

CODE OF RETAIL ETHICS

Version dd. October 20, 2020

"The Code is more what you'd call "guidelines" than actual rules." Captain Hector Barbossa, "Pirates of the Caribbean: The Curse of the Black Pearl"

Therefore, always make your own decision based on the current situation. CORE only suggests possible solutions, but it cannot decide for you what will be the right thing to do in each case.



This Code has been developed by retail managers for themselves and applies to all retail employees and contractors. By default, CORE is designed for Vkusvill employees, but it can be used by other companies as well.

This Code has the following objectives:

- promote the implementation of our values within and outside the company;
- help built a strong team;
- help new hires incorporate into the company, and encourage the old ones to embrace changes;
- provide guidelines for the right decision-making and handling controversial situations;
- be the foundation for building a culture of trust, self-government, and integrity.

Our values:

- integrity:
 - \circ we value openness and honesty,
 - we say what we mean, and we do what we say;
- trust:
 - we trust our customers and respect their opinion,
 - we believe that our employees and partners do their job in good faith, but we take talent and partner selection very seriously since our customers expect perfect products and a high level of service at all times;
- responsibility:
 - each of us contributes to the overall success, understands the importance of and responsibility for the decisions he or she makes;
- good relationships and mutual support:
 - we maintain good relationships within the team, with partners and customers to ensure maximum performance;
- decent work:
 - we value our jobs since they allow us to fulfill and develop ourselves, they give us stability and honest wages; we are not afraid of mistakes and do not punish for them, since it's better to act doing mistakes than do nothing at all;
- social significance:
 - our work benefits the community.

Our evolutionary goal is to make healthy foods available to everyone!

Customer interaction

In our stores, employees are welcoming hosts. Each one of them is authorized to decide how to make our stores better and more pleasant for employees and customers. We treat our colleagues and customers as if they were someone close to us. *Even if it is a sour old lady who only came to spoil everyone's mood, just imagine she is your friend's mom and treat her with proper respect and friendliness.*

Always look for opportunities to help a customer, but without prejudice to other customers' needs. For example, you can open a door before a customer; help them carry shopping bags to the car or even home; order products they may need; watch a baby stroller or a dog outside while they are shopping; occupy their child in the store; let them use a restroom; check if a product is in stock, find the nearest store with the product is available; help them install the VKUSVILL app or Telegram bot; keep and return items lost or forgotten in the store; get goods from hard-to-reach places like deep or top shelves; read labels; help them down the stairs; call an ambulance and escort a customer to the hospital and stay there until his or her relatives arrive; pay for the customer's purchase after he or she remits the required amount to the employee's card.

It is not the boss, but satisfied customers who pay you a salary! Customers do appreciate:

- your friendly and honest communication, especially if you use personal greetings and farewells, instead of standard memorized ones; sincere smiles, willingness to help;
- when you compliment them on their choice, help them choose a product, share your own preferences, provide detailed information on a product, offer them to taste a product before buying it, help them find a product on the shelf;
- jokes, but not offensive ones; it is better to refrain from any jokes that can go wrong;
- personal approach, for example: printing out information about a product, genuine interest in customers, addressing them by their name, no nagging for upsells.

