



Procedures for Safety and Security

In accordance with **NJAC 17:30-9.10**, HillviewMed Inc. (“Hillview”) has developed comprehensive safety and security plans and procedures to protect its facility, consumers, and staff, prevent the diversion and theft of cannabis, and secure its electronic systems and networks (“Security Plan”). As discussed below, Hillview will provide effective controls and procedures to guard against theft and diversion of cannabis and cannabis products including, systems to protect against electronic records tampering. In compliance with **NJAC 17:30-9.6(a) and (b)**, aspects of Hillview’s Security Plan will be incorporated into its on-site operations manual, available for inspection by the New Jersey Cannabis Regulatory Commission (the “Commission”). As required by **NJAC 17:30-9.10(b)(11)**, Hillview will provide law enforcement and neighbors, within 100 feet of its facility, the name and number of a Hillview staff member, to notify during and after operating hours, to whom they may report problems with the establishment.

SECURITY OVERVIEW

Hillview’s Security Plan is designed to: provide a safe and secure environment that will protect the premises, consumers, and employees of Hillview, as well as any third party that may visit the facility, pursuant to **NJAC 17:30-9.10(b)(3)**; protect the integrity of limited access and storage areas, handling and distribution of cannabis, and cash; ensure comprehensive audit, testing, and maintenance procedures for the entire operation, including a protocol for testing and maintenance of the security alarm system and onsite inspections, as required by **NJAC 17:30-9.10(b)(4)**; and deter and prevent the unauthorized entrance into areas containing cannabis and the theft and diversion of cannabis, as required by **17:30-9.10(b)(2)**.

The Security Plan also identifies reasonably foreseeable situations that could cause harm and establishes safeguards to minimize the risk in the areas of: Facility Security; Electronic Security; Operations Security; and Workplace Safety. Each representative of Hillview will be trained to comply with this Security Plan to prevent and respond to any security breaches. All employees will be trained in Hillview’s policies and procedures, at both inception of employment and regular intervals, in order to continually improve safety.

FACILITY SECURITY

Location and Building Specifications - Facility Overview. Hillview’s facility is constructed with insulated steel panel walls, preventing the ability to see cannabis operations from the outside.

Site Plan with Outdoor Lighting and Fencing. Hillview intends to construct a perimeter fencing around the facility. Exterior motion sensor cameras are installed on the exterior perimeter, in conjunction with security guards that will function as a second line of detection. As required by **NJAC 17:30-9.10(b)(2)**, outside areas of the premises and the perimeter are well illuminated, and

exterior lighting of the facility is sufficient to deter nuisance and criminal activity, while facilitating surveillance and not disturbing surrounding businesses or neighbors.

Locks and Doors. All exterior doors and windows are alarmed and secured against entrance or breakage. The entrance/exit doors are protected by steel security doors that are rated above industry standards for forced entry resistance. Locks are shielded with metal plates to prevent manipulation, and hinges are on the interior of the doors to prevent the same. During non-working hours, entrances and exits remain securely locked. Fire exits use a fire-rated emergency door lock system that has access control technology. Each door is monitored through an access control system that will trigger an alarm when a door is opened, and a notification is made of the date, time, and access point at the security workstation. All entrances including the main entrance have smart card reader control access technology. Only authorized personnel have an access card to gain entrance into the facility. For those personnel and visitors who don't have specific access to the entrances of the facility, security personnel will grant access only to authorized individuals.

Security Personnel Plan

David Alston - Director of Security. David Alston is Hillview's Director of Security. David has 27 years of law enforcement tenure with extensive leadership experience, and has received extensive professional training through the New Jersey State Police. As a Detective, he conducted criminal investigations involving narcotics and weapons trafficking, corruption, cargo theft, terrorism, and sensitive investigations. David rose through the ranks of Detective Sergeant, Detective Sergeant First Class, and Lieutenant, and supervised over 150 law enforcement and civilian personnel as a Captain/Bureau Chief. As the Bureau Chief, David maintained the focus and direction of the Organized Crime Control North Bureau, handled all day-to-day operations, and was involved in all decision-making processes for six investigative units under his command. These, these units conducted investigations throughout the central and northern regions of New Jersey. David's skill sets, experience, and leadership will drive the focus and direction of Hillview and will align with Hillview's stringent security protocols, policies, and procedures.

