa will employ industry-leading best practices to ensure regulatory compliance and nuisance mitigation.

Embarc commits to implementing odor control measures to prevent cannabis smells from reaching outside its premises, acknowledging that failure to do so may lead to suspension or revocation of its permit. These measures include an exhaust air filtration system with odor control

and an air system creating negative pressure between the building's interior and exterior. These systems are outlined more in depth later in this application.

This plan ensures that our retail facility serves as an environmental steward for the community and does not create a public nuisance. Our Odor Mitigation Plan was created and refined through our teams' years of experience operating cannabis facilities. As a result of this experience, we know that, if not properly treated, cannabis odors can create a public nuisance in the surrounding community. Such a condition is antithetical to our goal of being a contributing member and good steward of our community. We will take all possible steps to treat odors before they become problematic, and proactively address any complaints of unpleasant or offensive odors arising from the facility.

As a component of our proposed Good Neighbor Policy, Embarc will be responsible for the development, implementation, and maintenance of an Odor Mitigation Plan. This includes maintenance of all records relating to odor management including system installation, maintenance, equipment malfunctions, and deviations from the plan. The General Manager will verify the effectiveness of the air quality management system weekly by physically inspecting the system by listening for the sound of the system, visually ensuring the lights are on and the system is functioning, and verifying there is no odor. The General Manager will log that the system has been checked weekly in an odor control maintenance log.

In the event that Embarc receives an odor complaint, the General Manager will:

- Log the date, time, source, contact information, and description of the complaint.
- Within 30 minutes, the General Manager will identify the source of the odor by physically inspecting the facility for any

unpackaged cannabis product that may be emitting odor. This includes inspection of all areas of the retail premises including the secure storage area and retail floor, or any other areas where cannabis products are featured or stored.

- Upon identification of the source of odor, the General Manager will dispose of the cannabis product in a secure and air-tight waste disposal area and log the disposal in the track-and-trace system as well as the odor control log.
- The General Manager will also physically inspect the odor control system, within 30 minutes of receiving an odor complaint, to ensure it is functioning properly.
- If the General Manager identifies that the odor control system is malfunctioning, the General Manager will immediately contact the manufacturer.

The General Manager will determine if the issue can be addressed with the manufacturer over the telephone and, if not, will schedule the first available appointment with the manufacturer to visit the retail facility to physically inspect the odor control system.

If the odor control system cannot be fixed, the General Manager will immediately place an order for the first available replacement part or new system. The General Manager will immediately communicate the complaint and resolution to Embarc's President of Retail and Facilities team via email within two hours. The General Manager will discuss the source of the odor complaint or issue and its resolution with the retail team at the next team meeting to develop and implement procedures to avoid a future odor complaint.

Littering

We will utilize two primary methods for litter prevention and mitigation at our retail facility. The first method is providing ample waste receptacles for customers and staff. The second method is

employee litter checks and hourly premises inspections.

In addition to these methods, we will adopt a strict no-littering policy for all employees and customers. Any employee who is discovered to be littering on the premises will first receive a written warning, followed by increasingly serious disciplinary actions. We believe the best tool in the fight against littering is to give our patrons and employees ample places to properly dispose of their refuse.

In the public facing portions of our facility, we will have multiple three-stream waste receptacles. These receptacles will allow customers to properly dispose of their non-cannabis waste in landfill, recycling, and compost compartments to streamline the disposal process. Similarly, Embarc will provide three-stream waste receptacles for non-cannabis waste in all back-of-house areas where only employees or authorized contractors will be present.

With ample access to proper receptacles, there will be no excuse for our employees to not dispose of waste properly. All cannabis product waste will be disposed of in compliance with all applicable State and local laws, regulations, ordinances, and other requirements and as detailed in our Waste Management Plan. In the event a neighbor or member of the community feels that litter is accumulating in or around our facility, our team will immediately rectify the situation.

Vehicle Traffic

Embarc Colusa does not anticipate impacts to vehicle traffic, given the site's parking and thoughtful site layout. We have nevertheless considered vehicular turning movements in relation to traffic flow, proximity and relationship to intersections, adequacy of sight distances, location, and access of parking, and should impacts to vehicle traffic occur, Embarc will designate an employee to manage customer parking and traffic flow in the parking lot.

Furthermore, we will offer pre-ordering promotions and other discounts to encourage patrons to visit the store during non-peak hours to reduce vehicle traffic during peak hours. In the event a community member is concerned with vehicular traffic, our ownership and leadership team will immediately investigate the situation and develop a more robust response protocol.

Pedestrian Traffic

Our facility has been thoughtfully designed with a designated waiting area to ensure efficient customer flow to prevent pedestrian traffic from spilling out beyond the property or otherwise impacting the flow of traffic. In the event that the store has a large gathering of customers, there will be clearly delineated lines and a waiting area to make certain that customers are waiting in an orderly fashion and avoiding a pileup of pedestrian traffic outside the store. Security Officers will also be patrolling the property to help the flow of pedestrian traffic.

If there are still issues pertaining to pedestrian traffic, Embarc will engage an employee outside the store to manage the flow of pedestrian traffic and offer pre-ordering promotions and other discounts to encourage patrons to visit the store during non-peak hours. In the event a community member is concerned with pedestrian traffic, the General Manager will immediately investigate the situation and develop a more robust response protocol.

Importantly, our Security Officers will also engage in periodic neighborhood sweeps, ensuring no littering, loitering, or other negative impacts on the neighborhood. However, in the event a member of the community is concerned with any component of our operations, our owners, management team and security personnel will immediately rectify the situation.

Parking

We commit to implementing effective strategies to minimize vehicular congestion in the parking lot and ensure our operation doesn't inconvenience our residential or business neighbors. We'll post visible instructions inside and outside the store indicating proper parking etiquette, duration, and nearest crosswalk locations. Our communications to our customers will clearly define acceptable parking zones. We will also include a notification about parking etiquette in our customer communication channels, such as emails, text messages, and on our website. Our Security Officers will monitor parking habits and politely intervene when necessary to uphold our Good Neighbor Policy.

Maintaining a good relationship with neighboring businesses and residents is crucial to us. As mentioned previously, we will provide the contact information of our General Manager to all our neighbors. In the unlikely event of a parking concern, such as our customers utilizing residential areas or other business parking lots without authorization, we will promptly take action. Our responsive measures will include heightened signage around our store and extended communications to our customers. We are committed to ensuring that our operation doesn't inconvenience our neighbors, and we will adapt our strategies as needed based on feedback.

Embarc actively encourages a reduction in vehicle usage by offering incentives for customers and employees to ride bicycles, use public transportation, or carpool. These incentives range from product discounts to free transportation vouchers. We also plan to collaborate with a local bike shop to offer our employees discounts for bike purchases and maintenance, promoting this environmentally friendly transport option. Pre-tax benefits for transit cards will also be available to employees, encouraging the use of public transit.

Our extensive experience operating 16 licensed dispensaries makes us adept at managing

customer flow effectively. Although the number of customers in the store per hour varies depending on time and business maturity, it's common for customers to arrive in groups utilizing one vehicle, use public transit, bicycles, or take advantage of our Buy Online, Pick Up in Store (BOPIS) feature and delivery service—all of which cut down on the number of vehicles in the parking lot at a given time.

We offer promotional programs that incentivize the use of our BOPIS and delivery services. This strategy has seen increasing success at our other operational locations, making it an integral part of our approach to address parking concerns in Colusa. Through special incentives, we encourage customers to visit our store during off-peak hours, reducing traffic during peak times. Pre-ordering via our website for express in-store pick-up or delivery not only minimizes time spent in-store but also eases parking lot usage.

By promoting the use of bicycle paths, public transit, BOPIS, and delivery options on our website, and clearly outlining associated discounts or promotions, we aim to influence patron's transportation choices effectively. Additionally, our website will provide clear instructions for using our BOPIS and delivery options, ensuring a seamless customer experience.

These strategies aim to optimize customer service, increase sales, enhance tax revenue, and most importantly, alleviate parking challenges in the community.

Loitering

Embarc prohibits all loitering outside the facility and will notify the Colusa Police Department if anyone continues to loiter after all reasonable actions have been taken to remove the individual(s). Embarc will post signage (in multiple languages if desired and/or warranted) noting age restrictions and the prohibition on loitering. Simply put, loitering will not be tolerated under any circumstances.

All employees will receive training and implement protocols to reduce the risk of disruptive, nuisance behavior and negative impacts on neighbors. This includes ensuring that customers immediately exit the premises upon completing their purchase.

Security and staff will be responsible for controlling patrons' conduct on the property. As noted above, security personnel will be aware of customers leaving the facility who are carrying easily distinguishable exit bags and will monitor their exit from the premises. Because we will always have security personnel with visual access to both our security monitors and exterior, such personnel will be aware of any individuals on our property.

If any of our neighbors or members of the community feels that loitering on our premises is posing a nuisance to the community, we welcome them to reach out to our team, including but not limited to ownership and the General Manager, who will seek to rectify the situation immediately. Additional protocols will be implemented to adequately meet the community's needs.

Importantly, our Security Officers will also engage in periodic neighborhood sweeps, ensuring no littering, loitering, or other negative impacts on the neighborhood. However, in the event a member of the community is concerned with loitering, our General Manager, along with security personnel, will immediately rectify the situation in real time.

Public Consumption

Embarc has clearly defined SOPs to ensure no public consumption surrounding its facility, which is strictly enforced by both the security department and retail staff.

Specifically, Embarc prohibits the consumption of cannabis or cannabis products at or on the premises, in the parking areas of the premises, within 300 feet of the premises on the public right-

of-way, or in those areas restricted under the provisions of California Health and Safety Code Section 11362.79.

This policy is enforced by rigorous monitoring of the dozens of security cameras covering every inch of our parcel as well as by onsite security personnel who are trained to prevent consumption in or around the premises, including but not limited to regular patrol of the premises.

If someone is consuming publicly, security immediately addresses the issue with a clear directive to cease consumption. If the behavior continues, patrons are warned that they will be banned from shopping at Embarc in the future. If after being addressed by security the consumption continues, security will notify the Colusa Police Department. To date, Embarc has never required Police intervention regarding any public nuisance, including but not limited to public consumption.

Security personnel will be aware of customers leaving the facility because all products must leave the store in an easily identifiable bag. This allows security to utilize visual inspection and live security camera feed monitoring to view customers exiting the facility. Because we will always have security personnel with visual access to both our security monitors and exterior, such personnel will be aware of any individuals on our property and can respond immediately should public consumption occur.

While Embarc has control over its premises, the reality is that no operator has meaningful control of what happens beyond the four boundaries of its property. As such, we complement our rigorous onsite monitoring and protocols with public education efforts to ensure that the community's cannabis consumers are aware of where they can and cannot consume cannabis in Colusa. This educational information is intended to serve as an additional deterrent to public consumption.

Finally, deterring public consumption is part of actively monitoring for, and ultimately preventing, loitering, as further detailed below. It is coupled with onsite policies and procedures, including no opening of products onsite. By ensuring customers depart in a timely manner, loitering and on-premises consumption are avoided.

Embarc has developed a comprehensive approach to nuisance avoidance centered around proactive business management, easy-to-follow policies and procedures for its onsite team, and meaningful outreach to the surrounding neighborhood to ensure that neighbors know who to contact with questions or concerns. This approach is driven by lessons learned from existing operations and has proven effective in real-time. We welcome feedback or input from the City and our neighbors and view this plan as a living, breathing document. We will continue to evolve and adapt as we grow and will ensure our policies remain rooted in best practices as our industry evolves.

Avoiding Becoming a Nuisance or Having an Impact on the Community

Embarc's best practices are rooted in proactive steps to ensure our cannabis operations avoid becoming a nuisance or having any negative impacts on our neighbors or the surrounding community. Embarc will proactively engage with our surrounding neighborhood to react and respond to potential complaints regarding any potential issue.

Embarc's best practices and SOPs ensure our business is a positive addition to the community and can be boiled down to three critical components—ensuring accountability and accessibility; proactively engaging the community and neighborhood; and creating tangible benefits for our neighbors.

Step 1: Accessibility & Accountability

The first step to avoiding becoming a nuisance or having negative impacts is accessibility and

accountability with our neighbors and the City we serve. As such, Embarc will provide to both the City and to all neighboring businesses and residents within 1,000 feet contact information for our General Manager, to whom notice of any problems can be provided.

Additionally, we will provide emergency contact information to both the City Manager and Police Chief with the name and telephone number (both landline and mobile, if available) of an onsite employee or owner to whom emergency notice can be provided at any hour of the day. A 24-hour contact will also be readily available online and posted conspicuously on the exterior of the facility such that any passerby can access management staff with issues at any time. Please note that 24/7 contact information will also be provided for all owners and our Security Department, ensuring ample team members are available at any time.

Embarc's 24-hour contact for receiving complaints and other inquiries will ensure accessibility at all levels for the neighborhood and surrounding community and will be an Embarc Manager responsible for receiving, logging, and responding to any and all complaints and inquiries.

Embarc will encourage neighbors to report any impact, real or perceived, that they experience in relation to Embarc's operations and will dedicate all reasonable time and effort to resolving any such issue to the impacted neighbor's satisfaction. This mitigation could include making a roaming Security Officer available as a means of addressing any nuisance activities perceived as attributable to Embarc's business operations. Any such assigned Security Officer will be directed to mitigate the situation to the maximum limit permitted by the Private Security Services Act. Furthermore, Embarc will encourage neighboring residents to contact our personnel prior to contacting the City.

To ensure accountability, Embarc will maintain a log of any public nuisance activity on the premises or within 300 feet of the premises. The log will

include information required by the Chief of Police, or their designee, including but not limited to the date and time of the occurrence, the type of activity, the circumstances surrounding the activity, the identity of any persons involved in the activity, the corrective action taken by Embarc, and the police case number if applicable. The log will be available to the City upon request.

The inquiry will be managed by our General Manager depending on the nature of the issue and whether it is community or operationally based. Our General Manager will be responsible for timely resolution of any issues or concerns brought to our attention.

Embarc's owners and managers welcome the opportunity to attend regular meetings at the request of the City Manager, Chief of Police or any other relevant authority to discuss any and all issues associated with cannabis operations in Colusa, and in fact have coalesced coalitions comprised of the local cannabis operators in other communities where we operate for the purpose of providing a centralized place for the City to work collaboratively with industry.

Ultimately, our goal is to mitigate any concerns before they arise to City leadership and will utilize our proven policies and tactics to achieve this goal.

Step 2: Proactive Community & Neighborhood Outreach

In our experience, proactive community and neighborhood engagement is a critical step in building trust and in turn, positive relationships with our neighbors. We appreciate the importance of proactive engagement and ongoing collaboration with the community at large and the neighborhood surrounding our facility. As such, we have identified proactive and ongoing engagement strategies to ensure thoughtful integration of our proposed operations into the neighborhood:

NEIGHBORING BUSINESS OUTREACH: Embarc conduct outreach to neighboring businesses to

detail proposed operations and identify opportunities for potential partnerships (where appropriate given the use type). Embarc will document these meetings and provide a record should the City seek verification regarding neighboring business outreach. As part of this outreach plan, Embarc will provide the name, telephone number, and email address of owners and managers to whom notice of problems associated with the commercial cannabis business can be provided. Embarc will provide this information to all parcels located within 1,000 feet.

Additionally, once the General Manager has been hired, Embarc will solicit another meeting to facilitate an introduction and sharing of contact information between the General Manager and neighboring business owners. We have found that establishing this relationship is the single most important mechanism for managing neighbor relations, as neighbors feeling comfortable contacting us directly with issues or concerns ensures we are able to address them in real time.

OPEN HOUSES: We will host at least two open houses between receipt of the right to operate locally and the commencement of operations, designed to provide residents and other stakeholders with the opportunity to meet our owners, ask questions about our proposed operations and get a better understanding of Embarc's vision. During these open houses, we will focus on impact mitigation and community benefits and will be available to answer community questions and/or concerns. Having these direct engagement opportunities is important to addressing concerns related to operations.

One of these meetings will occur immediately prior to opening the store and will focus on those nearest to our property to afford them the opportunity to understand the myriad compliance and security measures in place governing operations. Based on our experience, this type of community outreach is essential to dispelling

myths and creating awareness of how legal cannabis dispensaries operate.

INFORMATIONAL CANVASSING: Embarc will canvass the surrounding neighborhood to discuss our intended operations, compliance, security, and best practices. We will do this again immediately before opening to provide contact information for team members. Doing so helps to proactively address comments and concerns prior to opening the business.

ONGOING ENGAGEMENT: Once operational, our ownership and management team will host annual "listening sessions" where members of the community will be able to voice opinions, ask questions, and meet the Embarc team. Our goal for these sessions is to address any unforeseen concerns and to ensure we are fulfilling our obligations as a good neighbor.

Step 3: Creating Benefits for Our Neighbors

The third step in ensuring nuisance avoidance is creating and delivering tangible benefits through our operations to our neighbors and the surrounding community.

NEIGHBORHOOD SAFETY: Increased safety surrounding the facility is a positive byproduct of the immense attention to detail given to our facility's security measures. Our presence in the neighborhood comes with patrolling Security Officers, an industry-leading surveillance system with coverage extending across the entirety of the interior and exterior of the facility and beyond, and advanced alarm systems with immediate access to local law enforcement. We are confident that the extreme importance placed on facility security and safety will result in a positive impact on the safety and wellbeing of our neighbors. In fact, other communities located near legal cannabis facilities have seen increased property values as a result of enhanced security and beautification efforts.

NEIGHBORHOOD BEAUTIFICATION: While engaging the neighborhood is critical, we also believe in the importance of rolling up our sleeves and participating in ongoing beautification efforts. As part of our paid employee volunteerism program, our staff will serve as a volunteer Street Team on beautification projects near the store, which will be informed by ongoing discussions regarding neighborhood priorities with neighboring businesses.

PARTNERSHIP WITH COLUSA POLICE DEPARTMENT: As we have done in every city where we operate, Embarc will form a positive and collaborative working relationship with local law enforcement to ensure trust and transparency with this nascent industry.

COMMUNITY WELLNESS EVENTS: Embarc seeks to support Colusa's health and wellness industries. Through providing educational seminars and partnering on outreach, we are confident our team's knowledge and resources can benefit Colusa's health and wellness industry.

ENGAGING & UPLIFTING LOCAL BUSINESSES: If selected to operate our General Manager will engage neighboring businesses to provide and/or discuss the following:

- **Good Neighbor Policy:** Solicit feedback on our proposed plans to ensure neighborhood cleanliness, safety and security while answering any questions or concerns.
- **Neighborhood Discount Program:** Discuss opportunities for cross promotion and co-marketing initiatives to encourage patronage of local businesses.
- **Accessible Leadership:** Contact information for our ownership and store leadership team to ensure our neighbors know our team and understand our proposed use.

It is through this collaborative and proactive approach to business management, neighborhood engagement, and supporting local businesses that Embarc will ensure we do not pose a nuisance to our surrounding neighbors and are accessible, approachable, and transparent with the Colusa community at large.

Proposed Good Neighbor Policy

In every community where we operate, Embarc institutes a Good Neighbor Policy specific to mitigating local concerns and modeled to address local regulations. We have drafted proposed policies informed by Colusa Municipal Code but would also welcome the opportunity to discuss our Good Neighbor Policies with City staff to incorporate any guidance prior to finalization.

As a responsible cannabis operator, Embarc Colusa must:

- Create a safe exterior environment through design and site management.
 - Provide outside lighting in a manner that illuminates the outside street and sidewalk areas and adjoining parking as appropriate, without bothering neighbors;
 - Maintain the premises and adjacent sidewalk in good condition at all times;
 - Manage parking and traffic to negate impacts to surrounding areas;
 - Prohibit double parking directly outside the premises;
 - Prohibit loitering around the premises, within 50 feet of the premises, or in the parking lot;
 - Enforce appropriate customer behavior outside the facility and in adjacent areas;
 - Prohibit littering in or around the premises;
 - Prohibit the consumption of cannabis products in or around the premises;

- Post notices at all public entrances to and exits from the establishment that are clear, well-lit, prominently displayed, and maintained;
- Direct patrons to leave the establishment and neighborhood peacefully and in an orderly fashion;
- Direct patrons to not litter or block driveways; and
- Advise individuals that consuming cannabis of any kind is prohibited in public places;
- Advise individuals of the prohibition on loitering.
- Provide the contact information for Embarc's General Manager, responsible for community relations and issue mitigation.
- Provide adequate and appropriate ventilation to ensure odor controls result in no emission of noxious odors.
 - Be a benefit to surrounding parcels;
 - Maintain the premises in a clean and orderly fashion; and
 - Instruct security to secure the premises within 50 feet of any public entrance and exit.
- Implement youth education and prevention strategies.
 - Provide physical infrastructure, security, and tailored SOPs to discourage, mitigate and prohibit youth access and/or loitering.

Youth Prevention Strategies – Our Commitment to Protecting Colusa's Youth

We understand the vital importance of safeguarding young people from the potential impacts of cannabis businesses as they begin to establish themselves within the City. It is essential for cannabis retailers to design their facilities and operations in a manner that effectively prevents cannabis from falling into the hands of young people. It is our responsibility to implement a

robust Youth Prevention Plan to ensure the safety, security, and quality of life for the neighborhood, including for Colusa's most promising residents—its youth.

As a cannabis retailer founded by policy and compliance experts, Embarc was born after the legalization and implementation of Proposition 64. We worked with State government to develop the policies that would inevitably lead to adult use legalization and industry-wide regulation. As part of that process, our team members have engaged with communities across the State and are acutely aware of the need to protect youth. When selling a product that was illegal during our lifetimes, we believe it is incumbent upon us to implement a plan that protects our youth while educating our community—through action and continuous engagement—that legal, regulated cannabis can and should responsibly exist within a community.

While some studies and experiences from other regulated markets have found that youth cannabis use remains static or decreases in communities with access to legal, regulated cannabis, we believe that it is especially incumbent upon us as operators to proactively implement security and other deterrent measures to protect against youth exposure or access. We also believe in our responsibility to educate the community on the protocols and security measures we have in place to protect youth as a component of our ongoing commitment to supporting the community.

We have many parents on our team and intimately understand the real concern parents face when sending their kids to school for a variety of reasons, including the proximity to retail cannabis and alcohol shops. We believe in our duty and commitment to the City, community partners, and neighbors to proactively engage, identify, educate, and address our local community's concerns regarding the safety and security of our neighborhood and the children that live, learn, play, and grow within it.

Embarc has developed a holistic, multifaceted approach to ensuring cannabis products do not end up in the hands of underage youth and that our storefront is safe, secure, and only frequented by those of appropriate age. A variety of physical features, staff protocols, and functional design concepts will be implemented at Embarc Colusa to ensure a secure, comfortable environment that poses no risk to Colusa's youth and positively contributes to the neighboring community. We will take a multi-layer approach to diversion prevention, including several state-of-the-art physical and bio-metric controls; detailed record keeping software; adequate and aesthetically pleasing exterior lighting; education for staff and the public; categorical access control; and dozens of other applied measures to ensure our products are only in the hands of authorized adults.

As responsible, community-oriented operators, we have developed a comprehensive Youth Prevention Plan to proactively take steps to ensure cannabis products do not end up in the hands of underage youth, detailed below.

INFRASTRUCTURE & SECURITY

- Implement physical infrastructure, security, and training protocols to ensure no youth enter or loiter outside or within 50 feet of the storefront;
- Post all required signage in easily identifiable locations to communicate age restrictions, identification requirements, and to prevent loitering;
- Premises constructed and designed to prevent access by any unauthorized individual through a variety of security measures, including alarms, surveillance systems, and target hardening measures;
- The front public entrance always remains secured with commercial grade locks, and customers or authorized visitors will only be allowed access via remote unlock button (controlled by staff) after passing an initial visual inspection;

- Comprehensive surveillance system to provide full video coverage of the entire interior and exterior of the premises.
- Professional Security Officers enforcing age restrictions and preventing youth exposure or access; and
- Security Officers will conduct "youth prevention patrols" and will be trained to monitor against and prevent any shoulder tapping or potential third-party sales to minors.

STANDARD OPERATING PROCEDURES & EMPLOYEE TRAINING

- Staff training and education on the hazards of youth cannabis use and how to identify and prevent potential youth access to the licensed premises;
- Tailored operational procedures and post orders to provide specific guidance to Security Officers and employees on interacting with youth and develop store protocols around the path of travel timeframes for Colusa's local students; and
- Stringent inventory control procedures will be put in place via an inventory tracking system, tools and forms for accounting and verification, and tasks and processes that will ensure accountability at every stage through the retail product cycle.

PRODUCT PACKAGING & LABELING:

- Embarc will only accept products from licensed distributors that conform to all packaging and labeling standards in the CCR § 17402–17412, including:
 - All packaging will be child-resistant and tamper-evident;
 - All packaging will have the California Universal Symbol;
 - All packaging will have the GOVERNMENT WARNING statement in bold print;
 - Package cannot imitate any package used for products typically marketed to children;

- Edible products must be in opaque packaging;
- Labeling must identify the product as a cannabis product or state “cannabis infused.”
- Employees utilize a check list at the time of product intake to ensure all proper packaging and labeling;
- All products sold to customers will be placed in an opaque child-proof exit bag before they are allowed to be carried out of the store; and
- At check out, Embarc reminds all customers to safely store all cannabis products in their child-proof packaging and out of reach of children in their homes.

AESTHETICS

- Exterior design of the premises has been developed to be a neutral presence on the street, without imagery or any design feature that would appeal to youth;
- Exterior signage is for business identification only and does not feature any decals or other imagery intended to garner attention;
- No cannabis goods are visible from the exterior of the premises; and
- Site has been designed to be discreet and cohesive with neighboring uses.

OVERSIGHT & ENGAGEMENT

- Marketing and social media will meet audience composition data requirements and be respectfully tailored to address our only audience—adults;
- Participate in Colusa County Chamber of Commerce meetings to monitor local trends and identify opportunities of need to raise to the Board for consideration;
- Engage nearby school leadership to provide contact information for our General Manager and to seek to provide youth drug prevention educational resources as we have in other communities; and

- Engage in regular check ins with City staff and/or Council to provide updates on our operations, receive feedback, and incorporate recommendations.

ACCESSIBLE, COLLABORATIVE, & TRANSPARENT

- Provide all neighbors within 1,000 feet of our proposed location with the contact information for our General Manager, and 24-hour community hotline;
- Facilitate transparent and accessible communications and relationships with our neighbors and surrounding community stakeholders; and
- Pursue a coordinated approach with neighboring and nearby businesses to collaboratively protect and support the youth in our community.

EDUCATE, EDUCATE, EDUCATE

- Educate all customers on the safe storage of cannabis in their home; and
- Educate parents and community leaders by providing them with the resources to have difficult conversations with their kids about cannabis and the damages underage use can have on adolescent brain development as well as the increased potential of addiction in adolescent use.

Through our comprehensive and holistic approach to infrastructure, community engagement, operational procedures, and our proven track record of responsibly operating in the communities we serve, we are confident that cannabis will not end up in the hands of underage youth.

While many cannabis industry operators write checks but do not put in the work to build the partnerships and the infrastructure needed to make a lasting impact, Embarc has a proven track record of respectfully and impactfully integrating with our partner communities by prioritizing the safety and education of young people in every aspect of our operations.

CONTRIBUTIONS TO THE SURROUNDING COMMUNITY

We understand that while cannabis has existed within our communities for decades, legal, regulated cannabis is still an emerging market. Communities are grappling with how to best integrate commercial cannabis activities into existing neighborhoods, balancing the economic opportunity this industry represents with a desire to protect public health, safety, and neighborhood integrity.

Furthermore, Embarc believes operating a cannabis business is a privilege and not a right. Our successful business model is based on consistently engaging the community and the City with integrity and through transparent collaboration. Given this foundational commitment to Colusa, which will be bolstered by a Community Advisory Board, we will operate a business that provides meaningful ongoing benefits and serves as the type of partner the community can be proud of and will value.

PURPOSE

The Community Benefits Plan, summarized below, is designed to be a dynamic document that embodies the company's core values and ongoing community engagement priorities. It was developed with, and will continue to evolve over time through, collaboration with our Community Advisory Board.

Importantly, this plan does not contain static organizational commitments or one-time checks at the front end of a license pursuit; rather, it is the embodiment of Embarc's proven community engagement model, one that values and respects the importance of diverse local perspectives and experiences in being able to adapt to continuously address evolving community needs.

Also, our approach is not merely formulated as a percentage of gross receipts to be responsive to

this application prompt but rather is a continuation of our established business model, which has been successfully implemented across 16 California communities. **Through this model, we have already allocated over \$2 million in community funding to date, demonstrating our sustained commitment to local reinvestment and authentic partnership everywhere we operate.**

PROMISES MADE, PROMISES KEPT: COMMUNITY IS IN OUR DNA

Embarc is proud to be the first cannabis operator in California to launch a Community Advisory Board in every community where it operates, ensuring that engagement and sensitivity have been part of the company's DNA since its inception. We are happy to see other operators similarly adopting this model, and we believe our track record of community engagement, not as an afterthought or reaction to others, but at the forefront of how we operate, is critical to living our values in action. Specifically, we are living these values by welcoming accountability from the community and through creating true empowerment for local stakeholders by allowing them—rather than Embarc representatives—to direct all funding.

