

# Security Plan

WR Wellness Dispensary

150 Bay Street

Jersey City, New Jersey 07310

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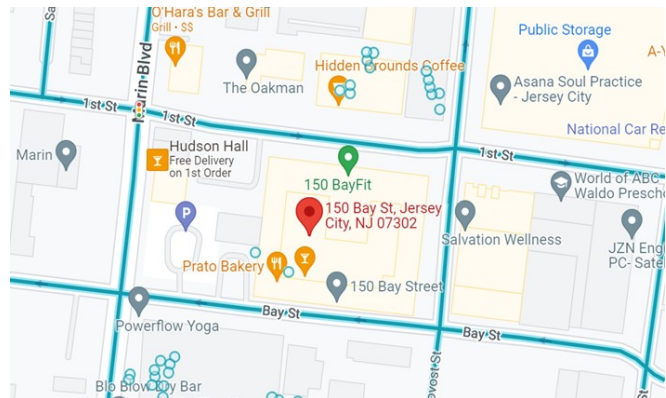
## Section I - Security Plan Overview

WR Wellness will be locating its cannabis dispensary business in a commercial building located at 150 Bay Street, Jersey City, NJ. The corner space is approximately 4920 s.f. located on the first floor. The dispensary will employ approximately 24 full time and 29 part time employees and will operate two shifts. The space will be equipped with the appropriate security, fire alarm and life safety equipment as required by applicable national, state and local building codes.



WR Wellness will be implementing a comprehensive security plan that addresses the security needs for the dispensary that will focus on securing the facility, the cannabis products, its employees and visitors.

The security plan has been prepared to fully meet and exceed the requirements of the **New Jersey Cannabis Regulatory Commission Personal Use Cannabis Rules: N.J.A.C. 17:30 9:10**. It will also comply with local and state security code, standards and requirements. The deployment of the security plan will implement security measures to deter and prevent entry into and theft of cannabis or currency, robbery, burglary, the diversion of cannabis products, as well as prevent any access to cannabis products by individuals under 21 years of age and create a safe and secure environment both for the business and the surrounding neighborhood. The security plan will incorporate best practices in security management policies and procedures as well as deploying throughout the facility a state-of-the-art security system to protect the premises, the interior and exterior of the building.



## Section II - Plans for The Use of Security Personnel and Contractors

WR Wellness will be hiring a security manager to implement and oversee the security program for the company. The security manager will be responsible for ensuring the site's protection of people, property, and assets and to help implement and oversee the security plan for the site which will include:

- Ensure that business security policies and procedures are being carried out.
- Implement and manage the anti-diversion plan for the site
- Emergency response plan responsibilities
- Receiving and delivery to curbside products in and out of the building
- Provide required security awareness training for employees
- Facilitating background checks
- Manage all access onto the site, including prohibiting access of minors to the site
- Compile security reports as required

Plans also include the use of other outsourced security contractors and monitoring services that are fully licensed and certified in the state for the security technologies we are deploying and the security program we are implementing. We have also retained the services of a Security Consultant that will assist us in developing and implementing the security plan.

Proposed contractors Experience and Qualifications include:

- **Integrated Systems & Services, Inc.** 541 Industrial Way West, Suite B, Eatontown, NJ 07724 will be used for the security systems installation and maintenance. ISS is a fully licensed and certified security systems integrator, and they have been in business for over 25 years.
- **COPS Monitoring Central Station** Williamstown, NJ. COPS is a national central station, certified for UL Burglar and Fire, Factory Mutual, IQ Certified, TMA Five Diamond Certified
- **Smart Security Partners**, a Service Disabled, Veteran Owned Small Business (SDVOSB) security consulting company with over 30 years of experience with providing security and fire solutions and services. Their experience includes providing security risk assessments, developing and implementing security plans, system design and engineering, equipment and vendor selection, project management and security program life cycle solutions. Their experience spans across many types of businesses including the cannabis industry. They are certified as Law Enforcement Security Assessment Specialists and in Crime Prevention Through Environmental Design (CPTED) by the American Crime Prevention Institute.