1. Promises

- 1. Each store employee promises that:
 - There will never be any expired products on the shelves. When it comes to unpacked vegetables and fruits, check the sell-by date on the supplier's label and monitor them closely so that they are immediately written off as soon as they lose their marketable quality. Especially sensitive berries must be checked 3 to 4 times a day.
 - He or she will never be rude, unprofessional, or callous. *Never discuss customers in the store! When choosing between two tasks, always choose the one that is more important for the customers in the store.*
 - He or she will contact the supervisor (Floor Manager, Retail Assistant Manager, Area Manager, CORE owner) if unable to handle a situation himself or herself.
 - Any returned goods will be accepted according to the rules, any complaint will be resolved in the store. *If you see that a customer needs you while you're talking on the phone, even if it is Retail Manager at the other end, immediately hang up and reach the customer.*
 - Shopping will be convenient and pleasant: attractive and convenient layouts, easy to find products, up-to-date price tags, no boxes obstructing the passages, nothing that may prevent customers from entering, clean premises, sanitary compliance, compliance with product compatibility and temperature requirements. *That is why you should never put boxes with food on the floor. As soon as you finish the layout, immediately remove any cardboard and sweep the floor.*
 - There will never be more than two customers in line at a cash register unless all other cash registers are busy serving other customers. *If you see that a line has formed, and at least one cash register is unoccupied, then occupy it yourself or invite a colleague to do so, even if you are busy laying goods out on the shelves. And to see a line, you must stay out of the back room.*
 - He or she will inform a customer about the unavailability of a favorite product and the possibility of ordering a replacement for the day.
- 2. Courier promises that:
 - He or she will always come to work clean, shaved, neat, without strong odors.
 - He or she will always communicate with customers politely and calmly.
 - He or she will know the app well, advise customers on the procedures for order creation, order picking, packaging, return rules, loyalty programs.
 - He or she will use PPE and comply with the applicable safety requirements.
 - He or she will carefully deliver the order in an insulated thermal bag to the customer's apartment, place the order on the thermal bag (not on the floor) to ensure contactless delivery.

- He or she will deliver the order within 45 minutes after the order is made. If it is impossible, immediately inform the manager.
- 3. Picker promises that:
 - In fulfilling an order, he or she will pull out the right goods as per the customer's order and comments.
 - He or she will notify the customer about any unavailable, old, defective goods, and coordinate further actions concerning such goods: replacement, rejection, order cancellation.
- 4. Floor Manager promises that:
 - The store will be opened on time.
 - All stock records will be up-to-date and correct. *Accordingly, every time you find a discrepancy, first make an adjustment, and only then figure out the cause. As soon as the goods are removed from the shelf, write them off in 1C.*
- 5. Retail Assistant Manager promises that:
 - He or she will timely inform store employees about any changes in the company.
 - He or she will always help store employees in solving problems.
- 6. Retail Manager promises that:
 - Our stores will not make life worse for those living nearby.
- 7. Each employee promises at his or her level that:
 - Our stores will be safe.

The main promise that each retail employee should make is that every customer must leave our store satisfied and eager to return! Therefore:

- Until each customer has been served, and all boxes in the front store have been emptied and removed do not engage in any other activity, either personal or work-related! Nothing at all! Even if it is important.
- Do not drink alcohol: neither at work nor before it. Do not smoke while wearing a uniform. After smoking, take measures to get rid of cigarette breath and remove the smell of tobacco from your hands. We are against any bad habits, especially when our customers complain about them.
- Do not steal! We are constantly improving our theft detection systems. We have zero tolerance for any theft, either from the company or from our customers, in any form whatsoever. For

example, scanning your own card for someone else's purchase or providing a fake medical certificate for sick leave is theft.

- Never discuss a customer: neither before them nor behind their back, nor among yourself, nor with other customers! Some customers may be offended even if called summer residents. Never discuss customers in the back room, since walls in our stores are quite thin. For the same reason, never swear at other employees or use obscene language in the back room. Always treat customers and colleagues with respect. Do not complain about your life before customers and spoil their shopping with your frustration.
- Never refuse any payment method. Quite on the contrary, if a buyer pays with a bunch of coins, sincerely thank him or her for making it more convenient for you, so that he or she does not feel uncomfortable. Always accept as payment any currency notes or coins, whatever their denomination or condition may be, even if they are torn, crumpled, or dirty. The only exception is counterfeit bills.
- Never try to prove a customer wrong, for example, that our goods are of proper quality when a customer returns them. We continuously review all returns, and in case of any massive product return, we investigate the product in detail to make even a better offer to our customers. Do not treat a return as a fraud, even if you suspect it. We have never punished anyone for accepting a return. Always gratefully accept any return, even if it is an already expired product or only the packaging left therefrom.
- Never delay any writing-off, adjustment, or issuance of a pending receipt. Always do so as soon as you take a product off the shelf, discover a shortage, or lay away any item at a customer's request. Otherwise, incorrect stock records will result in messing up the next shipment, so that customers will not be able to find the goods they need!
- Never lay away any goods for yourself. If you want to buy something, pay for it immediately and take it to the back room.
- Never lick your fingers! Use a sponge damper pad to damp them.
- Do not try to save time and effort by omitting the step of packing groceries into a bag. Always offer customers to pack their goods, even in their own bag. If the bag is very dirty, you can give them a plastic bag for free.
- Never let customers solve their problems on their own, for example, by suggesting that they call the hotline to solve their issue. Try to solve a customer's issue yourself, but without prejudice to other customers' needs. In case of any oral complaint about the quality of goods or service, refer the customer to the hotline so that the complaint is entered into the system and handled appropriately. Don't leave a customer until you are sure that the issue has been resolved.