This approach is evident in how we worked collaboratively to compile our Community Benefits Plan for Colusa.

COMMUNITY ADVISORY BOARD

The Colusa Community Advisory Board will represent the heart of Embarc's community reinvestment model. The board will be comprised of trusted local leaders, educators, nonprofit executives, and business owners and will ensure that decisions about community funding remain in local hands. Their collective insights will ensure that Embarc's contributions are not only transparent and accountable but also responsive to Colusa's evolving needs, empowering local voices to determine how resources are reinvested in their community for generations to come.

In every community where we operate, Embarc's Community Advisory Board is empowered with total control over where the Community Investment Fund is directed in perpetuity. It is this group that will work collaboratively with our ownership to drive Embarc's efforts to address Colusa's needs. The primary goals of the Community Advisory Board are to work collaboratively with Embarc leadership to implement and continue to refine our community benefits plan and to ensure safe, transparent, and community-oriented operations. Duties of the Board include:

1. Development and implementation of our community relations plan
 - Identifying and/or creating opportunities to help enhance and promote community input, engagement, education and awareness
 - Reviewing operational policies and procedures to identify opportunities for community and neighborhood engagement
2. Allocating all community funding
 - Assessing opportunities for financial contributions
 - Identifying local, immediate priority funding gaps in which our resources could provide flexible assistance
 - Determining the best allocation of community funding
3. Oversight and accountability for Embarc operations
 - Quarterly accountability on commitments made/commitments delivered
 - Providing input on marketing strategies and tactics
 - Monitoring Embarc's responses to any community feedback or concerns
4. Assistance in establishing and building community trust
 - Continuous identification of community priorities, values and needs

- Identifying opportunities for collaboration with local businesses and other stakeholders
 - Serving as a voice within the community
5. Ensuring appropriate and thoughtful community education
 - Providing input on education and awareness programs
 - Recommending priority causes for employee and executive volunteer support
 - Providing consistent feedback to refine and best tailor our efforts

To ensure operational transparency we welcome the opportunity to include a participant from City government and/or a public safety officer but thought it inappropriate to reach out to such representatives prior to the conclusion of this process. While the City would not be a voting member, this is an opportunity for a City representative to remain apprised of, and provide feedback on, Embarc's operations and philanthropic execution.

Ultimately, the Board will be comprised of leaders with diverse backgrounds and experiences that inform their ability to make thoughtful determinations regarding how Embarc Colusa executes its community benefits. Specifically, the Community Advisory Board decides funding priorities, volunteerism priorities, workforce development partnerships, financial support of City-sponsored activities, our ongoing neighborhood engagement plan, and execution of Embarc's youth drug education and prevention program.

In addition to directing our committed community funding, the Board meets quarterly to provide feedback on Embarc's operational model, including community outreach, neighbor and business engagements, local partnerships, the sensitivity of advertising and marketing efforts, and more.

Unlike most operators in the cannabis industry that attempt to apply their brand and values onto a community using a top-down approach, Embarc seeks to meet the needs of the community from the bottom up, as represented by the passion for the Colusa community that these Board Members embody and the role they have been empowered to play within Embarc's local business. In this way, we are not proposing specific allocations to specific organizations, but rather ongoing funding that is directed by this community for the benefit of this community forever.

COMMUNITY INVESTMENT FUND

The Community Advisory Board can make a sizable local impact because of our commitment to the creation of an internal Community Investment Fund. Just as it does in every community, **Embarc will allocate 1% of gross receipts to its Community Investment Fund in perpetuity**, generating significant, ongoing funding for community organizations through the efforts and allocations of our Community Advisory Board.

100% of the Community Investment Fund will be allocated by the Community Advisory Board to local organizations and partners, ensuring we prevent divestment by requiring all the benefits generated from operating a local cannabis business remain local. This is the same commitment Embarc makes in every community it operates, ensuring that this approach is sustainable and impactful in addressing community needs.

Embarc recognizes that a community's needs and priorities shift over time which is why it is so critical for Embarc's focus to be driven by our Community Advisory Board who live and work locally.

Youth Education & Prevention Resources

Embarc is proud to champion youth drug education and prevention through accredited,

evidence-based programs that empower young people to make informed choices and lead healthy lives. The primary program our CABs have funded and implemented is the Botvin LifeSkills Training curriculum, an internationally recognized, evidence-based prevention program that has been proven to reduce substance abuse and strengthen life skills among youth. We first launched the Botvin program in 2022 through the Community Advisory Board at our inaugural store in South Lake Tahoe, where the Boys and Girls Club of Lake Tahoe became the first organization to implement the curriculum. Their youth program engaged local children and teens in meaningful discussions, offering them the tools to resist substance abuse while empowering them with critical life skills. Building on this success, we have since initiated similar efforts across all of our operating communities. **Through our Community Advisory Boards and Community Investment Funds, Embarc has donated hundreds of thousands of dollars specifically to fund the purchase and deployment of youth drug prevention programs statewide.**

Embarc is committed to executing a thoughtful youth education and drug prevention program that reflects the unique priorities of the Colusa community. Our experience has shown that even the most well-designed youth prevention initiatives are ineffective without community buy-in. Therefore, if selected to operate in the City of Colusa, we hope to actively collaborate with our Community Advisory Board and City leadership to introduce a third-party, accredited youth education and drug prevention program tailored specifically to Colusa's needs. We are excited about the opportunity to work with local partners to ensure that these vital messages are delivered by responsible and trusted community leaders, not Embarc, fostering a proven and community-sensitive model of engagement that we have utilized successfully in communities across California.

“Teaching the Botvin curriculum is a great experience; it equips children with life skills and crucial knowledge about substances like tobacco, alcohol, and marijuana that will serve them for a lifetime. The program's structure fosters an environment where children comfortably ask questions and engage in meaningful conversations around challenging topics. It focuses not only on the short-term harm but also the long-term effects of substance use. I was particularly impressed by how it highlighted the influence of advertising on teens, triggering enlightening discussions about targeted marketing. This curriculum doesn't just educate, it empowers.”

Working with Embarc has been a seamless and rewarding experience. Their commitment is evident in their regular check-ins about the curriculum's progress and effectiveness. Their willingness to ensure the right resources are being utilized and their robust support for community programs is truly commendable. Embarc isn't just a collaborator, but a dedicated partner in fostering community wellbeing.”

Theresa Papandrea,
Boys & Girls Club of Lake Tahoe, Botvin
Program Educator

In our experience, educating both youth and the adults who shape their lives—parents, teachers, coaches, and mentors—is key to responsibly integrating legal cannabis operations into a community. Providing the tools and resources necessary for these influential adults allows us to create sustainable change. Throughout California, we have successfully implemented this approach, establishing programs that foster education on the dangers of substance abuse. We would bring this proven educational model to Colusa with the flexibility to adapt to the community's needs and feedback.

Program Overview

When founding members of our team led the development of Proposition 64, the initiative to legalize adult use cannabis in California, they knew youth prevention and education were paramount

to maximizing public health and safety within communities. As such, and with intentionality, our team ensured that Proposition 64 would provide the resources and direction necessary to educate youth on the risks associated with cannabis use.

Proposition 64 included the development of a State-sponsored educational campaign, entitled “Let’s Talk” with curriculum specifically targeted to communities, parents, and youth. We have utilized this program, developed with a science-based approach by some of the brightest minds in California, as a foundation for resource development for the adults that play formative roles in the lives of youth.

Additionally, understanding impactful education requires tailored age-appropriate content, Embarc has adopted accredited and nationally recognized Botvin LifeSkills Training for middle school aged students for use by its selected community youth education and prevention partners. Embarc hopes to deploy targeted youth drug prevention education utilizing Botvin’s LST 1 for middle school aged youth in partnership with our Community Advisory Board and local community partners in Colusa.

We will continue to refine our program and will work closely with our Community Advisory Board, the City, and potentially other operators to ensure this program is the best fit for the Colusa community. Cornerstones of this approach will be:

- Utilization of the “Let’s Talk” campaign to provide resources and toolkits for parents, teachers, coaches and others looking for guidance on how to navigate these discussions with youth
- Utilization of Botvin’s accredited LifeSkills program (or other similar curriculum as appropriate) specific to middle school aged youth, deployed through partnerships with appropriate messengers in the community including youth-oriented non-profits

"The Botvin curriculum delivers weekly lessons that are both enlightening and engaging, allowing young minds to recognize and challenge common misconceptions about tobacco, alcohol, and other drug use. It's more than just a class; it's a valuable asset that empowers teens to navigate peer and media pressures using robust coping and resistance skills. It's a resource that helps build self-esteem, promotes resilience, and fosters assertiveness. My heartfelt thanks to Embarc for providing this tool for our teens' growth and development!"

Kim Youn,

Lake Tahoe Unified School District, Youth Counselor

Program Background

The National Institute on Drug Abuse developed A Research Based Guide for Parents, Educators, and Community Leaders for Preventing Drug Use in Children and Adolescents, which serves as an internationally recognized analysis that cites Botvin's research as a guide on how to develop and implement effective youth drug prevention campaigns. This comprehensive guide contains significant science-based research that directed Embarc's efforts to develop and implement an effective youth education and drug prevention campaign.

The following served as foundations in this endeavor:

1. Prevention programs should be tailored to address risks specific to population or audience characteristics, such as age, gender, and ethnicity, to improve program effectiveness (Oetting et al, 1997).
2. Prevention programs aimed at general populations in key transition points, such as the transition to middle school, can produce beneficial effects even among high-risk families and children. Such interventions do not single out at-risk populations and, therefore, reduce labeling and promote bonding to school

and community (Botvin et al, 1995; Dishion et al, 2002).

3. Community prevention programs reaching populations in multiple settings, for example, schools, clubs, faith-based organizations, and the media, are most effective when they present consistent, community-wide messages in each setting (Chou et al, 1998).
4. Community prevention programs that combine two or more effective programs, such as family-based and school-based programs, can be more effective than a single program alone (Battistich et al, 1997).
5. Prevention programs are most effective when they employ interactive techniques, such as peer discussion groups and parent role-playing, that allow for active involvement in learning about drug abuse and reinforcing skills (Botvin et al, 1995).
6. Prevention programs should include teacher training on good classroom management practices, such as rewarding appropriate student behavior. Such techniques help to foster students' positive behavior, achievement, academic motivation, and school bonding (Ialongo et al, 2001).
7. When communities adapt programs to match their needs, community norms, or differing cultural requirements, they should retain core elements of the original research-based intervention (Spoth et al, 2002b), which include:
 - Structure (how the program is organized and constructed);
 - Content (the information, skills, and strategies of the program); and
 - Delivery (how the program is adapted, implemented, and evaluated).

Based on this significant body of research, it is clear that the most effective program:

- Targets youth with age-appropriate content at various stages in of development;
- Utilizes multiple learning formats including interactive content;
- Involves multiple parties including teachers, parents, faith-based organizations and more to provide multiple access points for information; and
- Benefits from hyper-localism, as long as the program remains rooted in structure, content and delivery.

Audience

To ensure we are both effective and inclusive in outreach, we have segmented our youth drug prevention education into three categories: Youth General, Youth Targeted Age, and Adults in the Lives of Youth.

YOUTH GENERAL: Research has proven that the most effective youth education and drug prevention programs utilize two or more effective programs rather than any single program alone. For example, an effective school-based curriculum is more successful when coupled with at-home and technological components. Thus, Embarc will implement a multicomponent program that takes a holistic approach to youth engagement through:

- Media campaigns with general anti-drug education messaging targeted to all youth
- Digital campaigns targeted to middle and high school students
- Educational programming for use as an in-school program, with a toolkit for teachers and/or a program coordinator

Creating a multicomponent program will ensure that youth education and prevention efforts engage youth across multiple channels, in many forums, and on a consistent basis to maximize efficacy.

YOUTH TARGETED IMPACT (MIDDLE SCHOOL):

Evidence demonstrates that the first year of middle school is when childhood drug use typically appears, so education before and during the teen years can delay or prevent experimentation and onset of use. At the middle-school level, children are eager to fit in, often overriding instincts to avoid unhealthy behavior especially in the face of peer pressure. As such, Embarc will focus our youth drug prevention and education efforts on this critical age through the use of Botvin's accredited model.

ADULTS IN THE LIVES OF YOUTH: Ensuring that adults who play a critical role in a young person's life have the tools and education necessary to address questions from youth is a critical component of a community's transition to legal cannabis. In coordination with accredited resources from the State's Let's Talk Campaign and Botvin's individualized tutorials for adults in the lives of youth, Embarc will ensure Colusa adults have the resources necessary to educate youth about the dangers of youth drug use through materials, toolkits and hosted educational events.

Understanding these are difficult conversations that the arrival of legal cannabis may have pushed to happen sooner than parents would have hoped, we believe it is our responsibility as leaders in the legal cannabis industry to do our part to ensure parents have the tools needed to answer tough questions during these critical conversations.

Content

We hope our Community Advisory Board Members will work collaboratively to implement this effort for youth through local partnership(s). By utilizing the accredited and nationally recognized Botvin LifeSkills Training coursework as the starting point, we can leverage the best science available while tailoring our program specifically to Colusa.

Embarc's Youth Drug Prevention and Educational coursework was developed through a series of workshops with youth drug prevention and

education specialists. Embarc undertook a rigorous process to select Botvin's curriculum as the most effective, engaging, and suitable youth drug prevention education coursework for young people today. Understanding that we alone should not decide what is the "best" education for young people, Embarc undertook an extensive process of ensuring Botvin's accredited and nationally recognized content was an impactful and engaging course for today's youth. We created our approach and coursework by:

- Identifying the target age group to focus our efforts;
- Adopting certified coursework resources from Botvin's nationally recognized youth drug prevention work;
- Pursuing a cognitive behavioral approach to education as our framework; and
- Conducting numerous workshops with drug prevention specialists, members of law enforcement, City Council members, parents, and members of Unified School Districts in multiple California communities.

Botvin's e-LST Middle School 1 is a substance abuse and violence prevention program based on more than 35 years of rigorous scientific research. LifeSkills Training is comprehensive and dynamic, designed to promote mental health, social-emotional learning (SEL) skills and positive youth development. In addition to helping young people resist drug, alcohol, and tobacco use, the LifeSkills Training Middle School program also effectively supports the reduction of violence and other high-risk behaviors. Through tailored courses, learning objectives include:

- **Personal Self-Management Skills:** Students develop skills that help them enhance self-esteem, develop problem-solving abilities, reduce stress and anxiety, and manage anger for better mental health.

- **General Social Skills:** Students gain skills to meet personal challenges such as overcoming shyness, communicating clearly, building relationships, and avoiding violence.
- **Drug Resistance Skills:** Students learn skills that help them build effective defenses against pressures to use tobacco, alcohol, and other drugs.

In this way, we are providing a holistic approach to drug resistance by also focusing on the vital personal and interpersonal factors necessary to effectively discourage youth drug use.

Understanding that those tasked with educating our young people must have the expertise, credentials, and trust of the community, we will develop meaningful partnerships with youth-servicing non-profit organizations to provide a full spectrum of ways in which we can appropriately and respectfully contribute to the education and personal development of the community's youth. These efforts are tailored to the specific needs of the community through the guidance of our Community Advisory Board as youth drug prevention and education is not a one-time effort, but rather a continuous commitment to meeting the ever-changing needs of today's youth.

We will work collaboratively with our Community Advisory Board to identify and finalize the most appropriate partnerships for the lifetime of operations.

PROMISES MADE, PROMISES KEPT: SUPPORTING CRITICAL YOUTH EDUCATION WORK – TAHOE ALLIANCE FOR SAFE KIDS (TASK)

The Tahoe Drug-Free Coalition is a group of parents, community leaders, and local law enforcement officers dedicated to providing educational resources to the community to prevent youth drug use. Embarc's team integrated into the organization, attending Board meetings over many months to rebrand the organization into Tahoe Alliance for Safe Kids, developing a new

identity package and website, and creating communications channels to better target youth and parents during the pandemic. Our team participates in ongoing meetings to keep our finger on the pulse of the community discussion regarding youth drug use prevention and continuously monitor for adverse impacts associated with legal cannabis operations.

“Embarc has been a steadfast partner in our shared commitment to youth drug prevention and education. From providing the expertise to modernize TASK’s website and branding to funding the expansion of Friday Night Live programming, I appreciate the collaborative approach Embarc takes to community benefits and have full confidence in their operations and leadership.”

PAULA PETERSON,

BOARD MEMBER, TAHOE ALLIANCE FOR SAFE KIDS

CASE STUDY: SENSITIVELY SUPPORTING YOUTH: BOYS & GIRLS CLUB OF LAKE TAHOE

Embarc conducted initial outreach to the Boys and Girls Club of Lake Tahoe more than five years ago (prior to the community’s licensing process even initiating) to get a better sense of community concern regarding legalization. At that time, it was virtually unheard of for a cannabis company to be working with a Boys and Girls Club, let alone for the discussion to be focused on youth education and how to navigate legal cannabis coming to the community.

Since that time, the Boys and Girls Club has continued to be a valued resource and community partner, both as a voice providing oversight of operations as a member of the Community Advisory Board and as a partner on vital local initiatives. Our partnership is multi-faceted, from providing volunteers for the organization’s annual fundraisers, to food and clothing drives to support families during the pandemic, to providing significant (\$50,000) economic support for the organization to build a new Clubhouse for youth.

As previously detailed, the Boys and Girls Club successfully piloted Botvin’s youth drug education and prevention curriculum in Tahoe, utilizing Embarc’s resources and tools to engage local youth in meaningful conversations. The Club implemented the program with two distinct groups:

- 24 fifth-graders, who attended 45-minute sessions once per week for 10 weeks; and
- 28 teens, primarily sixth and seventh-graders, who participated in 45- to 60-minute sessions for 12 weeks.

The program facilitator reported that many students appreciated the emphasis on managing emotions and coping with stress. The participants expressed that they would remember the three Cs for making sound decisions: Clarify, Consider, and Choose. Furthermore, the students were struck by the addictive nature of nicotine and were surprised to learn how advertising specifically targets teenagers to consume cigarettes and vape pens. They also gained a better understanding of the detrimental effects these substances have on the human body. Overall, the program left a profound and lasting impact on the students, equipping them with valuable knowledge and life skills.

“The Advisory Board comprised of local community organizations, including our Drug Free Coalition, holds Embarc accountable to our community, while also advising them on how to distribute their business donations. Embarc is committed to philanthropy, and in the short time they have been open, have already donated thousands of dollars to local non-profits. I feel strongly that businesses permitted to retail cannabis must conform to the highest standards of ethics and business practices and be willing to work with and support local nonprofits and youth organizations. In Embarc you will find a business that exemplifies those standards and provides meaningful support and engagement with the local community.”

JUDE WOOD,

EXECUTIVE DIRECTOR OF BOYS AND GIRLS CLUB OF LAKE TAHOE

Volunteerism

In addition to the financial commitments made above, Embarc will deploy significant human resources to benefit community partners and local community needs.

Employee Volunteerism

There are few things that feel better than doing a good deed, except maybe doing it with your peers while getting paid. Embarc is committed to providing a positive workplace that encourages employees to give back to their community. Partnering our workforce with community organizations will foster a culture of volunteerism among our employees.

Embarc employees will be afforded up to 40 hours of paid time off to participate in local community activities and programs per year through our volunteerism program. These opportunities for engagement provide employees with tools for professional development by exposing them to a variety of local organizations. In addition, investment in employees reduces turnover and improves workplace performance.

Research shows that the best way to achieve employee participation is to provide structured volunteer opportunities. Embarc will provide our employees with opportunities to work with our community partners and allow team members to suggest and organize additional activities with their colleagues. These opportunities help employees:

- Learn new skills;
- Gain project management experience;
- Grow personal and professional networks;
- Create a positive presence in our community; and
- Participate in off-site team-building with purpose.

Embarc commits to providing up to 40 hours of paid community service per employee per year. Given we anticipate employing approximately 30 employees initially, this will result in 1,200 hours in paid volunteerism per year and will scale to more than 1,560 hours per year at maturity.

PROMISES MADE, PROMISES KEPT: VOLUNTEERISM IN ACTION – PUTTING PEOPLE BEFORE PROFIT

With more families suffering from food and housing insecurity than ever before, a community partner called us for help. The local food bank received notice that their scheduled volunteers had canceled, leaving them with no team to prepare and serve the community members relying on them for a hot meal. In less than 12 hours, we mobilized our team, closed our doors, and redirected our entire store staff to cover the shift, ensuring the community's most vulnerable residents received the meals they depend on. This is indicative of the deeply entrenched nature of our community partnerships, and of the seriousness with which we approach volunteerism. Embarc seeks to be the type of partner you can call when it counts because of our track record of delivering on promises.

Other Benefits to the Local Community

In addition to the efforts outlined above, Embarc will implement the following customary corporate social responsibility components expected of all community-oriented cannabis businesses as part of its broader Community Benefits Plan in Colusa.

COMMUNITY EDUCATION: We will host educational panels, informational workshops, and non-profit partnership events as part of an ongoing community education and engagement effort. Education is critical in demystifying cannabis and breaking down the barriers and stigma that prevent many from feeling comfortable asking questions about appropriate use. Topics for this education range from cannabis specific (understanding dosing and your body) to public

safety (how to safely store cannabis at home). These will be led by Embarc team members and external subject matter experts as appropriate.

SENIOR OUTREACH: Seniors are one of the fastest growing consumer demographics for cannabis, but they are also the most likely to be susceptible to cannabis' long-lasting stigma. Therefore, it is important to create an atmosphere that makes seniors in the community feel as though they are a part of and welcome at Embarc. Employing seniors within the store is critical in breaking down that barrier.

In recognition of the tremendous medical benefits cannabis can provide this demographic, Embarc is committed to ongoing education and engagement with Colusa's senior community to dispel the myths, eliminate the stigma and provide education without a sales pitch to help seniors navigate this new normal. We will explore opportunities to partner with senior citizens' groups and organizations to provide free education workshops on CBD, THC, medical cannabis, dosing, and more. Topics will include cannabis basics, cannabis and pain, cannabis and sleep, and more. In recognition of fixed incomes, we will also provide a discount to senior citizens.

CREATING A SUBCOMMITTEE AT THE CHAMBER OF COMMERCE OR A LOCAL CANNABIS INDUSTRY ASSOCIATION: When implementing a new industry, and particularly when that industry is cannabis, we believe the community will benefit from having unified businesses that work together to achieve common, community-oriented goals. While we did not think it was prudent to do so prior to being awarded a permit and coordinating with the other licensees, Embarc will gladly undertake an effort to coalesce the local cannabis industry under a common umbrella, or proactively engage in any existing efforts, through a subcommittee at the Chamber of Commerce or via an independent local Cannabis Industry Association. By bringing a representative from each legal cannabis business to the table, we can facilitate ongoing working

relationships and positive collaboration among the legal and compliant cannabis operators. This could also provide a representative from the City the opportunity to engage with a singular, unified voice for the industry through participation as part of this effort.

ADDITIONAL DISCOUNT PROGRAMS: High quality, safe and tested cannabis should be accessible rather than exclusive. As such, Embarc maintains a range of discount programs intended to benefit a variety of communities, including seniors and veterans. Additionally, to encourage customers to shop during non-peak hours and mitigate traffic and customer flow impacts, Embarc often offers incentives for online order pick-up or off-hours shopping.

LOCAL BUSINESS PARTNERSHIPS: Embarc will do its part to support working families by keeping dollars local, thereby growing the local economy. This support drives local tax revenues, which in turn supports our tax base and vital local services. It is our intention to obtain goods and retain services from locally licensed small businesses, including but not limited to construction services; landscaping services; maintenance and janitorial services; ongoing IT services; security services; miscellaneous professional services; local artisan goods/products; and most importantly, our employees. Chamber of Commerce membership will provide a great network of local business contacts for these and other vital components of keeping our dollars local.

In addition to hiring local employees, partnering with local vendors, and relying on local goods and services, Embarc will also create meaningful partnerships with local businesses to cross promote and market their goods and services. Such opportunities span a variety of businesses, ranging from health and wellness (yoga instruction, outdoor gear, etc.) to restaurants, coffee shops, and entertainment. By solidifying promotional partnerships, our operations can help to drive additional customers to these businesses.

These partnerships are not just promises made but actual mandates we implement at the store level. For any Purchase Order or Service Contract to be approved, the General Manager must check a box that the contractor or vendor is based in Colusa. If the store proposes to use a non-local service provider, leadership must explain the reasoning for selecting an entity from outside the City for review and approval and must then identify an alternative option from within Colusa County.

COMPASSIONATE USE: Cannabis is recognized as an important medical treatment option for many medical conditions ranging from seizures to PTSD to cancer and more. To help meet the medical needs of some patients who are otherwise unable to afford cannabis, Embarc will offer reduced and no-cost medicinal products to low income and seriously ill patients. This program will be operated in accordance with the DCC's regulations. Patients who want to receive benefits from this program must provide evidence of residency as well as medical and financial need. As part of our Compassionate Use Program, Embarc will host compassion days specifically geared toward veterans through a partnership with Weed for Warriors Project, the pre-eminent compassionate care provider for veterans.

ADDICTION RESOURCES: We understand that admitting you need help is the first and often hardest step to recovery, and as such, we must be prepared to provide relevant resources to anyone who is willing to ask. Embarc will partner with local community health organizations to make resources available regarding addiction recovery and will maintain materials onsite for such requests.

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.

COMMERCIAL CANNABIS BUSINESS PERFORMANCE AGREEMENT:

A detailed plan outlining a schedule for beginning operation, including a narrative outlining any proposed construction and/or improvements and a timeline for completion showing major milestones.

Below, please find a schedule for beginning operation, including a narrative outlining proposed construction and improvements and a timeline for their completion. This schedule was developed by Embarc's Development Team, which possesses an in-depth understanding and extensive experience with local government entitlement processes, planning, building plan checks, and permitting, which is crucial for the efficient opening of a cannabis business. Our team members have successfully operationalized dozens of cannabis licenses from the ground up in various jurisdictions. By applying our direct knowledge of local and State regulatory frameworks, we consistently adhere to or surpass our projected operational timelines. Once approved, we act swiftly, aligning with aggressive schedules to ensure operations commence without delay.

Our team is second to none in California when it comes to entitling cannabis projects. Co-founder and Chief Compliance Officer Dustin Moore has managed the entitlement for all 16 existing Embarc locations and has overseen more than 100 project-specific entitlements throughout his career in communities across California and the country. This experience ensures he is intimately involved in every aspect of entitlement and operationalization to ensure the project not only conforms with all requirements but also participates meaningfully in each community's broader development goals. It is because of this nuanced approach that we open quickly and in true partnership with the cities we serve.

Dustin's efforts are enhanced through a partnership with Embarc's in-house development team.

Our track record is demonstrable. Across 16 California communities, we have consistently been the first or among the first to initiate operations—even during the height of the COVID-19 crisis—often months or even years ahead of other license recipients. Such efficiency isn't a coincidence; it is the result of a deliberate and strategic operational ethos. We don't just plan; we execute with precision and speed. This is a commitment we plan to uphold in Colusa.

- Embarc South Lake Tahoe opened more than a quarter before other license recipients and was the first of its cohort of licensees to open (there is a legacy operator that has been open for nearly a decade)
- Embarc Alameda was the first of its cohort of licensees to open by nearly two years (there is one store that opened prior because it was awarded in a prior licensing round)
- Embarc Martinez was issued one of one license during the licensing round
- Embarc Fairfield opened nearly a quarter before other license recipients and was the first to operate within the city
- In Fresno, Embarc on Blackstone Ave was the first of the license recipients to open and was one of only two to operate within the city for more than a year and a half
- Embarc Sacramento was the first of its cohort of recipients to open by approximately a year (the city has issued licenses previously that are operational)
- Embarc Redwood City opened in January 2023 and was the first to open in the city
- Embarc Chico opened in April 2023 and was the second to open, as the first had been built-to-suit prior to being awarded a license
- Embarc Ventura opened in September 2023 and was the first to open in the city

- Embarc Tracy opened in December 2023 and was the second of 11 recipients to open
- Embarc Meyers opened in January 2024 and is the first and only operator
- Embarc Fontana opened in April 2024 and was the first to open in the city
- Embarc Madera opened in May 2024 and is the first and only operator to open thus far
- Embarc Fresno on Shaw Ave opened in May 2024 and is the second Embarc location in the city
- Embarc San Bruno opened in November 2024 and is the first and only operator in the city

This track record in the communities we serve today demonstrates a consistent pattern of being first to market. Embarc marries the agility to rapidly actualize proposals with an unwavering commitment to regulatory compliance—a balance that has propelled our timely openings across California. Our Development Team's depth of experience with local government processes and proficiency in planning and permitting shine through in our history. This blend of expert navigation through complex systems and steadfast dedication to expedience assures that we are well-equipped to establish a successful cannabis operation in Colusa efficiently.

