

Diversity Plan

I. Intent

27 Broom St. LLC (“27 BROOM”) is committed to creating a diverse workforce that does not discriminate based on race, color, religion, gender, national origin, age, disability (or perceived disability), pregnancy, genetic information, gender identity, sexual orientation, military or veteran status, ancestry, marital or familial status, or citizenship. Furthermore, it is our belief that the more diverse and inclusive our team is the more successful 27 BROOM will be in Massachusetts as we seek to utilize ideas and innovations from a variety of backgrounds, experiences and cultures.

II. Purpose

27 BROOM’s Diversity Plan has been created to ensure that our hiring practices create a diverse and inclusive organization. In doing so, individuals will be able to apply their life experiences and talents to support the goals of the company.

27 BROOM’s Diversity Plan is meant to be an evolving document designed to guide decisions and practices that ensure we are able to reach our goals described below. The Diversity Plan represents an initial approach to establish a comprehensive management plan with goals and measures for inclusion and diversity. The Diversity Plan will be evaluated and modified, when necessary, as our company grows and expands.

Any actions taken, or programs instituted, by 27 BROOM will not violate the Cannabis Control Commission’s regulations with respect to limitations on ownership or control or other applicable state laws or regulations.

III. Proposed Initiatives, Goals and Metrics

GOAL 1: Recruit and hire a diverse group of employees that values and promotes inclusiveness among the workforce

Proposed Initiative: As part of its hiring plan, 27 BROOM will seek to hire a workforce that is made up of at least 50% women and 25% described as minorities, veterans, people with disabilities and LGBTQ individuals with a goal to increase the number of individuals falling into these demographics working in the establishment. To achieve this goal, 27 BROOM will:

- Create gender-neutral job descriptions;
- Recruit from state and local employment staffing groups such as MassHire Berkshire Career Center – Pittsfield, MassHire Holyoke Career Center – Holyoke, and MassHire Franklin Hampshire Career Center - Greenfield;
- Post hiring needs in diverse publications such as a variety of web-based recruitment platforms such as indeed.com;

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- Participate in local hiring events and job fairs, at least two annually, including events held by the Massachusetts Cannabis Business Association (MassCBA);
- Attend community group meetings in and around Plainfield, Pittsfield, and/or Springfield, at least two annually, to introduce 27 BROOM and address our existing hiring needs to attract a diverse array of individuals, with an emphasis on those affiliated with the cannabis industry.

27 BROOM will adhere to the requirements set forth in 935 CMR 500.105(4) relative to the permitted and prohibited advertising, brand, marketing, and sponsorship practices of marijuana establishments. 27 BROOM will engage with community groups and leaders to further identify ways in which to attract candidates that may not otherwise be aware of employment opportunities with 27 BROOM. To ensure that our workplace is an inclusive environment and to promote equity among our team, all hiring managers will undergo training to address bias and cultural sensitivity.

Metrics and Evaluation: 27 BROOM will assess the demographics of its employees to see if it is meeting its goal of increasing diversity in these positions. 27 BROOM will annually analyze the staffing makeup and based upon the outcome of those analytics, determine what steps are necessary to further increase the diversity of 27 BROOM. 27 BROOM will assess and review its progress within a year of receiving its Final License from the Cannabis Control Commission for an adult-use marijuana establishment and then annually, thereafter. Based upon this annual review and in conjunction with the renewal of its license, 27 BROOM will be able to demonstrate to the Commission the success of this initiative.

GOAL 2: Create a safe, accepting and respectful work environment

Proposed Initiative: To accomplish this goal, 27 BROOM will require one annual cultural sensitivity training for all employees including specific training for employees in management positions. Employees will be asked to fill out annual engagement surveys which will elicit feedback on 27 BROOM's work environment. Employees will be able to provide feedback to 27 BROOM at any time through the use of an anonymous suggestion box outside management offices for any employee who wishes to leave a suggestion but remain anonymous when doing so. This box will remain locked, so any suggestions left inside cannot be tampered with.

Metrics and Evaluation: 27 BROOM will collect and consider the feedback from the surveys and suggestion box with a goal of having at least 85% of our employees describe 27 BROOM as a safe, accepting, and respectful work environment. All comments and feedback will be documented and reviewed by senior management staff. 27 BROOM will conduct engagement surveys annually and review the results of these surveys within a month of administering them. The suggestion box will be checked at least on a weekly basis by either the CEO, COO, or approved corresponding human resources management of the company. The senior management staff, will identify the top 3-5 areas for improvement and, in collaboration with the 27 BROOM employees, develop goals (short and long term) on how to address those areas of development.

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This review of feedback and engagement surveys will enable 27 BROOM to demonstrate to the Commission the success of its progress upon the renewal of its license each year.

GOAL 3: Ensure that all participants in our supply chain and ancillary services are committed to the same goals of promoting equity and diversity in the adult-use marijuana industry.

Proposed Initiative: To accomplish this goal, 27 BROOM will prioritize working with businesses in our supply chain and required ancillary services that are owned and/or managed by minority groups; women, veterans, people with disabilities, and/or LGBTQ individuals (herein referred to as Plan Populations).

Metrics and Evaluation: 27 BROOM will measure how many of its ancillary services and participants in its supply chain are owned and/or managed by Plan Populations and will calculate the percentage of services and members of its supply chain who meet this requirement. 27 BROOM will ask suppliers and ancillary services if they would identify themselves as a business that is owned or managed by one of the Plan Populations and give supplier contractor priority to these businesses. In order to target a diverse supplier base, 27 BROOM will post hiring needs in diverse publications such as a variety of web-based recruitment platforms and attend community group meetings, at least two annually, to introduce 27 BROOM and address the existing hiring needs to attract a diverse array of suppliers. 27 BROOM will adhere to the requirements set forth in 935 CMR 500.105(4) relative to the permitted and prohibited advertising, brand, marketing, and sponsorship practices of marijuana establishments. During its engagement with community groups and leaders referenced in Goal 1, 27 BROOM will further identify ways in which to attract diverse supply chain candidates that may not otherwise be aware of employment opportunities with 27 BROOM. 27 BROOM's goal will be to work with at least 15% of businesses who identify as one of the Plan Populations throughout its supply chain and services. 27 BROOM will assess these percentages annually and will be able to demonstrate to the Commission the success of its progress upon the renewal of its license each year.

IV. Conclusion

27 BROOM will conduct continuous and regular evaluations of the implementation of its goals and at any point will retool its policies and procedures in order to better accomplish the goals set out in this Diversity Plan. Any actions taken, or programs instituted by 27 BROOM will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.