Security Guards. Hillview has engaged a professionally licensed, full-service security company that will maintain physical security and monitoring for the entire facility. Hillview's internal Security Team (described below), the members of which have substantial law enforcement experience, will review and improve as necessary, all security-related SOPs.

Our third-party security team will staff two-three-security guards, all with law enforcement backgrounds and certified by Security Officer Registration Act (SORA), onsite during business hours. One will be assigned to the secure onsite monitoring/security room; and the other(s) will conduct mobile patrols of the entire complex. During non-business hours, two guards will be assigned: one in the onsite monitoring/security room; and the other(s) on mobile patrol and relief.

Security guards will be deployed with mobile radios and cellular telephones to facilitate rapid and coordinated communications. The radio frequency will be on a frequency platform channel that can be monitored by local police to provide integrated communications. Additionally, select camera images may be live-streamed over the Internet to local police, to facilitate a coordinated, informed response to any emergency or call for service.

ELECTRONIC SECURITY MEASURES

Electronic security measures, including alarm and video surveillance systems, have been installed and continuously operate to rigorously monitor all critical control activities 24 hours a day 7 days each week, and are in good working order, as per **NJAC 17:30-9.10(b)(1)** and **(9)(i)**. In compliance with **NJAC 17:30-9.10(b)(1) (i)-(ii)**, these continuously operating systems will provide: (i) immediate automatic or electronic notification to alert security and local police to any unauthorized breach of security at the facility; and (ii) a backup system that activates automatically upon loss of electrical support, and immediately notifies the state and local police accordingly.

Controlled Access to Electronic Security. Hillview has employed a single, unified security system with login audits at each access point, including captured pictures and timestamps, to ensure site safety, and ensure that access to areas where cannabis and cannabis products are held is limited to authorized personnel only, as required by **NJAC 17:30-9.10(b)(8)**. All original tapes or digital pictures produced by this system shall be securely stored for one year, (exceeding the 30-day archive requirement set forth in **NJAC 17:30-9.10(b)(9)(ii)**, in a manner that will be easily accessible for investigative purposes. As required by **NJAC 17:30-9.10(b)(2)**, security components will prevent, impede, or delay unauthorized entry into areas that contain cannabis or cannabis products, allowing time for security and law enforcement to respond. These layers of protection include, among other things: alarmed security fencing; LED invasion-activated strobe lighting; high-definition CCTV cameras equipped with motion sensors; rooftop thermal imaging; controlled access zones; motion detectors; double-A line electrical protection; glass break sensors; and storage vault.

Video Surveillance System Equipment. As required by **NJAC 17:30-9.10(b)(9)(i)**, Hillview has installed a professionally monitored, first-class high-definition video surveillance system that records all video activity including images capable of clearly revealing facial detail. The system fully covers all entrances and exits, rooms with exterior windows, exterior walls, roof hatches or skylights; storage rooms, including those that contain safes; and the facility perimeter.

Video Camera on Premises. Hillview utilizes CCTV camera coverage of all facility entrances and exits; rooms with exterior windows, exterior walls, storage rooms, including those that contain safes; and the perimeter of the facility, in furtherance of its requirement to prevent the unauthorized entrance into areas containing, and the theft of cannabis, as set forth in **NJAC 17:30-9.10(b)(9)**, and its obligation to keep access from outside the premises to a minimum and ensure that access is well-controlled, as required by **NJAC 17:30-9.10(b)(7)**. The cameras incorporate motion detection and are capable of one-year video archive retention, in full resolution, exceeding the 30-day requirement imposed by **NJAC 17:30-9.10(b)(9)(ii)**.

