### FORM 7

# **MONTHLY PROGRESS REPORT**

| Name of Listed Issuer: <u>4Front Ventures Corp.</u> (the "Issuer" or "4Front").      |            |
|--|------------|
| Trading Symbol: FFNT   |            |
| Number of Outstanding Listed Securities: 126,001,492 Subordinate Voting Shares ("SVS | <u>3")</u> |
| Date: December 31, 2019  |            |

This Monthly Progress Report must be posted before the opening of trading on the fifth trading day of each month. This report is not intended to replace the Issuer's obligation to separately report material information forthwith upon the information becoming known to management or to post the forms required by Exchange Policies. If material information became known and was reported during the preceding month to which this report relates, this report should refer to the material information, the news release date and the posting date on the Exchange website.

This report is intended to keep investors and the market informed of the Issuer's ongoing business and management activities that occurred during the preceding month. Do not discuss goals or future plans unless they have crystallized to the point that they are "material information" as defined in the Policies. The discussion in this report must be factual, balanced and non-promotional.

#### **General Instructions**

- (a) Prepare this Monthly Progress Report using the format set out below. The sequence of questions must not be altered nor should questions be omitted or left unanswered. The answers to the items must be in narrative form. State when the answer to any item is negative or not applicable to the Issuer. The title to each item must precede the answer.
- (b) The term "Issuer" includes the Issuer and any of its subsidiaries.
- (c) Terms used and not defined in this form are defined or interpreted in Policy 1 Interpretation and General Provisions.

#### **Report on Business**

1. Provide a general overview and discussion of the development of the Issuer's business and operations over the previous month. Where the Issuer was inactive disclose this fact.

In December 2019, the Issuer:

• Announced that its Mission dispensary located in Chicago's South Shore neighbourhood would begin adult use sales January 1, 2020.

- Continued its cultivation optimization project in its Georgetown, Massachusetts facility.
- Continued its build out of its Commerce, California facility.
- 2. Provide a general overview and discussion of the activities of management.

Management is focused on infrastructure initiatives to support the production capabilities in markets in which it operates, the development of additional assets in legal medical and adult-use cannabis markets, and the continued growth of its operating/managed cannabis dispensaries/stores.

3. Describe and provide details of any new products or services developed or offered. For resource companies, provide details of new drilling, exploration or production programs and acquisitions of any new properties and attach any mineral or oil and gas or other reports required under Ontario securities law.

Not applicable.

4. Describe and provide details of any products or services that were discontinued. For resource companies, provide details of any drilling, exploration or production programs that have been amended or abandoned.

Not applicable.

5. Describe any new business relationships entered into between the Issuer, the Issuer's affiliates or third parties including contracts to supply products or services, joint venture agreements and licensing agreements etc. State whether the relationship is with a Related Person of the Issuer and provide details of the relationship.

Not applicable.

6. Describe the expiry or termination of any contracts or agreements between the Issuer, the Issuer's affiliates or third parties or cancellation of any financing arrangements that have been previously announced.

Not applicable.

7. Describe any acquisitions by the Issuer or dispositions of the Issuer's assets that occurred during the preceding month. Provide details of the nature of the assets acquired or disposed of and provide details of the consideration paid or payable together with a schedule of payments if applicable, and of any valuation. State how the consideration was determined and whether the acquisition was from or the disposition was to a Related Person of the Issuer and provide details of the relationship.

Not applicable.

8. Describe the acquisition of new customers or loss of customers.

Not applicable.

9. Describe any new developments or effects on intangible products such as brand names, circulation lists, copyrights, franchises, licenses, patents, software, subscription lists and trade-marks.

Not applicable.

10. Report on any employee hirings, terminations or lay-offs with details of anticipated length of lay-offs.

Across all subsidiaries, the Issuer hired approximately 32 employees in December 2019.

11. Report on any labour disputes and resolutions of those disputes if applicable.

Not applicable.

12. Describe and provide details of legal proceedings to which the Issuer became a party, including the name of the court or agency, the date instituted, the principal parties to the proceedings, the nature of the claim, the amount claimed, if any, if the proceedings are being contested, and the present status of the proceedings.