Embarc anticipates open its doors in Colusa and begin generating revenue in early 2027. Embarc will aggressively pursue this schedule to complete this project in a timely manner and begin operations given our proven track record of executing our proposals rapidly and fastidiously in each community where we operate today. Because the building is currently developed and will only require basic tenant improvements, we anticipate construction will be completed quickly should we be fortunate enough to be selected to operate in Colusa.

The following timeline for completion has been broken into four phases, some with distinct action

items and some that will overlap to run concurrently where possible.

Phase I: June – October 2026

This phase contemplates City administration of application review, scoring, and selection, and has been informed by the City's published process.

JANUARY 31, 2026: APPLICATION DUE

Pursuant to the City of Colusa's application guidelines for storefront cannabis retail, Embarc will submit its application no later than January 31, 2026.

JANUARY – MAY 2026: CITY SELECTION PROCESS

Based on previous RFP processes for cannabis retail in other communities and the City's published process, we estimate that the City review process will take approximately four months.

Phase II: June – August 2026

This phase contemplates that Embarc is invited to apply for a use permit, at which point the building permit and entitlement process will begin. This includes filing applications for a use permit, building permit, and local and State licensing. Additionally, given that application review and plan check can take between 30–90 days, Embarc intends to submit these plans within two weeks of being awarded a license to expedite the entitlement and building permit process.

JUNE 2026: APPLY FOR USE & BUILDING PERMITS

Embarc anticipates submitting for permits in early June 2026. We anticipate the permitting process to take approximately 90 days, which is why we have prioritized rapid submission. We look forward to the conditions of approval that encapsulate the commitments we have made to the community. We look forward to working with the planning staff in the lead up to the Planning Commission hearing to obtain the necessary use permit.

JULY – AUGUST 2026: SUBMIT BUILDING & SIGNAGE PLANS FOR REVIEW, PLAN CHECK, AND PERMITS

To mitigate delay, Embarc has engaged a preeminent design studio and architecture firm to be prepared to complete stamped architectural drawings, including a site plan, floor plans, section drawings, building elevation drawings, and plumbing and mechanical plans immediately upon notification to proceed. Their expertise across projects of all scales and sizes will be vital to timely execution.

SEPTEMBER 2026: SUBMIT STATE ANNUAL APPLICATION FOR A TYPE 10 CANNABIS RETAIL LICENSE

Embarc will submit an annual State cannabis license application immediately after our use permit is approved. While the license will not be approved until the City has completed its process, Embarc will mitigate some of the waiting period by getting in the queue. Based on our communications with the DCC and the current processing time for applications, we believe the State licensing process should take approximately three months.

Phase III: October – November 2026

This phase contemplates the issuance of all permits related to land use and building and the subsequent commencement of construction. This is also when business operationalization commences.

OCTOBER 2026: ISSUANCE OF USE PERMIT, BUILDING PERMIT, & COMMENCEMENT OF CONSTRUCTION

Embarc anticipates receiving a use permit and a building permit. At that point, the estimated 4–6-week construction process begins. Please note our construction schedule is further outlined in the following section.

NOVEMBER 2026: INITIATE OPERATIONALIZATION

Embarc will initiate operational preparations, including but not limited to employment recruitment through job fairs, postings, and partnership with workforce development partners; marketing plan development; and ongoing community outreach.

Phase IV: November 2026 – January 2027

The final phase of the process includes completion of construction, operations staging, issuance of a State annual license, and both soft and grand openings.

Note: We have added significant buffer time in Phases III and IV to account for any permitting issues or corresponding delays.

ONGOING: OPERATIONALIZATION

Embarc will continue operational preparations, including but not limited to the following: finalize employee hiring, finalize vendor agreements, initiate pre-marketing outreach activities, full security implementation, set up IT infrastructure, and continue ongoing community outreach. A General Manager will be hired eight weeks prior to opening to participate in the final weeks of operationalization, oversee manager training, and help to develop initial inventory placement.

NOVEMBER 2026: ISSUANCE OF STATE & LOCAL LICENSE, CERTIFICATE OF OCCUPANCY, & BUSINESS LICENSE

A State Type-10 commercial cannabis license is issued prior to a Certificate of Occupancy. Upon final sign-off on construction by building and other City officials, a Certificate of Occupancy will be issued along with a local license for commercial retail at our site and a business license to conduct retail activities.

DECEMBER 2026: CONSTRUCTION CONCLUDES & OPERATIONS STAGING BEGINS

The 4–6-week construction timeline outlined by our contractor is anticipated to be completed as

early as November or as late as December depending on when a building permit is issued. In the final two weeks prior to opening, Embarc will finalize pre-opening preparations, including but not limited to: conducting in-store employee training and vendor educational workshops; inventory procurement and stocking (pending local approvals and State license); point-of-sale and track-and-trace trainings; onsite security and IT training; ongoing marketing and community outreach activities; and a detailed compliance audit of all operations and components of the retail facility. During this time all final walkthroughs with the Police Department and relevant City staff will occur, including a tour for public safety officers and interested City officials.

JANUARY 2027: SOFT & GRAND OPENINGS

Once the business is fully licensed and compliant, Embarc will commence a soft opening that will last approximately 7–14 days to perfect operations before a Grand Opening.

Proposed Design & Construction, Improvements, & Timeline for Completion

To bring its consumer experience and aesthetic to life, Embarc will undertake tenant improvements at the site, resulting in the transformation of a traditional retail space into a secure and compliant high-end retail boutique. Our construction team has completed all necessary diligence and our plan includes the following:

Exterior

Creating an exceptional customer experience begins the moment someone arrives on-site. We intend to transform the existing structure into a secure, welcoming, and visually refined storefront that reflects the community's character and our brand's commitment to excellence. Though the building's structural condition is sound, our planned exterior improvements are extensive and thoughtful, focusing on both aesthetic quality and public safety.

FAÇADE TRANSFORMATION & PAINTING: The building's exterior will be modernized through a fresh, cohesive color palette that complements the surrounding commercial environment while distinguishing Embarc as a polished retail destination. New paint and subtle architectural enhancements will refresh the façade without overwhelming the character of Mission Plaza.

SUSTAINABLE LANDSCAPING: We will enhance the perimeter of our storefront with drought-tolerant, low-maintenance landscaping that contributes to both visual appeal and functional security. Our landscape design will be regularly maintained to ensure long-term vibrancy and community pride.

ADA COMPLIANCE & SITE ACCESSIBILITY: As part of our site upgrades, Embarc will ensure that all approaches, pathways, and entries are fully ADA compliant. We will conduct a site-wide accessibility audit and make any necessary minor repairs to parking areas, curb ramps, and walkways to ensure safe and equitable access for all.

DOORS, WINDOWS, AND PRIVACY ENHANCEMENTS: Although the existing doors and windows are structurally intact, our Security Director will conduct a full review to determine whether replacement or reinforcement is needed. If security can be enhanced through upgraded glazing or framing, Embarc will invest accordingly. Windows will feature tasteful tinting to maintain privacy without compromising natural light or the site's welcoming appearance. No cannabis products will be visible from the exterior.

COMPLIANT AND TASTEFUL SIGNAGE: Our signage will display our wordmark—"embarc Dispensary"—alongside our globe-and-wings logo. This signage will be professionally fabricated, appropriately scaled to the façade, and fully compliant with City of Colusa signage regulations. All necessary signage permits will be obtained prior to installation. No imagery or text appealing

to youth or promoting consumption will be present on exterior signage.

SECURITY-CONSCIOUS LIGHTING: Exterior lighting will be upgraded to enhance safety while preserving the site’s understated aesthetic. We will install energy-efficient LED fixtures—including wall sconces and shielded overhead lights—to illuminate entryways, signage, and adjacent walkways. Lighting will be designed to avoid glare, minimize light pollution, and meet or exceed all municipal illumination standards. After-hours lighting will be automated to ensure consistent security coverage.

WAYFINDING & REQUIRED NOTICES: All required signage—including notices regarding the prohibition of on-site cannabis consumption and entry restrictions—will be prominently and legibly displayed near entry and exit points in multiple languages if necessary. Additionally, we will incorporate subtle wayfinding elements for accessibility, bicycle parking, and pedestrian entrances.

SITE INTEGRATION & NEIGHBORHOOD HARMONY: We are committed to ensuring that Embarc Colusa integrates seamlessly with the environment. Our design approach is sensitive to this context, maintaining a neutral, professional exterior presence that complements rather than disrupts the existing commercial landscape.

Interior

Our interior transformation will be both comprehensive and intentional—designed to reflect our brand’s ethos of exploration while meeting all local codes, ADA requirements, and operational needs for a modern cannabis dispensary. We are reimagining this space into a warm, efficient, and fully compliant retail environment that elevates the customer experience.

CONSTRUCTION & FUNCTIONAL IMPROVEMENTS: Extensive tenant improvements

will be undertaken to reconfigure and modernize the space. Our construction scope includes:

- **Selective Demolition:** Removal of interior walls and non-structural elements to accommodate a modernized floor plan tailored for secure retail cannabis operations.
- **Back-of-House Reconfiguration:** Construction of a new vault-like secure inventory room, staff workspaces, and administrative offices to support day-to-day operations and ensure compliance with cannabis handling protocols.
- **Restroom Upgrades:** Renovation of restroom facilities to meet or exceed current ADA accessibility standards.
- **Framing & Floor Plan Buildout:** Installation of new interior framing to reflect our proposed operational layout, including a Screening Lobby, point-of-sale areas, and back-of-house area.
- **Mechanical, Electrical & Plumbing (MEP):** Our MEP engineers have confirmed that existing utilities are sufficient, but upgrades will be performed as necessary to meet modern commercial standards. This includes new lighting, HVAC improvements, and possible plumbing enhancements to align with building code requirements.
- **Infrastructure Enhancements:** Installation of drywall, flooring, and low-voltage systems.
- **Fixtures & Furnishings:** Final buildout will include the installation of custom cabinetry, display cases, and seating—each element chosen for both function and aesthetics.

DESIGN PHILOSOPHY & BRAND EXPERIENCE: Embarc’s interior design draws deeply from the spirit of travel and global discovery—an ethos symbolized by our globe-and-wings logo. Every detail within our Colusa location will evoke the feeling of setting off on a new journey, turning a

cannabis purchase into an experience of exploration.

- **Interior Design:** Customers will enter into a world inspired by the golden age of travel, featuring tasteful design cues such as airport-style benches, split-flap departure boards, vintage luggage-style displays, antique globes, and authentic travel posters. This creates an atmosphere that's sophisticated, nostalgic, and entirely unique in the cannabis retail space.
- **Lighting & Atmosphere:** The interior is intentionally bright, with ambient lighting and a color palette that encourages relaxation, discovery, and joy. Every space is designed to feel welcoming and accessible.
- **Functional Flow:** Our layout is highly intentional, offering intuitive customer wayfinding from the Screening Lobby through to checkout. Retail areas are organized to minimize bottlenecks and ensure privacy while maximizing operational efficiency.
- **Customer Comfort:** The journey continues through curated display areas where guests are invited to learn about products at their own pace, assisted by trained staff in a comfortable, uncluttered environment.

COMMUNITY-FOCUSED LAYOUT: Embarc's interior not only meets our operational and branding goals—it also reflects our commitment to being a respectful and low-impact neighbor:

- The Screening Lobby provides a structured and distinct point of entry, reinforcing ID and age verification while maintaining a welcoming feel.
- The Retail Area is organized to efficiently accommodate customers without overcrowding, with clearly marked pathways and stanchions to guide foot traffic.
- The layout prevents customer overflow onto sidewalks or public spaces, aligning with community expectations and helping

to ensure a calm, respectful atmosphere in the surrounding area.

Security Infrastructure

The safety of our customers, employees, and community is paramount. Our Colusa location will be equipped with a best-in-class security infrastructure rooted in industry-leading standards and decades of collective experience operating secure, compliant cannabis businesses. Our approach combines physical safeguards, staff protocols, environmental design principles, and real-time monitoring to ensure both the security of our facility and the well-being of the surrounding neighborhood.

CPTED PRINCIPLES: Our security strategy is informed by Crime Prevention Through Environmental Design (CPTED), integrating principles such as:

- **Natural Surveillance:** Strategic lighting, transparent sightlines, and low landscaping to maximize visibility
- **Territorial Reinforcement:** Clear boundaries between public and private spaces using fencing, signage, and visual cues
- **Target Hardening:** Reinforced doors, tamper-proof locks, and secure storage for cannabis products

SURVEILLANCE & MONITORING SYSTEMS: We will deploy a robust, analytics surveillance system with comprehensive video coverage of the interior and exterior of the premises. Cameras will be strategically installed to monitor:

- All entry and exit points
- The parking lot and adjacent areas
- Perimeter walkways and sidewalks
- All interior spaces, including customer service areas, point-of-sale counters, and secure product storage area

ALARM SYSTEMS & INTRUSION PREVENTION: The facility will be outfitted with a UL-listed alarm system featuring:

- Door contacts at all access points
- Motion sensors covering all interior rooms
- Glass-break detectors on all exterior-facing windows
- Silent robbery/panic buttons accessible to management and security personnel

LIMITED-ACCESS AREAS: Areas where cannabis or currency are stored will be of fortified construction, incorporating layering of walls and the lid with tunnel/cut-resistant steel mesh. The doors to these areas will be solid core and feature multi-point locks.

AFTER-HOURS PROTECTIONS: When the facility is closed, the premises will remain secure through a combination of:

- Reinforced access points with manual key overrides
- Internal scissor gates to prevent intrusion through storefront glass
- Remote alarm and camera monitoring with real-time alert verification

The scope outlined above ensures that the existing space will be reimagined into a modern, state-of-the-art retail facility with finishes consistent with modern upscale retail developments. Further, here is a specific timeline by which the construction will occur as provided by our contractor:

WEEK 1:

Mobilization
Demolition
Concrete/saw cut
Rough electrical
Metal stud framing

WEEK 2:

Inspect underground utility
Concrete pour back trench
Framing inspection
Security rough low voltage
Rough electrical (walls)
Rough mechanical

Rough electrical inspection
Insulate walls

WEEK 3:

Insulation inspection
Sheetrock
Nail inspection
Tape sheetrock
Door frame install
Acoustical ceiling grid

WEEK 4:

Paint
Glazing
Finish electrical
Finish security install
Millwork
Door install
Finish mechanical
Above grid inspection
Drop ceiling tiles
Point-of-sale and low voltage finish
Concrete sealer
Final inspections
Punch walk
Hand over
Move in

WEEKS 5-6:

Held for contingency should other activities face delays

FLOOR PLAN:

A scaled floor plan for each level of each building that makes up the cultivation/manufacturing site, including the entrances, exits, walls, and cultivation/manufacturing areas. The floor plan must be professionally prepared by a licensed civil engineer or architect.

Per an email dated January 28, 2026, City Manager Jesse Cain confirmed that floor plans are not required for retail storefront cannabis dispensary applications. The application materials further specify that these plans are required for cultivation and manufacturing applications only.

As Embarc's proposal is solely for a retail storefront cannabis dispensary with delivery service, the submission of a professionally prepared floor plan is not applicable at this stage of the application process.

Should Embarc be selected to operate within the City of Colusa, all required plans will be prepared by licensed professionals and submitted at the appropriate point in the entitlement, permitting, and plan review process, in full compliance with City requirements.

SITE PLAN:

A scaled site plan of the cultivation/manufacturing site, including all buildings, structures, driveways, parking lots, landscape areas, and boundaries. The site plan must be professionally prepared by a licensed civil engineer or architect.

Per an email dated January 28, 2026, City Manager Jesse Cain confirmed that site plans are not required for retail storefront cannabis dispensary applications. The application materials further specify that these plans are required for cultivation and manufacturing applications only.

As Embarc's proposal is solely for a retail storefront cannabis dispensary with delivery service, the submission of a professionally site plans is not applicable at this stage of the application process.

Should Embarc be selected to operate within the City of Colusa, all required plans will be prepared by licensed professionals and submitted at the appropriate point in the entitlement, permitting, and plan review process, in full compliance with City requirements.

LIGHTING PLAN:

A detailed lighting plan showing existing and proposed exterior and interior lights that will provide adequate security lighting for the cultivation/manufacturing site.

Per an email dated January 28, 2026, City Manager Jesse Cain confirmed that lighting plans are not required for retail storefront cannabis dispensary applications. The application materials further specify that these plans are required for cultivation and manufacturing applications only.

As Embarc's proposal is solely for a retail storefront cannabis dispensary with delivery, the submission of a professionally prepared lighting plan is not applicable at this stage of the application process. However, a general overview of lighting systems are outlined below.

Should Embarc be selected to operate within the City of Colusa, all required plans will be prepared by licensed professionals and submitted at the appropriate point in the entitlement, permitting, and plan review process, in full compliance with City requirements.

Embarc will strictly adhere to the City's lighting standards to ensure safe vehicular operations in external spaces and parking areas and will obtain all required permits and approvals. As part of this commitment, we will submit a comprehensive exterior lighting plan.

Embarc Colusa understands the community's desire for a safe and secure facility that blends seamlessly into the surrounding neighborhood, along with the ability to enjoy the night sky without obtrusive bright lights. In compliance with all regulations, the exterior of our facility, including the parking lot, will be adequately illuminated for security purposes while not posing a nuisance.

Exterior lighting will be balanced and will not result in glare on adjoining properties. It will complement the security systems and ensure that all areas of

the premises and parking areas are visible while also providing increased lighting at all entrances to the premises. The exterior lighting required will be turned on from dusk to dawn.

Should facility lighting give rise to a complaint, we will work to develop a compliant lighting solution that accommodates neighborhood concerns without sacrificing security. Our security, maintenance, and operational teams will ensure that the electrical system and lighting comply with all applicable State and local laws, regulations, ordinances, and other requirements, are maintained in good repair, and do not present an electrical shock or fire hazard.

WATER EFFICIENCY PLAN:

A detailed plan describing how the cultivation/manufacturing site will conform to all design guidelines, promote water conservation, and avoid or minimize any potential adverse environmental effects of operating a cultivation/manufacturing site.

As Embarc's proposal is solely for a retail storefront cannabis dispensary with delivery, the submission of a water efficiency plan is not applicable to this use type, as water use will be limited to employee restrooms and an employee break area sink. However, the prioritization of facility improvements that promote energy and water conservation remains an integral part of Embarc's overall sustainability strategy.

Installing water-efficient fixtures such as low-flow toilets and faucets contributes to conservation efforts by reducing overall water consumption and the associated energy required for water heating and treatment. Any newly installed plumbing fixtures will be water-efficient, including low-flow toilets and low-flow faucet restrictors. Property maintenance is a priority for Embarc, including routine inspection and timely repair of plumbing systems, which helps prevent leaks and unnecessary water usage.

ODOR CONTROL PLAN:

A detailed plan describing how the applicant will prevent all odors generated from the cultivation/manufacturing and storage of cannabis from escaping from the buildings on the cultivation/manufacturing site, such that the odor cannot be detected by a reasonable person of normal sensitivity outside the buildings.

Embarc is committed to mitigating and controlling any odors associated with our facility and will be responsive to the odor control requirements set forth in the applicable State and local regulations.

Embarc utilizes odor control devices and techniques to ensure that odors from cannabis are not detectable off-site. Appropriate air purification systems and air scrubbers will be utilized to prevent the odor of cannabis from emanating beyond the walls of the premises. Other odor mitigation equipment will include, but not be limited to, charcoal filtration systems.

Embarc's odor mitigation practices are intended to serve the following purposes:

- To ensure that air circulation resulting from Embarc retail operations does not impact our employees' health and welfare;
- To ensure that air circulation resulting from Embarc retail operations does not impact surrounding businesses and outdoor areas; and
- To ensure thoughtful operations that demonstrate a true commitment to the health and welfare of the City and its residents.

Through our leadership team's years of operating cannabis facilities across the country, and the lessons learned at our existing 16 dispensaries, we have developed industry-leading protocols and procedures to mitigate and eliminate any potentially offensive odors that could be detectable by the surrounding community.

Many of Embarc's odor mitigation practices overlap with its hygiene protocols. Embarc will train all employees to maintain a sanitary facility reinforced by anti-contamination SOPs. Per Colusa regulations, Embarc prohibits employees from consuming cannabis within or outside our licensed facility, and odor control devices such as carbon filtration technology will be utilized to minimize the chances of off-site detection of odors emanating from our facility. To further minimize or eliminate odors emitted to the surrounding community, no cannabis will be stored or displayed in an area accessible to the general public or stored overnight outside of the building.

Our Odor Mitigation Plan will be approved by the applicable City authorities prior to operation. The system will consist of an exhaust air filtration system utilizing multiple fans and active carbon filters to prevent internal odors from escaping the facility. Generally, this means exhaust air will be filtered through active carbon filtration and, where applicable, HEPA filters prior to exterior release.

Carbon filters will be regularly inspected and recharged and/or replaced in accordance with usage and manufacturer specifications. Embarc will also perform self-inspections, encourage employee observation and reporting, and create response protocols to effectively address any odor complaints that may arise. It is our intention to resolve any complaints received from neighbors in a timely and satisfactory manner.

Our administrative controls have been field-tested and proven effective. They have been designed to ensure that no odors will be detectable outside of our facility. Our General Manager will ensure all odor-producing activities are isolated and mitigated and will perform routine audits to ensure that odor mitigation equipment, filters, and ventilation are working effectively and in good order. Each employee will be trained to ensure that all doors remain closed and odor-emitting activities are isolated. If an employee notices any

equipment malfunction, they are required to immediately report the situation to the General Manager, who will develop a plan of action to repair or replace the equipment.

Odor mitigation practices are only as good as their implementation. Thus, this Odor Mitigation Plan seeks to be all-encompassing, focused not only on the mitigation of odors but also on the ongoing maintenance of best practices with clearly defined process ownership, community engagement and communications protocols. It is this level of detail that ensures effective ongoing odor management is achieved.

Embarc's Odor Mitigation Plan detailed below contemplates the following critical components:

PHYSICAL INFRASTRUCTURE: Embarc's approach to retail design contemplates the importance of the physical infrastructure necessary to mitigate odors.

BEST PRACTICES: Embarc will employ industry-leading best practices to prevent odors from being generated and/or detected inside or outside the facility. Embarc will provide a sufficient odor absorbing ventilation and exhaust system so that odor generated inside the business that is distinctive to its operation is not detected anywhere outside of the facility.

COMMUNITY ENGAGEMENT & RESPONSIVENESS: In addition to physical infrastructure designed to mitigate odors, an important component of our odor control plan is community engagement and responsiveness. While our facility is designed to eliminate odors, we recognize that any new cannabis use, even if that use is not odor-generating, can result in questions and concerns from community leaders, residents, and businesses. Thus, a critical component of our Odor Mitigation Plan is a robust community responsiveness protocol designed to be proactive in addressing community questions and diligent in responding to concerns.

INTERNAL PROCESS OWNERSHIP: Embarc's retail management structure ensures that there is at least one manager on-site during all working hours. All managers and staff are trained extensively on SOPs, including the odor management protocols outlined in this proposal. Managers are responsible for ensuring that any odor issues are resolved promptly and that the resolution is communicated effectively both internally and externally.

Potential Sources of Odor

As cannabis is legalized across the country, significant research is being undertaken to better understand odor intensity at each point in the cannabis supply chain. These findings are integral to ensuring thoughtful air quality management best practices are in place specific to each point along the chain.

One example of the research driving the development of best practices can be seen in the City of Denver's Public Health and Environment Guide to reducing the impact of cannabis operations on air quality. Per this Guide, odor generation is typically associated with the cultivation and manufacturing of cannabis, as both processes are odor intensive, and not with retail operations given all products arrive in their final form. California law requires that all products arrive at a retail establishment fully processed, tested, packaged, and sealed in child-resistant packaging. Because all products arrive at Embarc retail facilities in their final packaged form, there are virtually no odors associated with this license type.

Specifically, per State law, all packaging shall:

- Protect the product from contamination;
- Be tamper evident and sealed so the contents cannot be opened without destruction of the seal; and
- Be child resistant as stipulated by the California Department of Public Health Code (40415) .

Our proposed dispensary will receive, store, and sell packaged products in their final form. Consequently, it is highly improbable that any on-site product will emit a strong odor. Nevertheless, this section contains a comprehensive Odor Mitigation Plan designed to ensure odors are undetectable.

Odor Mitigation Practices

An overview of Embarc's proposed Odor Mitigation Plan is provided above in Section 3.3. Odor Mitigation Practices and more comprehensive information can be found in Section 3.5. Odor Control Devices, Equipment, & Techniques. In response to this prompt, we've provided details on Embarc's staff training plan related to odor mitigation.

Staff Training Related to Odor

The General Manager will train all employees on odor detection, mitigation, reporting, and general system maintenance as part of the pre-store opening training and on an ongoing basis throughout the lifetime of the business. System and process maintenance training and activities are incorporated into the quarterly all hands meeting, and the General Manager will provide a weekly update for all staff with pertinent reminders including retrainings on control measures, maintenance responsibilities, and community engagement, among others.

Additionally, each new hire must complete an odor control training curriculum prior to reporting to work. In addition to technical and procedural components, this curriculum includes de-escalation techniques for use in discussion with community members should odor rise to the level of concern.

The General Manager will organize re-training on administrative and engineering activities for odor mitigation at least once a year or following any material change in odor mitigation equipment or policy.

Trainings will be conducted in person, using real world examples and hands-on learning activities. All Embarc Colusa employees will be trained on the company's specific administrative and engineering activities for odor mitigation, including but not limited to:

- Employee responsibilities;
- The importance of closing doors and windows;
- Recordkeeping;
- System design;
- Employee observation and reporting;
- Equipment cleaning;
- Ensuring exhaust and filtration systems are running as required;
- Equipment maintenance; and
- Equipment audits and checks.

Embarc will also hold refresher courses throughout the year to remind employees of best practices for odor mitigation. These refresher courses will be mandatory for all employees. During these trainings, Embarc will stress that odor mitigation is each employee's responsibility.

All employees will be trained to report any odors emitted or any discrepancies between our operations and our odor control SOP. Embarc will also emphasize the fact that we are members of the Colusa community, and that each employee therefore has an obligation to monitor odors and make a positive impact on the neighborhood.

Embarc employee training practices have been proven successful at our seven existing dispensaries and this hands-on experience operating cannabis facilities has taken the guesswork out of developing training protocols. To date we have experienced no issues with odor management.

Odor Control Devices, Equipment, & Techniques

Odor control devices and techniques will be incorporated in all aspects of our facility to ensure cannabis odors are not detectable. Embarc Colusa will provide an odor absorbing ventilation and exhaust system so that odor generated inside the property is not detected anywhere outside the facility, including the adjacent property or public rights of way, on or about the exterior or interior common area walkways, hallways, breezeways, foyers, lobby areas, or any other area available for use by common tenants or the visiting public, or within any other unit located inside the same building as Embarc Colusa.

Physical Infrastructure

Examples of the physical infrastructure that has been contemplated in the development of a proposed Odor Plan for Embarc Colusa include, but are not limited to, the following:

- Reduced path of travel for deliveries of bulk cannabis goods, i.e. a reduced path of travel to transport products from the distributor's vehicle to the Secure Product Storage Room;
- Installation of weather stripping on all doors and windows to prevent odor leakage; and
- A sufficiently sized inventory room to allow for all (appropriately packaged and self-contained) product to be unpacked from bulk boxes within the inventory room to ensure interaction with cannabis products at a high volume are self-contained.

Odor Mitigation Techniques

Embarc Colusa will implement the following odor mitigation strategies.

NO ODOR-PRODUCING ACTIVITIES ON-SITE:

Embarc will not be conducting any cultivation, testing, packaging, extraction or distribution of

cannabis and no noxious fumes or gases will be released.

CARBON CHARCOAL SCRUBBER: Embarc will use a carbon charcoal scrubber to remove contaminants and impurities using chemical absorption which will prevent odor from escaping the facility. Carbon charcoal scrubbers are an industry best practice for effectively neutralizing and mitigating odor from cannabis and other industries.

AIR FILTRATION AND NEGATIVE AIR PRESSURE:

Our HVAC consultant will design our air system to maintain negative air pressure between the interior and exterior of the building. The HVAC consultant will follow industry standard procedures that are summarized here, based on a study conducted by the California Department of Health Services and the Lawrence Berkeley National Laboratory:

Maintain the interior as depressurized relative to the exterior of the building. Our pressure differentials will be between -5 to -7 Pa (-0.02 to -0.03 in. w.c.). Because of this, exhaust efficiencies of at least 90% will be achieved.

Air from the commercial cannabis sales area will be filtered and exhausted to the outside without recirculation to other occupied spaces.

Increasing the ventilation rate will diminish the concentration of contaminants in any air that happens to leak from the commercial cannabis sales floor to the other areas of the building.

We will work with our vendor, Pure N Natural Systems, to procure industry-leading technology to implement the negative air pressure system including the use of the Clean Leaf System. This system captures VOCs, odors and more. As the air flows through three stages of filtration, it is cleaned of odors.