- Never keep customers waiting in line! On your own initiative invite pregnant women and customers with children to proceed to the cash register. In order not to offend other people in the line, better open another, unoccupied, cash register. Where it is impossible to do so, ask other customers to let a customer with a child go first. In stores with a single line, tell customers where the line ends.
- Never break your promise to a customer! Always keep a promise, even if turns out to be harder than expected. When something a customer may expect is impossible, then warn him or her about it.
- Never assume that a customer may be lying! Do not hesitate to believe a customer, for example, if he claims to have given another bill, just check if there is a surplus in the cash register.
- Never sell alcohol to any customer unless he or she surely looks older than 36 years old or can
 prove that he or she is already an adult by showing his or her passport, international passport,
 military service record book, seafarer certificate, residence permit, refugee certificate, criminal
 record, prosecutor's office employee card, fan ID, or driver's license. We do not accept
 customer complaints about being refused alcohol due to the customer's failure to produce an
 appropriate ID.
- Never try to settle a matter outside the proper procedure should anyone notice you breach the law (e.g, sell alcohol to a minor). Wait for a representative of the appropriate authority to arrive and do the paperwork to impose a fine.
- Never hide fresh products from customers. Follow the inline rotation procedure, placing items so that the use-by dates face the customers, so that the fresh ones are always available, and there is no need to reach for them.
- Do not pile items, including any upselling goods, on the cash desk and near the cash register, where they can be an inconvenience for customers. Use special furniture for additional layouts.
- Do not show up at work if you are sick. We are a health food store, and our customers may be very sensitive about sick employees. We provide paid sick leaves as per the applicable labor laws.
- Never try to save money by not writing off any products that lose their marketable quality. Store employees have every authority to remove any product from the shelves if they doubt its quality, without confirming with anyone. The most important thing is to immediately and correctly write it off, without any delay at all. Should you repeatedly write off the same product, notify Retail Assistant Manager and process manager.
- Never let customers see you use goods of a competitive brand if we sell compatibles thereof. If a customer leaves a cart from another store, take it outside.

- Never refuse a discount if, for example:
 - someone misplaced or failed to update a price tag;
 - a favorite product is out of stock though stock records show it is in;
 - all favorite products have green price tags.
- Never cover the date of manufacture, ingredients details, and manufacturer details, and never leave any barcodes uncovered when attaching green price tags.
- Never bother customers while they are shopping, do not follow or watch them, do not inspect their things, do not make comments, and do not get into a verbal altercation, even if you are a security guard.
- Never stop a customer from entering the store until the very last minute before closing, never make them leave after the closing time until they complete their purchase and leave on their own.
- Never do anything that you don't want others to know about. If you are not sure about anything
 – just ask for advice.

Each customer complaint is handled on a case-by-case basis. When you call a customer to apologize, be sincere so that the customer does not feel uncomfortable for giving us important and useful feedback. When responding in writing, always write in your own name and tell what has been done to prevent such events in the future.

