

Exhibit W

(Applicants Marijuana Management Plan)

RM CONCEPTS, LLC MARIJUANA MANAGEMENT PLAN

Introduction

RM Concepts, LLC uses best industry practices in production of marijuana and hemp infused products. In order to achieve this goal, RM Concepts, LLC places significant focus on the training of its employees in its operational standards and maintaining those operational standards

Training

RM Concepts, LLC training program requires employees to be occupationally licensed and be a certified responsible vendor. After being hired, any employee must then be trained onsite in order to be authorized to engage in the production of concentrates and/or edible products.

1. **Before Hiring. Prior to being hired by RM Concepts, LLC any employee must have:**
 - a. **An associated key, key, or support license from the Marijuana Enforcement Division;**
 - b. **Certification as a responsible marijuana vendor. Certified responsible vendors must have training which includes at a minimum:**
 - i. Marijuana's physical effects based on type of marijuana product;
 1. The amount of time to feel impairment;
 2. Visible signs of impairment; and
 3. Recognizing the signs of impairment.
 - ii. Sales to minors. Training shall cover all pertinent Colorado law provisions.
 - iii. State laws and rules affecting owners, managers, and employees.
 1. a. Local and state licensing and enforcement;
 2. Compliance with all Inventory Tracking System regulations;
 3. Administrative and criminal liability;
 4. License sanctions and court sanctions;
 5. Waste disposal
 6. Health and safety standards
 7. Patrons prohibited from bringing marijuana onto licensed premises;
 8. Permitted hours of sale;
 9. Conduct of establishment;
 10. Permitting inspections by state and local licensing and enforcement authorities;
 11. Licensee responsible for activities occurring within licensed premises;
 12. Maintenance of records;
 13. Privacy issues; and
 14. Prohibited purchases.
2. Prior to engaging in the manufacture of any Marijuana or Hemp concentrate, each employee must:
 - a. Be given the comprehensive training manual that provides:

- i. Step-by-step instructions for all standard operating procedures for each method of concentrate production used at that Licensed Premises;
 - ii. Machinery Training;
 - iii. Quality control procedures;
 - iv. The emergency procedures for that Licensed Premises;
 - v. The appropriate use of any necessary safety or sanitary equipment;
 - vi. The hazards presented by all solvents used within the Licensed Premises as described in the material safety data sheet for each solvent;
 - vii. Cleaning Procedures.
3. **At this point in time RM Concepts, LLC does not intend to engage in the manufacture of any edible Marijuana products. In the event that RM Concepts, LLC decided to engage in such production, they shall:**
 - a. Prepare a kitchen for certification and/or inspection by any relevant authority that complies with all Grand County and Colorado Department of Public Health and Environment Regulations which pertain to and govern the operation of such kitchen facilities.
 - b. Prior to engaging in the manufacture of any Edible Retail Marijuana Product each employee shall:
 - i. Have a currently valid ServSafe Food Handler Certificate obtained through the successful completion of an online assessment or print exam; or
 - ii. Take a food safety course that includes basic food handling training and is comparable to, or is a course given by, the Colorado State University extension service or a state, county, or district public health agency, and;
 - iii. Must maintain a status of good standing in accordance with the course requirements, including attending any additional classes if necessary. Any course taken pursuant to this rule must last at least two hours and cover the following subjects:
 1. Causes of foodborne illness, highly susceptible populations and worker illness;
 2. Personal hygiene and food handling practices;
 3. Approved sources of food;
 4. Potentially hazardous foods and food temperatures;
 5. Sanitization and chemical use; and
 6. Emergency procedures (fire, flood, sewer backup).
4. **Disciplinary Action.**
 - a. In the event that an employee of RM Concepts, LLC does not follow the procedures and guidelines set forth above, RM Concepts, LLC will take any single action or combination of actions as set forth below:
 - i. Notification of Impropriety;
 - ii. Instruction of how to comply with the policy;
 - iii. Suspension from employment;
 - iv. Termination of Employment

- b. In the event that an employee or independent contractor ceases employment, work, or is terminated, RM Concepts will:
 - i. Relieve Employee of access to the premises and security identification documents.
 - ii. Change all locks, combinations, or other secure access/egress protocols to prevent further access.

Prevention of Sale or Distribution to Persons under 21 Years Old

Because RM Concepts, LLC is a Marijuana Infused Products manufacturer, by law, it is only allowed to sell its products wholesale to marijuana dispensaries within the state of Colorado. It is not allowed to sell products directly to the end user. Consequently the risk of RM Concepts, LLC in selling directly to a minor is very low.

Despite this, RM Concepts, LLC is dedicated to being a responsible steward of the community and has therefore adopted a policy which will help to ensure that no end users of any RM Concepts, LLC products reach minors. These policies include:

1. Maintaining a safe and secure premises using cameras, lighting, alarm systems and fencing to prevent any theft of the product;
2. Maintaining strict adherence to METRC (formerly, "MITS,"), the marijuana inventory tracking system which tracks plants and associated marijuana products from seed to sale.
3. Selling products only to licensed dispensaries which are in good standing with the Colorado State Marijuana Enforcement Division and the local jurisdictions in which customer dispensaries are located;
4. Requiring customers to make a pledge to comply with identification requirements for dispensaries as set forth under Colorado Law.
5. Maintaining labels and child safety protections as required by state law on any products sold;

Last, RM Concepts, LLC believes that it is important and part of its corporate social responsibility to give back to the community in which it operates. RM Concepts, LLC is proposing to donate an annual lump sum to drug education, awareness, outreach, and/or treatment. Potentially recipients of such donation initially include the Luna Center, LLP and The Watershed Treatment Centers.

Waste Management Plan

Any waste disposal by a licensed marijuana facility must be compliant with 1 CCR 212-1 M307 (et. al). The Clerk is concerned that Applicant's disposal plan as outlined is not Compliant with M307(F). Under M307(F)(3), Marijuana waste may be composted on site at a facility owned and operated by a facility in compliance with 6-CCR 1007-2 (Part 1). (CDPHE Regulations Pertaining to Solid Waste Management).

Under 6-CCR 1007-2 composting facilities with operations of less than 100 cubic yards

and consist of Class 1 Feedstocks are exempt from the regulations (Section 14.1.2.). RM Concepts will not be producing more than 100 cubic yards of waste at any point in time. Class 1 Feedstocks are defined as "Agricultural crop residues, manure, untreated wood wastes, yard, paper and green wastes." Marijuana or its oils are therefore a Class 1 Feedstock because it is either a crop residue or a green waste. Since the composting is composed of class 1 Feedstocks, and the amount of compost is less than 100 cubic yards, it is exempted from the regulations of 6 CCR-1007-2 (14.1.2). Therefore, it can dispose of the composted waste in compliance with M307 at Hurd Creek Ranch in full compliance with Colorado State regulations.

In the event that for any reason said waste disposal is deemed non-compliant, Applicant will arrange to have its composted waste disposed of at Summit County Resource Allocation Park located at 639 SCR 66, Dillon, CO 80435. This information is attached to Applicant's Revised Waste Management Plan, attached hereto.