## Section III - Security Video Surveillance, Card Access, and Intrusion and Duress Alarm Features Overview

WR Wellness will be installing and maintaining a comprehensive security alarm system throughout the facility. The security alarm system will include a video surveillance, card access, and intrusion alarm systems. The following is an overview of the systems capabilities and features:

### **Common to all systems:**

- Built-in redundancy for all system network equipment controllers, servers and storage devices in the event of any equipment failure

- All security system equipment will be tied to a dedicated uninterruptable power supply (UPS) device to switch on immediately upon loss of power. This will provide at a minimum of four (4) hours of back-up power.
- After the UPS power, all security intrusion alarm equipment will also have (80) hours of battery back-up
- Automatic reporting (via two means) in the event of any system failure
- Systems will automatically back-up data and store for a minimum of 90 days.
- All security systems will be monitored 24/7 365 days per year for both during and after business hours (via a UL approved central station).
- All security system related software will be installed on a server platform which will:
  - Continue real time coverage with automatic failover
  - Limit any downtime for the system
  - Provide automatic data back-up and recovery

**Video Surveillance System** – An extensive video surveillance system will be deployed for monitoring the exterior and interior of the building and all areas containing cannabis regardless of the amount.

- The system will be deployed in a way that provides unobstructed video surveillance of all enclosed dispensary areas, including all entry and exits, vault, processing areas, retail point of sale areas, and any area where cannabis is stored, handled, dispensed, or destroyed.
- Video cameras will be angled to allow for facial recognition and the capture of clear identification of any person(s) entering or exiting the dispensary area.
- To provide high quality detailed information the system will be programmed to record at eight (8) frames per second (FPS) and video surveillance data will be encrypted and digitally stored for 30 days minimum.
- Different types of cameras will be deployed at the site depending on the application. All cameras will be IP based, and capable of providing high-definition views of the secured areas. For low light requirements cameras will be equipped with infra-red technology that perform well in low light environments.

**Card Access System** – A card access system will be installed to control any unauthorized access into the building, externally or internally and provide a detailed audit trail of all activity. Card readers will be placed on all exterior doors, doors leading in from the vestibule area, doors leading into the restricted area, doors for the office containing sensitive company information, the door leading into the IT room and the vault door day gate. Access will be controlled into any area containing any cannabis (or product) regardless of the amount, its storage, and areas with company sensitive information.

- The card access system will utilize Open Supervised Device Protocol (OSDP) and Secure Communication Protocol (SCP) for bi-directional, secure communications to prevent “hacking”.
- The card access system controllers will have redundancies that will allow continued communications in the event of a network port failure, as well as continue to operate in the event a control panel were to go off line. It will be capable of storing all data at the door to allow the system to continue to function in the event a control panel fails and upload its information once the control panel comes back on line.
- The system will incorporate anti-pass back capabilities to prevent users from allowing their card to be used by others.

- Card readers for the system will require two forms of identification to enter the area, a smart card for more secure use and the requirement of a unique personal identification number (PIN). Smart cards data will be encrypted.
- Input of a specific PIN at the card readers will also provide a duress alarm in the event of an emergency.

**Intrusion Alarm System** – A dedicated intrusion alarm system will provide alarm protection throughout the dispensary. All exterior doors, internal doors, glass windows, vaults and safes, storage, or any areas of cannabis, administrative offices will have the appropriate alarm protection for the area.

- The system will be monitored 24/7 for any emergency duress alarms that may be generated within the facility.
- All alarm points will be programmed to report the type of alarm condition, where the alarm is being generated from, and what action is required.
- All wiring for the system will be protected with line security to deter any tampering of disconnecting the systems components.
- All alarms will be continuously monitored at the security manager/ office during normal business hours and at a UL approved central station for non-business hours.
- As a built-in redundancy, all alarm conditions will also automatically send an email and text message to the appropriate security employee or manager.
- The alarm condition (thru security system programming) will include detailed information as to the type of alarm condition and will provide unique actions to the recipients for handling.

**Duress Alarm System** – A duress alarm (hold-up alarm) system will be deployed throughout the facility for use in the event of an emergency.

**Security System Testing and Maintenance** – All security systems will be tested daily. Testing will be performed by the site manager responsible for security.

**Security System Maintenance and Inspections** – All security systems will be inspected monthly by a state licensed and system certified security contractor to ensure systems are fully operational and functioning as designed.

**Procedures for Monitoring** – All alarm conditions will be monitored at two locations, one at the dispensary managers office during business hours and the other at a remote UL approved central station for monitoring during non-business hours. Security systems will be monitored 24/7, 365 days per year.