Handling times are as follows: Telegram -3 hours; mail -24 hours; Book of Complaints and Suggestions -4 days. Every customer complaint is an opportunity to improve.

- 8. We do NOT promise customers that we will:
 - provide space outside the store to tie up their pets, or let their pets inside, except for assistance and guide dogs, which are often distinguished by a hard harness;
 - it is the store policy to not let customers with dogs inside;
 - sell alcohol without asking for an ID;
 - sell goods of a certain manufacturer in the store;
 - provide a discount on any product regardless of its remaining shelf life;
 - warn about the expiring shelf life of any product.

This does not mean that those are prohibited and cannot be allowed, but no customer complaints regarding such matters will be accepted.

2. Working Conditions

1. Work Schedule

Each store employee may choose the work pattern convenient for them for the next month: according to the schedule or part-time.

We do not guarantee that you will always work in the same store or the one closest to where you live.

For each store, the staffing table is prepared by Retail Manager.

Store employees themselves develop the work schedule for the entire store. To be considered a store employee, a person must work in the store at least 7 shifts during a current month. If by the 25th day of any current month, the work schedule for the next month, duly approved by all employees, is not entered into 1C, then Retail Assistant Manager will develop the work schedule himself/herself. Retail Assistant Manager also may modify the work schedule prepared by the employees. The work schedule for any current day may only be modified subject to approval by all store employees.

Each employee must be given at least 42 hours of uninterrupted weekly rest. Employees always may swap shifts, even in different areas, subject to compliance with this rule.

If a store employee is unable to work his or her shift, he or she must find a replacement for himself/ herself. If necessary, he or she may address the Retail Assistant Manager with the issue.

All employees are given 3 breaks of 10 minutes and 1 break of 30 minutes during a shift. Breaks must be scheduled without affecting the customers. No employee may take a break if there is a line of customers. Floor Manager must be in the front store if any employee takes a break. Until all boxes in the front store have been emptied and removed, and during rush hours, all employees, including Floor Manager, must be in the front store!

2. Working Conditions

Employees are entitled to:

- a refund of RUB 175 for any lunch they purchase in the store they work in, during their shift (alcohol and household goods excluded), provided that products with green price tags are charged at full price, and no unclaimed refund may be accumulated or paid out;
- free uniform, including a replacement for any worn-out items or an additional set of items;
- free training for their current position or that of their immediate supervisor;
- all the necessary consumables for the store operation, which they may independently order from the warehouse;
- reimbursement for the cost of regular medical examinations and tests necessary to renew the health permit;

- once-a-year reimbursement for the cost of thermal underwear, warm footwear, or compression stockings, up to RUB 1,500, even if the actual cost is higher than that;
- installation of cash desk heaters or protective shields (against drafts);
- reimbursement for the cost of issue of a health permit, subject to entering into an employment agreement, after 1 full month with the company;
- accommodation reimbursement for employees from other cities, for the first 3 months of employment, up to RUB 7,000 per month;
- 50% reimbursement for the documented cost of a health club or gym memberships, **up to RUB 20,000 per year after 3 months with the company**;
- comprehensive medical examination every 3 years, **but only after 3 months with the company**. To sign up for a medical examination, call 8 985 088 8575 or send an SMS with the word Vkusvill to the same number;
- reward points of up to 15% of any purchase made in VkusVill.

All cash desks must have chairs for cashiers to rest on. When checking out purchases, a cashier may only stand or lean on the chair.

Employees are not allowed to use personal phones in the front store. However, no one can force them to hand their personal phones in before work. Customers must be a top priority for all employees, so even an office phone should not be a reason to neglect a customer.

If store employees are unable to agree on a vacation schedule for any current year, Retail Assistant Manager will prepare such a schedule. Anyway:

- vacation schedule must be completed at least two weeks before the first vacation;
- vacation always begins after the routine weekend after the last work shift;
- the following employees will be given priority when choosing the vacation times:
 - \circ having two or more children under the age of 12;
 - before or immediately after maternity leave;
 - raising a disabled child under the age of 18;
 - honorary donors of Russia;
 - military spouses.

