

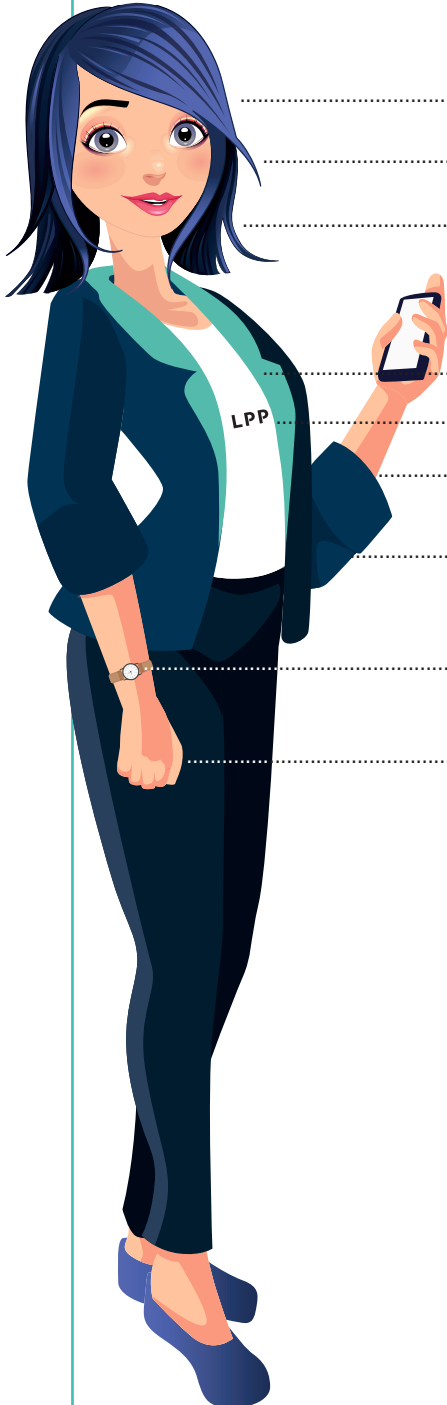


LPP RULES

FOR EMPLOYEES OF RETAIL STORES

LPP

WHAT IS PROFESSIONALISM?



- Knowledge of how we can help the customer
- Eagerness for learning
- Positive attitude
- Flexibility and adjustability
- Ethical conduct
- Loyalty
- Tolerance
- High manners
- Timeliness, diligence and accuracy
- Ability to find compromise



At each stage of our company's development, we want to take proper care of its exceptional atmosphere and attitude to work. These are our distinguishing marks. One of the reasons we gain our successes is that, among others, we are a well-tuned, ambitious and effective team that values professional challenges. The common denominator of LPP's culture is our values gathered under the comprehensive acronym FAST.

For us, it is important WHAT we do and HOW and IN WHAT STYLE we do it. Bringing attention to some fundamental rules which determine the type of company we are and what we care for, in this Manual, we want to facilitate your daily operations and your decision-making process. In this Manual, you will find both the rules and practical advice. Some of them are given in detail, other are more general, yet all of them affect the way we work and our performance both today and in the future. I do hope that each current and future employee of LPP will have the knowledge of these rules and will identify with them.

Marek Piechocki

OUR VALUES



FIRE-FUELLED

WE ARE FULL OF ENERGY.

We are passionate about our business, our brands and our customers. We are proud to be part of LPP.



AMBITION-DRIVEN

WE SEEK NEW CHALLENGES EVERY DAY AND STRIVE FOR EXCELLENCE.

We dare for more. We expect unexpected.



SOCIALLY RESPONSIBLE

WE CARE FOR OUR CLOSER AND FURTHER SURROUNDINGS.

We support our employees and partners. We listen to their needs to act in harmony with nature.



TEAM-ORIENTED

THE OPINION OF EACH TEAM MEMBER IS JUST AS IMPORTANT.

We treat everyone as we would like to be treated ourselves. Respect, justice and tolerance are our guideposts for action..

OUR MISSION

We help our customers express our emotions and fulfil their dreams through the way they look.

OUR VISION

Passion drives us forward making our company the best fashion retailer in the world.

I. WHO IS THE ADDRESSEE OF THE RULES PROVIDED IN THIS DOCUMENT?

LPP Rules – Manual for Employees of Retail Stores is a document that applies to, and should be observed by, employees **at all levels**. Each of us is required to have the knowledge of, and adhere to the rules specified in, this document. This Manual is focused on, and specifies in detail, the most important rules applying in the entire company, and has been prepared specially for LPP store employees.