As a component of Embarc's commitment to sustainability, we will utilize biofiltration as a

component of our broader odor control plans, effectively enhancing odor control efforts. A recent NASA Clean Air Study identified biofiltration as a powerful tool in controlling odors. Through use of “living walls” and beneficial microbes, Embarc will be able to filter indoor pollutants and odors from the air in a completely sustainable way.

ON-SITE ODOR NEUTRALIZATION: Embarc will utilize industry-leading odor neutralization gel to eliminate odors. Odor neutralizers are different than air fresheners as they are chemically compounded gels that bind to and absorb terpenes, thus eliminating the cannabis smell. By utilizing these products in the inventory room and sales floor, Embarc is adding another layer of odor mitigation.

VENTILATION SYSTEM: Our facility will be equipped with a ventilation system to maintain air quality and prevent any cannabis odor from leaving the premises. The ventilation system is designed to control the facility’s environment, taking into consideration the square footage, quantity of cannabis products on site, and any odor-emitting activities that occur. Every occupied space will be ventilated by natural or mechanical means in accordance with the International Mechanical Code, International Building Code, and National Fire Protection Association Code. As previously stated, odor control equipment utilized at the facility will include responsible ventilation design and activated carbon filtration technology.

VENTILATION INTAKE OPENING: The location of air intake openings will comply with the International Mechanical Code. All intake fans will be equipped with UV and insect filters. Air intake openings that terminate outdoors will be protected with corrosion-resistant screens, louvers, or grilles. Openings in screens, louvers, and grilles will be sized in accordance with the International Mechanical Code and will be protected against local weather conditions. Outdoor air intake openings located in exterior walls will meet the provisions for exterior wall

opening protective measures in accordance with the International Building Code.

OUTDOOR AIR: The minimum outdoor airflow rate will be determined in accordance with the International Mechanical Code. Ventilation supply systems will be designed to deliver the required rate of outdoor airflow to the breathing zone within each occupied space.

AIR BALANCING: The ventilation air distribution system will be provided with a means to adjust the system to achieve at least the minimum ventilation airflow rate, as required by the International Mechanical Code. Ventilation systems will be balanced by an approved method. Embarc will maintain air balancing reports in the Facility Maintenance Log.

NEGATIVE AIR PRESSURE: As detailed above, negative air pressure will be maintained at all times inside the building. We will accomplish this by compartmentalizing the facility and by utilizing negative pressure airlocks. Airtight functionality will create pressure differentials that alleviate the permeation and spread of odors. Furthermore, doors and windows will always remain closed, except for the minimum time required to allow people to enter and exit the building.

EXHAUST OPENING PROTECTION: Exhaust openings that terminate outdoors will be protected with corrosion-resistant screens, louvers, or grilles. Openings in screens, louvers, and grilles will be sized not less than a quarter inch ($\frac{1}{4}$ ”) and not larger than half an inch ($\frac{1}{2}$ ”). Openings will be protected against weather conditions. Outdoor openings located in exterior walls will meet the provisions for exterior wall opening protective measures in accordance with the International Building Code.

DUCT SYSTEMS: The ducting systems used for the facility’s heating, air-conditioning, ventilating, and exhaust systems will conform to the provisions of

the International Mechanical Code and National Fire Protection Association Code 90A.

Ultimately, Embarc Colusa commits to utilizing the best available technology, devices, and techniques to eliminate odors and to effectively maintaining these systems to maximize their efficacy.

System Maintenance

Because each location is different, there is no one-size-fits-all maintenance schedule for retail operations. Rather, a customized plan is created for each location by the President of Development, Facilities Manager, General Manager, and construction team, encapsulating odor control as well as general facilities maintenance and management specific to the unique characteristics of the location.

President of Development Terri Gilles and Facilities Manager John Ngu oversee system maintenance for Embarc, bringing years of operational experience in cannabis and a variety of highly regulated industries. The operational excellence, including precise system maintenance protocols, exhibited at existing Embarc locations is a testament to this team's ability to approach system maintenance proactively and efficiently.

In accordance with all applicable municipal code requirements and regulations, Embarc's system maintenance plan will include detailed maintenance policies, procedures, and timelines for odor control. This timeline has daily, weekly, monthly, quarterly, and annual timelines (depending on item and focus area), and this timeline is built into our store-specific management software requiring proactive acknowledgment of completion for each activity. This proactive acknowledgment corresponds to various forms and checklists which are maintained electronically and built into the quarterly and annual performance review process for each General Manager at Embarc. This ensures ongoing maintenance is store-specific, detailed enough to ensure accuracy, and ongoing in nature.

As described previously, the odor control system's carbon filters will be regularly inspected and recharged and/or replaced in accordance with usage and manufacturer specifications. Embarc will also perform self-inspections, encourage employee observation and reporting, and create response protocols to effectively address any odor complaints that may arise. It is our intention to resolve any complaints received from neighbors in a timely and satisfactory manner.

Embarc is committed to ongoing preventative maintenance and ensuring proper functionality of all operations as well as aesthetic management of the facility and surrounding area, including ensuring the property is consistently provided with adequate electricity, sewerage, disposal, water, fire protection, and storm drainage for the intended business purpose. We will maintain proper facility and system maintenance through the following processes.

At the conclusion of a store buildout, the President of Development and Facilities Manager will schedule a building walkthrough with key members of the construction team to review all components of the facility as well as all warranty and maintenance information. This site inspection and transfer of warranty and other documentation is required of the general contractor before final payment is made and is kept in a binder on the premises.

Upon finalizing the documentation and handover from the construction team, the President of Development and Facilities Manager will then meet with the local onsite General Manager to review the binder in detail and develop a comprehensive preventative maintenance schedule. Items requiring maintenance plans include, but are not limited to:

- HVAC System Maintenance
- Odor Mitigation Infrastructure
- Charcoal Filters
- General PM Schedule

- Waste, Recycling, and Composting Disposal
- Smoke Detectors & Carbon Monoxide Alarms
- Uninterrupted Power Sources (UPS) Batteries for DVR and Network Server Systems
- Exterior Camera Cleaning
- Roof Structures
- Landscaping
- Pest Control
- Plumbing Back Flow & Hydrojetting

During this meeting, the team will also identify all relevant contractors and service personnel and initiate contracts with them to ensure regular service. Embarc Colusa seeks to achieve 100% local service providers and will utilize the Chamber of Commerce membership guide as a starting point for identifying service providers locally. In fact, for any purchase order or service contract to be approved, the General Manager and/or on-site Manager must assure that the contractor or vendor is based in Colusa County.

Non-local service providers will only be utilized when the service is not available locally or where warranties dictate the use of a specific entity. Thus, our commitment to utilizing local service providers goes beyond an abstract sense of community.

As noted above, the findings of this initial process development are then populated into the store-specific management software, with key daily, weekly, monthly, quarterly, and annual deadlines requiring proactive acknowledgment and documentation in order for the General Manager to remain in good standing with Embarc. The General Manager is supported in these key functions by the President of Retail, who oversees General Manager performance, and by the Facilities Manager, who works hand-in-hand with the General Manager to monitor and maintain the facility.

Odor Control Record Keeping Systems & Forms

Embarc has developed an Odor Mitigation Plan, which includes maintenance of all records relating to odor management, including system installation, maintenance, equipment malfunctions, and deviations from the plan. The General Manager will verify the effectiveness of the air quality management system weekly by physically inspecting the system by listening for the sound of the system, visually ensuring the lights are on and the system is functioning, and verifying there is no odor. The General Manager will log that the system has been checked weekly in an Odor Control Maintenance Log.

The equipment cleaning and maintenance records will include, at a minimum, the following information:

- Manufacturer information;
- Date equipment was put into service;
- Date and time of cleaning or maintenance;
- Detailed description of cleaning or maintenance;
- Name of employee who cleaned or maintained equipment;
- Name of tradesperson, if applicable; and
- Date of required next service.

The General Manager will also maintain an odor complaint log. Details of this procedure and log are outlined in part one of this Neighborhood Plan.

The General Manager will be responsible for creating and submitting a monthly odor management report, and Embarc Colusa will maintain complete records that can be provided to the City upon request.

All records and logs related to the Odor Mitigation Plan will be stored onsite in the Management Office as well as electronically as part of the store-specific management software requiring proactive acknowledgment of completion for each activity. This proactive acknowledgment corresponds to various forms and checklists which are maintained

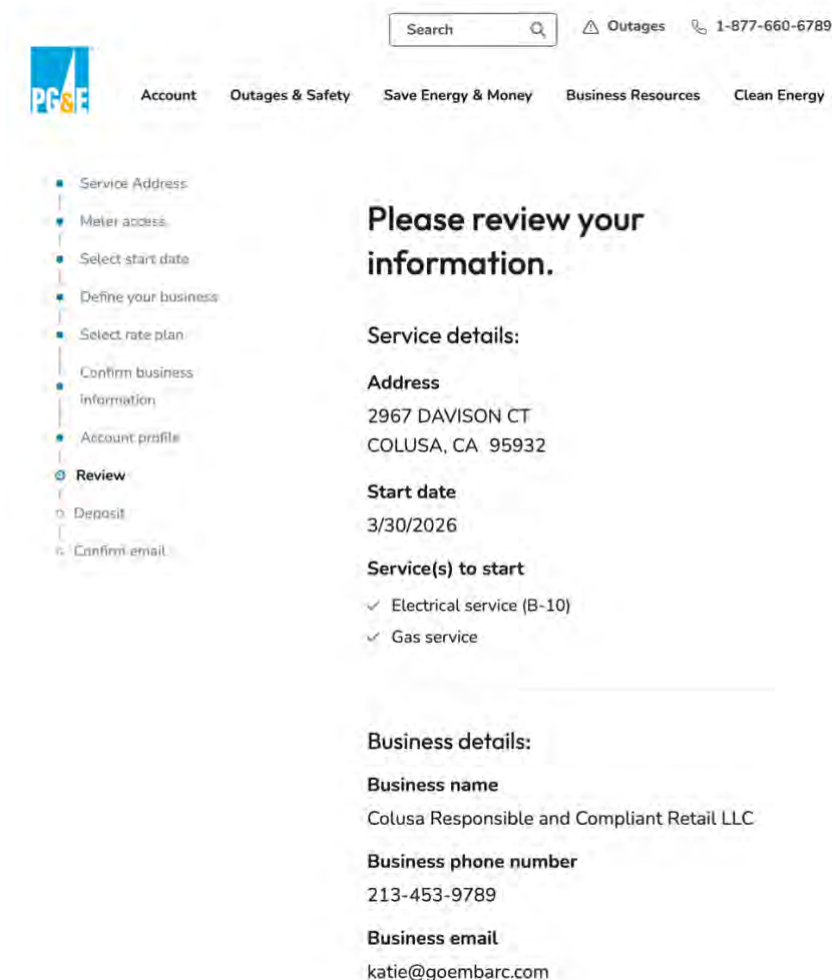
electronically and built into the quarterly and annual performance review process for each General Manager at Embarc. This ensures ongoing maintenance is store-specific, detailed enough to ensure accuracy, and ongoing in nature.

ENERGY EFFICIENCY PLAN:

Documentation that the applicant has contacted PG&E for help finding the best way to provide reliable and efficient energy solutions for their business. The applicant must provide the date they contacted PG&E and the name of the PG&E representative.

Embarc's proposed business is a retail cannabis dispensary storefront with delivery, and anticipated energy usage is substantially lower than that of cultivation or manufacturing operations. The proposed location at 2967 Davison Ct, Colusa, CA 95932 has historically been used for retail or office purposes and is already serviced by PG&E with infrastructure appropriate for this use type. The property owner spoke with Sandra at PG&E to confirm that the smart meter could be turned on the same day that a new service request was submitted.

To confirm utility coordination and maintain compliance with this application requirement, Embarc submitted a request through PG&E's website to further establish electrical service at the proposed location. A screenshot documenting this request, dated January 29, 2026, is included with this application and demonstrates our proactive engagement with PG&E regarding reliable and efficient energy service for the site.



PG&E Account Outages & Safety Save Energy & Money Business Resources Clean Energy

Search Outages 1-877-660-6789

Service Address
Meter address
Select start date
Define your business
Select rate plan
Confirm business information
Account profile
Review
Deposit
Confirm email

Please review your information.

Service details:

Address
2967 DAVISON CT
COLUSA, CA 95932

Start date
3/30/2026

Service(s) to start
☒ Electrical service (B-10)
☒ Gas service

Business details:

Business name
Colusa Responsible and Compliant Retail LLC

Business phone number
213-453-9789

Business email
katie@goembarc.com

In addition, Embarc has outlined below the operational practices and design considerations we strive to implement across our retail locations to promote ongoing energy efficiency.

Retail cannabis businesses, although not directly engaged in the cultivation or production of cannabis, have a significant opportunity to influence the industry's carbon footprint through sustainable practices. Our absence from the growing and manufacturing stages, which can be significant sources of greenhouse gas emissions, does not diminish our capacity to adopt environmentally responsible operations.

We are committed to integrating energy-efficient designs in our stores, implementing robust waste reduction strategies, and championing recycling and composting initiatives. By sourcing products from suppliers who prioritize environmental responsibility, we aspire to significantly lessen the indirect carbon footprint linked to cannabis products. Moreover, our commitment to responsible consumerism and the education of our customers about eco-friendly choices empowers us to extend our sustainable impact beyond our immediate operational sphere. This approach positions Embarc as a proactive contributor to minimizing the cannabis industry's overall carbon footprint and mitigating its environmental impact.

LIGHTING: We will use energy-efficient lighting to decrease both local pollution and global greenhouse gas emissions. Exterior lighting will be replaced with light-emitting diodes (LEDs). When appropriate and not impactful to security measures, we will use “de-lamping” techniques to reduce lighting levels on the exterior and the parking lots. Interior lighting systems in the back-of-house areas are on occupancy sensors, while our Retail Sales Area is on a timer to ensure lights are not left on when the building is not occupied.

PLUMBING: Prioritization of improvements and facilities upgrades that save energy and water will be an integral part of our sustainability strategy. Installing water-efficient fixtures like low-flow toilets contributes to energy conservation by reducing the energy needed for water heating and treatment. Newly installed equipment will be water efficient, including low-flow toilets and low-flow faucet restrictors. Property maintenance is a priority for Embarc, including regularly checking and fixing plumbing issues which can help prevent leaks and unnecessary water usage.

APPLIANCES: We will utilize appliances and fixtures that are Energy Star certified to ensure energy-efficient equipment. Employees will be trained on energy saving policies, including powering off relevant appliances after hours. Lowering energy consumption aligns with our commitment to energy efficiency and sustainability.

HVAC & THERMOSTAT: We always utilize smart thermostats that not only ensure thermal comfort but also allow us to control air temperature after hours to reduce energy use.

WINDOW FILM: Window films will be used to reduce energy loss and carbon emissions through the building's windows. These films provide 99.9% UV protection and have no VOCs.

RECYCLING: By recycling materials such as paper, plastics, and metals, the energy-intensive process of manufacturing new products from raw materials is avoided. This significantly reduces greenhouse gas emissions since manufacturing processes are often carbon-intensive. Embarc has implemented a waste reduction strategy to increase recycling and reuse of materials. We will have waste receptacles with three compartments for landfill, recycling, and composting in both public and employee areas, with clear signage to educate individuals on proper disposal. Single-use plastics and styrofoam will not be provided in the

employee breakroom. We also encourage vendors to reduce the use of styrofoam and/or plastics and increase composting of materials. We are working with our distributors to identify vendors with sustainable packaging and will use our purchasing power to encourage sustainable packaging among our vendors.

To ensure safety and environmental protection, we will maintain a locked, secured recycling vessel for used vape pens in a secure storage area and offer a discount on future purchases to customers who recycle their vaporizers with us. Recycling used vape pens not only diverts waste from landfills, where it would generate methane (a potent greenhouse gas), but also conserves resources and energy that would otherwise be expended in producing new products.

TRANSPORTATION: Encouraging alternative transport modes and using reduced-emission vehicles for delivery will minimize carbon emissions. Embarc encourages the reduction of vehicle miles traveled by incentivizing consumers and employees to ride bicycles, utilize public transportation, and utilize alternative fuels in vehicle travel. Incentives can include product discounts and free transportation vouchers. Embarc intends to provide anchored bicycle racks near the retail premises to encourage other modes of transportation for employees and customers. Embarc plans to provide pretax benefits for transit cards for employees to get to and from work as needed.

To expand the use of alternative fuels in vehicle travel, Embarc intends to use reduced emission vehicles for the purposes of delivery. We will also encourage our employees to adopt this technology for their personal vehicles by providing information on available incentives. Designated priority parking will be provided for clean air vehicles on our premises, if feasible.

CANNABIS WASTE: Gaiaca is our contracted licensed cannabis waste hauler. Gaiaca is a highly integrated cannabis waste management provider with certifications as both a Green Business and Small Business Enterprise (SBE). Gaiaca's primary mission is to provide licensed cannabis operators a compliant yet sustainable solution for their regulated cannabis waste. Gaiaca is responsible for the transportation of rendered waste material for final disposal and/or recycling. Gaiaca is dedicated to diverting waste from landfills through composting, recycling, fuel blending, and waste-to-energy efforts. These waste management strategies prevent methane emissions from landfill decomposition and promote the reuse of materials, thereby reducing greenhouse gas emissions associated with both cannabis waste and general operational practices. This approach ensures that the environmental impact of cannabis products is minimized even after they leave the store.

PARTNERING WITH ENVIRONMENTALLY CONSCIOUS & LOCAL BRANDS: We aim to stock products from growers and producers who use sustainable cultivation and manufacturing methods. This includes those who use organic practices, renewable energy sources, or have lower water usage. By supporting these producers, we can indirectly reduce greenhouse gas emissions associated with cannabis production. We pride ourselves on showcasing these sustainable cannabis brands at all our locations. A few examples of cannabis brands focused on environmentally friendly cultivation are Raw Garden, Sonoma Hills Farms, and Pure Beauty.

As demonstrated, we are committed to implementing innovative sustainability measures and will look for additional ways to be a sustainable commercial cannabis business in Colusa. Specific commitments will be further refined once a site has been selected to ensure feasibility.

BUSINESS PLAN:

A plan describing how the commercial cannabis business will operate in accordance with this code, state law, and other applicable regulations. The business plan must include plans for transporting cannabis and cannabis products to and from the cultivation/manufacturing site.

Embarc is proposing to operate a retail dispensary with delivery service in the City of Colusa. As further detailed below, Embarc's operational plan has been designed to comply with all State and local regulations. It serves as a realistic model of operations developed through a collaborative process. Importantly, this plan will continue to be refined as it is informed by operations.

True compliance is predicated on a commitment to continuously innovate and refine to ensure best practices are easily implemented, maintained, and become a lived value rather than simply a mandate. Embarc has implemented industry-leading best practices perfected over decades of collective operational experience at some of the State's most respected dispensaries, along with input from our team, which has been responsible for more than 2,000 retail stores across the globe, and valuable lessons learned from successfully operating Embarc's existing retail footprint of 16 operational stores.

Embarc's operating procedures and best practices are contained in our business plan, operating plan, employee handbooks, employee training program, and numerous other resources. In total, there are over **450 pages** of material specific to Embarc's operating procedures, policies, and best practices. Given that many of these materials are proprietary and this business permit application is subject to a Public Records Act request, and in deference to the need for succinct application materials, we have included a detailed overview of how Embarc's best practices have been included in the Standard Operating Procedures (SOPs) informing day-to-day operations for a retail and delivery business.

We welcome the opportunity to provide more detail on Embarc and its proposed operations in Colusa at any time and full copies of policies and manuals from our robust library of information are available to the City of Colusa upon request.

PHYSICAL FUNCTIONALITY

Our layout and customer flow have been designed to maximize security, compliance, and an optimal consumer experience. This concept has been proven in other communities—the concept is predicated on the following customer flow and experience:

1. GREETED: Guests are buzzed into the Screening Lobby, where they are welcomed by staff and undergo immediate identification and age verification. While this is a strict compliance protocol, staff are trained to ensure this is a warm and inviting experience.

2. INTRODUCED: Once identification and age are verified and based on customer flow in the Retail Sales Area, guests will either move directly from the Screening Lobby into the Retail Sales Area or stay in the waiting area until space permits. The waiting area of the Screening Lobby has been designed with the customer in mind. Here you will find educational materials regarding cannabis as well as community-specific activations and installations.

3. GUIDED: After entering the Retail Sales Area, guests will approach the countertop, where they are greeted by a retail sales associate, called a "Guide." Guides take the guest through product selection, answer questions, and provide individualized suggestions. If there is a line of customers when a guest first enters the Retail Sales Area, the guest will queue until called up to the counter by a Guide.

4. CHECKOUT: Once the customer has selected products, the Guide will obtain the products and facilitate the transaction at a point-of-sale station.

Purchased products are placed into an opaque exit package and guests are reminded to always keep their products stored in the product's compliant child-proof packaging to prevent accidental youth access. The easily identifiable exit package allows Security Officers to monitor customers exiting the building.

5. EXIT: Guests are thanked for coming and are directed to exit through the exit path. Customers will not be permitted to loiter on the property.

CUSTOMER CHECK-IN PROCEDURES

Embarc utilizes state-of-the-art technology, security, and customer experience protocols to ensure no person under the age of 21 (or 18 with a valid physician's recommendation and/or medical card) is permitted to enter. These protocols have been proven to ensure no person enters the Retail Sales Area until their identification has been verified, including age, identity, and validity of medical recommendation, if one is provided.

Guests will enter utilizing the designated main entrance to the building, where signs will be posted clearly and legibly stating that no person under the age of 21 is permitted to enter. The premises will have a clearly labeled entrance door, which will lead into the access-controlled reception area, Screening Lobby, that will remain electronically locked and under Embarc's control during all business hours (with deadbolt security after-hours).

The entrance into the building will be locked at all times, with entry strictly controlled. A robust surveillance network complemented by viewing stations will allow for pre-screening of those approaching the business, ensuring only those who can be certainly identified on camera will be granted electronic access into the Screening Lobby to initiate the check-in process and that youth are not able to access even the waiting area.

Upon entry, a guest is greeted in the secure Screening Lobby area by a reception employee

who visually inspects the guest's identification card before scanning it into Treez (Embarc's track-and-trace/point-of-sale) software, which automatically inputs necessary identity verification and compliance information into our point-of-sale (POS) system. As a redundant layer of security, the reception employee also scans the identification card using a portable age verification device such as the CAV-2000 (or a similar model, depending on best-in-class technology at the time of operations). Acceptable forms of identification include:

- A document issued by a federal, State, county, or municipal government, or a political subdivision or agency thereof, including, but not limited to, a valid motor vehicle operator's license, that contains the name, date of birth, height, gender, and photo of the person;
- A valid identification card issued to a member of the Armed Forces that includes the person's name, date of birth, and photo; or
- A valid passport issued by the United States or by a foreign government.

To protect against any guest accessing the Retail Sales Area prior to identification verification, the Screening Lobby is secure without any access capabilities unless buzzed through the locked door by the Security Officer or reception employee, which only occurs after identification verification is complete.

Medical Patients & Caregivers

If the potential customer is between 18 and 20 years old (and thus only able to access the facility as a medical patient or caregiver), Embarc will confirm the customer's possession of a valid identification card utilizing the process outlined above as well as a physician's recommendation and/or Medical Marijuana Identification Card using a protocol that exceeds State regulations. Pursuant to State law, physician's recommendations will not be obtained or provided at our location. No person under the age of 21 will

be allowed access to the Retail Sales Area without the following verification protocol:

1. If the patient produces a physician's recommendation, staff will verify that the doctor's license is active and in good standing using the California Medical Board's online license verification program, BreZE; and upon verification that the physician's license is in good standing and active, the staff member will utilize the online verification system provided by the doctor to verify that the medical recommendation is valid. If no online platform is available, the staff member will call the physician's office and manually verify the recommendation.
2. If the patient produces a State-issued medical identification card, the staff member will utilize the official website administered by the California Department of Public Health to verify the patient's identification card using the assigned nine-digit Unique User Identification Number.

Once the above procedures are complete, the following outcomes are possible:

- The patient is properly verified, their information is entered into the Treez system, and their records are stored in a HIPAA-compliant database to meet State guidelines for record retention, or
- The patient's verification fails, and they are asked to promptly leave the premises and only return with valid documentation.

Once age and identity verification are complete, the reception employee completes the guest's profile, including contact information in case of a product recall and should the guest want to join the Passport Club, Embarc's proprietary customer loyalty program. This information is properly stored pursuant to all cannabis and general advertising laws and regulations. The guest is then buzzed into the Retail Sales Area, where they are greeted by a Guide (retail sales associate) or, if at capacity, are invited to wait in the Screening Lobby

seating area. The patient will be asked to show the government-issued identification and, if applicable, a doctor's recommendation or MMIC card again at the POS station at the time of purchase.

POINT-OF-SALE

Embarc will seek approval from the City to utilize Treez as its point-of-sale (POS) system in Colusa. Treez is an enterprise-quality retail management software built using the most sophisticated security systems available to increase security and productivity, resulting in faster transaction times and more secure monitoring.

Treez tracks and reports on all aspects of commercial cannabis activity, including but not limited to, cannabis tracking, inventory data, gross sales (by weight and by sale), and other information deemed necessary by the city. Embarc will ensure that the Treez system is compatible with the City's record-keeping systems and can produce historical transactional data for review.

Treez POS software manages and stores transaction information, including records, reports, manifests, and any other documents generated by Embarc. Per State requirements, this data is stored both physically and electronically in the cloud for a period of at least seven years. Importantly, Treez maintains the confidentiality of all customer and patient data and records.

Treez is an integrated software platform that automatically enforces best practices with a focus on compliance and loss prevention. Unique features of the Treez system include, but are not limited to, the following:

ACCURACY: Customizable inventory locations mirror the physical workings of the store and segment inventory by medical or recreational status, fulfillment type, or sales channel to ensure accurate inventory at all times.

FULFILLMENT: A centralized dashboard streamlines processes across in-store, express, pick-up, and delivery orders and captures orders from all eCommerce marketplaces and fulfills them from a single place to ensure real time inventory management.

COMPLIANCE: Built-in tools to safeguard against selling over State-specific purchase limits, dynamic tax collection based on product type, customer classification, and delivery destinations, real time sale reporting to CCTT-MetrC, and insulation from track-and-trace outages using the proprietary TraceTreez automation layer.

Treez Interaction with CCTT-MetrC

Embarc will create and maintain an active and functional account within the CCTT-MetrC system prior to engaging in any commercial cannabis activity. Once the Embarc accounts and systems are linked, the Treez system utilizes an Application Programming Interface (API) to facilitate a direct online connection to the California Cannabis Track-and-Trace system (CCTT-MetrC), the State's track-and-trace platform.

Treez will then automatically interface with and push all the sales data to CCTT-MetrC in real time. This enables sales data from Treez to be uploaded directly to CCTT-MetrC, reducing the risk of diversion, loss, and theft while maintaining the integrity and safety of cannabis products as they move through the supply chain. Furthermore, Treez allows Embarc to remain compliant with requirements that commercial cannabis businesses must have an accounting software system in place to provide POS data as well as audit trails for both product and cash, where applicable.

Embarc will designate one individual owner as the CCTT-MetrC account manager. The account manager may authorize additional owners or employees as system users and will ensure that each user is trained on the system prior to its access or use. This designated track and track account manager will be responsible for ensuring

that the Treez system conducts all required reporting to the DCC.

Embarc will monitor all compliance notifications from the system and timely resolve the issues detailed in the compliance notification. Embarc will keep a record, independent of the system, of all compliance notifications received from CCTT-MetrC, and how and when compliance was achieved. If Embarc is unable to resolve a compliance notification within three business days of receiving the notification, we will notify the DCC and local authorities immediately by submitting the appropriate Notification and Request Form. Embarc is accountable for all actions its owners or employees take while logged into or using the system, or otherwise while conducting track-and-trace activities.

OPENING & CLOSING PROCEDURES

Embarc's opening and closing procedures have been developed by our security, operational and compliance teams to ensure the protection of public and employee health, safety, and wellbeing. These policies have been tested through Embarc's existing operations and are thus a realistic model of functional best practices.

Opening Procedures

ARRIVAL & EXTERIOR INSPECTION: Opening shifts begin one hour before the shop opens to ensure ample attention to detail for opening procedures. Security is directed to arrive fifteen minutes prior to the first employee's arrival to conduct a visual inspection of the premises. The Opening Manager also conducts a visual inspection from the safety of their vehicle upon arrival. If any signs of forced entry or suspicious persons or circumstances are observed, or if the security detail is not present, the Manager will retreat and summon the contracted private patrol operator or police, as appropriate for the circumstances.

ENTERING & DISARMING: Security and the Opening Manager enter the store, close and re-

lock the lobby door, and disarm the premises alarm. Security opens any security gates and window coverings; however, access doors remain locked. The Opening Manager prepares the site for opening shift employees, including checking that all door locks, cabinet locks and safes are in operable condition and free of tampering; checking cameras for functionality; and verifying that all emergency egress pathways are unobstructed. The front door of the store remains locked until opening.