Cameras - PTZ Control with Advanced IR Performance. Exceeding the requirements of **NJAC 17:30-9.10(b)(9)**, installed cameras use fixed camera placement to cover all lines of sight without blind spots, allowing for a clear image of all individuals and activities in and around the facility. These cameras, which combine patented self-learning video analytics with zoomable IR technology, provide broad coverage and exceptional image quality in a range of lighting conditions and environments. These cameras are available in 1 MP (with 45x zoom) and 2 MP (with 30x zoom) camera resolutions, with a 250-meter or 820-foot IR illumination range.

Embedded Network Video Recorder (ENVR) Device. Hillview incorporates a 64- channel IP Embedded Network Video Recorder (ENVR), which functions as the security system's central

hub. The ENVR will be remotely accessible through a secure web portal for management and law enforcement use at all times, allowing them to view live footage and review security logs from the facility and verify, in addition to Commission inspection and onsite assessments mandated under **NJAC 17:30-17.3**, that Hillview is following all applicable safety and procedural requirements and other laws and rules. Hillview is mindful that the Commission may enter the facility without notice to carry out an onsite assessment, under **NJAC 17:30-17.3(a)**, and that failure to cooperate constitutes grounds for revocation of its permit as well as referral to law enforcement, under **NJAC 17:30-17.3(a)(2)**. The video surveillance system can record all video and images captured by each surveillance camera for a minimum of four years in a format that will be easily accessed for investigative purposes.

Hard-drive Rack Mountable Servers. A removable hard-drive and rack mountable servers with up to 64 TB of storage each on board for long-term storage, in addition to off-site cloud storage. Video compression is ideal for remote video transmission over affordable broadband, and allows the same number of days of voice storage, using less than half the hard drive space required by leading competitors. Video recordings will be stored in a designated locked cabinet, closet or other secure place to protect from tampering or theft, as required by **NJAC 17:30- 9.10(b)(9)(ii)**. Access to a video surveillance room will be limited to authorized individuals and secured by a security alarm system that is separate from the site's primary security system, and that will be authorized by the Commission.

Alarm Systems. In strict compliance with **NJAC 17:30-9.10(c)**, Hillview's safety and security alarm systems will provide substantial protection against theft and diversion 24/7. This alarm system will be monitored by experienced security monitoring professionals, their world-class monitoring facilities provide alarm monitoring and alarm verification as well specialized monitoring options for high-risk industries like cannabis. The alarm system also features a failure notification system that provides an instantaneous audible text and email notification to management of any system failure. The alarm system has a parallel back-up alarm system which is also managed by our third-party security company, 24/7. Hillview has installed a radio automatic voice dialer, that when activated, automatically sends to the central station alarm company and law enforcement, pre-recorded voice message requesting law enforcement dispatch. The monitoring system also has a robust smoke and fire alarm and auxiliary power sufficient to maintain security and surveillance systems when activated, for at least 48 hours. A power failure will not release electronic door locks.

PIR Motion Detector and Glass Break Detection. Hillview has installed motion detectors and sensors, which in the event of a security breach, including an attempted break-in through the roof or walls, will automatically alert authorities, as required by **NJAC 17:30-9.10 (b)(1)(i)**. The motion detectors will be installed at entry and exit points, exterior windows with exterior walls, roof hatches, skylights, storage rooms that contain safes, and the facility perimeter. Hillview integrated glass breaking detectors on all exterior glass. These detector sensors may be mounted on any wall or ceiling within a 25' range of a glass window and will alert authorities of any attempted break-in through glass windows. The LEDs indicate test mode, alarms and trouble conditions, and are compatible with all other wireless devices.

Alarm Keypad. An alphanumeric keypad, equipped with a duress alarm code, allows users to enter a code that sends a silent signal to the alarm company, indicating that the user is being forced to turn off the alarm system, and features a panic button, intended to signal a robbery in progress.

Panic Buttons. As required by **NJAC 17:30-9.10(b)(9)**, the interior and exterior premises are outfitted with panic buttons, which are strategically and discreetly located around the facility, and intended to be used to signal a life-threatening situation or emergency that would require a law enforcement response. When pressed, the panic button will signal an audible alarm that notifies local law enforcement.