## Section IV – Storage of Cannabis and Cannabis Items

- Access to any cannabis item storage areas will be limited to only the minimum number of authorized personnel needed to maintain safe and orderly operations in that area.
  - Any visitors passing through any areas where cannabis items areas are stored, regardless of the amount will be escorted by the authorized personnel only. All visitors will be required to be logged in and go thru the visitor check, be badged accordingly

- WR Wellness will only store cannabis in secured areas / rooms equipped with card readers, door alarm contacts, door alarm sounders, appropriate security door hardware, and video cameras for monitoring.
- To securely store all finished and usable cannabis and cannabis products WR Wellness will be installing a walk in UL Rated Class 2 vault located in the dispensary. This will include any cannabis stored as waste, or product waiting to be destroyed.
  - The vault, vault door and frame unit will conform to **21 CFR § 1301.72** DEA's standards for the secure storage of a Schedule I controlled substance.
    - 30 man-minutes against surreptitious entry, 10 man-minutes against forced entry, 20 man-hours against lock manipulation, and 20 man-hours against radiological techniques
    - The vault, will be equipped with a "day-gate" which is self-closing and self-locking, for use during the hours of operation when the vault door is open
    - The walls of the vault will be equipped with an alarm, upon unauthorized entry will transmit a signal directly to a central station protection company
    - Duress / holdup buttons will be placed at strategic points of entry to the perimeter area of the vault and inside the vault.
    - The door of the vault will be equipped with contact switches and thermostat alarms
    - The inside of the vault will have installed sensitive ultrasonic equipment for sensing both audio and seismic vibration to detect illegal forced entry.
  - A video surveillance and access control system will monitor all activity into and out of the area and control access into the area.
  - These areas will be monitored by the security office and by the central station in real time and recorded to ensure the visibility of employees and escorted visitors.
  - Only authorized access will be permitted into the storage vault area for those employees designated to work in this area
  - Detailed security system reports will provide audit trail data as to who has entered the specific area, along with dates, times, and duration.

## Section V – Diversion Prevention Plan

WR Wellness will implement a comprehensive **Diversion Prevention Plan** with a set of policies that will ensure the preventing of access of products to non-authorized individuals, minors, the unregulated market, or others intending to acquire the product through illegal means. Actions will include the careful vetting of new employees, badge use, carefully controlled access methods, secured storage and processing areas, and following secured waste management procedures.

- **Employee Background Checks** – WR Wellness will perform extensive background checks for all employees. These will be conducted through an FCRA-compliant company and follow EEOC and FTC guidelines, and performed initially prior to the employees hiring.
  - Type of checks will include: criminal history, alias search, identity search, driving record, credit history, and previous employment verifications.
- **Employee Access Levels** - All employees will be assigned a unique level of access based on their role within the organization. The level of access will determine which sections of the facility the employee has permission to enter, access to safes or vaults, and which folders or files can be accessed within the company's computer system. These will be audited regularly.
- **Employee Identification** - All employees or others operating on behalf of the company will be required to display a laminated badge issued by the company at all times.



- **Limiting Dispensary Capacity** – WR Wellness will develop and implement a policy that addresses the maximum capacity for customer flow in waiting rooms and retail areas.
- **Key and Access Code Issuing Procedures** - The security office will manage and maintain records for any issuing or requests for keys, access codes or access cards. All non-issued cards and keys will remain secured at all times. All keys, access codes and access cards must be returned upon employees leaving.
- **Cannabis Dispensing** - During hours of operation all cannabis storing and dispensing will take place from the restricted access area through a secured door from restricted to the limited space. During operating hours, all cannabis shall remain stored in the secured vault area, safes, display cabinets, and drawers. These will be accessible only by authorized employees.
- **Access to Vaults, Safes, Storage, and Secured Cabinets During and After Normal Hours** – During hours of operation the main vault, safes, cash drawers, storage and display cabinets will have limited access to authorized employees only, and will be secured at all times. An electronic daily log of dispensary agents entering the secured areas will be kept. When the dispensary is closed all cannabis and currency will be stored in the main vault room in a way to prevent diversion, theft or loss.
- **Non-Employee Access**
  - All non-employees that will have access to limited or restricted access areas, will be required to show ID. Those entering restricted access areas will be escorted by an authorized employee at all times.
- **Visitor Management System** – WR Wellness will be using a visitor management system to process visitors, including scanning a government-issued ID, record creation, badge printing, check-in and check-out and watch list screening. The system will provide additional safeguards by screening against felony offenders watch lists.

## Section VI – Emergency Management Plan

For all security-related emergencies, the designated senior manager will be assigned to oversee the implementation and overall management of the plan. The sites security manager will be the lead to manage all activities until the companies designated senior emergency manager is present. If the Security Manager is not present, the designated senior alternate Security Member will initiate the call to 911 and interact with Emergency Response personnel.

In addition to the physical security measures mentioned earlier WR Wellness will develop and implement an emergency management plan to include medical emergencies, fire, severe weather, bomb threat, robbery, hold-up, and extended power loss.

## Section VII – Procedures for Screening and Hiring

All employees will have a series of background checks performed prior to their hiring. Criminal and credit history will be checked on a regularly random basis during their employment.