OPENING SHIFT ARRIVAL: Opening shift employees may access the building via the secure employee access area. Electronic access cards ensure that employees are only eligible to enter the premises within one hour of the store opening and one hour of the store closing to prohibit after-hours or unauthorized access. This ensures sales associates cannot enter the store without security and management onsite. Furthermore, employees have different access levels based on their position. Access cards utilized by Guides will only allow access to the employee limited-access area but are not valid to access managerial areas and secure storage.

The opening shift prepares the store by disinfecting all high-touch surfaces, dusting cases, cleaning glass, cabinetry and displays, and setting up registers. Technology, including point-of-sale systems, receipt printers, barcode scanners, music players, and the ATM are powered on, systems are booted up, and manual checks occur to ensure no technology glitches. The Manager or Lead Guide ensures all laptops and telephones have charged overnight and are in their respective areas prior to opening. Additionally, given the City's preference for all inventory to remain enclosed during non-operational hours, employees will restock the front of house using Embarc's restocking protocol, perfected in existing operations and further detailed in response to Question 7 later in this section regarding secured product during non-business hours.

During store preparations, the Manager double counts the cash drop from the previous night in the secure room and records it in the Cash Log. Once the deposit is confirmed, the Manager takes cash drawers out of the safe and counts each drawer to \$200. The drawers are handed to individual sales associates to double count before they "open" their cash register terminal. It is critical to include sales associates in this process to ensure they take accountability for proper cash handling procedures.

Opening activities are encapsulated in an Opening Checklist that is laminated and physically checked off by the team as each task is completed. This ensures all tasks are adequately addressed and allows the team to work together to achieve shared goals by dividing and conquering to maximize cooperation and efficiency.

MORNING HUDDLE: Once the Manager has completed all tasks in the secure room, they update the "daily updates" board with relevant information. Just before opening, the team conducts a morning huddle. This meeting is ten minutes long and covers topics including break schedules and floor assignments. We also utilize this time to talk about new product education, specials for the day, and industry or operational updates. Huddle meeting topics are added to a touchdown sheet that is reviewed with each employee at the start of their shift so mid-shift and afternoon shifts are provided this information as well. Once the meeting is complete, the Manager checks the shop voicemails and responds to any messages as needed. We have found that customers leave messages asking for information and/or stocking questions, and by committing to respond to every voicemail, we are building relationships and loyalty with customers.

TAKE YOUR POSITIONS: The team usually spends the final minutes quizzing one another about new products and providing reviews. This is critical information sharing and is helpful when assisting customers navigate product selection. At opening,

security unlocks the deadbolt of the front door and employees take their respective positions to begin welcoming patrons into the store.

Closing Procedures

Closing procedures are overseen by a Store Manager and security officer with specific tasks for all employees. Closing procedures typically take approximately 30 to 45 minutes depending on the size of the team at closing. Embarc initiates “last call” fifteen minutes prior to the shop’s closing time. In instances where a high volume of customers approaches the business as closing nears, we have a policy of “fair but firm” that has worked well in our existing operations—ensuring strict compliance with all laws regulating transaction cutoff times while also facilitating final transactions. Once closed, team members work together to execute closing procedures:

ACCOUNTING: The Closing Manager is responsible for overseeing cash drawer reconciliation, and they close each cash drawer while having the employee assigned to each drawer confirm that the cash matches daily sales. Including employees in cash drawer verification is critical to instilling a sense of accountability. Our point-of-sale system monitors all cash in each cash drawer and alerts managers in real time if any cash drawer exceeds the on the floor limit. If notified during working hours, managers then remove the cash drawer, immediately replace it with a cash drawer insert with a smaller quantity of cash and place the overfull cash drawer into the safe. After closing, cash drawers are counted and removed but are not replaced so there is no cash in cash drawers overnight. This cash is included in the daily tally, which is notated, bagged, signed by the Manager, and kept in the safe as the “daily drop.” This drop is placed in a secure deposit bag in our safe, to be counted and confirmed a second time in the morning by a different Manager.

CLEANING: While the Manager is reconciling the day’s cash, the closing team is sweeping, dusting, and cleaning glass. All high touch surfaces are

disinfected, and technology is powered down including the ATM and music system.

INVENTORY: The day’s remaining inventory is straightened and organized on the sales floor. The bulk of cannabis inventory is secured within the Secure Product Storage Room.

DAILY EMAIL: The closing Manager sends an end of day shift summary email to ensure all managers are apprised of relevant information. The email includes staffing insights, new products or sales trends and reminders for the rest of the management team. With this daily communication, our management team is fully informed of notable instances that occur when they are not in the store.

SECURING THE PREMISES: The Closing Manager collects all access badges in secure storage. Additional closing procedures performed by the Manager include securing any records into their respective locking cabinets or filing systems; logging out of any software, verifying proper functioning and no obstructions of all surveillance cameras; verifying functioning of exterior lighting; and verifying all interior doors, cabinets and safes are closed and locked. The Manager then turns off appropriate interior lighting, arms the premises alarm system, and walks out with the staff and security officer.

Employee safety is imperative, and no employee is ever onsite without a security officer present. Closing employees are expected to never leave the shop for the night alone but rather to leave as a group and only with the security officer present. Security accompanies the group to each employee’s car and ensures everyone leaves the shop safely.

BEING MINDFUL: After closing, employees and managers are trained to be cognizant of security risks while driving home. Perpetrators may falsely assume employees are traveling with cannabis products and/or currency. Consequently, staff is

instructed to watch for vehicles that may be following them, to vary their routes, and to have pre-designated safety zones (locations with heavy police/security presence) identified along their path home for use if they believe they are being followed. Examples of such safety zones include police departments and hospitals with emergency rooms.

Opening and closing procedures are encapsulated in morning and evening checklists and overseen by the opening and closing managers. The team practices these procedures for at least one week prior to a new store opening as part of training. This ensures the team has a full understanding of all protocols and policies and understands the importance of strict adherence to these procedures.

HOURS OF OPERATION

Embarc anticipates operating between the hours of 8 am and 8 pm pursuant to Colusa Municipal Code for both retail storefront and delivery activities. Embarc acknowledges the City may impose more restrictive hours as a condition of the permit, and if so, Embarc will comply with those new hours.

EMPLOYEE ROLES & RESPONSIBILITIES

Embarc anticipates 13 employees at the time of opening and will scale to meet demand as data is gathered through operations; we are estimating this at 16 employees by year 5. These roles will be supported by ownership, which exists in service to the retail team.

The following provides a brief overview of all positions and responsibilities:

GENERAL MANAGER: The General Manager is responsible for overseeing day-to-day operations, including Store Managers and staff across sales, inventory, community, facilities, accounting, marketing, public relations, and more. This role is

responsible for successfully developing and implementing strategies to constantly improve the business through merchandising, inventory, expense control, human resources management, and operational management. Importantly, this role is also ultimately responsible for ensuring strict adherence to all State and local laws and regulations pertaining to cannabis and business operations. Critical functions of the General Manager role include, but are not limited to:

- Embodying our values and leading in a positive and respectful manner;
- Ensuring compliance with all laws, policies, and procedures through regular store management and staff meetings, store walk-throughs, audits, etc.;
- Confirming daily cash receipts ensuring monies are deposited regularly, and reports are submitted as prescribed by company policies;
- Analyzing and measuring business trends;
- Developing and implementing plans to meet or exceed goals and objectives;
- Continually evaluating employee and store performance and recruiting, inspiring, and training management candidates to grow from within; and
- Liaising with law enforcement, vendors, and community members as needed and through the lens of being proactive rather than reactive to opportunities, needs, and requests.

STORE MANAGERS: Managers focus on customer satisfaction, daily operations, and operational flow. Based on each focus area, Managers are assigned specific roles and responsibilities necessary for the effective execution of their role. Critical functions of the Store Manager role include, but are not limited to:

- Maintaining a compliant work environment through coordination with the General Manager on daily, weekly, quarterly, and annual audits and spot checks;

- Motivating a positive team through communication, incentives, and evaluations;
- Confirming daily sales reports and cash receipts ensuring monies are deposited regularly, and reports are submitted as prescribed by company policies;
- Addressing customer needs and resolving issues, ensuring positive relationships;
- Ensuring inventory data is correct by performing inventory counts and checks;
- Executing employee volunteerism program with enthusiasm, inclusivity, and sensitivity;
- Maintaining communication with community members, stakeholders, and customers to ensure Embarc is a welcoming environment that is responsive to local needs; and
- Liaising with law enforcement, vendors, and community members as needed and through the lens of being proactive rather than reactive to opportunities, needs, and requests.

LEAD GUIDES: Lead Guides support the General and Store Managers in ensuring that all daily operating procedures are performed as required while promoting a company image of excellence through a strong work ethic, leadership by example, and the consistent delivery of impeccable customer service and store visual presentation. This role will also maximize sales through the development and supervision of sales staff. Lead Guides are responsible for ensuring transactions are carried out in compliance with all applicable laws and regulations. Critical functions of this role include, but are not limited to:

- Implementing operational rules, regulations, policies, and procedures;
- Supervising, managing, and directing the activities of the Guides (sales team);
- Implementing company policies and ensuring staff adheres to best practices;

- Maintaining in-depth knowledge of all inventories, products, and trend knowledge;
- Assisting in employee performance reviews; and
- Assisting in hiring and training new employees.

The Chief Executive Officer participates in quarterly “all hands” meetings with staff to lead ongoing training, facilitate educational modules, and ensure coordination and collaboration among the team.

INVENTORY SPECIALISTS: Under the direction of and in coordination with the Inventory & Purchasing Manager, Inventory Specialists maintain the organization’s inventory by managing and supplying necessary items while maintaining accurate records of all procurements. Critical functions of the Inventory Specialist include, but are not limited to:

- Assisting with product intake;
- Providing inventory reports to the Inventory Manager;
- Developing and maintaining good working relationships with vendors;
- Maintaining accurate daily records of goods received;
- Managing and maintaining the inventory system;
- Facilitating upgrades to related databases and/or software under the direction of the Inventory & Purchasing Manager;
- Conducting frequent spot and partial audits of physical inventory;
- Assisting with weekly physical inventory audits;
- Leading education and training on all products for staff; and
- Compiling delivery orders.

GUIDES (RETAIL SALES & DELIVERY ASSOCIATES): Retail Sales and Delivery Associates, or Guides, work closely with customers to determine needs, answer questions, and recommend the right

products. This role will promptly resolve customer issues and ensure maximum client satisfaction. Guides must maintain up to date knowledge of product features and maintain the store's visual appearance. Critical functions of Guides include, but are not limited to:

- Friendly check-in with customers while scanning identification into the POS system;
- Ensuring high levels of customer satisfaction through excellent sales service;
- Assessing customers' needs, providing assistance and information on product features;
- Maintaining in-stock and presentable condition of assigned areas;
- Actively seeking out customers in store;
- Remaining knowledgeable on products offered and discussing available options;
- Processing purchases;
- Handling customer returns using the compliance protocol and SOP; and
- Maintaining a neat and orderly work environment, including participation in the store cleaning and disinfecting protocols.

Guides are cross-trained to engage in both retail and delivery activities because it is critical that all employees have a thorough understanding of all products and modalities Embarc carries. Regardless of whether engaging with a customer in the store or on a doorstep, it is important for our team to be communicative and capable of answering questions rooted in extensive retail training.

RECEIVING DELIVERIES

Embarc has developed proven delivery receipt protocols through existing operations that maximize public health and safety and eliminate impacts to neighboring uses. Embarc will confirm that we have already received the specific shipping manifest and certificate of analysis (COA) via CCTT-Metric prior to a scheduled delivery of a shipment of cannabis goods. As an additional layer of

security as part of our daily rolling inventory reconciliation process, the Inventory Manager will perform package counts on all current inventory and ensure labels and actual weights are reconciled before accepting any new inventory to more easily identify discrepancies.

Embarc will not accept any delivery of cannabis or cannabis products without receiving a copy of the shipping manifest and COA containing necessary and accurate information from the licensed distributor or licensed microbusiness authorized to engage in distribution responsible for making the delivery at least 24 hours prior to delivery.

Embarc will receive shipments of cannabis goods only from licensed distributors and/or licensed microbusinesses authorized to engage in distribution and only during business hours with advance notice. Shipments will enter the licensed premises through the secure delivery area.

Distribution schedules will be varied and will be maintained in confidence and only released to those with a business need-to-know in the moments prior to receipt of a distribution. Distributors will be required to notify Embarc of the approximate delivery time and shall include the name and photos of the distribution drivers scheduled as part of the pre-scheduling process. Distributors will be required to make telephonic notification 10 minutes in advance of their anticipated arrival. At that time, the Manager will alert the Patrol Security Guard of the imminent arrival, providing the Security Guard with the name and photo of the expected driver.

The Security Guard will meet the distributor and will verify that the party presented matches the information provided by the Manager. If there is a mismatch, the Security Guard will collect driver's license information from the distributor and communicate it to the Manager by radio for validation by the distributor.

Once validated, the Security Guard will allow the distributor into the licensed facility. The Manager will proceed to the Loading & Unloading Area. The Security Guard will remain in the area to monitor the delivery.

The vendor will be logged. Goods will be inspected for completeness, condition, and compliance. Compliant goods will be accepted and transferred into the track-and-trace account of Embarc. The door from the Loading & Unloading Area to the Intake Area will remain closed and locked until the distributor has vacated the premises following the transfer. The Security Guard will escort the distributor out of the building and thereafter, the Security Guard will resume their duties.

Shipments of cannabis goods will be inspected for freshness and cannabis goods that have exceeded their expiration or sell-by date will not be accepted. Per State regulations, a shipment will either be accepted or refused in full.

Embarc will only accept deliveries during daylight hours and at staggered times to prevent predictability. Embarc will not allow shipments of cannabis goods to enter the licensed premises through an entrance or exit that is available to the public and will only accept deliveries through the secure vendor entrance.

Embarc will inspect and accept the inventory in a limited-access area and under video surveillance. This area will be segregated from the rest of the premises to ensure delivery personnel do not have access to the inventory room or any other aspect of operations, further enhancing product security during intake.

Embarc will not engage in any packaging or labeling of cannabis or cannabis products and will not accept any cannabis or cannabis products from a distributor that are not packaged for final sale in a compliant manner. If an employee discovers a defect or nonconformity in an inventory shipment, they will refuse it. Furthermore, Embarc will not

accept goods that have not passed laboratory testing as documented by a COA.

Inventory Management

When a shipment of cannabis goods arrives, Embarc will inspect the scheduled delivery's inventory and verify that the distributor or microbusiness authorized to engage in distribution has provided a hard copy shipping manifest. The hard copy shipping manifest will be inspected to verify that the shipping manifest contains the following information: name and type of the cannabis goods, UIDs of the cannabis goods, amount of cannabis goods by weight or count, total wholesale cost of the cannabis goods, estimated times of departure and arrival, actual time of departure and arrival, name, license number, and address of all licensees involved, such as the cultivator, the transporter, driver's license number of anyone driving the transport vehicle and make, model, and license plate number of the vehicle used for transport. When information in the shipping manifest is suspect or inaccurate, Embarc will seek clarification or correction from the distributor but refuse acceptance if warranted.

Embarc will reconcile all cannabis product package counts, labeling, and actual weights of the incoming shipment against the shipping manifest and CCTT-Metrc. When there is a discrepancy in weight or package reconciliation, Embarc will record and document the discrepancy in the Treez system which also serves as its chosen internal seed-to-sale tracking system in CCTT-Metrc and report the discrepancy to the Inventory Manager.

Embarc will inspect the shipment of cannabis or cannabis goods for freshness. When cannabis or cannabis goods have exceeded their expiration or sell-by date, Embarc will not accept them. Embarc will inspect the shipment's labeling and packaging and ensure that all cannabis or cannabis products are labeled and packaged for final sale. When there is a defect to a label or package, or any is missing, Embarc will refuse the shipment.

Embarc will confirm that cannabis goods in the shipment have all passed required testing. If the products have not passed testing, Embarc will refuse the shipment. If the physical shipment and the shipping manifest are accurate, Embarc will sign the manifest. If the products or paperwork do not meet the above standards and Embarc refuses the shipment, we will record the refusal in CCTT-Metric and indicate on the relevant manifest, invoice and/or sales receipt the specific reason for rejection.

Embarc will follow detailed steps as further outlined in our SOPs to accept a transfer in CCTT-Metric, will immediately place the inventory in the designated Secure Product Storage Room and will retain the manifest, bills of lading, any certificates of analysis, and any sales invoices or receipts in Embarc's inventory tracking records for seven years. We will ensure that all records are legible, securely stored and are easily accessible upon request from local and/or State regulators.

Types of records produced and maintained when acquiring new inventory will include a shipping manifest, a sales invoice or receipt, a bill of lading, and a COA. The sales invoice or receipt will disclose, at minimum, Embarc's legal business name and license number.

COMPLIANCE WITH LOCAL & STATE REGULATIONS

We will ensure that Embarc Colusa is operating in a manner compliant with all applicable State and local laws, including the Medical Cannabis Collective Laws, the Medical and Adult Use Cannabis Regulation and Safety Act (MAUCRSA), any subsequently enacted State law or regulations, licensing requirements, City of Colusa Cannabis Ordinances and Zoning: 12D – Cannabis Dispensaries, 12E – Personal Cannabis Cultivation, 12F – Cannabis Business Regulatory Permit, Zone Article 21.5 – Cannabis Regulations, and Zone Article 33 – Use Permits, and any specific additional operating procedures or requirements

which may be imposed by the City. The Department of Cannabis Control (DCC) has established nearly 250 pages of detailed regulations governing commercial cannabis activity, and Embarc has deep experience managing compliance with these regulations across 16 operational storefronts. Our team's proven track record demonstrates our ability to navigate these extensive regulations, ensuring that all operations meet the highest standards of safety, compliance, and efficiency. We understand the State and local regulatory landscape has been designed to protect the health and safety of employees and the community at large.

Operating a cannabis business is a privilege, not a right, and strict adherence to all laws and regulations is a cornerstone of our ability to operate. Given this dynamic, we approach compliance through the ethos that we are only as strong as our weakest link, i.e., having the best SOPs and compliance checklists in the world is meaningless if the team does not understand, implement, and live compliance through consistent action. That means conformance with all laws starts with meaningful initial training and ongoing education.

Given our team's experience as architects of California's legal cannabis regulatory landscape, Embarc's team members have been and continue to be at the forefront of compliance and regulatory development. Owners of Embarc helped draft the Medical Marijuana Regulation and Safety Act (MMRSA), Proposition 64 (2016), the Medical and Adult Use Cannabis Regulation and Safety Act (MAUCRSA), and the implementing regulations promulgated by the three State licensing authorities: California Department of Food and Agriculture (CDFA), DCC and Manufactured Cannabis Safety Branch (MCSB) of the California Dept of Public Health (CDPH).

Owners of Embarc were involved with the consolidation of the three regulatory agencies overseeing commercial cannabis activities at the

State level and are actively engaged in the subsequent regulatory “clean up.” We will continue to engage in this critical work, analyzing the status of relevant pending State and local cannabis bills and regulations; working collaboratively with the industry and regulatory agencies; and developing industry best practices.

This cannabis regulatory development experience has taught us that true compliance requires a combination of skills—lawyers and regulatory experts shaping the policies, procedures, and checklists, as well as human resources and training professionals that translate technical language into practical tools to support daily operations.

Sustained Compliance Performance

Embarc maintains a robust Compliance Team dedicated to ensuring ongoing adherence to all state and local laws across every level of the organization. Across all operational storefronts, Embarc maintains full alignment with Department of Cannabis Control (DCC) regulations as well as applicable local ordinances. Compliance responsibilities are centralized under our Director of Operational Compliance, Director of Licensing, and General Counsel, who work closely with our Chief Compliance & Strategy Officer and Chief Executive Officer to ensure every operational practice meets or exceeds state and municipal standards.

This coordinated structure ensures seamless compliance across more than a dozen jurisdictions, each with its own regulatory framework. Our internal processes verify conformance with local regulations, conditions of approval, security requirements, and neighborhood compatibility expectations. Simultaneously, our team manages DCC obligations such as METRC reporting, employee training, packaging and labeling compliance, and consumer safety protocols.

To operationalize compliance in daily practice, Embarc employs a layered accountability framework that combines task management and

digital documentation tools, including Zipline (our retail management and communication platform) for compliance task verification and store-level audits. Our compliance leadership conducts routine internal audits to identify potential gaps, refine SOPs, and ensure all employees maintain a clear understanding of current regulations. This proactive and preventive approach ensures Embarc not only remains in full compliance, but also continues to set the benchmark for responsible, transparent operations aligned with evolving state and local policy objectives.

The Compliance Team leverages an ongoing feedback loop from store leadership to continuously refine training, checklists, and compliance tools based on real-world operational experience. This iterative process ensures our systems remain adaptive, effective, and reflective of the highest regulatory standards. Embarc will employ the below strategies and tactics to maintain compliance. These strategies are briefly summarized below due to spatial constraints.

As such, Embarc maintains a robust team dedicated to ensuring ongoing compliance at every level of the organization and leverages an ongoing feedback loop from the store team on what is working and where improvement is needed to continuously inform how we enhance our training, protocols, checklists, and other compliance tools to be most effective. Embarc will employ the below strategies and tactics to maintain compliance. These strategies are briefly summarized below due to spatial constraints.

A HOLISTIC APPROACH: Detailed SOPs are developed by a six-person compliance team and include topic-specific guidance as well as actionable documents for use in the stores based on operational needs. Key components of this holistic approach include:

- A compliance memo developed for each location specific to the business’s unique needs;

- SOPs covering all retail and delivery operations;
- Daily, weekly, quarterly, and annual compliance checklists and audits through our retail management platform, Zipline;
- Consistent coordination between the Compliance Team and the store team to provide additional resources based on on-the-ground needs;
- Ongoing compliance audits to identify any areas where procedures need to be adjusted, where confusion may occur, or where additional resources must be allocated; and
- In-store compliance training before every store opening and during ongoing team meetings.

Embarc takes compliance audits seriously and promptly addresses any deficiencies found. Within 48 hours, the Compliance Team meets to discuss and remedy the issue, a revised SOP is generated, and pushed to all stores, if necessary. Employees are trained on the new SOP during their next scheduled shift to avoid future issues.

Embarc seeks to strike the balance between aggressively pursuing strict compliance with creating a safe space for the team to ask questions, suggest revisions, and otherwise feel that compliance is approachable rather than intimidating. For that reason, compliance is treated as an ongoing conversation.

RIGOROUS ONGOING TRAINING & EDUCATION:

To ensure compliance with regulations, consistency is essential, and compliance must be a lived value rather than just a check box on a list. This means implementing initial and ongoing compliance education to keep SOPs top of mind and reinforce their importance.

Embarc Colusa's General Manager will receive in-store training at an existing Embarc location to gain real-world experience operating under our specific protocols and procedures. Members of Embarc's

leadership team will attend and co-lead the new store orientation and training alongside the Colusa General Manager to share best practices and provide resources for improving the operationalization of the store. This approach helps ensure that compliance is a lived value and it facilitates information sharing among Embarc leadership.

Using our "Train the Trainer" approach, after the Colusa General Manager is fully trained on all Embarc operations at existing locations, they will then be responsible for facilitating training for the Colusa team. All employees will complete training to ensure competency for their assigned functions before operations commence.

Initial training will include significant compliance and security training as part of the comprehensive multi-week training prior to opening a new store. Ongoing compliance education will include, but not be limited to, compliance quizzes, and weekly and quarterly re-trainings.

Demonstrated Experience with the Department of Cannabis Control & Local Regulatory Agencies

Beyond standard regulatory compliance, Embarc has developed a uniquely collaborative working relationship with the California DCC. Over the past several years, the DCC has repeatedly engaged with Embarc for field training, regulatory education, and special event licensing, reflecting our reputation as a trusted operator with exemplary compliance systems. Our stores are recognized by the DCC as real-world examples of how regulated retail cannabis can operate safely, transparently, and in alignment with both the letter and spirit of state law.

EMBARC SACRAMENTO: Our Sacramento location, situated near the DCC's headquarters in Rancho Cordova, has become a hub for regulatory collaboration and education. DCC inspectors and staff frequently use the store as a live training

environment, allowing new inspectors to observe compliant operations in real time, including age verification, inventory management, track-and-trace procedures, and sales transactions. In August 2025, the DCC filmed an educational video for its Retail ID Campaign inside the store, demonstrating how Metrc's Retail ID system enhances transparency, traceability, and consumer confidence. The video highlights the consumer experience, showing how Retail ID QR codes link directly to certificates of analysis, ingredient lists, and product data.

EMBARC ALAMEDA: In October 2025, Embarc's Alameda store hosted the California Cannabis Appeals Panel (CCAP) and DCC leadership for a comprehensive educational tour focused on real-world compliance execution. During the visit, our leadership team demonstrated how compliance is embedded into daily operations through technology, documentation, and oversight.

EMBARC WOODLAND: Our Woodland location exemplifies our proactive approach to public safety and local partnership through our collaboration with the Woodland Police Department. The store's exterior surveillance system is integrated with the City of Woodland's Flock Safety camera network, an advanced, citywide system that uses fixed and PTZ (pan-tilt-zoom) cameras to capture and securely share license plate and vehicle data with law enforcement. This integration allows the Woodland Police Department to access live and recorded footage from our exterior cameras in real time, supporting investigations, improving response times, and enhancing neighborhood safety. By linking our system directly into the City's Flock network, Embarc ensures full transparency and seamless coordination with local law enforcement while maintaining strict compliance with privacy and data security standards under both state and local law.

LOCAL LAW ENFORCEMENT: It is standard practice for Embarc to grant local law enforcement live feed

access to our online surveillance viewing system. This access allows police departments to monitor our exterior and interior camera systems in real time, ensuring immediate visibility into store activity when needed for public safety or emergency response. All camera systems meet or exceed the DCC's security requirements and maintain continuous, high-definition recording for a minimum of 90 days. By granting direct access to local law enforcement agencies, Embarc promotes transparency, strengthens community trust, and enhances coordination in the event of incidents. This collaborative approach has been widely praised by law enforcement partners across multiple jurisdictions.

CALIFORNIA STATE FAIR CANNABIS EXHIBIT – EMBARC EVENTS: Embarc is proud to operate the nation's first state-licensed cannabis sales and consumption venue at the California State Fair in Sacramento, in partnership with the DCC and the City's Office of Cannabis Management. Launched in 2024 and continuing through 2025, this historic activation has required an unprecedented level of coordination between our compliance team, DCC licensing officials, and multiple state and local enforcement agencies. Every aspect of the operation, from access control and ID verification to inventory tracking, odor mitigation, and waste management, undergoes multiple rounds of pre-event inspection and onsite review. DCC inspectors work directly alongside Embarc staff during event setup and live operations to verify compliance in real time.

OUTSIDE LANDS GRASS LANDS – EMBARC EVENTS: Since 2021, Embarc has served as the licensed operator of Grass Lands, the cannabis area of the annual Outside Lands Music Festival in San Francisco's Golden Gate Park. This partnership involves close coordination with the DCC, the San Francisco Office of Cannabis, law enforcement, and public health officials. Our team works through multiple pre-event inspections and rigorous compliance walkthroughs to ensure every aspect of sales, storage, and consumption adheres

to both local and state regulations. The scale of Grass Lands, one of the largest and most visible regulated cannabis events in the country, requires exacting coordination and operational precision. DCC inspectors routinely conduct onsite evaluations during the festival, and our continued record of compliance has positioned Embarc as the benchmark for safe, responsible, and community-integrated event operations statewide.

Complying with City of Colusa Cannabis Ordinances & Zoning

While the State of California's laws and regulations regarding cannabis operations are thorough, the City has taken additional steps to maximize public health and safety. Embarc will maintain strict compliance with Colusa Municipal Code and all other relevant local rules and regulations, such as local building codes and zoning ordinances as further detailed below.

Embarc has extensive experience managing 16 operational storefronts across different California communities, each of which has distinct local cannabis regulations. Our team is adept at managing these varied regulations while ensuring all store management and employees remain aware of both compliance and operational best practices. This experience positions us well to conform to the specific local laws of Colusa and ensures that our team is fully trained on how to meet all compliance requirements, including local safety and operational regulations. By combining this regulatory experience with a strong commitment to training and continuous improvement, Embarc Colusa will be fully equipped to maintain compliance with local laws while contributing positively to the community.

SEC. 12D-8. OPERATING REQUIREMENTS FOR CANNABIS DISPENSARIES

A. Compliance with Laws

Embarc's owners and operators will ensure that the Colusa dispensary operates at all times in full compliance with all applicable federal (to the

extent applicable), state, and local laws, regulations, licensing requirements, and any conditions imposed by the City as part of the cannabis dispensary permit. Embarc will also comply with any subsequently enacted laws, regulations, or operational requirements adopted by the City of Colusa.