Electronic Security Testing. Hillview's electronic systems shall be inspected, and all devices tested, once per year by a qualified alarm system vendor and qualified surveillance system vendor, which has been approved by the Commission. In strict accordance with **NJAC 17:30-9.10(b)(5)**, Hillview will also conduct maintenance inspections and tests of its security alarm systems at authorized locations, at intervals not to exceed 30 days from the previous inspection, and promptly implement all necessary repairs to ensure their proper operation.

Security Room. Hillview's security equipment is installed in a "Security Room," where it's protected from electronic records tampering (in accordance with **NJAC 17:30-9.10(a)**) or theft. Access to the Security Room is limited to essential employees, law enforcement, security system service employees, the Commission's authorized representatives, and others, when approved by the Commission. Access to security equipment and computers is password protected. An up-to-date list of authorized employees and service personnel with access to the Security Room will be maintained and available to law enforcement upon request.

Breach in Security Protocol. Any unauthorized security breach will generate an immediate, automatic, electronic notification to alert state or local police agencies, in accordance with **NJAC 17:30-9.10(b)(1)(i)** and **NJAC 17:30-9.11(a)(1)(i)**. As required by **NJAC 17:30-9.11(b)(1)-(4)**, Hillview will notify the Commission within 24 hours by telephone, followed by email notification within five (5) business days, should any of the following events occur: an alarm activation or other event that requires response by public safety personnel, a breach of security, the failure of the security alarm system due to a loss of electrical support or mechanical malfunction that is expected to last longer than eight hours; and corrective measures taken. Upon becoming aware of a reportable loss, discrepancies identified during inventory, diversion or theft, whether or not cannabis, cannabis products, funds, or other lost or stolen property is subsequently recovered and/or the responsible parties are identified, and action taken against them, Hillview will, as required by **NJAC 17:30-9.11(a)**, immediately notify the local police department by telephone; and notify the Commission (no later than three hours post-discovery thereof). After any of the reporting described herein, Hillview will, as required by **NJAC 17:30-9.11(g)**, maintain related documentation in an auditable form for a period of at least two years.

Pending Investigations. Hillview will notify in writing, the Commission or its authorized agents, law enforcement, or other Federal, State or local government officials of a pending criminal or administrative investigation for which a recording may contain relevant information. Hillview will retain an unaltered copy of the video recording until the earlier of four years, the investigation or proceeding is closed, or the entity conducting the investigation or proceeding notifies Hillview that retention is unnecessary.

Backup Power Source. As required by **NJAC 17:30-9.10(b)(6)**, Hillview will immediately address any failure of its security alarm system due to a loss of electronic support or mechanical malfunction. Hillview has on-site, the appropriate backup power source system that when activated will maintain regular video surveillance activity for up to 48 hours. The video surveillance systems will be equipped with an uninterruptible power supply (UPS), synchronized

with a compatible high-output generator to provide a seamless transition from main power to auxiliary power in the event of a power outage. Hillview management will immediately be alerted via email and text message of any system failure.

OPERATIONS SECURITY

Limited and Secure Access Areas. The facility will remain locked and only accessible to employees or principals with valid cannabis business ID cards as required by **NJAC 17:30-11.1**. Cannabis storage areas shall have heightened restricted access that meets the diversion and physical security control measures for Schedule I substances that are promulgated by the Drug Enforcement Administration (DEA) under **21 C.F.R. 1301.72**, and will be limited to the absolute minimum number of employees under **NJAC 17:30-9.12(a)**. Consequently, a Class M vault and vault door will be used to store finished and in-process cannabis products with cameras installed inside and around the vault, in accordance with **NJAC 17:30-9.12(b)**. The walls surrounding the vault room where safes will be located will be made up of Concrete Masonry Unit (CMU) walls--concrete blocks with concrete tie beams and reinforced with rebar.

Visitors or Vendors Access Procedure. Visitors and vendors will be required to sign-in at the security station upon entering and leaving the facility. The facility will not be open to the general public. Vendors, contractors, and other individuals requiring facility access must be signed in and wear a visitor identification badge during the duration of their visitation, and the badge must be visible at all times to others.