Any vacation is always subject to prior approval by the manager. An unauthorized vacation, even for the reasons like "my husband got a leave" or "we've already bought the tickets", will be treated as an unauthorized absence and grounds for termination of employment.

3. Remuneration and Liability

Store employees are paid hourly. The duration of each shift is recorded in the work schedule and is calculated as the difference between the start and end times. I.e., if a store is open from 9:00 a.m. to 10:00 p.m., and an employee is supposed to come to work at 8:00 a.m. to lay out the goods, then 14 hours of work will be recorded in the schedule.

An emergency shift is understood as an employee's turning up for work on his or her day off at the request of Retail Manager or Retail Assistant Manager, received after 10:00 p.m. on the previous day or the same day. If requested before such time, an employee also may refuse to turn up for work unless it is treated as an emergency shift. If an employee swaps shifts with another employee or turns up for work at the request of another employee, this will not be treated as an emergency shift.

- all employees are entitled to extra payments, additional to their hourly rate; such extra payments are not summed up, but the largest of the below rates applies, i.e., when an employee turns up for work (emergency shift) on a holiday, for the ninth hour of work, he or she will receive exactly + 100%:
 - \circ + 35% for work at night from 10:00 p.m. to 6:00 a.m. (added to all others),
 - \circ + 50% for overtime, for the ninth and tenth hours of work,
 - \circ + 100% for overtime, for the eleventh and further hours of work,
 - \circ + 100% for an emergency shift on a day off and for work on the following holidays (subject to no overtime pay):
 - January 1, 2, 3, 4, 5, 6, and 8 New Year's holidays,
 - January 7 Orthodox Christmas Day,
 - February 23 Defender of the Fatherland Day,
 - March 8 International Women's Day,
 - May 1 Spring and Labor Day,
 - May 9 Victory Day,
 - June 12 Russia Day,
 - November 4 National Unity Day;
- Floor Manager earns RUB 125 per hour +0.2% of the store revenue (+0.4% of the store revenue in Shmel stores);
- Sale Assistant earns RUB 100 per hour +0.2% of the store revenue (+0.4% of the store revenue in Shmel stores);

- Sale Assistant earns RUB 100 per shift;
- Cashier earns RUB 100 per hour +0.1% of the store revenue (+0.2% of the store revenue in Shmel stores);
- Produce Stocker earns RUB 100 per hour +0.1% of the store revenue (+0.2% of the store revenue in Shmel stores);
- if a store revenue is less than RUB 200,000 per day, bonuses will be calculated from revenue of RUB 200,000;
- if a Shmel store revenue is less than RUB 100,000 per day, bonuses will be calculated from revenue of RUB 100,000;
- each employee earns 0.4% of the store revenue from online orders;
- interns are paid at the rate of RUB 100 per hour;
- after every six months with the company, each employee is entitled to extra RUB 50 per shift;
- one-time extra payment of RUB 2,000 for an internship of another Floor Manager;
- one-time extra payment of RUB 1,000 for mentoring another employee (per employee), in the month in which the employee starts work;
- RUB 1,000 per day of work in a committee, session, training seminar;
- the company has an ongoing Bring a Friend program, according to which an employee referring a new employee is given extra RUB 2,500 in addition to the salary, provided that the new employee stays with the company for at least one full month;
- each employee is awarded reward points on their VkusVill card on their birthday;
- each employee is awarded 5,000 reward points on their VkusVill card upon marriage, provided that they produce the Marriage Certificate to Retail Assistant Manager;
- based on Floor Managers' recommendations, Retail Assistant Managers may award distinguished employees with reward points on their VkusVill cards;
- financial assistance of RUB 30,000 is paid to each employee in the event of the death of a close relative (husband, wife, parents, children), subject to completing the necessary paperwork to be provided by HR;
- financial assistance of RUB 20,000 is paid to each employee in the event of the birth of a child, subject to completing the necessary paperwork to be provided by HR;

At the request of a store employee, Floor Manager must provide a printout of the employee's payroll report, during the employee's shift (after the 5th and 19th day of the month).

