Odor Management Plan

Each municipality in California may have its own ordinances and regulations relating to odor control and mitigation. As part of Bask Ventures, Inc.'s commitment to positive community impact, Bask Ventures, Inc. has developed odor mitigation strategies to minimize cannabis smells being emitted by the cultivation facility. Bask Ventures, Inc. has considered potential impacts to people, animals, and neighboring properties during site selection, facility design, and development of standard operating procedures (SOPs). Both primary and secondary systems will be installed within the cultivation to reduce detectable odors outside the facility.

Reducing Known Odor Sources

Propagation - During the propagation stage, young plants are created from cuttings or "clones" of existing plants in the company's inventory. Very little odor will be emitted in this stage, primarily during the cutting process. All activities will be conducted with the entrance to this room closed to minimize odors escaping into the adjacent hallway. All tables and surfaces that come in direct contact with cannabis will be cleaned and disinfected immediately after use to prevent build-up of residue and potential odors. All non-contact surfaces in this room will be cleaned and disinfected on a weekly basis. Due to the minimal odor emissions at this stage, the propagation room will rely on a commercial PHI unit (see specs below) that will be installed in the primary HVAC to mitigate any odors that enter the ventilation system.

Vegetative - During the vegetative growth phase, plants are transplanted from 2-inch clone trays holding 5-inch cups to 3-gallon planters and receive 18 hours of light per day. During vegetative growth, very little odor is emitted. All activities will be conducted with the entrance to this room closed to minimize odors escaping into the adjacent hallway. All tables and surfaces that come in direct contact with cannabis will be cleaned and disinfected immediately after use to prevent build-up of residue and potential odors. All non-contact surfaces in this room will be cleaned and disinfected on a weekly basis. Due to the minimal odor emissions at this stage, the vegetative room will rely on the PHI unit installed in the primary HVAC to mitigate any odors that enter the ventilation system.

Flowering - In these rooms, plants receive 12 hours of light and 12 hours of darkness to induce flowering. The plants will initially generate minimal odor, but this will become more pronounced as the plants approach maturity. All activities will take place with the entrance to the room closed to prevent odors from entering the adjacent hallway. Each flowering room will also feature a filter affixed to the inlet of its HVAC system that uses activated charcoal to absorb most odors. While carbon filters have been shown to be one of the most effective methods of reducing odors, they do not remove 100% of the pollutants that pass through them; the PHI unit installed in the primary HVAC system will remove most remaining odors that aren't absorbed by the activated carbon filters, rendering the exhausted air free of any detectable odor.

Harvest - In these rooms, live plants are harvested and broken down into categories for packaging. During harvest, the most significant odor is emitted due to handling and agitating the plants. All activities will take place with the entrance to the room closed, to prevent odors from entering the adjacent hallway. Each harvest room will also feature a filter affixed to the inlet of its HVAC system that uses activated charcoal to absorb most of the odors. The PHI unit installed

in the primary HVAC system will remove most remaining odors that aren't absorbed by the activated carbon filters, rendering the exhausted air free of any detectable odor.

Cure - Within the cure room, harvested flowers and trimmings are dried on exposed racks for a period of 2-5 days and then placed into sealed curing tubs for another 10-20 days. The cure room is an isolated, secure and contaminant free room specifically designed and equipped to maintain constant temperature, humidity and air circulation. Moderate odor can result from the cure process, and Bask Ventures, Inc. will rely on the PHI unit installed in the primary HVAC system to remove any odors.

Packaging - Within the packaging station, dried flower is separated according to bud size and placed into either bulk or retail packaging. Mild odor is emitted during the packaging process, as the cured cannabis is agitated during packaging. This also results in a small amount of particulate matter being released, which can contribute to the odors emitted. The packaging room will be equipped with an activated carbon filter, similar to those used in the other more odor-intensive rooms. The activated carbon filter will absorb a large portion of the odors emitted during packaging, and features a pre-filter designed to collect particulate matter.

Storage – Odors should be minimal in designated storage areas but may be elevated at times due to potentially open product containers being held in the designated quarantine area. Employees will be trained to place open containers of quarantined products into resealable plastic (Ziploc) bags, and immediately close all containers in the storage area to minimize odor. The storage room will also be equipped with an activated carbon filter.

Odor Mitigation Devices
Bask Ventures, Inc. will install a commercial Photohydroionization (PHI) Unit as the primary odor mitigation device, designed to eliminate 99.99% of all odors safely and efficiently. In rooms where the odor is more intense, Bask Ventures, Inc. has elected to use activated carbon filters as a secondary odor reduction method.