Access Control Entry Points. Each employee will be issued an access proximity security card which contains the employee's picture and a unique serial number. Employee access cards will grant access only to those areas in which the employee is authorized to enter. An electronic log of an employee's key card serial number will be kept on file. Hillview will maintain an electronic backup system for all access codes and electronic records. Employees must visibly wear their access proximity security card on their person while on Hillview premises; lost or stolen access proximity security cards must be reported to security or management immediately.

Each employee will sign an employee handbook complete with a confidentiality agreement, the breach of which shall be cause for immediate termination, and such confidentiality agreement, among other things, will prohibit employees from sharing their access proximity security card and pin code with others. Hillview will make available to the Commission or the Commission's authorized agents, upon request, a current list of authorized employees and service employees or contractors who have access to any security and surveillance areas.

Security Protocols. In addition to the foregoing, all visitors, vendors, contractors, principal officers, directors, board members and employees will operate in strict accordance with the following standard operating procedures:

- Only permitted employees, contractors, approved visitors, emergency responders, and/or law enforcement will have access to the facilities;
- All vendors, contractors, and visitors will be escorted by security personnel or a designated employee at all times while on the premises;
- Any door that is intended to serve as a barrier between the public and private areas of the facility must remain closed and locked at all times, except for the moment when an

- authorized individual is walking through it;
- Employees will not be permitted to bring personal items into the facility unless they are stored in a clear case. If needed, employees will be issued clear cases for their personal belongings, which will be stored in designated lockers. Clear cases allow management to inspect both what employees bring to work and leave work with, ensuring that unauthorized items are not present;
- In addition to security personnel, at least two employees will be on-site at all times during regular business hours to ensure that no employee will be the only employee present at the facility, from opening to closing.

PROCEDURES FOR EMPLOYEE SCREENING AND BACKGROUND CHECKS

Hillview employees, directors, principals, officers, and board members of the facility will be required to undergo a criminal history background check pursuant to **N.J.S.A 24:6I-7**. In accordance with **NJAC 17:30-9.7(i)**, Hillview will maintain a personnel record for each owner, principal, management services contractor, employee, and volunteer of the license-holder that includes, at a minimum, copies of the following, as applicable:

- An application for employment or to volunteer;
- Current Hillview Identification Card;
- Driver's license or other State or federally issued photo identification;
- Certification confirming the person's or entity's submission to the jurisdiction of the courts of the State and agreeing to comply with all requirements of the laws of the State pertaining to the Commission;
- Documentation of verification of references;
- Documentation of submission of fingerprint impressions for compliance with a criminal history record background check;
- Job or role description or contract that includes the duties, authority, responsibilities, qualifications, and supervision of the job or role;
- Documentation of all required training and the signed statement of the person indicating the date, time and place that individual person received they received such training and the topics discussed, including the name and title of presenters;
- Documentation of periodic performance evaluations; and
- Documentation of any disciplinary action taken.

Hillview will maintain personnel records for at least 12 months after termination of the person's affiliate with the cannabis business, as required by **NJAC 17:30-9.7(j)**

The Alcohol, Drug-Free and Smoke-Free Workplace Policy. As required by **NJAC 17:30-9.9**, in its Operations Manual, Hillview has established, implemented, and will adhere to a written alcohol, drug- free and smoke-free workplace policy, which will be made available to the Commission upon request, as required by **NJAC 17:30-9.9(c)**. Its policy includes the following provisions:

- The policy will not apply if an employee, who is also a qualifying patient, fails the drug test solely because of the presence of cannabis in a confirmed positive test result, as required by **NJAC 17:30-9.9(a)(3)**.
- Hillview will only strictly adhere to State and Federal laws regarding probable cause substance abuse testing of employees. In this regard, and for example, employees may be

tested for substance abuse in the event that they are observed consuming on site (which may also violate **NJAC 17:30-9.9(a)**), or are visibly intoxicated, impairing their ability to safely and appropriately perform their work-related obligations.