Any penalties are prohibited, including coercing employees to buy products, reducing working hours, and any other indirect withholdings.

Each store employee working at a cash register is financially responsible for the money in it, and Floor Manager is responsible for the money in the central cash register.

If any shortage is discovered when cashing up the cash register, it is necessary to draw up an act, collect explanatory notes, and investigate. The causes for a shortage may be as follows:

- human error;
- technical failure;
- wrongful act of an employee;
- wrongful act of a customer;

Retail Assistant Manager makes the final decision depending on the cause and extent of the damage.

If following an encashment, the bank reports on a counterfeit bill found, such amount will not be withheld from anyone, although an employee working at the cash register is responsible for checking all large bills.

3. Communication with other employees, managers, office, and warehouse

All relationships must be built on trust, integrity, responsibility, mutual assistance, fair division of labor, and a friendly attitude.

Store employees themselves monitor the fulfillment of the promises made to them and assign appropriate ratings to those responsible for keeping such promises, in 1C, and where necessary, approach Floor Managers, Retail Assistant Manager, and Area Managers.

Any rating should be an assessment of an employee's actions, not personality.

It is prohibited to scold employees in front of others, shout at them, or use obscene language.

Any leadership should be based on a personal example of how to work and communicate with others.

Any employee can approach colleagues on any issue, including:

• Floor Manager. Floor Manager is a leader, a facilitator. Floor Manager is not responsible for ensuring that every store employee keeps his or her promises. However, Floor Manager is responsible for the general promises given by the team, therefore Floor Manager can and should organize the work of the entire shift to ensure that they keep their promises, giving the necessary instructions to other employees and contractors, leading by example, spending most of the time in the front store, and not in the back room.

- Retail Assistant Manager. Called assistant for a reason, Retail Assistant Manager helps store employees solve any problems related to the store, which employees cannot solve themselves. Retail Assistant Manager is not responsible for the operation of a particular store, but ensures communication with all office employees and is responsible for implementing best practices, informing and training store employees, resolving internal and external conflicts, building a store team, helping stores with anything they may need, providing psychological support to store employees and helping them find solutions to problems, as well as conducting a proper review of any mistake so that it does not repeat itself in the future. *It is Retail Assistant Manager who must answer questions about payroll.*
- Area Manager, Development Manager, or **Investigation Department manager**. This is the last resort in resolving any issues. Any employee can always move to another department under another manager if they mutually agree so.
 - Renata Yurash retail1@izbenka.msk.ru or +7-925-786-1122,
 - Tatiana Berestovaya <u>retail2@izbenka.msk.ru</u> or +7-925-786-1007,
 - Lyubov Frolova <u>retail5@izbenka.msk.ru</u> or +7-925-786-1212,
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 - Gulnara Beschastnova <u>g.zabbarowa@yandex.ru</u> или +7-925-786-1379,
 - Yevgeny Kurvyakov <u>r@vkusvill.ru</u> or +7-925-589-4011.
- Other employees must only help retail employees to better serve customers and certainly have no right to interfere with the process.

Any employee can move to another store or under another manager subject to prior agreement with the future manager.

Floor Manager must reply to any email sent to the store, during the day. However, customer service is always a top priority. Retail executives and office employees should not distract sales assistants from their work by calling them before 12:00 noon and after 6:00 p.m. on any matters that may wait for a day without causing any significant losses for customers.

