

**FROM: Frozen 4 Corporation**  
**TO: Cannabis Control Commission**  
**DATE: December 10, 2019**  
**RE: Summary of Diversity Plan**

### Diversity Mission

To encourage the entire community to participate in the Frozen 4 Corporation (“F4”) mission, and to establish specific, measurable goals to promote equity for the above-listed groups in the operation of F4’s proposed Marijuana Establishment.

### Vision

We strive to build a staff that reflects the racial, ethnic and cultural diversity of the community and our country. We will build lasting relationships with people from diverse backgrounds and will aspire to be a leader in promoting inclusion, equity and community engagement. We believe that our commitment to promoting diversity will inspire exceptional employee performance, enhance patient and customer experience and contribute to financial viability.

### Five Key Elements

1. Establish ambitious goals for staff diversity
2. Recruit, hire and retain a diverse staff
3. Increase staff awareness of the importance of inclusion and diversity
4. Conduct continuous outreach designed to engage diverse members of the community
5. Measure engagement and participation against the diversity goals

### Plan Summary

#### Element No. 1 : Establish Ambitious Goals

F4 will strive to develop and maintain a diverse pool of candidates for participation in the business of cultivation. Our intent is to build a workforce that is reflective of the demographics of our community. Our workforce will include minorities, women, veterans, people with disabilities, and LGBTQ+ in numbers at least equal to those present within the community at large, if not more. We will conduct an analysis of the community using public and private resources and will endeavor to improve our understanding of the community.

F4 will establish goals to secure a diverse and qualified group of employees. These goals will include, at a minimum, the following:

- F4 will hire not less than 60 employees within the first 12 months after receipt of its approval to commence operations;
- F4 will assure that not less than 50% of its employees will be diverse. F4 intends to target each demographic in percentages at least equal to the following: women (50%); minorities (20%); veterans (15%); LGBTQ (10%); people with disabilities (10%);

- F4 will count the number of individuals hired who are minorities, women, veterans, people with disabilities, and LGBTQ+, and will assess this number from the total number of individuals hired to ensure that at least 50% of all individuals hired fall within this goal;
- F4 will ensure that all of its employees, including minorities, women, veterans, people with disabilities, and LGBTQ+, are notified of and encouraged to apply for a promotion should a vacancy occur; and
- F4 will count the number of promotions earned by minorities, women, veterans, people with disabilities, and LGBTQ+, and will assess this number from the total number of available promotions to ensure that at least 50% of all individuals promoted fall within this goal.

#### Element No. 2 : Recruit, Hire and Retain a Diverse Staff

In order to attract and retain a diverse staff, the company will engage in the activities listed below:

- F4 has formed a partnership with C3RN and has provided financial support to this certified non-profit. C3RN and F4 will work together to recruit, hire and train as diverse a staff as possible for all aspects of F4's cannabis business.
- Propose new partnerships with culturally diverse institutions, including the Bristol Community College and Taunton Area School to Career Inc., with a focus on conducting targeted recruiting and hiring initiatives for candidates that will diversify the staff;
- At least 4 times a year (i.e. quarterly), provide specific opportunities for success, including job training, mentoring programs, and opportunities for promotion, provided further that all employees shall be eligible for mentoring and promotional opportunities;
- At least twice a year, offer business-relevant seminars to introduce diverse sectors of the workforce to technical skills (e.g. plant science, cultivation techniques, etc.) and analytical skills (e.g. financial accounting, inventory management, etc.), provided further that such seminars shall be available to not less than 200 individuals per seminar;
- Gather, compile and share demographic data, and reflect on any patterns or trends which appear in the data;
- Host career fairs at least 4 times a year (i.e. quarterly), in underrepresented and minority communities;
- Use online resources such as indeed.com, zip recruiter.com and social media platforms to cast a wide search for diverse employees;
- At least monthly, create and distribute internal workplace newsletters to encourage current employees to recommend individuals that might advance the diversity and business performance objectives of the company;
- Contract with suppliers that demonstrate a commitment to diversity and inclusion; and

- Establish procedures for diversity orientation and annual continuing education for all management and staff;
- Develop a consistent process for identifying, screening and interviewing candidates on issues relating to diversity and equity;
- Analyze exit surveys, and develop recommendations to improve retention and quality of staff;
- Implementation of a process to provide orientation to all new administrators on the topic of diversity/equity; and
- Organize social and networking events each twice a year in an effort to build relationships and increase retention.

### Element No. 3 : Increase Staff Awareness

In order to increase staff awareness of the importance of inclusion and diversity, the company will:

- Conduct quarterly reviews of the business to search for and remove barriers for people of diverse backgrounds, to ensure they have access to opportunities within the company;
- Develop collaborative workplace processes to provide first-hand experiences;
- Utilize instructional materials aligned to the company's business objectives in order to provide all employees with an understanding of how cultural differences might affect or enhance participation in the workplace;
- Create an environment of trust between management and staff as well as amongst peers and practices within the business;
- Hold an annual employee training to maintain awareness and to continue to promote diversity within the company; and
- Develop a process and procedure to properly document and resolve any matters that may impact the diversity plan.

### Element No. 4 : Conduct Continuous Outreach

In order to engage diverse members of the community, the company will:

- Encourage community participation in activities sponsored by the company, including community events, street fairs, job fairs, chamber of commerce events and the like;
- Participate in events sponsored by the host community;
- Engage in honest conversation with management and staff on a semiannual basis about issues that impact a diverse population; and
- Use print and electronic communication tools, including web and social media, to share information about the opportunities for employment and participation within the company.

### Element No. 5 : Measurement

In order to measure outcomes against the diversity goals of the company, F4 will:

- At least annually evaluate the then-current process used for recruiting, hiring and retaining staff to determine whether the diversity plan is still effective;
- Collect and analyze data, including demographic information related to the composition of the workforce, and whether the company's plan is achieving its diversity objectives;
- Measure the number of individuals from the above-referenced demographic groups who were hired and retained after the issuance of a license;
- Measure the number of promotions for people falling into the above-referenced demographic groups since initial licensure;
- Measure the number of positions created since initial licensure;
- Measure the number and subject matter of trainings held, and track the number of individuals falling into the above-listed demographics in attendance;
- Document the number and natures of employment outreach and community events and the individuals that attended, and retain copies of any materials distributed at such events;
- Publish such employment data, and at least annually, share that data with management, staff and the CCC;
- Establish a timeline, organized by month, to track F4's progress in meeting its diversity goals;
- Document F4's performance, in a writing suitable for submission to the CCC, within 90 days of its annual renewal date; and
- Develop a written plan for continuous improvement.

#### Affirmative Statement

In accordance with the Guidance on Required Positive Impact Plans and Diversity Plans (revised 2/25/19), Frozen 4 Corporation affirmatively states as follows: (1) The applicant acknowledges and is aware, and will adhere to, the requirements set forth in 935 CMR 500.105(4) which provides the permitted and prohibited advertising, branding, marketing, and sponsorship practices of every Marijuana Establishment; and (2) Any actions taken, or programs instituted, will not violate the Commission's regulations with respect to limitations on ownership or control or other applicable state laws.