- **Employee Background Checks** - All background checks will be conducted through an FCRA-compliant company and follow EEOC and FTC guidelines.
  - Type of checks will include: criminal history, alias search, identity search, driving record, credit history, and previous employment verifications.



## Section VIII – Cyber Security Plan

To prevent against electronic records tampering and separate from the physical security team WR Wellness will assign a dedicated computer security manager that will be responsible for developing, implementing, and enforcing the cybersecurity policies and procedures for the business. The following make up the framework of our cybersecurity plan:

1. Establish an **Acceptable Use Policy** and an **Internet Access Policy** to cover use of company laptops, cell phones, email procedures, internet usage, remote access, and employee-owned devices. Policy will be reviewed yearly, as well as training.
2. Provide ongoing employee education on cybersecurity to prevent phishing scams and how hackers can gain access into the system. Provide internal escalation process in the event of a security breach.
3. Implement a company password policy. Passwords will be changed at six (6) month intervals and use complex, random, long passwords or phrases and incorporate a two-factor authentication (password and secret question).
4. Encryption will be applied to our wireless network, hard drives, files, and USB's. Any workstation mobile phone or laptop device that goes on-line will be encrypted
5. Implement procedures to decommission user accounts and devices for employees no longer with the company.
6. Implement and manage the company firewall protection, antivirus and malware programs to secure data coming into the organization and protect against viruses, ransomware, keyloggers, botnets, trojans, and other malicious programs.
7. Limit access to critical assets and company information by setting up proper privileges for each employee. These will be reviewed periodically.
8. Provide up-to-date patch updates to operating systems and software's when required.
9. The computer security manager will ensure that vulnerability scans are performed on a regular basis to detect and classify potential points of exploitation in network devices, computer systems, and applications.
10. The computer security manager will manage disaster recovery and replication policies and procedures to provide a regular backup schedule and ensure that all information is stored securely.

## Section IX – Work Safety Plan

WR Wellness will be implementing a comprehensive **Work Safety Plan** for its business. The plan will include the following Federal OSHA workplace safety rules that are relevant to cannabis retail operations:

*\* Note that OSHA has not drafted any cannabis industry-specific regulations due to continued prohibition of cannabis at the federal level. Nevertheless, OSHA regulations and guidance can be readily applied to a cannabis retail business, as described here.*

## **Emergency Action Plans**

In compliance with 29 CFR 1910.38, WR Wellness will have a written emergency action plan. The plan will cover how to report fire or other emergencies, alarm systems, evacuation, critical operations, who to contact for more information, training and how the plans will be periodically reviewed. These will be kept in the workplace, both in electronic and paper format.

## **Electrical Hazards**

Employees will be trained to identify and control electrical hazards. Management will provide guidance to employees on which level of personal protection each hazard demands and determine if employees require additional training to safely operate equipment.

## **Personal Protective Equipment (PPE)**

Appropriate PPE, such as eye protection and gloves, will be provided by WR Wellness and worn by employees and contractors for all tasks when appropriate. Training, health assessments and fittings will be done for each employee immediately upon being hired and assigned tasks requiring any kind of protection in accordance with 29 CFR Part 1910.132 and 29 CFR Part 1910.134

## **Hazard Communication**

Hazard Communication will be handled in accordance with 29 CFR Part 1910.1200. WR Wellness is committed to preventing accidents and ensuring the safety and health of all employees and site visitors. The Hazard Communication Plan will be communicated to employees and appropriate protective measures will be put in place to control exposures to these identified materials.

## **Hazardous Energy – Lockout/Tagout**

Hazardous energy will be handled in accordance with 29 CFR Part 1910.147. A lockout/tagout system will be used to ensure that machines or equipment are stopped, isolated from all potentially hazardous energy sources and locked out before employees or contractors perform any servicing or maintenance.

## **Injury and Illness Prevention Program (IIPP)**

OSHA requires that a safety committee be established at federal agencies, and the practice is recommended for all employers. Management will create a Safety Committee, with the duties similar to those established in 29 CFR 1960.40,

## **Slips, Trips, Falls and Use of Ladders**

Safety related to walking and working surfaces will be handled according to 29 CFR 1910.21 and 1910.22. The primary method to prevent slips, trips and falls is to maintain safe walking-working surfaces.

## **Repetitive Motion Injuries/Ergonomics**

Note: Currently no OSHA regulation specifically addresses repetitive motion injuries but WR Wellness will be referencing OSHA's Elements of Ergonomics Programs in an effort to reduce employee risk of experiencing musculoskeletal injuries from repeatedly using scanners or hand tools, bending, squatting, lifting or reaching, as well as other activities related to typical office/business functions like using computer equipment or sitting for long periods of time.