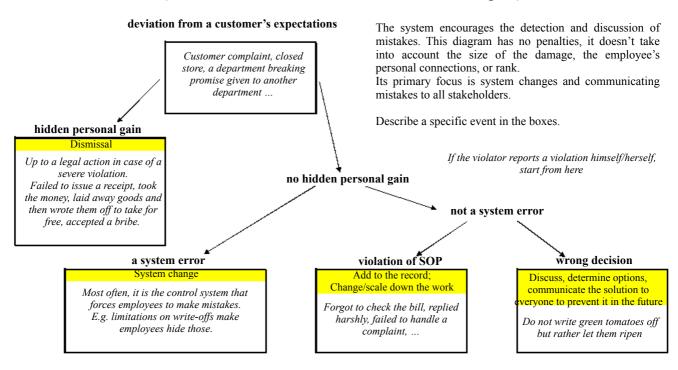
Our employees try to resolve any conflicts that may arise between them on their own, but they always may seek help from another employee if it suits both parties. Such employee shall be the only person authorized to resolve the conflict, and the parties thereto will be bound by such resolution. Such employee shall speak eye to eye with each party to the conflict before making any decision and shall follow the deviation review diagram below to analyze the situation.

4. Compliance with the Code

The responsibility for remedying a violation and dealing with its consequences lies with the violator.

Any deviation must always be analyzed using the diagram below:

Mistake Handling for Better Performance (based on the book titled "The Black Box Principle")



- 1. Determine whether there was malicious intent. Always assume there was none unless proven otherwise. If the violator himself/herself reports a violation, consider that there is no malicious intent.
 - a. If there was malicious intent, then there is no point in continuing the violator's employment with the company.
 - b. If there was no malicious intent, determine and eliminate the systemic cause that led to the error.
- 2. If this is not a system error, determine whether there was a failure to follow SOP.
 - a. A violation of an SOP is not recognized as malicious intent. However, if an employee constantly violates the same SOP, and this is not a system error of conflicting SOPs, then such an employee must be recognized as unfit for the work.
 - b. If there was no violation of an SOP, then the violation is considered an honest mistake, for which the employee must not be punished, and if the violation is the result of the employee trying something new, the employee must be encouraged to do so in the future.

Deviations from the Code are classified into three groups depending on the degree of severity.

• Minor:

- failure to keep a promise given to customers, provided that the violation is remedied right away in the store;
- expired products on the shelves, provided that the violation is discovered not by a customer, but by another employee;
- offensive behavior and rudeness between employees.

The employee's supervisor decides on the necessary corrective action.

- Moderate:
 - failure to keep a promise given to customers, as a result of which a customer contacts the company;
 - repeated minor violations;
 - fights;

All cases of moderate deviations by an employee must be considered by his or her supervisor on a case-by-case basis and may lead to the employee's transfer to another area, a disciplinary action imposed on him or her, and even dismissal if violations are constant.

- Severe:
 - violation of the Criminal Code of the Russian Federation,
 - imposing penalties on employees, including oneself, and coercing employees to purchase products;
 - putting an employee on the list of refused employees if entire teams of three consecutive stores submit written refusals to work with the employee.

A severe deviation from the Code automatically results in the violator's dismissal unless Retail Manager decides otherwise.

No other deviations may be grounds for taking any corrective actions and imposing punishments, including those not described in CORE.

In case of any inconsistencies between CORE and the applicable law, the latter will prevail.

The latest version of the Code is always available on the company's website and in the Work Rules in 1C. Each new employee of the retail department will be given his or her own copy of the Code.

Every other Monday, at 10:00 a.m., on the eleventh floor of Orbita, Retail Assistant Managers will hold general meetings concerning the implementation and modification of this Code, where all customer complaints about the quality of service and employees' comments on deviation analysis will be reviewed using the Black Box method.

Any store employee may participate in those meetings and propose changes. In case of any adopted change, all employees will be notified accordingly by e-mailing the new version of CORE, with all changes highlighted in bold. If no objections thereto are received within 24 hours after the mailing, the change will be considered effective, but without prejudice to the possibility to reverse such change at the next meeting. However, until such a decision is made, the updated version will be considered valid.

For further explanations on CORE and to suggest your amendments hereto, please contact the owner, Irina Ronzhina: job@izbenka.msk.ru or + 7-925-786-1253.