Hillview will assist its employees to overcome substance abuse by providing information on treatment opportunities and programs covered under Hillview's health insurance carrier. However, the decision to seek diagnosis and accept treatment for drug abuse will primarily be the individual employee's responsibility.

The use of alcohol and any tobacco products onsite will be strictly prohibited, as will sales thereof, as per **NJAC 17:30-9.5(b)**. As required by **NJAC 17:30-9.9(d)**, upon receipt of a license, Hillview will contract with an approved New Jersey employee assistance program, which will enable it to best address, and address early, employee work-life balance and other work-related or personal concerns that may negatively impact job performance. Preventative care will be paramount.

WORKPLACE SAFETY

Hillview's safety precautions are consistent with the Occupational Safety and Health Act ("OSHA"), and will otherwise be compliant with safety requirements promulgated by the New Jersey Department of Labor and Workforce Development, Division of Public Safety and Occupational Safety and Health. Hillview has no prior history of workers' compensation claims or safety assessments. In accordance with **NJAC 17:30-11.11(a)**, Hillview will enter into an on-site consultation agreement with the New Jersey Department of Labor and Workforce Development, Division of Public Safety and Occupational Safety and Health, Occupational Safety and Health On-Site Consultation Program ("Consultation Program") and will cooperate fully in the consultation process. Hillview will permit the Consultation Program full access to evaluate its premises and operations and to interview staff on an ongoing basis. In the event the Consultation Program identifies any health or safety hazards in its written report, Hillview will correct, to the satisfaction of the Consultation Program, any such health and safety hazards. Hillview will cooperate with the Consultation Program on an ongoing basis and continue to correct, to the satisfaction of the Consultation Program, health and safety hazards that the Consultation Program may find and identify in subsequent written reports.

Safety Attitude (OSHA). Employees will evaluate their work methods and areas for potential safety hazards and/or ideas for improving safety in their work areas. On an annual basis, the Security Director will work with all managers to conduct a thorough self-inspection to identify any potential safety hazards and create a formal action plan for improving the safety of operations. OSHA requires employers to provide their employees with working conditions that are free of known dangers. Hillview will ensure these standards become the principles that guide its operations.

Reportable Events. As required by **NJAC 17:30-9.11(a)**, Hillview, upon becoming aware of discrepancies identified during inventory, diversion or theft, whether or not the cannabis, funds or other lost or stolen property is subsequently recovered and/or the responsible parties are identified and action taken against them, will: (i) immediately notify appropriate law enforcement authorities by telephone; and (ii) notify the Commission immediately but no later than three hours after discovery of the event. In addition, as required by **NJAC 17:30-9.11(b)**, Hillview will notify the Commission within 24 hours by telephone, followed by written notification within ten (10) business days in the event of an alarm activation or occurrence that requires a response by public safety

personnel. Any breaches of security or alarm system failure shall also be reported in the same manner and records will be maintained for at least two years.

Emergency Response Plans. As required by NJAC 17:30-9.6(a)(5), the safety and security procedures contained in Hillview's onsite Operations Manual includes a "Disaster and Emergency Operation Plan" with procedures to be followed in case of fire or other emergencies. Such procedures include responses to a robbery, fire, medical emergency, bomb threat, severe weather, power failure, workplace violence (including stalkers, active shooters, harassment, and intimidation), reputational harm, and evacuation procedures. Some employees will be designated specific emergency tasks (e.g., assuring full evacuation from individual offices and restrooms). The Security Director will conduct periodic training on these protocols, and employees will be required to promptly report any incident that may be considered a "disaster" or "emergency".

CYBERSECURITY

Hillview will put in place administrative, physical, and technical safeguards to safeguard confidential data. Hillview will utilize dual active/passive firewalls for redundancy, and will include gateway anti-virus, intrusion prevention, and firewall management functionality. All core network components are protected by backup power generators, as well as by local and offsite backups of firewalls, servers, and confidential data. Hillview will enforce a rigorous users and password policy including dual factor authentication and frequent password expiration. Hillview's use of cloud servers and data sets will be backed up and synchronized offsite to encrypted disks.