II. OUR RULES AT THE WORKPLACE

2.1 EQUALITY OF CHANCES AND TEAMWORK DIVERSITY

1. We value diversity at our workplace. LPP offers equal chances to all employees and evaluates their performance at work in a professional way only, analysing their achievements and attitude to work.
2. We do not accept any forms of discrimination at the workplace (for example, in terms of sex, age, sexual orientation, disability, health condition, nationality, philosophical or religious beliefs), starting from the recruitment process through the period of cooperation with employees, the remuneration level, decisions on promotions and career development.
3. We are a family-run company gathering many talented people. For us, it is natural that some of them may be related. However, it is important for us that family relationships do not affect professional relations in any improper way:
 - any instances involving superior-subordinate relations and other dependency relationships in a decision-making process between ourselves and our relatives are to be reported to the Store Manager and Regional Sales Manager,
 - if we employ, or intend to employ, a person close to us, we ask Store Manager and Regional Sales Manager for approval, except for cases involving minor temporary works. In such an event, we should just inform the Store Manager and Regional Sales Manager accordingly.

Close relation



What is a close relation? This is a relation based on kinship as well as formal and informal intimate relationships. Any of those should be reported to the Store Manager and Regional Sales Manager if two persons concerned are in a reporting relationship.

2.2 TRUST, OPENNESS AND RESPECT IN EMPLOYEE RELATIONS

1. The rule we have in mind on a daily basis and at any stage of our work is respect for other people. In practice, this means that, among others, we try to behave towards our colleagues, subordinates and superiors in a way we want to be treated by others – with respect and kindness.
2. Openness and respect is reflected by means of a frank conversation and the ability to provide and receive feedback, suggestions or comments.
3. In our work, we do not accept any violations of law, including violations of human rights.
4. We neither tolerate any actions in bad faith, which would bring harm to other employees or the entire company – its welfare and renown.
5. In LPP, we respect business and private time. Therefore:
 - if you face problems and you are unable to separate them from your work, please remember that you may count on your superior's support. We want to create the environment full of empathy and understanding.
 - although we know that our industry is characterised by dynamics and variability, we should make efforts, whenever possible, to inform all parties of any changes in advance (such as changes in work schedules or other time-tables). We should engage employees, including managers, in their free time in exceptional cases only.
6. In LPP, mobbing and bullying of employees are prohibited. Any irregularities reported in this respect will be carefully and diligently analysed, with due observance of the principle of safety and anonymity of a person reporting any such irregularity.
7. Any confirmed cases of mobbing or bullying of an employee, subordinate or superior at work will result in severe consequences.

Mobbing



A variety of actions or behaviours by or against an employee, involving notorious and long-term harassment or intimidation.

2.3. WORK FOR OTHER ENTITIES, PERFORMED BY LPP EMPLOYEES

1. If you are employed in LPP, then, during your employment with LPP, you may perform chargeable work and/or carry out assignments for entities other than LPP provided that:
 - they are not carried out for entities competitive to LPP and are not concordant with your position at LPP,
 - you have received a written approval from the Regional Sales Manager.
 - NOTE: no approval is required for any temporary or short-term work or minor assignments not performed on a continuous basis.
2. You may also pursue your own economic activity which is not competitive for LPP, however, you are required to notify the Regional Sales Manager accordingly and obtain his/her written approval.
3. If you are a superior, you should provide information on the above-mentioned cases to the HR department.
4. Any work/assignments carried out by us for other entities may not be executed during LPP's working hours or using LPP's software and/or other resources or any internal data of LPP, in particular, any confidential or sensitive data.

Example

I am a senior salesperson in a LPP retail store. Apart from my main job, I am also engaged in a nearby construction store, mainly at the time of display changes, once or twice a month. Is my conduct compliant with LPP's ethic rules?

- A. Yes, if this actually is a short-time and minor assignment not affecting your work for LPP, for example, the fixing of your time schedule. If the second employer offers you a permanent contract, you may accept it provided that you have reported it to the Regional Sales Manager in advance and received his/her approval.
- B. Yes, because this assignment is not carried out for an entity competitive to LPP. You may make your own decisions in that respect even if, ultimately, you will give your support to the other company several times a week.