Commercial PHI Unit by RGF®
This device is designed to reduce air pollutants that cause odors such as volatile organic compounds (VOCs) or smoke, and kills mold, bacteria, and viruses. The unit is easily mounted into air conditioning and heating system air ducts, which are the primary conduits for odors being released outside the facility. When the HVAC system is in operation the Commercial PHI Unit creates an advanced oxidation process consisting of hydro-peroxides, ozonide ions, super oxide ions and hydroxide ions. All are considered "low-r oxidizers" that revert to oxygen and hydrogen during the oxidation of a pollutant. The system comes fully assembled for easy installation.

Germicidal UV light rays have been used for decades by the medical industry as a method for destroying micro-organisms (germs, viruses, bacteria). UV light is dependable and can be easily installed in HVAC ducts or a plenum. Germicidal UV light is effective in reducing the airborne micro-organisms that pass directly through its rays. However, germicidal UV light has little to no effect on gases, vapors or odors. PHI Advanced Oxidation, on the other hand, is very effective on gases, vapors, VOCs and odors.

The combination of safe, low-level ozone and UV light enhanced by a hydrated quad-metallic compound target develops an advanced oxidation reaction that reduces ozone to safe levels. This process also produces hydro-peroxides, super oxide ions, ozonide ions and hydroxides. By engineering the proper UV light wavelength, in combination with a triple function, no maintenance unit, the PHI Cell provides safe hydro-peroxides, super oxide ions, ozonide ions and hydroxides to purify the air.

Activated Carbon Filters
Secondary odor mitigation will include the placement of high-quality, 2.5" activated carbon filters in the HVAC systems. These filters will be affixed to the HVAC intake vents in all rooms where cannabis is grown, harvested, dried, packaged, stored, displayed for sale, or otherwise handled.

These filters act by "scrubbing" the air, absorbing contaminants into the activated carbon material as it passes through to be recirculated throughout the HVAC system. Bask Ventures, Inc. has selected Can Filter for the provider of these filters. The products are made in North America and Can Filter has a reputation for supplying high-quality filters for over 30 years. The brand was selected for having the thickest filter material and longest shelf life of the various filters Bask Ventures, Inc. compared.

Service and Maintenance
Employees will be instructed on the routine maintenance of pre-filters and carbon filters during orientation and training. Employees will learn how to disassemble pre-filters and carbon filters for inspection and proper maintenance, along with proper removal and reinstallation.

Pre-filter - Employees will perform maintenance on pre-filters monthly by vacuuming the dust from the pre-filter. Pre-filters will be replaced every six months.

Carbon filter - Employees will perform maintenance on carbon filters as needed by vacuuming the dust from the outside of the carbon filter. Carbon filters will be replaced every four years.

PHI unit – Employees will routinely check the bulb during monthly inspections with a sight glass to confirm the unit is operational. Per manufacturer's instructions, the bulbs will be replaced every 18,000 hours, or around every 4 years at an average of 12 hours per day of operation.

All filters and pre-filters will be tagged to identify the employee that installed the device, the date and time of the replacement, and the date by which the device should be replaced. Service and maintenance records will be maintained for all serviceable items in the odor control system. These records will contain:

- Date and time of service,
- Service performed,
- Name of individual performing the service, and
- Unit number or device number serviced.

Odor Complaints and Troubleshooting

Bask Ventures, Inc. has developed SOPs to manage complaints or system malfunctions should they arise. As part of routine facility inspections, Bask Ventures, Inc.'s Quality Assurance Manager (QAM) will walk around the perimeter of the facility to confirm there are no detectable odors being emitted. Should any odor be detected, the QAM will record the issue in their inspection notes including the location the odor was detected.

If Bask Ventures, Inc. receives a complaint of odors being emitted from the facility, the QAM will complete a complaint form to document the incident and begin the investigation and resolution process. Once the form has been completed, it will be immediately provided to the GM and Maintenance Manager. The complaint form will include:

- Date and time of complaint,
- Name of the individual making the complaint,
- Description of the complaint, and
- Name and badge number of the employee recording the complaint.

Once an odor mitigation concern has been identified, the Maintenance Manager will follow a diagnostic process to pinpoint the possible source of the odors, complete mitigation procedures such as repair or replacement of equipment as needed and confirm the repair has resolved the issue.