B. Fees, Charges, & Taxes

Embarc will timely pay all City fees, charges, and applicable taxes required for the operation of the cannabis dispensary. The dispensary will also pay all applicable sales, use, business, cannabis, and other taxes required under federal, state, and local law. Embarc will cooperate fully with the City regarding any reasonable audit or review of books and records for purposes of verifying compliance with tax and fee obligations.

C. Hours of Operation

Embarc will limit public access to the storefront cannabis dispensary to the hours of 8:00 A.M. to 8:00 P.M., Monday through Sunday, or such other hours as may be expressly authorized in its cannabis dispensary permit. Delivery operations will be conducted only during permitted hours.

D. Restriction on Consumption

Embarc will strictly prohibit the consumption of cannabis or cannabis products on the premises or in any areas adjacent to the dispensary, in accordance with City and State law.

E. Outdoor Storage

No cannabis or cannabis products will be stored outdoors at any time.

F. Reporting, Tracking, & Gross Sales

Embarc will utilize a State-compliant point-of-sale and inventory tracking system capable of tracking cannabis inventory, sales by weight and transaction, and gross sales. The system will maintain historical transactional data and will be compatible with City record-keeping requirements. Records will be made available to the City Manager or designee upon request.

G. Licensed Supply Chain

All cannabis and cannabis products sold by Embarc will be cultivated, manufactured, distributed, and transported exclusively by properly licensed State-authorized cannabis businesses operating in full compliance with State and local regulations.

H. Emergency Contact

Embarc will provide the City Manager or designee with the name and telephone number (mobile preferred, if available) of an owner and/or manager who can be reached at any hour for emergency notifications.

I. Signage & Notices

Embarc will ensure all signage complies with the Colusa Municipal Code and will obtain all required City sign permits. No signage will obstruct entrances, exits, or windows. Required notices prohibiting on-site consumption will be clearly posted at each entrance.

J. Minors

Embarc will strictly prohibit access by minors except as permitted by law and will not employ any individual under twenty-one (21) years of age. Age-restriction signage will be posted at all entrances, and delivery drivers will meet all legal requirements.

K. Odor Control

Embarc will install and maintain industry-leading odor control systems, including exhaust air filtration and negative air pressure systems, to ensure cannabis odors are not detectable outside the premises or in adjacent properties or public rights-of-way. Manufacturer certifications will be provided as required.

L. Display of Permit & Business License

The City-issued cannabis business permit and business license will be posted inside the dispensary in a location readily visible to the public.

M. Background Checks

All owners, managers, and supervisors will submit fingerprints and required information for background checks conducted by the Colusa Police Department. Embarc will pay all required fees and comply with all background investigation requirements prior to permit issuance.

N. Loitering

Embarc will prohibit loitering on the premises and within fifty (50) feet of the dispensary and will enforce strict policies to ensure compliance.

O. Permits & Approvals

Prior to commencing operations, Embarc will obtain all required planning, zoning, building, and other applicable permits and approvals from the City and other relevant agencies.

ADDITIONAL DISPENSARY REQUIREMENTS (SEC. 12D-9)**Records & Recordkeeping**

Embarc will maintain accurate and complete financial, inventory, and ownership records and will provide required reports and sworn statements to the City upon request. Records will be made available for inspection within required timeframes.

Security Measures

Embarc will implement a City-approved security plan including surveillance cameras, alarms, access controls, panic buttons, licensed security personnel, secure storage, and emergency response protocols. Real-time and recorded video access will be provided to the City and Police Department as required.

Alcohol Restriction

No alcohol will be sold, dispensed, or consumed on or about the premises.

Age Verification

All customers will be age-verified prior to entry and prior to any sale or delivery.

On-Site Inventory Limits

Only quantities of cannabis reasonably anticipated to meet daily demand will be accessible in the retail area. Non-cannabis products will remain within permitted floor-area limits.

Restroom Controls

All restroom facilities will remain locked and under management control.

Packaging Compliance

All cannabis products will be dispensed in State-compliant packaging and will remain sealed until off the premises.

DELIVERY COMPLIANCE (SEC. 12D-10)

Embarc will conduct delivery operations in full compliance with State law. All delivery personnel will be Embarc employees and will verify the legal age of each delivery customer prior to dispensing any product.

OVERSIGHT, INSPECTION, & COMMUNITY RELATIONS (SEC. 12D-11)

Embarc will comply with all additional regulations promulgated by the City Manager and will participate in required community relations meetings. Embarc will designate a community relations contact, provide required outreach to nearby residents and businesses, support youth education initiatives, and fully cooperate with City inspections, audits, and enforcement actions.

Complying with State Law

The Department of Cannabis Control (DCC) has more than 200 pages of regulations governing commercial cannabis activity. For brevity, the following briefly summarizes compliance with the most relevant regulatory requirements.

§15000.1. GENERAL REQUIREMENTS: Embarc will obtain and maintain a valid license from the DCC for the premises at which commercial cannabis activity is conducted and will only conduct commercial cannabis activity between licensees.

Embarc will only conduct commercial cannabis activities authorized by the license and on the premises licensed for the activity and all transfers of cannabis and cannabis product will be conducted by a licensed distributor. Embarc license will not be transferable or assignable to another person or premises, except as provided in §26050.2 of the California Business and Professions Code (CA BPC), and in the event of the sale or other transfer of the commercial cannabis business, changes in ownership will be made in accordance with §15023. Embarc will use its legal business name on all documents related to commercial cannabis activity.

§15000.5. RESPONSIBILITY FOR ACTS OF EMPLOYEES AND AGENTS: Embarc acknowledges that the act, omission, or failure of an agent, officer, representative, or other person acting for or employed by Embarc, within the scope of their employment or office, will in every case be deemed the act, omission, or failure of Embarc.

§15000.6. AGE RESTRICTION: Embarc will not retain or employ anyone under the age of 21.

§15000.7. STORAGE OF INVENTORY: Embarc will store all inventory on the licensed premises and within a limited-access area. No cannabis goods will be stored outdoors. Employee break rooms, changing facilities, and bathrooms will be separated from all storage areas.

§15002. ANNUAL LICENSE APPLICATION REQUIREMENTS: Embarc will comply with all license submission and maintenance requirements as specified by the DCC.

§15025. ADDITIONAL PREMISES REQUIREMENTS FOR RETAILERS AND MICROBUSINESSES AUTHORIZED TO ENGAGE IN RETAIL: Embarc will only serve customers who are within the licensed premises, or at a delivery address that meets DCC requirements. Embarc will not sell or deliver cannabis goods through a pass-out window or slide-out tray to the exterior of the premises and

will not operate as or with a drive-in or drive-through. No cannabis goods will be sold to any person within a motor vehicle, except for curbside delivery conducted pursuant to §15504. Alcoholic beverages will not be stored or consumed on the premises. Cannabis goods will not be dispersed in the air by an oil diffuser or any other vaporizing device. No cannabis consumption will occur onsite unless expressly permitted as a cannabis lounge and with appropriate State and local licensing.

§15034. SIGNIFICANT DISCREPANCY IN INVENTORY: Embarc will determine whether a discrepancy in inventory is significant based upon a five percent difference between the physical inventory and the inventory recorded in the track-and-trace system.

§15036. NOTIFICATION OF THEFT, LOSS, AND CRIMINAL ACTIVITY: Embarc will notify the DCC and local law enforcement within 24 hours of discovery of any of the following: a significant discrepancy, as defined in §15034, in inventory; diversion, theft, loss, or any other criminal activity pertaining to operations; diversion, theft, loss, or any other criminal activity by an agent or employee pertaining to operations; loss or unauthorized alteration of records related to cannabis or cannabis products, customers, or employees or agents; or any other breach of security.

§15037. GENERAL RECORD RETENTION REQUIREMENTS: Embarc will keep and maintain the following records related to commercial cannabis activity for at least seven years: financial records, personnel records, training, contracts with other licensees, permits, licenses, and other authorizations to conduct commercial cannabis activity, security records, records relating to the composting or destruction of cannabis goods, documentation for data in the track-and-trace system, and all other documents prepared or executed by an owner or their employees or assignees in connection with the licensed commercial cannabis business. All required records will be legible and will be stored in a

secured area where they are protected from debris, moisture, contamination, hazardous waste, fire, and theft. All records are subject to review by the DCC as well as other governmental agencies.

§15039. LICENSE POSTING REQUIREMENT: Embarc will prominently display all licenses on the premises where they can be viewed by agencies and within plain sight of the public. Embarc will post its DCC-issued QR Code, where it can be scanned from outside of the premises, at the size indicated in this section and of sufficient clarity that the code can be read by a smartphone or device capable of reading QR Codes from a distance of at least three feet.

§15040. ADVERTISING PLACEMENT & PROHIBITIONS: Any advertising or marketing that is placed in broadcast, cable, radio, print, and digital communications will only be displayed after Embarc has obtained reliable up-to-date audience composition data (as defined in regulations) demonstrating that at least 71.6% of the audience viewing the advertising is reasonably expected to be 21 years of age or older; will not use any depictions or images of minors or anyone under 21 years of age; will not use any images that are attractive to children; will not imitate candy packaging or labeling or utilize the terms “candy” or “candies” or variants in spelling; and will not advertise free cannabis goods or cannabis accessories. Embarc will provide the DCC audience composition data for advertising or marketing upon request. If the DCC determines that audience composition data for advertising or marketing provided does not comply with these requirements, Embarc will remove the advertising or marketing placement. Any outdoor signs, including billboards, will be affixed to a building or permanent structure, will comply with the provisions of the Outdoor Advertising Act, commencing with §5200 of the CA BPC, if applicable, and will not be located within a 15-mile radius of the California border on an Interstate Highway or on a State Highway that crosses the California border.

§15040.1. MARKETING CANNABIS GOODS AS ALCOHOLIC PRODUCTS: Embarc will not market, advertise, sell, or transport cannabis goods that are labeled as beer, wine, liquor, spirits, or any other term that may create a misleading impression that the product is an alcoholic beverage.

§15041. AGE CONFIRMATION IN ADVERTISING: Prior to any advertising or marketing involving direct, individualized communication or dialogue, Embarc will use age affirmation to verify that the recipient is 21 years of age or older. Direct, individualized communication or dialogue may occur through any form of communication and a method of age verification is not necessary for a communication if Embarc can verify that it has previously had the intended recipient undergo a method of age affirmation and is reasonably certain that the communication will only be received by the intended recipient. Embarc will use a method of age affirmation before having a potential customer added to a mailing list, subscribe, or otherwise consent to receiving direct, individualized communication or dialogue from Embarc.

§15041.1. BRANDED MERCHANDISE: Branded merchandise (non-consumable consumer goods utilized for advertising and marketing purposes) will include Embarc's license number in a manner that is permanently affixed to the merchandise, legible, and clearly visible from the outside of the merchandise. It will not be designed in a manner attractive to children.

§15041.2, §15041.3, §15041.4, §15041.5, §15041.6 AND §15041.7. TRADE SAMPLES: Embarc will obtain trade samples in compliance with all pertinent regulations.

§15042. PREMISES ACCESS REQUIREMENTS: Only employees and other authorized individuals can access the licensed premises. All permitted non-employee individuals will be escorted by an

employee at all times, and Embarc will maintain a record of all such access, including the name, company, reason for entry, date, and times entered and exited. These records will be available upon request. Embarc will never obtain compensation for such access.

§15043. LICENSEE EMPLOYEE BADGE REQUIREMENT: All agents, officers, or other persons acting for or employed by Embarc will display a laminated or plastic-coated identification badge issued by Embarc at all times while engaging in commercial cannabis activity. The identification badge will, at a minimum, include Embarc's "doing business as" name and license number, the employee's first name, an employee number exclusively assigned to that employee for identification purposes, and a color photograph of the employee that clearly shows the full front of the employee's face and that is at least 1" in width and 1.5" in height.

§15044 – §15047. VIDEO SURVEILLANCE SYSTEM, SECURITY PERSONNEL, LOCKS, & ALARM SYSTEM: Embarc will comply with all regulations pertaining to security as outlined in §15044. – §15047.

§15047.1. – §15051. TRACK-AND-TRACE: Embarc will comply with all regulations pertaining to CCTT-Metric, as outlined in §15047.1. – §15051.

§15052. RETURNS: Embarc may return cannabis and cannabis products to the originating licensee for lawful business purposes in accordance with the following:

- Cannabis and cannabis products will not be reprocessed, rebranded, relabeled, physically repackaged, have their expiration dates amended, or be modified in any way without prior approval from the DCC.
- Returns of cannabis and cannabis products will be recorded in the track-and-trace system on a return manifest that will contain the reason for the return.

- Cannabis and cannabis products will not be transported pursuant to a return unless Embarc and the licensee receiving the cannabis and cannabis products have both consented to the return.

§15052.1. ACCEPTANCE OR REJECTION OF SHIPMENTS: Embarc will accept or reject, in whole, shipments of cannabis or cannabis products. If Embarc receives a shipment containing any cannabis/products that were damaged during transportation, Embarc will reject that portion of the shipment that was damaged. If Embarc receives a shipment containing cannabis or cannabis products that is non-compliant with labeling requirements or exceeds its provided expiration date, Embarc will reject the portion of the shipment that is non-compliant with labeling requirements or expired. When rejecting a shipment of cannabis or cannabis products, whether in whole or in part, Embarc will record in the track-and-trace system and indicate on any relevant manifest, invoice, or sales receipt the specific reason for rejection.

§15400. ACCESS TO RETAILER PREMISES: Access will be limited to those over the age of 21.

§15402. CUSTOMER ACCESS TO THE RETAIL AREA: Customers will only be granted access to the retail area to purchase cannabis goods after an Embarc employee has confirmed the individual's age and identity. At least one employee will be physically present in the retail area at all times a customer is present. Sales will only occur in the retail sales area, or via authorized delivery.

§15403. HOURS OF OPERATION: Embarc acknowledges that pursuant to State law, cannabis retail storefronts may operate between the hours of 6 am and 10 pm, but will comply with the more restrictive hours set by the City of Colusa—8am to 8pm.

§15403.1. REQUIREMENTS WHILE NOT OPEN FOR BUSINESS: The licensed premises will be securely

locked with commercial-grade, nonresidential door locks and equipped with an active alarm system at any time it is not open for retail sales.

§15404. RETAIL CUSTOMERS: Embarc will only sell cannabis goods to individuals after confirming their age and identity via an acceptable form of identification.

§15405. CANNABIS GOODS DISPLAY: Cannabis goods for inspection and sale will only be displayed in the retail area. Cannabis goods may be removed from their packaging and placed in containers to allow for customer inspection but will not be readily accessible to customers without the assistance of an employee, who must provide the container to the customer for inspection. Goods removed from their packaging for display will not be sold or consumed and will be destroyed when no longer used for display.

§15406. CANNABIS GOODS FOR SALE: Embarc will not make any cannabis goods available for sale or delivery to a customer unless they were received from a licensed distributor or licensed microbusiness authorized to engage in distribution and Embarc has verified that the cannabis goods have not exceeded their best-by, sell-by, or expiration date if one is provided. In the case of manufactured cannabis products, the product must comply with all requirements of CA BPC §26130. The cannabis goods must have undergone laboratory testing as required by the DCC; the batch number must be labeled on the package of cannabis goods and must match the batch number on the corresponding Certificate of Analysis for regulatory compliance testing; the packaging and labeling of the cannabis goods complies with CA BPC §26120 and all applicable regulations within the Division as well as California Code of Regulations; and the cannabis goods comply with all applicable requirements found in the California statute and applicable State and local regulations.

§15407. SALE OF NON-CANNABIS GOODS: In addition to cannabis, Embarc may sell only

cannabis accessories and branded merchandise and may provide promotional materials.

§15408. SALE OF LIVE PLANTS AND SEEDS: Embarc will only sell live, immature cannabis plants and cannabis seeds if all of the following requirements are met: the plant is not flowering, is shorter and narrower than 18 inches, and the plant or seed originated from a nursery that holds a valid license from the DCC or a licensed microbusiness authorized to engage in cultivation. Embarc will not sell any other live plants and will never apply nor use any pesticide, nor cause any pesticide to be applied nor used, on live plants.

§15409. DAILY LIMITS: Embarc will not sell more than the following amounts to a single adult-use cannabis customer in a single day:

- 28.5 grams of non-concentrated cannabis.
- 8 grams of cannabis concentrate as defined in CA BPC §26001, including cannabis concentrate contained in cannabis products.
- 6 immature cannabis plants.

Embarc will not sell more than the following amounts to a single medicinal cannabis patient, or to a patient's primary caregiver purchasing medicinal cannabis on behalf of the patient, in a single day:

- 8 ounces of medicinal cannabis in the form of dried mature flowers or the plant conversion as provided in Health and Safety Code section 11362.77.
- 12 immature cannabis plants.

If a medicinal cannabis patient's valid physician's recommendation contains a different amount than the limits listed in this section, the medicinal cannabis patient may purchase an amount of medicinal cannabis consistent with the patient's needs as recommended by a physician and documented in the physician's recommendation.

The limits provided will not be combined to allow a customer to purchase goods in excess of any of the limits provided. We will be responsible for determining the amount of cannabis concentrates found in manufactured cannabis products sold to customers comply with the requirements set forth above.

§15410. CUSTOMER RETURN OF CANNABIS GOODS: Embarc will only accept returns of cannabis goods purchased from Embarc. We will not resell products that have been returned and will treat any cannabis goods abandoned on the premises as a return. Defective manufactured cannabis products returned by customers to Embarc will be destroyed pursuant to approved waste disposal practices or returned to the licensed distributor from which they were obtained.

§15412. PROHIBITION ON PACKAGING AND LABELING BY A RETAILER: Embarc will not accept, possess, or sell cannabis goods that are not packaged as they will be sold at final sale and will not package or label cannabis goods. We may place a barcode or similar sticker on the packaging of a cannabis good to be used in inventory tracking, but a barcode or similar sticker will not obscure any other required labels.

§15413. CANNABIS GOODS PACKAGING AND EXIT PACKAGING: All cannabis goods sold will comply with packaging. All purchases will not leave the premises unless placed in an opaque exit package. Immature plants and seeds are not required to be placed in resealable, tamper-evident, child-resistant packaging.

§ 15415. DELIVERY EMPLOYEES: All deliveries will be made in person by an employee who is at least 21 years of age and never through an "unstaffed" vehicle. Deliveries of cannabis goods will be received by customers only during compliant hours of operation. Delivery employees will return to the licensed premises after making their last delivery of the day if they have any unsold cannabis goods

to return to the premises. The delivery employee may not engage in any activities except for cannabis goods delivery and necessary rest, fuel, or vehicle repair stops.

A delivery employee will carry a copy of the commercial cannabis license and QR Code, the employee's government-issued identification, and an identification badge. Prior to providing cannabis goods to a delivery customer, a delivery employee will confirm the identity and age of the delivery customer as required by the identification verification procedures contained in this document. Embarc will maintain an accurate list of the delivery employees and will provide the list to government agencies as requested.

§15415.1. DELIVERIES FACILITATED BY TECHNOLOGY PLATFORMS: Embarc will not sell or otherwise transfer any cannabis goods to a customer through the use of an unlicensed third party, intermediary business, broker, or any other business or entity. Embarc may contract with a service that provides a technology platform to facilitate the sale and delivery of cannabis goods, in accordance with all of the following:

- Embarc does not allow for delivery of cannabis goods by a technology platform service provider.
- Embarc does not share in the profits of the sale of cannabis goods with the technology platform service provider, or otherwise provide for a percentage or portion of the cannabis goods sales to the technology platform service provider.
- Embarc will not advertise or market cannabis goods in conjunction with the technology platform service provider, outside of the technology platform, and will ensure that the technology platform service provider does not use Embarc's license number or legal business name on any advertisement or marketing that primarily promotes the services of the platform.

- Embarc will ensure the following information is provided to customers: any cannabis goods advertised or offered for sale on or through the technology platform will disclose, at a minimum, Embarc's business name and license number and customers placing an order for cannabis goods through the technology platform must be able to easily identify that each cannabis good is being ordered or purchased from Embarc. This information will be available to the customer prior to the customer placing an order or purchasing the cannabis goods.
- All required sales invoices and receipts, including any receipts provided to the customer, will disclose, at a minimum, Embarc's legal business name and license number.
- All other delivery, marketing, and advertising requirements under the Division are complied with.

§15416. DELIVERY TO A PHYSICAL ADDRESS: An Embarc delivery employee will only deliver cannabis goods to a physical address in California and will not leave the State while possessing cannabis goods. We will not deliver cannabis goods to an address located on publicly owned land or any address on land or in a building leased by a public agency. This prohibition applies to land held in trust by the United States for a tribe or an individual tribal member unless the delivery is authorized by and consistent with applicable tribal law. A delivery employee may deliver to any jurisdiction within California, provided that such delivery is conducted in compliance with all delivery provisions. A delivery employee will not deliver cannabis goods to a school providing instruction in kindergarten or any grades 1 through 12, daycare center, or youth center.

§15417. DELIVERY VEHICLE REQUIREMENTS: Employees will only travel in an enclosed motor vehicle while engaged in deliveries. Any vehicle used will be operated by an employee of Embarc.

A vehicle used in the delivery of cannabis goods will not have any marking or other indications on the exterior of the vehicle that may indicate that the delivery employee is carrying cannabis goods for delivery. Only store employees will be in the delivery vehicle.

While carrying cannabis goods for delivery, an employee will ensure the cannabis goods are not visible to the public. Cannabis goods will be stored in a secure, fully enclosed trunk that cannot be accessed from inside the vehicle, or in a secured area or compartment within the interior of the vehicle. A “secured area” is defined as an area where solid or locking metal partitions, cages, or high-strength shatterproof acrylic can be used to create a secure compartment in the fully enclosed vehicle. The secured area may be comprised on three sides by any part of the body of the vehicle, provided the parts of the vehicle used for the purposes of this section are shatterproof and are not made of glass.

The employee will not leave goods in an unattended motor vehicle unless it is locked and equipped with an active alarm system. Any cannabis goods left in an unattended vehicle must be stored in a container.

The vehicle will be outfitted with a dedicated Global Positioning System (GPS) device for identifying the location of the delivery vehicle and recording a history of all locations traveled to by the delivery employee while engaged in delivery. The device will be either permanently or temporarily affixed to the delivery vehicle and will always remain active and inside the delivery vehicle during delivery.

At all times, Embarc will be able to identify the geographic location of all delivery vehicles that are making deliveries and document the history of all locations traveled to by a delivery employee while engaged in delivery. Embarc will provide this information to the DCC as well as other government agencies upon request. The history of

all locations traveled to by a delivery employee while engaging in delivery will be maintained by Embarc for a minimum of 90 days.

Embarc will provide government agencies with information regarding any vehicle used for delivery, including the vehicle’s make, model, color, Vehicle Identification Number, license plate number and Department of Motor Vehicles registration information. Vehicles used to deliver cannabis goods may be stopped and inspected by the DCC at any licensed premises or during delivery.

§15418. CANNABIS GOODS CARRIED DURING DELIVERY: Embarc’s delivery employees will not carry cannabis goods in the delivery vehicle with a value in excess of \$10,000 at any time. The value of cannabis goods will be determined using the current retail price of all goods carried by, or within the delivery vehicle of, Embarc’s delivery employee. A delivery employee will depart and return to the same retail store before taking possession of any cannabis goods from another retail store performing deliveries.

Before leaving the licensed premises, Embarc’s delivery employees will have a delivery inventory ledger of all cannabis goods provided to them. The contents of the delivery inventory ledger will comply with the requirements of §15049.3. During the delivery trip, the delivery employee will maintain the delivery inventory ledger in either hard or electronic copy, which may be maintained in the track-and-trace system. After each customer delivery, the delivery inventory ledger will be updated to reflect the current inventory in the delivery employee’s possession. The delivery ledger will be updated in accordance with the requirements of §15049.3 and will be entered into the track-and-trace system no later than the end of the day on which the delivery occurred.

The delivery employee will maintain a log that includes all stops from the time the delivery employee leaves Embarc to the time that the

delivery employee returns to Embarc, and the reason for each stop. The log will be turned in to the delivery manager when the driver returns to Embarc. Embarc will maintain the log as a commercial cannabis activity record as required by the DCC. The log may be maintained electronically.

Prior to arrival at any delivery location, Embarc will have received a delivery request from the customer and provided the delivery request receipt to the delivery employee electronically or in hard copy. The delivery request receipt provided to the delivery employee will contain all the information previously described, except for the date and time the delivery was made, and the signature of the customer.

Immediately upon request by the DCC or any law enforcement officer, the delivery employee will provide: (1) All delivery inventory ledgers from the time the driver left Embarc up to the time of the request; (2) All delivery request receipts for cannabis goods carried by the driver, in the delivery vehicle, or any deliveries that have already been made to customers; and (3) The log of all stops from the time the delivery employee left Embarc up to the time of the request.

If the driver does not have any delivery requests to be performed for a 30-minute period, the driver will not make any additional deliveries and will return to the retail premises. Required meal breaks will not count toward the 30-minute period. Upon returning to the licensed premises, all undelivered cannabis goods will be returned to Embarc's inventory and recorded within the track-and-trace system in accordance with §15049.3.

§15419. CANNABIS CONSUMPTION DURING DELIVERY: A delivery employee will not consume cannabis goods while delivering cannabis goods to customers.

§15420. DELIVERY REQUEST RECEIPT: Embarc will prepare a hard copy or electronic delivery request receipt for each delivery of cannabis goods. The

delivery request receipt will contain the following: the name and address of Embarc; the first name and employee number of the delivery employee who delivered the order; the first name and employee number of the employee who prepared the order for delivery; the first name of the customer and a customer number for the person who requested the delivery; the date and time the delivery request was made; the delivery address; and a detailed description of all cannabis goods requested for delivery.

The description will include the weight, volume, or any other accurate measure of the amount of all cannabis goods requested; the total amount paid for the delivery, including any taxes or fees, the cost of the cannabis goods, and any other charges related to the delivery; and upon delivery, the date and time the delivery was made, and the handwritten or electronic signature of the customer who received the delivery.

At the time of the delivery, the delivery employee will provide the customer who placed the order with a hard or electronic copy of the delivery request receipt. The delivery employee will retain a hard or electronic copy of the signed delivery request receipt for the licensed retailer's records.

An employee number is a distinct number assigned by Embarc to an employee that would allow Embarc to identify the employee in documents or records using the employee number rather than the employee's full name. Embarc will be able to identify the employee associated with each employee number upon request from the DCC. A customer number is a distinct number assigned by Embarc to a customer that would allow Embarc to identify the customer in documents or records using the customer number rather than the customer's full name. Embarc will be able to identify the customer associated with each customer number upon request from the DCC or local regulators.

§15421. DELIVERY ROUTE: While making deliveries of cannabis goods, a delivery employee will only travel from Embarc to the delivery address; from one delivery address to another delivery address; or from a delivery address back to Embarc. A delivery employee will not deviate from the delivery path described in this section, except for necessary rest, fuel, or vehicle repair stops, or because road conditions make continued use of the route unsafe, impossible, or impracticable.

§15422. RECEIVING SHIPMENTS OF INVENTORY: Embarc will only receive a shipment of cannabis goods from a licensed distributor or licensed microbusiness authorized to engage in distribution and only within hours allowable by State law and local conditions. Shipments of cannabis goods will not enter the licensed premises through an entrance or exit that is available for use by the public.

§15423. INVENTORY DOCUMENTATION: Embarc will maintain an accurate record of its inventory and will be prepared to provide the DCC with the record of inventory immediately upon request. The record will include a description of each item such that the goods can be easily identified; the date and time the goods were received; the sell-by or expiration date (if any); the name and license number of the distributor; and the price paid for the goods (including taxes, delivery costs and any other costs).

§15424. INVENTORY RECONCILIATION: Embarc will be able to account for all its inventory. In conducting a reconciliation, Embarc will verify that the physical inventory is consistent with the records pertaining to inventory. The result of inventory reconciliation will be retained in our records and will be made available to the DCC upon request. If Embarc identifies any evidence of theft, diversion, or loss, we will notify the DCC and law enforcement.

In summary and as previously stated, Embarc has hundreds of pages of documents designed to conform with all State and local laws, regulations, industry best practices, and Embarc-specific proprietary procedures. The responses above are intended to provide a thorough overview of Embarc's comprehensive understanding of, and plans to conform to, pertinent State and local laws, but are not exhaustive of Embarc's ongoing efforts to maintain compliant operations.

COMMUNITY RELATIONS

PLAN:

A plan describing who is designated as being responsible for outreach and communication with the surrounding community, including the neighborhood and businesses, and how the designee can be contacted.

As previously noted in our Neighborhood Responsibility Plan, Embarc believes operating a cannabis business is a privilege and not a right and that a successful business model is predicated on consistently engaging the community to ensure transparency, integrity, and collaboration. Based on our experience operating compliant retail and delivery operations in other communities, we understand that proactive outreach and accessibility are vital to addressing concerns early and preventing issues from escalating.

PRIMARY DESIGNEE (DAY-TO-DAY COMMUNITY CONTACT): Once hired, the General Manager (GM)—who will live locally—will serve as the primary point of contact for community relations, outreach, and day-to-day communications with neighbors and nearby businesses. The GM will be responsible for receiving, logging, and responding to inquiries and concerns, coordinating resolutions, and ensuring timely follow-up.