Correct answer: A. The important principle you should remember about is your engagement. In order to perform a regular chargeable work on a permanent basis, you must obtain a written approval of the Regional Sales Manager.

2.4. DISPUTES AT WORK

1. Differences in opinions and disputes may happen anywhere. This is natural as we have the right to differ. We resolve disputes with persons concerned because we are an open organisation and we aim at direct communication. We try to understand the other person's perspective – why he/she holds a given view and takes specific actions. If this way proves insufficient, we refer to our direct superiors.
2. Any irregularities and major disputes involving work relations, which may not be resolved as given above, may be reported to the HR department and/or the ethics officer..

III. BUILDING CUSTOMER RELATIONS

1. In all our operations, we observe the principle of respect for our customers and their expectations.
2. Our goal is to know best our customers' needs and duly react to them. The development of our company depends on our customers and their satisfaction with our offer and service quality.
3. In case of any conflict with a customer, we keep acting professionally and with high manners. If there are any problems, we reach for support to a more experienced colleague, our superior or store manager.
4. In customer relations and when communicating with customers, we avoid any forms of discrimination. It means, among others, that:
 - we give our support to customers in need of special care: the elderly, persons having difficulty to move, pregnant women and any other person who may require our assistance;
 - we do not accept any forms of discrimination towards our customers;
 - our priority is to learn the needs and expectations of all our customers, support them both in the product selection process and provide after-sales and customer claim services.
5. Our respect for customers is shown also by our neat appearance, the language we use and our focus on the work, for example, we do not use private phones in the sales area.



IV. EMPLOYEE AS LPP AMBASSADOR

4.1. EMPLOYEES' STATEMENTS IN SOCIAL MEDIA

1. In our private activity in social media, we must always remember that our comments and behaviours may affect the way our company and its attitudes are perceived.
2. Our defaults or weaknesses are dealt with internally by reporting any such issues by way of constructive criticism to superiors, without posting any private comments in social media.
3. While being active in social media, the provide no posts related to our professional duties or internally available information on our company, such as photos of the back office or customer information.

Remember



Please remember that you are an LPP ambassador

Therefore, you should make sure that your personal statements and all materials (even private) published in social media:

- do not infringe any commonly acceptable principles of public decency,
- do not include information which may violate the principle of protection of LPP's confidential data,
- bring no detriment to LPP's good name.

4.2. RULES OF SPEAKING ON BEHALF OF THE COMPANY

1. Only authorised persons who have been trained in communication issues may speak on the company's behalf.
2. If you are invited to speak on behalf of the company, for example, in local media or at a conference, please report this to your direct superior. If, after consulting the Communication and Sustainable Development Department, your superior gives his/her approval, you may make a public appearance and speak on behalf of LPP.

4.3. CONFIDENTIAL INFORMATION

1. Confidential information is any piece of information on the company's operations and staff the disclosure of which may be detrimental to LPP. In particular, this applies to information on clearance sales, sales performance or planned marketing projects.
2. Do not provide unauthorised persons with any information which should not be made known to our competitors.
3. Do not provide unauthorised persons with any information the disclosure of which could weaken LPP's position and increase market opportunities of our competitors.

Confidential data



Examples of confidential data: unpublished sales results, price policy, remuneration or bonus-granting policy, planned investments not yet made publicly known or closings of retail stores.