Not applicable.

13. Provide details of any indebtedness incurred or repaid by the Issuer together with the terms of such indebtedness.

On December 31, 2019, the Issuer paid \$180,392.22 in interest on the \$32,000,000 in convertible notes ("Notes") issued in November 2018. The Notes mature in November 2021, bear interest at LIBOR + 11% during the first year, +10% the second, and +9.5 in the third), and are convertible into to 4Front proportionate voting shares at a price equivalent to US\$0.83 per subordinate voting share. Half the interest due is paid in cash monthly, and half is paid in kind.

14. Provide details of any securities issued and options or warrants granted.

| Security                         | Number<br>Issued | Details of Issuance  | Use of<br>Proceeds |
|----------------------------------|------------------|--|--------------------|
| Subordinate Voting Share ("SVS") | 167,840          | An aggregate 167,840 SVS were issued to 15 shareholders on the conversion of 2,098 Proportionate Voting Shares ("PVS") (2) |                    |

- (1) State aggregate proceeds and intended allocation of proceeds
- (2) PVS are convertible to SVS at the holder's option (subject to certain restrictions) on a one (1) PVS for eighty (80) SVS basis

15. Provide details of any loans to or by Related Persons.

A director and officer of the company is a part-owner of a firm which has extended the Issuer a real estate improvement/development loan of up to US\$50,000,000 of which approximately US\$45,000,000 had been extended as of December 31, 2019, with additional monies to be extended after the period.

16. Provide details of any changes in directors, officers or committee members.

Not applicable.

17. Discuss any trends which are likely to impact the Issuer including trends in the Issuer's market(s) or political/regulatory trends.

Vape Bans

In October 2019, controversies arose regarding potential health effects of vape products. Multiple states are considering new vape product limitations or outright bans. Some such vape bans are being challenged in legal proceedings, and the Issuer currently does not have enough information in order to forecast what, if any, material impact such bans will have on its business.

## **Certificate of Compliance**

The undersigned hereby certifies that:

- 1. The undersigned is a director and/or senior officer of the Issuer and has been duly authorized by a resolution of the board of directors of the Issuer to sign this Certificate of Compliance.
- 2. As of the date hereof there is no material information concerning the Issuer which has not been publicly disclosed.
- 3. The undersigned hereby certifies to the Exchange that the Issuer is in compliance with the requirements of applicable securities legislation (as such term is defined in National Instrument 14-101) and all Exchange Requirements (as defined in CNSX Policy 1).
- 4. All of the information in this Form 7 Monthly Progress Report is true.

Dated January 7, 2020

| Brad Kotansky                      |  |  |  |  |
|------------------------------------|--|--|--|--|
| Name of Director or Senior Officer |  |  |  |  |
|                                    |  |  |  |  |
| lsl Brad Kotansky                  |  |  |  |  |
| Signature                          |  |  |  |  |
|                                    |  |  |  |  |
| Chief Financial Officer            |  |  |  |  |
| Official Capacity                  |  |  |  |  |

| Issuer Details Name of Issuer                    | For Month End          | Date of Report<br>YY/MM/DD |  |  |  |
|--|------------------------|----------------------------|--|--|--|
| 4Front Ventures Corp.                            | December 2019          | 20/01/07                   |  |  |  |
| Issuer Address 5060 North 40th Street, Suite 120 |                        |                            |  |  |  |
| City/Province/Postal Code                        | Issuer Fax No.         | Issuer Telephone No.       |  |  |  |
| Phoenix, AZ 85018                                | ( - )                  | (602) 633-3067             |  |  |  |
| Contact Name                                     | Contact Position       | Contact Telephone No.      |  |  |  |
| Whit Richardson                                  | VP Investor Relations  | (602) 633-3067             |  |  |  |
| Contact Email Address                            | Web Site Address       |                            |  |  |  |
| IR@4frontventures.ciom                           | www.4frontventures.com |                            |  |  |  |