HOW THE DESIGNEE CAN BE CONTACTED:

- Embarc will provide neighboring businesses and residents within 1,000 feet with the General Manager's contact information (name, phone number, and email) once the GM is hired.
- Embarc will also maintain a 24-hour telephone number (community hotline) for complaints and inquiries regarding the operation. A manager will be responsible for receiving, logging, and responding to communications daily in accordance with Embarc's written complaint-response protocol.

ESCALATION & OVERSIGHT: In addition to the General Manager's day-to-day responsibility, Embarc's Public & Government Affairs Team will support community communications as needed, and Embarc's owners and founders, Lauren Carpenter and Dustin Moore, will be available for escalation of any significant community concerns to ensure accountability at the highest level and to reinforce Embarc's commitment to being a responsible neighbor.

OUTREACH APPROACH: Embarc will proactively engage surrounding businesses and community stakeholders prior to opening and on an ongoing basis. This includes outreach to neighboring businesses to share operational information, identify partnership opportunities where appropriate, and ensure community members know exactly who to contact with questions or concerns. Embarc will also host community engagement opportunities such as open houses and ongoing "listening sessions" to maintain transparency and incorporate community feedback.

STATE LICENSES:

Copies of the state licenses relating to marijuana, including cultivation licenses, the applicant holds (when available).

Members of Embarc's founding team were driving forces behind California's successful effort to legalize adult use cannabis and continue to work tirelessly in shaping the State's ongoing refinement of regulations. This relevant experience, first in developing, implementing, and continually refining California's legal cannabis landscape, and now as operators navigating the rules we effectively wrote, is what gives Embarc a competitive advantage and informs and enhances Embarc's existing operations and those proposed here.

Under the leadership of founders and owners Lauren Carpenter and Dustin Moore, Embarc has successfully opened 16 legally permitted cannabis retail storefronts across California. These locations span a diverse range of jurisdictions, demonstrating Embarc's ability to navigate complex regulatory environments and operationalize compliant, community-centered cannabis businesses across the state. Lauren and Dustin are also in the process of launching several additional retail and delivery operations across California. Notably, all but two of Embarc's 20+ operational and pending licenses were secured through competitive, merit-based processes, underscoring our consistent success in developing businesses that align with and enhance the communities we serve. The remaining two were awarded through lottery processes.

Lauren and Dustin have assembled a leadership team with deep roots in the legal cannabis market and over a century of collective leadership experience in Fortune 500 companies, ensuring operational excellence, fiscal accountability, and the ability to deliver on commitments. Embarc's leadership also brings decades of combined expertise across cannabis, retail, supply chain management, and other highly regulated industries. This experience informs every aspect of our operations, from compliance and community relations to workforce development and customer education.

As the City of Colusa works to launch this nascent industry efficiently, creating local jobs, tax revenue, and meaningful community reinvestment, proven operators are essential. Embarc has consistently met that standard, opening first in nearly every jurisdiction where we've been licensed and setting the benchmark for safe, compliant, and community-centered operations that cities can trust.

Today, Embarc employs nearly 400 team members across California, and we anticipate increasing that number significantly in 2026 as new stores open. We achieved cash-flow positivity early in our growth, a rare distinction in the regulated cannabis industry, and have since recorded strong year-over-year revenue growth. In many jurisdictions, Embarc ranks among the top tax-generating businesses, alongside major companies such as Chevron, McDonald's, and Safeway.

Embarc's leadership and innovation have been recognized nationally. In both 2023 and 2025, Lauren and Dustin were honored on Forbes' 42.0 list, celebrating entrepreneurs transforming the cannabis industry through integrity, innovation, and community reinvestment. Lauren has also been recognized as a "Forty Under Forty" leader for her business acumen, leadership and proven community-centric approach. Additionally, Embarc's Chief Brand & Marketing Officer, Courtney Zalewski, was named to Adweek's 2025 Creative 100 list of "Brand Innovators Challenging the Status Quo" for redefining how cannabis is represented through inclusive, culturally resonant storytelling.

At the core of Embarc's success is a rigorous operational framework guided by comprehensive Standard Operating Procedures (SOPs), a commitment to compliance, and the continuous improvement of our systems through proprietary data and analytics. This framework is enhanced through our proven track record of direct engagement with diverse stakeholders including local regulators, public health and safety officers, and officials. This engagement is crucial to effective and collaborative implementation of local cannabis regulations for operators and for the cities they serve.

Equally central to our model is community investment. We have contributed over \$2 million in voluntary direct local benefits beyond local tax revenues, including partnerships with nonprofit organizations, youth education programs, and community development initiatives. We are proud to be the first cannabis company to partner with the Boys & Girls Club and to fund a third-party accredited youth drug education and prevention program through a national youth organization.

This proven record of safety, compliance, and meaningful local reinvestment positions Embarc to bring the same level of excellence and integrity to Colusa.

Detailed information about each of Embarc's operational businesses and copies of Department of Cannabis Control (DCC) licenses are provided on the following pages.

Operational Legal California Cannabis Businesses

Owners Lauren Carpenter and Dustin Moore have ownership of and/or operate the following operational cannabis businesses:

Business Name	State License Number	Address
Embarc Tahoe LLC DBA Embarc Tahoe	C10-0000695-LIC	4035 Lake Tahoe Blvd, South Lake Tahoe, CA 96150
Alameda Patients Group LLC DBA Embarc Alameda	C10-0000774-LIC	1616 Webster St, Alameda, CA 94501
Embarc Martinez LLC DBA Embarc Martinez	C10-0000786-LIC	3503 Alhambra Ave, Martinez, CA 94553
Embarc Events LLC	CEO14-0000067-LIC	N/A
Responsible and Compliant Retail Fairfield LLC DBA Embarc Fairfield	C10-0000939-LIC	180 Serrano Dr Suite A, Fairfield, CA 94533
Responsible and Compliant Retail Blackstone LLC DBA Embarc Fresno	C10-0001096-LIC	4592 N Blackstone Ave Suite 103, Fresno, CA 93726
Embarc Sacramento LLC DBA Embarc Sacramento	C10-0001168-LIC	6233 Mack Rd, Sacramento, CA 95823
Responsible and Compliant Retail Redwood City LLC DBA Embarc Redwood City	C10-0001213-LIC	1870 Broadway, Redwood City, CA 94063

Responsible and Compliant Retail Chico LLC DBA Embarc Chico	C10-0001236-LIC	185 Cohasset Rd, Chico, CA 95926
Responsible and Compliant Retail Ventura LLC DBA Embarc Ventura	C10-0001372-LIC	1890 E Main St, Ventura, CA 93001
Responsible and Compliant Retail Tracy LLC DBA Embarc Tracy	C10-0001397-LIC	2706 Pavilion Pkwy, Suite 110, Tracy, CA 95304
Embarc Meyers LLC DBA Embarc Meyers	C10-0001398-LIC	3008 Us Highway 50 S Lake Tahoe, CA 96150
Fontana Responsible and Compliant Retail LLC DBA Embarc Fontana	C10-0001432-LIC	9132 Sierra Ave, Fontana, CA 92335
1784 Shaw Retail LLC DBA Embarc Fresno	C10-0001442-LIC	1784 W Shaw Ave, Fresno, CA 93711
Responsible and Compliant Retail Madera LLC DBA Embarc Madera	C10-0001447-LIC	530 East Yosemite Ave, Madera, CA 93638
San Bruno Responsible and Compliant Retail LLC DBA Embarc San Bruno	C10-0001498-LIC	120 El Camino Real, San Bruno, CA 94066
Woodland Responsible and Compliant Retail LLC DBA Embarc Woodland	C10-0001571-LIC	825 East St, Woodland, CA 95776
Riverside Community Retail LLC DBA Embarc Riverside Magnolia (Opening March 2026)	C10-0001666-LIC	10919 Magnolia Ave, Riverside, CA 92505



Department of
Cannabis Control
CALIFORNIA

Department of Cannabis Control
licensing@cannabis.ca.gov, www.cannabis.ca.gov

Cannabis Retailer License Adult-Use and Medicinal

Business Name:

Alameda Patients Group LLC

Embarc Alameda

License Number: C10-0000774-LIC

License Type: Retailer
(Storefront)

The license authorizes Alameda Patients Group LLC to engage in commercial cannabis Retail (Storefront) at the premises address listed above until the expiration date of this license. This license issued is pursuant to Division 10 of the California Business and Professional Code and is not transferable to any other person or premises location. This license shall always be displayed in a prominent place at the licensed premises. This license shall be subject to suspension or revocation if the licensee is determined to be in violation of Division 10 of the Business and Professions Code or regulations adopted thereunder.

Premises Address:

1616 WEBSTER ST
ALAMEDA, CA 94501

Valid: 1/8/2021

Expires: 1/8/2027

Scan to verify this
license.



Non-Transferable

Post in Public View

Scan to verify this license.

**Valid:**

1/8/2021

Expires:

1/8/2027

License No:

C10-0000774-LIC

Legal Business Name:

Alameda Patients Group LLC
Embarc Alameda

Premises Address:

1616 WEBSTER ST
ALAMEDA, CA 94501

1. Use your smartphone camera to scan the QR code for licensing information.
2. If your camera doesn't have scanning functionality, you can look up a location at search.cannabis.ca.gov using license number C10-0000774-LIC.



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Cannabis Retailer License Adult-Use and Medicinal

Business Name:

RESPONSIBLE AND COMPLIANT RETAIL CHICO LLC

EMBARC CHICO

License Number: C10-0001236-LIC

License Type: Retailer
(Storefront)

The license authorizes RESPONSIBLE AND COMPLIANT RETAIL CHICO LLC to engage in commercial cannabis Retail (Storefront) at the premises address listed above until the expiration date of this license. This license issued is pursuant to Division 10 of the California Business and Professional Code and is not transferable to any other person or premises location. This license shall always be displayed in a prominent place at the licensed premises. This license shall be subject to suspension or revocation if the licensee is determined to be in violation of Division 10 of the Business and Professions Code or regulations adopted thereunder.

Premises Address:

185 COHASSET RD
CHICO, CA 95926-2201

APN:

006-180-040
CHICO

Valid: 3/13/2023

Expires: 3/12/2026

Scan to verify this
license.



Non-Transferable

Post in Public View

Scan to verify this license.

**Valid:**

3/13/2023

Expires:

3/12/2026

License No:

C10-0001236-LIC

Legal Business Name:

RESPONSIBLE AND COMPLIANT RETAIL
CHICO LLC
EMBARC CHICO

Premises Address:

185 COHASSET RD
CHICO, CA 95926-2201

APN:

006-180-040
CHICO

1. Use your smartphone camera to scan the QR code for licensing information.
2. If your camera doesn't have scanning functionality, you can look up a location at search.cannabis.ca.gov using license number C10-0001236-LIC.



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www.cannabis.ca.gov
(844) 612-2322

Cannabis - Event Organizer License

LICENSE NO:
CEO14-0000067-LIC

VALID:
5/28/2025

LEGAL BUSINESS NAME:
Embarc Events LLC

EXPIRES:
7/6/2026

MAILING:
1616 WEBSTER STREET
ALAMEDA, CA 94501



Non-Transferable

*Prominently display this license
as required by Title 16 CCR § 5039*



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Cannabis Retailer License Adult-Use and Medicinal

Business Name:

Responsible and Compliant Retail Fairfield LLC

Embarc Fairfield

License Number: C10-0000939-LIC

License Type: Retailer
(Storefront)

The license authorizes Responsible and Compliant Retail Fairfield LLC to engage in commercial cannabis Retail (Storefront) at the premises address listed above until the expiration date of this license. This license issued is pursuant to Division 10 of the California Business and Professional Code and is not transferable to any other person or premises location. This license shall always be displayed in a prominent place at the licensed premises. This license shall be subject to suspension or revocation if the licensee is determined to be in violation of Division 10 of the Business and Professions Code or regulations adopted thereunder.

Premises Address:

180 SERRANO DR, SUITE A
FAIRFIELD, CA 94533-6811

Valid: 1/26/2022

Expires: 1/26/2027

Scan to verify this
license.



Non-Transferable

Post in Public View

Scan to verify this license.

**Valid:**

1/26/2022

Expires:

1/26/2027

License No:

C10-0000939-LIC

Legal Business Name:

Responsible and Compliant Retail Fairfield
LLC
Embarc Fairfield

Premises Address:

180 SERRANO DR, SUITE A
FAIRFIELD, CA 94533-6811

1. Use your smartphone camera to scan the QR code for licensing information.
2. If your camera doesn't have scanning functionality, you can look up a location at search.cannabis.ca.gov using license number C10-0000939-LIC.



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Cannabis Retailer License Adult-Use and Medicinal

Business Name:

Fontana Responsible and Compliant Retail LLC

Embarc Fontana

License Number: C10-0001432-LIC

License Type: Retailer
(Storefront)

The license authorizes Fontana Responsible and Compliant Retail LLC to engage in commercial cannabis Retail (Storefront) at the premises address listed above until the expiration date of this license. This license issued is pursuant to Division 10 of the California Business and Professional Code and is not transferable to any other person or premises location. This license shall always be displayed in a prominent place at the licensed premises. This license shall be subject to suspension or revocation if the licensee is determined to be in violation of Division 10 of the Business and Professions Code or regulations adopted thereunder.

Premises Address:

9132 SIERRA AVE
FONTANA, CA 92335

Valid: 2/26/2024

Expires: 2/25/2026

Scan to verify this
license.



Non-Transferable

Post in Public View

Scan to verify this license.

**Valid:**

2/26/2024

Expires:

2/25/2026

License No:

C10-0001432-LIC

Legal Business Name:

Fontana Responsible and Compliant Retail
LLC
Embarc Fontana

Premises Address:

9132 SIERRA AVE
FONTANA, CA 92335

1. Use your smartphone camera to scan the QR code for licensing information.
2. If your camera doesn't have scanning functionality, you can look up a location at search.cannabis.ca.gov using license number C10-0001432-LIC.



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Cannabis Retailer License Adult-Use and Medicinal

Business Name:

RESPONSIBLE AND COMPLIANT RETAIL BLACKSTONE LLC

Embarc Fresno

License Number: C10-0001096-LIC

License Type: Retailer
(Storefront)

The license authorizes RESPONSIBLE AND COMPLIANT RETAIL BLACKSTONE LLC to engage in commercial cannabis Retail (Storefront) at the premises address listed above until the expiration date of this license. This license issued is pursuant to Division 10 of the California Business and Professional Code and is not transferable to any other person or premises location. This license shall always be displayed in a prominent place at the licensed premises. This license shall be subject to suspension or revocation if the licensee is determined to be in violation of Division 10 of the Business and Professions Code or regulations adopted thereunder.

Premises Address:

4592 N BLACKSTONE AVE
FRESNO, CA 93726-1912

Valid: 6/21/2022

Expires: 6/21/2026

Scan to verify this
license.



Non-Transferable

Post in Public View

Scan to verify this license.

**Valid:**

6/21/2022

Expires:

6/21/2026

License No:

C10-0001096-LIC

Legal Business Name:

RESPONSIBLE AND COMPLIANT RETAIL
BLACKSTONE LLC
Embarc Fresno

Premises Address:

4592 N BLACKSTONE AVE
FRESNO, CA 93726-1912

1. Use your smartphone camera to scan the QR code for licensing information.
2. If your camera doesn't have scanning functionality, you can look up a location at search.cannabis.ca.gov using license number C10-0001096-LIC.



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Cannabis Retailer License Adult-Use and Medicinal

Business Name:

1784 SHAW RETAIL LLC

Embarc

License Number: C10-0001442-LIC

License Type: Retailer
(Storefront)

The license authorizes 1784 SHAW RETAIL LLC to engage in commercial cannabis Retail (Storefront) at the premises address listed above until the expiration date of this license. This license issued is pursuant to Division 10 of the California Business and Professional Code and is not transferable to any other person or premises location. This license shall always be displayed in a prominent place at the licensed premises. This license shall be subject to suspension or revocation if the licensee is determined to be in violation of Division 10 of the Business and Professions Code or regulations adopted thereunder.

Premises Address:

1784 W SHAW AVE
FRESNO, CA 93711

Valid: 4/10/2024

Expires: 4/10/2026

Scan to verify this
license.



Non-Transferable

Post in Public View

Scan to verify this license.

**Valid:**

4/10/2024

Expires:

4/10/2026

License No:

C10-0001442-LIC

Legal Business Name:

1784 SHAW RETAIL LLC
Embarc

Premises Address:

1784 W SHAW AVE
FRESNO, CA 93711

1. Use your smartphone camera to scan the QR code for licensing information.
2. If your camera doesn't have scanning functionality, you can look up a location at search.cannabis.ca.gov using license number C10-0001442-LIC.



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Cannabis Retailer License Adult-Use and Medicinal

Business Name:

RESPONSIBLE AND COMPLIANT RETAIL MADERA LLC

Embarc Madera

License Number: C10-0001447-LIC

License Type: Retailer
(Storefront)

The license authorizes RESPONSIBLE AND COMPLIANT RETAIL MADERA LLC to engage in commercial cannabis Retail (Storefront) at the premises address listed above until the expiration date of this license. This license issued is pursuant to Division 10 of the California Business and Professional Code and is not transferable to any other person or premises location. This license shall always be displayed in a prominent place at the licensed premises. This license shall be subject to suspension or revocation if the licensee is determined to be in violation of Division 10 of the Business and Professions Code or regulations adopted thereunder.

Premises Address:

530 E YOSEMITE AVE
MADERA, CA 93638

Valid: 4/18/2024

Expires: 4/18/2026

Scan to verify this
license.



Non-Transferable

Post in Public View

Scan to verify this license.

**Valid:**

4/18/2024

Expires:

4/18/2026

License No:

C10-0001447-LIC

Legal Business Name:

RESPONSIBLE AND COMPLIANT RETAIL
MADERA LLC
Embarc Madera

Premises Address:

530 E YOSEMITE AVE
MADERA, CA 93638

1. Use your smartphone camera to scan the QR code for licensing information.
2. If your camera doesn't have scanning functionality, you can look up a location at search.cannabis.ca.gov using license number C10-0001447-LIC.



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Cannabis Retailer License Adult-Use and Medicinal

Business Name:

EMBARC MARTINEZ LLC

Embarc Martinez

License Number: C10-0000786-LIC

License Type: Retailer
(Storefront)

The license authorizes EMBARC MARTINEZ LLC to engage in commercial cannabis Retail (Storefront) at the premises address listed above until the expiration date of this license. This license issued is pursuant to Division 10 of the California Business and Professional Code and is not transferable to any other person or premises location. This license shall always be displayed in a prominent place at the licensed premises. This license shall be subject to suspension or revocation if the licensee is determined to be in violation of Division 10 of the Business and Professions Code or regulations adopted thereunder.

Premises Address:

3503 ALHAMBRA AVE
MARTINEZ, CA 94553-3910

Valid: 2/26/2021

Expires: 2/26/2026

Scan to verify this
license.



Non-Transferable

Post in Public View

Scan to verify this license.

**Valid:**

2/26/2021

Expires:

2/26/2026

License No:

C10-0000786-LIC

Legal Business Name:

EMBARC MARTINEZ LLC

Embarc Martinez

Premises Address:

3503 ALHAMBRA AVE

MARTINEZ, CA 94553-3910

1. Use your smartphone camera to scan the QR code for licensing information.
2. If your camera doesn't have scanning functionality, you can look up a location at search.cannabis.ca.gov using license number C10-0000786-LIC.



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Cannabis Retailer License Adult-Use and Medicinal

Business Name:
EMBARC MEYERS

Embarc Meyers

License Number: C10-0001398-LIC
License Type: Retailer
(Storefront)

The license authorizes EMBARC MEYERS to engage in commercial cannabis Retail (Storefront) at the premises address listed above until the expiration date of this license. This license issued is pursuant to Division 10 of the California Business and Professional Code and is not transferable to any other person or premises location. This license shall always be displayed in a prominent place at the licensed premises. This license shall be subject to suspension or revocation if the licensee is determined to be in violation of Division 10 of the Business and Professions Code or regulations adopted thereunder.

Premises Address:
3008 US HIGHWAY 50
S LAKE TAHOE, CA 96150-5222

Valid: 10/13/2023
Expires: 10/12/2026

Scan to verify this
license.



Non-Transferable

Post in Public View

Scan to verify this license.

**Valid:**

10/13/2023

Expires:

10/12/2026

License No:

C10-0001398-LIC

Legal Business Name:

EMBARC MEYERS

Embarc Meyers

Premises Address:

3008 US HIGHWAY 50

S LAKE TAHOE, CA 96150-5222

1. Use your smartphone camera to scan the QR code for licensing information.
2. If your camera doesn't have scanning functionality, you can look up a location at search.cannabis.ca.gov using license number C10-0001398-LIC.



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Cannabis Retailer License Adult-Use and Medicinal

Business Name:

RESPONSIBLE AND COMPLIANT RETAIL REDWOOD CITY LLC

Embarc Redwood City

License Number: C10-0001213-LIC

License Type: Retailer
(Storefront)

The license authorizes RESPONSIBLE AND COMPLIANT RETAIL REDWOOD CITY LLC to engage in commercial cannabis Retail (Storefront) at the premises address listed above until the expiration date of this license. This license issued is pursuant to Division 10 of the California Business and Professional Code and is not transferable to any other person or premises location. This license shall always be displayed in a prominent place at the licensed premises. This license shall be subject to suspension or revocation if the licensee is determined to be in violation of Division 10 of the Business and Professions Code or regulations adopted thereunder.

Premises Address:

1870 BROADWAY ST
REDWOOD CITY, CA
94063-2015

Valid: 1/17/2023

Expires: 1/17/2027

Scan to verify this
license.



Non-Transferable

Post in Public View

Scan to verify this license.

**Valid:**

1/17/2023

Expires:

1/17/2027

License No:

C10-0001213-LIC

Legal Business Name:

RESPONSIBLE AND COMPLIANT RETAIL
REDWOOD CITY LLC
Embarc Redwood City

Premises Address:

1870 BROADWAY ST
REDWOOD CITY, CA 94063-2015

1. Use your smartphone camera to scan the QR code for licensing information.
2. If your camera doesn't have scanning functionality, you can look up a location at search.cannabis.ca.gov using license number C10-0001213-LIC.



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Cannabis Retailer License Adult-Use and Medicinal

Business Name:
RIVERSIDE COMMUNITY RETAIL LLC

Embarc Riverside

License Number: C10-0001666-LIC
License Type: Retailer
(Storefront)

The license authorizes RIVERSIDE COMMUNITY RETAIL LLC to engage in commercial cannabis Retail (Storefront) at the premises address listed above until the expiration date of this license. This license issued is pursuant to Division 10 of the California Business and Professional Code and is not transferable to any other person or premises location. This license shall always be displayed in a prominent place at the licensed premises. This license shall be subject to suspension or revocation if the licensee is determined to be in violation of Division 10 of the Business and Professions Code or regulations adopted thereunder.

Premises Address:
10919 MAGNOLIA AVE
RIVERSIDE, CA 92505

APN:
142-261-009
RIVERSIDE, Riverside

Valid: 1/20/2026
Expires: 1/20/2027

Scan to verify this
license.



Non-Transferable

Post in Public View

Scan to verify this license.



Valid:
1/20/2026

Expires:
1/20/2027

License No:
C10-0001666-LIC

Legal Business Name:
RIVERSIDE COMMUNITY RETAIL LLC
Embarc Riverside

Premises Address:
10919 MAGNOLIA AVE
RIVERSIDE, CA 92505

APN:
142-261-009
RIVERSIDE, Riverside

1. Use your smartphone camera to scan the QR code for licensing information.
2. If your camera doesn't have scanning functionality, you can look up a location at search.cannabis.ca.gov using license number C10-0001666-LIC.



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Cannabis Retailer License Adult-Use and Medicinal

Business Name:
EMBARC SACRAMENTO LLC

Embarc Sacramento

License Number: C10-0001168-LIC
License Type: Retailer
(Storefront)

The license authorizes EMBARC SACRAMENTO LLC to engage in commercial cannabis Retail (Storefront) at the premises address listed above until the expiration date of this license. This license issued is pursuant to Division 10 of the California Business and Professional Code and is not transferable to any other person or premises location. This license shall always be displayed in a prominent place at the licensed premises. This license shall be subject to suspension or revocation if the licensee is determined to be in violation of Division 10 of the Business and Professions Code or regulations adopted thereunder.

Premises Address:
6233 MACK RD
SACRAMENTO, CA 95823-4667

APN:
118-0103-017-0000
SACRAMENTO

Valid: 7/26/2022
Expires: 7/26/2026

Scan to verify this
license.



Non-Transferable

Post in Public View

Scan to verify this license.

**Valid:**

7/26/2022

Expires:

7/26/2026

License No:

C10-0001168-LIC

Legal Business Name:

EMBARC SACRAMENTO LLC

Embarc Sacramento

Premises Address:

6233 MACK RD
SACRAMENTO, CA 95823-4667

APN:

118-0103-017-0000
SACRAMENTO

1. Use your smartphone camera to scan the QR code for licensing information.
2. If your camera doesn't have scanning functionality, you can look up a location at search.cannabis.ca.gov using license number C10-0001168-LIC.



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Cannabis Retailer License Adult-Use and Medicinal

Business Name:

SAN BRUNO RESPONSIBLE AND COMPLIANT RETAIL LLC

Embarc San Bruno

License Number: C10-0001498-LIC

License Type: Retailer
(Storefront)

The license authorizes SAN BRUNO RESPONSIBLE AND COMPLIANT RETAIL LLC to engage in commercial cannabis Retail (Storefront) at the premises address listed above until the expiration date of this license. This license issued is pursuant to Division 10 of the California Business and Professional Code and is not transferable to any other person or premises location. This license shall always be displayed in a prominent place at the licensed premises. This license shall be subject to suspension or revocation if the licensee is determined to be in violation of Division 10 of the Business and Professions Code or regulations adopted thereunder.

Premises Address:

120 EL CAMINO REAL
SAN BRUNO, CA 94066

APN:

21172240
SAN BRUNO, San Mateo

Valid: 10/10/2024

Expires: 10/10/2026

Scan to verify this
license.



Non-Transferable

Post in Public View

Scan to verify this license.

**Valid:**

10/10/2024

Expires:

10/10/2026

License No:

C10-0001498-LIC

Legal Business Name:

SAN BRUNO RESPONSIBLE AND
COMPLIANT RETAIL LLC
Embarc San Bruno

Premises Address:

120 EL CAMINO REAL
SAN BRUNO, CA 94066

APN:

21172240
SAN BRUNO, San Mateo

1. Use your smartphone camera to scan the QR code for licensing information.
2. If your camera doesn't have scanning functionality, you can look up a location at search.cannabis.ca.gov using license number C10-0001498-LIC.



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Cannabis Retailer License Adult-Use and Medicinal

Business Name:
EMBARC TAHOE LLC

Embarc Tahoe

License Number: C10-0000695-LIC
License Type: Retailer
(Storefront)

The license authorizes EMBARC TAHOE LLC to engage in commercial cannabis Retail (Storefront) at the premises address listed above until the expiration date of this license. This license issued is pursuant to Division 10 of the California Business and Professional Code and is not transferable to any other person or premises location. This license shall always be displayed in a prominent place at the licensed premises. This license shall be subject to suspension or revocation if the licensee is determined to be in violation of Division 10 of the Business and Professions Code or regulations adopted thereunder.

Valid: 3/11/2020
Expires: 3/11/2026

Scan to verify this
license.



Non-Transferable

Post in Public View

Scan to verify this license.

**Valid:**

3/11/2020

Expires:

3/11/2026

License No:

C10-0000695-LIC

Legal Business Name:

EMBARC TAHOE LLC

Embarc Tahoe

1. Use your smartphone camera to scan the QR code for licensing information.
2. If your camera doesn't have scanning functionality, you can look up a location at search.cannabis.ca.gov using license number C10-0000695-LIC.



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Cannabis Retailer License Adult-Use and Medicinal

Business Name:

RESPONSIBLE AND COMPLIANT RETAIL TRACY LLC

Embarc Tracy

License Number: C10-0001397-LIC

License Type: Retailer
(Storefront)

The license authorizes RESPONSIBLE AND COMPLIANT RETAIL TRACY LLC to engage in commercial cannabis Retail (Storefront) at the premises address listed above until the expiration date of this license. This license issued is pursuant to Division 10 of the California Business and Professional Code and is not transferable to any other person or premises location. This license shall always be displayed in a prominent place at the licensed premises. This license shall be subject to suspension or revocation if the licensee is determined to be in violation of Division 10 of the Business and Professions Code or regulations adopted thereunder.

Valid: 10/13/2023

Expires: 10/12/2026

Scan to verify this
license.



Non-Transferable

Post in Public View

Scan to verify this license.