V. HOW CAN YOU REPORT POTENTIAL IRREGULARITIES?

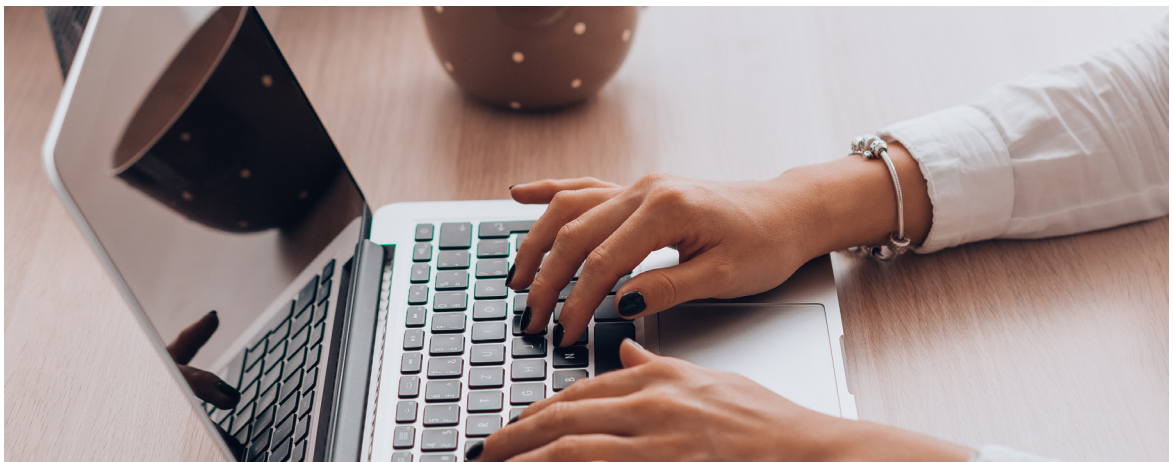
1. Any wilful violation by employees or managers of the rules adopted by LPP and provided for in this Manual may bring about adequate consequences.
2. In any situation, in which you will consider that:
 - our company acts in breach of the law or the rules provided for in this document,
 - our employee or member of the governing bodies acts in breach of the law or the rules provided for in this document, you should report any such breach for the good of us all and entire LPP following a procedure of your choice.
3. If you want to report any potential irregularities or situations to be controlled or clarified, you may do it as follows:

Contacting your direct superior

- a. direct or telephone conversation,
- b. reporting by email.

Contacting LPP's ethics officer

- a. reporting by email at..... direct conversation,
- b. reporting by email to LPP's ethics officer.....
[name of the country]
- c. direct conversation,
- d. telephone conversation (see the Intranet for the ethics officers' contact details),
- e. by post to: ethics officer.....[address of the main headquarters]



The direct superior of an employee reporting irregularities and the ethics officer consulted or notified by an employee are required to:

- respect the right to anonymity of the employee consulting the rules/reporting an irregularity and not to provide his/her personal data to any third parties without the employee's consent;
- take first actions, within the maximum of 14 days from the reporting date, to examine the irregularity reported;
- make a decision in respect of the procedure for examining the irregularity reported;
- inform the person reporting the irregularity (if he/she discloses his/her contact data at the time of reporting) of the results following the examination of the irregularity reported.

Anonymous



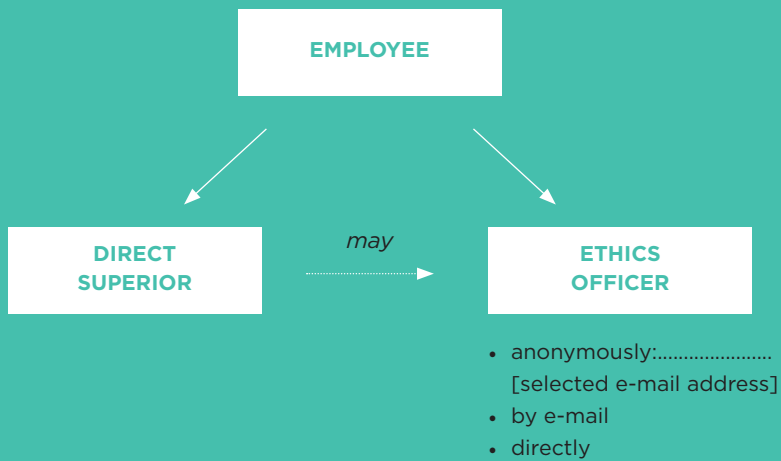
You will decide whether you want to stay anonymous when consulting the rules or reporting an irregularity. We will respect your decision and make endeavours to ensure you feel comfortable when consulting the rules of interest to you/when reporting irregularities or situations you find ambiguous.

VI. WHO CAN CLARIFY YOUR DOUBTS?

1. If you have questions or doubts concerning the most appropriate conduct or you want to ask about the rules and issues discussed in this document, consult specific situations, propose supplementations or methods of increasing the employees' knowledge on the rules provided for in this Manual, we invite you to:
 - atalk to your direct superior,
 - contact the ethics officer.
2. Just like in cases of reporting irregularities, the information that you are the person asking a question, bringing up an important issue or reporting doubts concerning the issues of ethics and the rules provided for in this Manual is confidential and may be given to other persons with your consent only.



COMPLIANCE MECHANISM



SCHEME



The ethics officer has 14 days to reply.

The ethics officer has the duty to keep the notification anonymous.