

LeafWorks Inc. Genetic Data Policy

V1.0

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LeafWorks is an herbal genetics company creating genetic verification products and services for the botanical industry, tools that are built with the community to serve the community. The purpose of these products and services is to empower our customers to grow the market themselves, enable substantiated label claims, establish a transparent supply chain, and maximize product value for our customers.

The information presented in this data policy outlines how LeafWorks treats customer genetic data. LeafWorks is a company rooted in honoring herbal culture and community empowerment, and as such, we feel it is paramount to offer transparency and integrity in the way we treat submitted material and its associated genetic data. Genetic data is defined herein as DNA, DNA-derived information and/or sequencing information as the case may be.

Handling of Data from Tests Purchased from LeafWorks

Genetic data derived from tests that you purchase from LeafWorks is only used to complete the genotyping test purchased and reporting the results back to you as our customer. DNA or sequencing information from purchased tests are not entered into the LeafWorks genetics database for use in its research program or for disclosure to any other customer or third party.

If you as a customer want your DNA or sequencing information submitted to the LeafWorks research program (for example, if you want to have your plant's or cultivar's genetic code validated and added to LeafWorks' research program for use in developing and improving the genetic identification tests sold to customers), please see the *Research Participation* section below on how to opt into the program.

How we store submitted material from purchased tests

Cannabis and hemp: For purchased tests for cannabis and hemp, LeafWorks only works with DNA. Kit collection cards submitted to LeafWorks for genetic testing are stored for three months after a test report is returned to the customer. These cards are then destroyed unless, in accordance with LeafWorks' sale documents, the customer notifies LeafWorks of a question with respect to its test prior to such destruction date.

Herbal plants: For purchased tests for herbal plants (i.e., plants other than cannabis or hemp), raw material submitted to LeafWorks for genetic testing is stored for three months after a test report is returned to the customer. This raw material is then destroyed unless, in accordance with LeafWorks' sale documents, the customer notifies LeafWorks of a question with respect to its test prior to such destruction date.

Extracted DNA (All Plants): Any associated DNA extracted for any purchased test, if applicable, is destroyed 12 months after a test report is returned to the customer unless, in accordance with LeafWorks' sale documents, the customer notifies LeafWorks of a question with respect to its test prior to such destruction date. These three and 12 month windows allow LeafWorks to retest any samples directly from the submitted card/material and from extracted DNA, respectively, at the customer's behest, should the need arise.

DNA-derived and Sequencing Information (All Plants): For purchased tests, DNA-derived information and/or sequencing information that may be generated to complete purchased tests will enter our archive servers for six years, provided that where any such information is legally required to be retained thereafter pursuant to applicable law, regulation or requirement of any court or arbitration, such information shall be retained only until the expiration of its legal requirements. These data are kept for company insurance, accounting, interaction with the submitting customer, and dispute resolution reasons only and are not for reanalysis.

If the customer requests a retest after submitted material and/or genetic data is destroyed, customers must repurchase tests and submit new samples.

For customers entering our LeafWorks-Certified Seal program for their products, DNA-derived information and/or sequencing information that substantiates the identity of the product line showcasing our seal will enter our archive servers for six years.

Persons who have access to data

The only LeafWorks employees who will have access to your genetic data will be laboratory workers and computer and scientist personnel approved to do so. All forms of these genetic data are kept in secure facilities.

To maintain anonymity during genetic data processing, data are organized by alphanumeric code. Data are only linked to customer information upon intake and for test report generation. This process is overseen and maintained by LeafWorks executives.

Research Participation

For those customers interested in joining our mission to empower the herbal community through genetic verification, LeafWorks offers customers the opportunity to support our scientific research.

For purchased tests, customers will be asked upon purchase if they would like to opt-in. Customers must actively opt-in if they want to participate in our scientific research program, as enrollment is not automatic. Choosing not to participate will not impact your LeafWorks experience, although it can limit the work we do in providing the community with new DNA ID tests. Our research program is constructed to create products and services that explicitly support our customers to reach their own business goals, not to compete with them.

If you choose to participate, your genetic data will be put into the LeafWorks DNA Research Database™ to facilitate work by LeafWorks' scientists for the creation of new and improved genetic tests to further serve the community. **These genetic data will be kept private, and viewable only to the LeafWorks research and development team as LeafWorks develops new and improved DNA identification tests and breeding tools that help our clients and community thrive.**

As LeafWorks offers tests and services rooted in vetted material, LeafWorks requires any submissions to our DNA Research Database™ to be curated from authenticated sources and a representative piece of the plant that has been vouchered for documentation. The LeafWorks team will guide you through the submission process. If Cannabis plants, the voucher must be submitted to Canndor, for inclusion in its Cannabis Herbarium. For federally compliant plant species, vouchers must be submitted to LeafWorks or established with an in-house herbarium with maintained, shared documentation and committed long-term

storage. LeafWorks must be given any in-house specimens scheduled to be destroyed by that organization to maintain proof of authentication.

Data in our research program is subject to the applicable provisions of the Nagoya Protocol to maintain international standards of genetic information acquisition and use. The concept of honoring communities responsible for stewarding important plants resonates with us and our mission. For submissions from non-signatory countries to this protocol, LeafWorks honors the spirit of the Nagoya protocol through the LeafWorks Give Back Program™, whereby a portion of profits from applicable tests are donated back to charities in the community from which material emanated.

Please see our *LeafWorks Give Back Program™ policy* for more information.

Opting into the research program does not give contributors rights to any products, inventions, patents, or services that LeafWorks discovers or develops, all of which are under the exclusive ownership of LeafWorks. LeafWorks expressly rejects the rights to the original plants themselves.

Breeding

LeafWorks will never engage in its own in-house breeding program. No research data will be used for such purposes. We're geneticists, not breeders, and feel it is a conflict of interest to engage in such endeavors.

Consulting Work Related to Genetic Data

LeafWorks offers consulting for community organizations who want help finding a desired phenotype, establishing best agricultural practices, stabilizing or improving a cultivar, or projects along similar lines, involving their own seeds or plants or seeds or plants that they provide to us. We expressly do not own the plants on which we are contracted to work. In fact, LeafWorks expressly rejects all ownership rights to those plants for which we are hired to consult, whether inside or outside of federal legalization. However, LeafWorks retains the right to utilize any genetic data submitted for consulting work for research purposes unless otherwise mutually agreed upon. Arrangements on treatment of genetic data pertaining to consulting work are subject to contractual agreements.

Genetic Data Protection

LeafWorks does not sell your genetic data to third parties, nor do we publish your genetic data online in public repositories for others to use, unless specifically requested by a customer. All genetic data is maintained with password protection and state-of-the-art encryption.