**Valid:**

10/13/2023

Expires:

10/12/2026

License No:

C10-0001397-LIC

Legal Business Name:

RESPONSIBLE AND COMPLIANT RETAIL
TRACY LLC
Embarc Tracy

1. Use your smartphone camera to scan the QR code for licensing information.
2. If your camera doesn't have scanning functionality, you can look up a location at search.cannabis.ca.gov using license number C10-0001397-LIC.



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Cannabis Retailer License Adult-Use and Medicinal

Business Name:

Responsible and Compliant Retail Ventura LLC

Embarc Ventura

License Number: C10-0001372-LIC

License Type: Retailer
(Storefront)

The license authorizes Responsible and Compliant Retail Ventura LLC to engage in commercial cannabis Retail (Storefront) at the premises address listed above until the expiration date of this license. This license issued is pursuant to Division 10 of the California Business and Professional Code and is not transferable to any other person or premises location. This license shall always be displayed in a prominent place at the licensed premises. This license shall be subject to suspension or revocation if the licensee is determined to be in violation of Division 10 of the Business and Professions Code or regulations adopted thereunder.

Premises Address:

1890 MAIN ST E
VENTURA, CA 93001-3469

APN:

073-0-201-265
VENTURA

Valid: 8/1/2023

Expires: 7/31/2026

Scan to verify this
license.



Non-Transferable

Post in Public View

Scan to verify this license.

**Valid:**

8/1/2023

Expires:

7/31/2026

License No:

C10-0001372-LIC

Legal Business Name:

Responsible and Compliant Retail Ventura LLC

Embarc Ventura

Premises Address:

1890 MAIN ST E
VENTURA, CA 93001-3469

APN:

073-0-201-265
VENTURA

1. Use your smartphone camera to scan the QR code for licensing information.
2. If your camera doesn't have scanning functionality, you can look up a location at search.cannabis.ca.gov using license number C10-0001372-LIC.



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Cannabis Retailer License Adult-Use and Medicinal

Business Name:

WOODLAND RESPONSIBLE AND COMPLIANT RETAIL LLC

Embarc Woodland

License Number: C10-0001571-LIC

License Type: Retailer
(Storefront)

The license authorizes WOODLAND RESPONSIBLE AND COMPLIANT RETAIL LLC to engage in commercial cannabis Retail (Storefront) at the premises address listed above until the expiration date of this license. This license issued is pursuant to Division 10 of the California Business and Professional Code and is not transferable to any other person or premises location. This license shall always be displayed in a prominent place at the licensed premises. This license shall be subject to suspension or revocation if the licensee is determined to be in violation of Division 10 of the Business and Professions Code or regulations adopted thereunder.

Premises Address:

825 EAST ST, SUITE 102 & 103
WOODLAND, CA 95776

APN:

066-111-028
WOODLAND, Yolo

Valid: 4/23/2025

Expires: 4/23/2026

Scan to verify this
license.



Non-Transferable

Post in Public View

Scan to verify this license.

**Valid:**

4/23/2025

Expires:

4/23/2026

License No:

C10-0001571-LIC

Legal Business Name:

WOODLAND RESPONSIBLE AND
COMPLIANT RETAIL LLC
Embarc Woodland

Premises Address:

825 EAST ST, SUITE 102 & 103
WOODLAND, CA 95776

APN:

066-111-028
WOODLAND, Yolo

1. Use your smartphone camera to scan the QR code for licensing information.
2. If your camera doesn't have scanning functionality, you can look up a location at search.cannabis.ca.gov using license number C10-0001571-LIC.



Department of
Cannabis Control
CALIFORNIA

TAX COMPLIANCE:

A current copy of the applicant's city business operations tax certificate, state sales tax seller's permit, and the applicant's most recent year's financial statement and tax returns (for first-time applicants, the business operations tax account will be set up in-house after the application has been submitted).

Colusa Responsible and Compliant Retail LLC is a newly formed, project-specific entity created solely for the purpose of pursuing and, if awarded, operating the proposed retail storefront cannabis dispensary and delivery operation within the City of Colusa. As a new entity that is not yet operational, Colusa Responsible and Compliant Retail LLC does not currently have a City business operations tax certificate, a California Department of Tax and Fee Administration (CDTFA) seller's permit, or prior-year financial statements, tax returns, or historical financials.

Consistent with the City's guidance for first-time applicants, these accounts and registrations will be established at the appropriate time following application submission and prior to commencement of operations, if Embarc is selected for licensure in Colusa.

Notwithstanding the above, Embarc maintains a robust finance, accounting, and compliance infrastructure to ensure the timely and accurate payment of all applicable local and State taxes for our 16 operational dispensaries throughout California, and to support proper financial controls from day one. Embarc's finance and accounting team oversees budgeting, financial reporting, and tax compliance across our operating retail locations, including:

- Establishing and maintaining tax registrations and business accounts prior to opening;
- Timely remittance of applicable sales and cannabis taxes in accordance with CDTFA and local requirements;

- Ongoing reconciliation and internal controls to support accurate reporting; and
- Coordination with external tax professionals and advisors as needed to ensure full compliance.

Upon selection, Colusa Responsible and Compliant Retail LLC will promptly apply for all required City and State tax registrations and will provide copies of the business operations tax certificate, seller's permit, and required financial documentation to the City as they become available and prior to the start of commercial operations.

Embarc's approach to maintaining financial documents and records is anchored by the profound expertise and leadership of our Finance and Accounting Team. This team is structured to ensure meticulous financial oversight, with all senior-level accountants holding degrees in accounting and operating under the supervision of a Certified Public Accountant.

At the forefront of our financial strategy and oversight is Tessa O'Dowd, our Chief Financial Officer, with a career spanning over two decades. Tessa combines her financial expertise with in-depth knowledge of California's regulated industries to drive Embarc's fiscal strategy. As CFO, Tessa's acumen is central to Embarc's fiscal health, guiding the company through the intricacies of the cannabis sector with adept financial reporting, insightful analysis, and comprehensive strategic planning.

The team is further enriched by Tracy Nguyen, the Accounting Manager, and Sam Harrison, the Senior Accountant, and other staff members. Each team member contributes specialized skills, from state auditing to multi-state account management, forming a collaborative unit that ensures Embarc's financial data is both precise and reliable. This collective expertise fortifies Embarc's financial processes, from the creation to the auditing of financial statements, safeguarding each store's

adherence to industry regulations and fiscal health.

In preparing financial statements, Embarc Colusa will follow a rigorous process that involves the integration of our Treez software, which handles cannabis track-and-trace and point-of-sale data, with our financial management system, Sage Intacct. This integration allows for real-time monitoring and accurate financial reporting, which is critical to cannabis businesses and the complex regulatory environment.

Embarc Colusa will prepare balance sheets, income statements, and cash flow statements. These documents provide a comprehensive overview of our financial health and are essential for strategic planning, investor relations, and compliance with tax regulations.

The process begins with the collection of detailed sales and inventory data from Treez, ensuring that every transaction is accounted for. This data is then seamlessly transferred to Sage Intacct, where it is used to prepare the various financial statements. Our Accounting Team meticulously reviews this information to ensure that it is complete, accurate, and compliant with both the Generally Accepted Accounting Principles (GAAP) and the unique financial reporting requirements of the cannabis industry.

Finally, our financial statements undergo a review process to ensure they are free of errors and misstatements. This includes reconciliations, analysis of financial ratios, and, where necessary, adjustments to reflect the true financial position of Embarc Colusa. Through this diligent process, we maintain transparency and uphold the trust of our stakeholders.

Embarc stands out in the cannabis industry with its commitment to annual third-party financial audits conducted by a leading accounting and advisory services firm. This far exceeds standard accounting practices in the sector, underscoring our

dedication to transparency and responsible operations. The firm is a multidisciplinary financial services firm, offering the collective intelligence of professionals committed to delivering exceptional client service across a wide range of tax, accounting, audit, business advisory, valuation, financial planning, wealth management and support services. This ensures that Embarc audits are not only aligned with our business functions but also encompass a broader scope, considering long-term strategies and risk assessment.

INSURANCE:

The applicant's certificate of commercial general liability insurance and endorsements and certificates of all other insurance related to the operation of the cultivation business.

Colusa Responsible and Compliant Retail LLC is a newly formed, project-specific entity created solely for the purpose of pursuing the proposed retail storefront cannabis dispensary and delivery operation in the City of Colusa. As the entity has not yet been selected to operate and is not yet licensed at the local or State level, it is not possible at this time to obtain or bind commercial cannabis insurance coverage.

Commercial cannabis insurance cannot be underwritten or issued until a business has received local authorization and the right to operate, as insurers require confirmed licensure, finalized premises information, and business details to calculate premiums and issue policies. Accordingly, certificates of commercial general liability insurance and related endorsements are not available at this stage of the application process.

To demonstrate readiness and compliance, Embarc has provided a letter from its insurance broker, HUB International Insurance Services, Inc., confirming that Colusa Responsible and Compliant Retail LLC will be able to obtain commercial general liability insurance and all other insurance required by the City and State immediately upon being selected to operate. The letter further confirms Embarc's established track record of securing insurance coverage that meets or exceeds municipal requirements in other jurisdictions.

If selected, Colusa Responsible and Compliant Retail LLC will promptly obtain and maintain all required insurance coverage in the amounts and forms required by the City of Colusa.

Docusign Envelope ID: E856005C-3706-41C2-A531-49D5F642E09B

January 28, 2026

To Whom It May Concern:

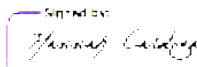
I am writing to confirm that Colusa Responsible and Compliant Retail LLC, will be able to obtain commercial general liability insurance, along with all necessary endorsements and certificates for any other coverage required to meet municipal and state insurance requirements for their proposed retail and delivery operations in Colusa. I am also writing to affirm that Embarc has a track record of being an exemplary client; they understand the importance of insurance and have secured coverage far beyond minimum requirements in other communities where they operate—a testament to that understanding.

Without confirmation that a business will operate at the location, it is not possible to underwrite and produce commercial cannabis insurance for a company, as insurance companies require building information and business receipts to generate premium calculations. Thus, no reputable insurer can provide commercial cannabis insurance unless a commercial cannabis business is properly licensed by the local jurisdiction and the State of California.

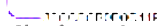
Should they be fortunate enough to receive a license, Colusa Responsible and Compliant Retail LLC will immediately obtain and maintain comprehensive commercial general liability insurance and any other insurance required by the City. All coverage will meet or exceed the amounts, types, and requirements established by the City of Colusa, pursuant to its applicable guidelines and policies. The City will be named as an additional insured on all required insurance policies. When the City of Colusa determines more specific insurance requirements for commercial cannabis retail storefronts within the City, Embarc will comply with those insurance requirements. Additionally, based on Embarc's current insurance policies in other communities, they have a track record of exceeding municipal requirements, including product liability, product loss, and a general liability balloon policy. This demonstrates how seriously they take this requirement.

In my discussions with the Company, they have indicated they are prepared to obtain insurance immediately upon notification from the City of being selected to operate and/or receiving the right to apply for a permit. At that time, we are prepared to facilitate the company obtaining sufficient insurance coverage.

Sincerely,

 Signed by:

1/30/2026


Charlotte Cardoza, CLCS, CISR, Lic. #4125518
Commercial Lines Account Manager
Cannabis Practice

Office: +1 310-207-8090

Email: charlotte.carlson@hubinternational.com

HUB International Insurance Services Inc., #0757776
16030 Ventura Blvd. #500, Encino, CA 91436

BUDGET:

A copy of the applicant's most recent annual budget for operations (if available).

Embarc has developed the following detailed budget and has sufficient capital in place to fully fund startup costs and initial operations. This budget is based on practical experience from a team that has operationalized dozens of dispensaries across careers spanning every element of the legal cannabis supply chain, as well as actual costs and best practices after opening and operating 16 Embarc dispensaries throughout California. It specifically contemplates costs associated with construction, operations, maintenance, compensation of employees, equipment, property lease, security equipment and staff, City fees, state fees, utility costs, product purchases, and other anticipated contingency costs.

We have more than enough working capital reserved to cover construction and operationalization for the proposed Colusa dispensary. Below are anticipated costs associated with construction and initial operationalization. These figures are informed by actual costs from other communities and have been verified by our construction team, which led the execution of Embarc's unique retail vision across multiple projects to date.

Uses of Capital	Amount
Equipment	\$100,000
Construction Costs, Leasehold Improvements	\$400,000
Financing Cost	-
Operations, Inventory Purchases	\$300,000
Operations, Maintenance	\$72,000
Operations, Professional Fees	-
Operations, Insurance	\$60,000
Operations, Other	\$38,491
Employee Compensation and Related Expenses	\$584,703
Property Lease, Security Deposit	\$16,000
Property Lease, Rent	\$72,000
Property Lease, Utilities	\$19,000
Security Equipment and Staff	\$120,000
Local Cannabis Business License and Application Fees	\$5,000
State Cannabis Business License and Application Fees	\$30,500
Total Startup Budget	\$1,817,694

PRO FORMA

Providing an accurate pro forma is critical to a city's ability to understand the revenue potential from these businesses. It is imperative that projections be rooted in reality rather than conjecture. We have generated the following assumptions based on practical experience operating existing cannabis dispensaries, robust market research, and documentation.

Our five-year pro forma demonstrates the business's strong financial position, operational discipline, and long-term solvency. The model reflects Embarc's proven ability to launch and operate profitable cannabis

retail businesses throughout California, supported by a leadership team with extensive financial and operational expertise.

These projections illustrate that Embarc Colusa has both the financial capacity and operational experience to meet its long-term obligations, maintain regulatory compliance, and deliver consistent community and economic benefits to the City of Colusa.

	Pre-Open Year 0	Year 1	Year 2	Year 3	Year 4	Year 5
Revenue						
Retail	-	\$3,060,256	\$3,213,269	\$3,373,932	\$3,542,629	\$3,719,760
Delivery	-	\$459,038	\$481,990	\$506,090	\$531,394	\$557,964
Total Revenue	-	\$3,519,294	\$3,695,259	\$3,880,022	\$4,074,023	\$4,277,724
Cost of Goods Sold						
Product COGS	-	\$1,689,261	\$1,773,724	\$1,862,410	\$1,955,531	\$2,053,308
Other COGS	-	\$17,596	\$18,476	\$19,400	\$20,370	\$21,389
Community Benefits (1.0%)	-	\$35,193	\$36,953	\$38,800	\$40,740	\$42,777
Total Cost of Goods Sold	-	\$1,742,051	\$1,829,153	\$1,920,611	\$2,016,641	\$2,117,473
Gross Profit	-	\$1,777,244	\$1,866,106	\$1,959,411	\$2,057,382	\$2,160,251
% Margin	<i>nmf</i>	50.5%	50.5%	50.5%	50.5%	50.5%
Operating Expenses						
Employee Compensation	\$83,529	\$1,002,348	\$1,020,757	\$1,115,293	\$1,204,808	\$1,305,579
Safety and Security	-	\$240,000	\$247,200	\$254,616	\$262,254	\$270,122
Advertising and Promotion	-	\$87,982	\$92,381	\$97,001	\$101,851	\$106,943
Rent	\$24,000	\$96,000	\$98,880	\$101,846	\$104,902	\$108,049
Utilities	\$6,000	\$25,000	\$24,720	\$25,462	\$26,225	\$27,012
Repairs and Maintenance	-	\$24,000	\$24,000	\$24,000	\$24,000	\$24,000
Custodian	-	\$12,000	\$12,000	\$12,000	\$12,000	\$12,000
Insurance	-	\$30,000	\$30,000	\$30,000	\$30,000	\$30,000

California Cannabis Business License	-	\$30,500	\$30,500	\$30,500	\$38,500	\$38,500
Local Cannabis Business License	\$5,000	\$5,000	\$5,000	\$5,000	\$5,000	\$5,000
Office Supplies	-	\$12,000	\$12,000	\$12,000	\$12,000	\$12,000
Meals and Entertainment	-	\$6,000	\$6,000	\$6,000	\$6,000	\$6,000
Vehicles	-	\$30,000	\$30,000	\$30,000	\$30,000	\$30,000
Employee Training	-	\$6,000	\$6,000	\$6,000	\$6,000	\$6,000
Uniforms	-	\$2,500	\$2,500	\$2,500	\$2,500	\$2,500
IT	-	\$18,000	\$18,000	\$18,000	\$18,000	\$18,000
Point of Sale	-	\$18,000	\$18,000	\$18,000	\$18,000	\$18,000
Total Operating Expenses	\$118,529	\$1,645,330	\$1,677,939	\$1,788,217	\$1,902,040	\$2,019,705
EBITDA	(\$118,529)	\$131,913	\$188,167	\$171,194	\$155,342	\$140,546
<i>% Margin</i>	<i>nmf</i>	<i>3.7%</i>	<i>5.1%</i>	<i>4.4%</i>	<i>3.8%</i>	<i>3.3%</i>
Federal Income Taxes	-	\$373,221	\$391,882	\$411,476	\$432,050	\$453,653
State Income Taxes	-	\$6,357	\$11,330	\$9,830	\$8,428	\$7,120
Depreciation and Amortization	-	\$60,000	\$60,000	\$60,000	\$60,000	\$60,000
Total Income Taxes and D&A	-	\$439,578	\$463,212	\$481,306	\$500,478	\$520,773
Net Income (Loss)	(\$118,529)	(\$307,665)	(\$275,045)	(\$310,112)	(\$345,137)	(\$380,227)
<i>% Margin</i>	<i>nmf</i>	<i>(8.7%)</i>	<i>(7.4%)</i>	<i>(8.0%)</i>	<i>(8.5%)</i>	<i>(8.9%)</i>

PRICE LIST:

A list of the most recent prices for all products and services provided by the applicant.

Embarc is committed to making cannabis accessible to a wide range of customers by offering a thoughtfully curated assortment across multiple price points. Our assortment architecture is intentionally designed to include value, good, better, and best options within each product category, ensuring customers can find products that meet both their needs and their budgets. The price ranges listed by product category vary significantly due to differences in product format, package size, potency, and quantity, such as single-serving edibles or beverages compared to multi-packs, or individual pre-rolls versus bundled offerings. This range reflects our goal of serving first-time consumers, budget-conscious shoppers, medical patients, and experienced consumers alike. A current price list by category is included below, and a full catalog of products by SKU, including real-time pricing, is publicly available on our website at goembarc.com.

While this section focuses specifically on pricing, Embarc's approach to pricing cannot be separated from our broader philosophy around product curation, education, and responsible retail. California's cannabis market includes thousands of brands and hundreds of thousands of SKUs, which can be overwhelming—particularly for new or returning consumers. Embarc addresses this complexity through values-driven curation and knowledgeable in-store Guides who help customers navigate product options, formats, and price points based on individual preferences and needs. This approach ensures that affordability does not come at the expense of quality, safety, or education and that customers are empowered to make informed decisions regardless of where they fall within the price spectrum.

Product Type	Description	Varieties	Sizes	Consumption Method	Price Range
Cannabis Flower	Dried buds from the female cannabis plant that contain a variety of cannabinoids and terpenes.	Sativa, Indica, Hybrid	Gram, Eighth (3.5 Grams), Quarter (7 Grams), Half Ounce (14 Grams), Ounce (28 Grams)	Smoked or vaporized	\$6.00 to \$175.05
Pre-Rolls	Pre-rolled cannabis flower joints or blunts ready for immediate use.	Joint, Infused Pre-Rolls, Blunts, Cones	Single Pre-roll, Packs of multiple Pre-rolls	Smoked	\$2.00 to \$150.05
Extract / Concentrates	A variety of extracted cannabis oil, refined and concentrated through further processing and sold as cannabis concentrates.	Live Resin, Shatter, Budder, Hash, Rosin, Diamonds / Crystals, Wax, Rick	Half Gram, Gram Consumption	Intended for ingestion or inhalation through vaporization.	\$14.05 to \$180.05

		Simpson Oil			
Vaporizers	Vaporizing devices filled with cannabis concentrates and able to heat the product without combustion, leading to inhalable vapor.	Disposable Vape Pens, Refillable Vape Pens, Cartridges	0.3ml, 0.5ml, 1ml, 2ml	Inhalation through vaporization	\$7.00 to \$90.05
Edibles	Cannabis-infused food products providing an alternative to inhalation.	Gummies, Chocolates, Brownies, Cookies, Mints, Candies, Baked Goods	Various depending on the type of edible, generally measured in milligrams (mg) of THC/CBD per serving.	Ingested	\$3.05 to \$96.05
Infused Beverages	Liquids that have been infused with cannabis, providing a discreet and unique method of consumption.	Sodas, Teas, Coffees, Elixirs, Seltzers	Often offered in single-use cans or bottles, sizes range from about 6 to 16 ounces.	Ingested	\$4.05 to \$54.05
Capsules/ Tablets/ Pills	Cannabis products in pill, capsule, or tablet form that offer a discreet, smokeless, and easily measured method of consumption. They contain either cannabis oil or powdered cannabis flower and are often used for medical purposes.	THC Capsules, CBD Capsules, Hybrid Capsules, Extended Release Tablets, Quick Release Tablets	Most commonly sold in containers or blister packs of 10, 30, 60, or 90 capsules, tablets, or pills.	Ingested	\$5.05 to \$111.05
Tinctures	Cannabis extract dissolved in alcohol or another carrier oil.	Full Spectrum, Broad Spectrum, Isolate	Varies, commonly in 15ml, 30ml, and 60ml bottles	Sublingual (under the tongue), Ingested, or mixed into	\$12.05 to \$110.05

				foods or drinks.	
Topicals	Products infused with cannabis intended for external use on the skin.	Creams, Lotions, Balms, Salves, Patches, Bath Bombs, Epsom Salt	Varies, commonly in 1 oz, 2 oz, and 4 oz containers, or single-use patches	Applied to skin directly or added to bathwater to soak in	\$4.05 to \$95.05
CBD Dominate Products	Products made primarily with CBD (cannabidiol), a non-psychoactive cannabinoid found in cannabis, and a lower dose of THC.	All product types described above.	Varies based on product—see each product type described above.	Varies based on product type. Can be ingested, inhaled, applied topically, or used sublingually.	See the above categories for pricing
Medicinal Cannabis Products	Products specifically designed for medical use, often to alleviate symptoms such as pain, inflammation, or anxiety. These products are formulated with higher THC concentrations as described in §17304 of the California Code of Regulations, Title 4, Division 19: DCC Medicinal and Adult-Use Commercial Cannabis Regulations and must be labeled “FOR MEDICAL USE ONLY.” These products are only available to medicinal cannabis patients, who are qualified patient as defined in Health and Safety Code §11362.7 or a person in possession of a valid identification card issued under Health and Safety Code §11362.71. Note that Embarc also carries a number of low THC products with a specific focus on CBD and relief.	All product types described above.	Varies based on product—see each product type described above.	Varies based on product type. Can be ingested, inhaled, applied topically, or used sublingually.	See the above categories for pricing
Non-Cannabis Goods	Embarc branded merchandise, as well as smoking accessories	T-shirts, Stickers, Rolling Papers, Lighters, Matches, Vaporizer Batteries, Gift Cards			\$1.55 to \$600.05
Services	Embarc employees are well-versed in all product offerings and				N/A

	able to provide product recommendations and education to all customers.				
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California has a rich history of cannabis cultivation and product innovation, with thousands of brands and hundreds of thousands of SKUs on the market. For most consumers, including many people who are new to cannabis or are re-entering the market for the first time in decades, this proliferation of brand and product optionality is overwhelming, leaving many folks uncertain about where to start.

Embarc seeks to fill that void through knowledgeable Guides who provide personalized attention. Because each person's body metabolizes cannabis differently, it is important to find the best product(s) to meet an individual's unique needs, and as such, our guiding ethos is values-driven curation to ensure a wide variety of products and modalities that ensure the right product for everyone. Embarc's brand and product curation is driven by the following guiding principles:

UPLIFT RATHER THAN DOMINATE: We believe in the power of prosperity through partnership, or the ability to uplift an entire ecosystem rather than centralize power in one company that seeks to dominate the supply chain. Partnering with small farmers, celebrating sustainable farming practices, and finding opportunities to amplify local, BIPOC, and female-owned brands is how we uplift one another and maintain the cannabis community and ecosystem.

SHARE VALUES, CULTIVATE CULTURE: As brands and products continue to come to market, consumers find themselves overwhelmed by optionality. Embarc will ask a few key questions when considering a brand partner for our shelves because shared values are the cornerstone of cultivating culture within our companies, our communities, and the industry at large:

- Does this brand have defined values?
- Do those values share commonality with our own?
- Does the brand live its values?
- Would our customers appreciate the opportunity to explore this new modality/strain/SKU?

DATA DRIVEN DECISION MAKING: While values are the first step in determining whether a brand is the right fit, data is the other critical component. For most dispensaries, inventory decisions are made based on which brands come to the shop and provide the most enticing deals. We believe consumers deserve better than that and have implemented extensive data analysis and customer feedback loops into our purchasing process, utilizing customer survey tools, customer relationship management (CRM) analysis, and point-of-sale metrics. Embarc utilizes predictive analytics technology to help drive purchasing decisions. This ensures our shelves are stocked with what our customers want, not with whatever brand has engaged in predatory marketing strategies. This data and feedback loop are what ensure our curated selection is responsive to consumer behavior, purchasing patterns, and preferences.

Our product selection is also informed by our experience operating 16 successful cannabis retail storefronts in California today. We are constantly scrutinizing and analyzing which products our customers and patients are responding to, and adjusting our product selection accordingly. We will use what we have learned to build upon, and continue to evolve, our product selection based on the feedback and needs of our customers and

patients in Colusa. This localized approach ensures our curation is rooted in values, local preferences, sustainability, local sourcing, and economic viability.

WELLNESS-FOCUSED SELECTION: We also live our values by offering wellness and medicinal-grade product lines designed to support the health and well-being of our customers. We recognize that many people are turning to cannabis for its therapeutic benefits, and we prioritize sourcing products that cater to these needs. Our wellness-focused approach ensures that our product lineup includes offerings that are specifically formulated for pain management, stress relief, sleep support, and other health-related concerns, which is crucial to serving the needs of aging populations and wellness-seeking individuals in Colusa.

PROPOSED PRODUCT LINE TO BE SOLD: Embarc's proposed product line to be sold is informed and driven by our product curation ethos and will include, but not be limited to, the product types outlined in this section. In addition to prioritizing small farms, local cultivators and manufacturers, and amplification of female and BIPOC-owned brands, Embarc focuses on many products that are non-psychoactive and do not contain tetrahydrocannabinol, or THC, the psychoactive substance found in many adult use products. We always ensure ample options that contain cannabidiol or CBD, a non-psychoactive substance.

Embarc will only conduct business with other State-licensed cannabis businesses that can provide proof of their valid State license. Our team members have established business relationships with the leading suppliers in the industry over the past decade, which ensures that when we open to the public, we will be able to consistently meet consumer demand for quality products without interruption.

Cannabis retailers carry hundreds of SKUs from dozens of brands, which shift over time based on customer preference, strain, availability, and many other factors. Above are many of the brand names we anticipate carrying upon opening, which will evolve over time to reflect customer purchasing patterns and preferences.

LOCAL SOURCING: Embarc always strives to collaborate with and feature cannabis goods that are locally cultivated, manufactured, and produced. We believe in the power of prosperity through partnership and the ability to uplift an entire ecosystem rather than centralize power in one company that seeks to dominate the supply chain. Partnering with and finding opportunities to amplify local brands and businesses is how we uplift one another and maintain the cannabis community and ecosystem.

To the extent they are available, we will expand our product selection to include products manufactured, cultivated, or distributed by licensed Colusa County cannabis businesses. These products will not only be carried at our Colusa location but throughout the Embarc network, which is rapidly growing to be one of the largest retail dispensary footprints statewide. We believe this will allow these brands and businesses to gain prominence statewide.

STATEMENT OF OWNER'S CONSENT:

A notarized written consent form signed by the owner or the landlord of the proposed site to operate a commercial cannabis business, specifying the street address and parcel number.

STATEMENT OF OWNER'S CONSENT

I, HARRISON SIMON [Name of Property Owner / Authorized Agent], am the legal owner of, or duly authorized representative for, the real property located at:

Street Address: **2967 Davison Ct, Colusa, CA 95932**

Assessor's Parcel Number (APN): **017-150-007-000**

I hereby provide my written consent for **Colusa Responsible and Compliant Retail LLC** to apply for and operate a commercial cannabis business at the above-referenced property, subject to all applicable local and state laws, regulations, permits, and approvals.

This consent is provided specifically for the purpose of satisfying the City's cannabis application requirements and acknowledges that the operation of a commercial cannabis business at this location is contingent upon a fully executed lease and approval by the appropriate regulatory authorities.

Property Owner / Authorized Agent Name: HARRISON SIMON

Signature: [Signature]

Date: 1-28-26

Notary Acknowledgment

[Signature] Notary

Statement of owner's consent

ACKNOWLEDGMENT

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California
County of SUTTER

On 1/28 /2026 before me, JIA DHILLON, NOTARY PUBLIC
(insert name and title of the officer)

personally appeared Harminder Singh —
who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) are
subscribed to the within instrument and acknowledged to me that he/she/they executed the same in
his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the
person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.



Signature Jia Dhillon (Seal)