

Qinshift Whistleblowing Policy and Procedure

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1. Introduction

Qinshift Group of companies, i.e., Aricoma Group International AB and all its subsidiaries (hereinafter referred to as “Qinshift” or “the Group”) in ensuring a high ethical standard in all its business activities has established a code of ethics which set out the standard of conduct expected in the management of its businesses across the Group. All stakeholders are expected to comply with these standards in the discharge of their duties.

In furtherance of this, Qinshift Whistleblowing Policy and Procedure (hereinafter referred to as “the Policy” or “this Policy”) provides a channel for the Group`s employees and other relevant stakeholders to raise concerns about workplace malpractices, in a confidential manner, in order for the Group to investigate alleged malpractices and take steps to deal with such in a manner consistent with the Group`s policies and procedures and relevant regulations.

“Whistleblowing” for the purpose of this Policy is the act of reporting perceived unethical conduct of employees, management, directors, and other stakeholders by an employee or other persons to appropriate authorities.

This Policy outlines the Group`s rules and principles on whistleblowing and the procedure for investigating and dealing with all reported cases of illegal and unethical conduct and any other misconduct across the Group. This Policy is in compliance with the requirements of various regulatory authorities with oversight on the activities of the Group on whistleblowing, depending on the country/region where Qinshift companies are located.

2. Objective of the Policy

This Policy is intended to encourage staff and other relevant stakeholders to report perceived unethical or illegal conduct of employees, management, directors and other stakeholders across the Group to appropriate authorities in a confidential manner without any fear of harassment, intimidation, victimization



or reprisal of anyone for raising concern(s) under this policy. Specific objectives of the Policy are:

- a. To ensure all employees feel supported in speaking up in confidence and reporting matters they suspect may involve improper, unethical or inappropriate conduct within the Group;
- b. To encourage all improper, unethical or inappropriate behavior to be identified and challenged at all levels of the organization;
- c. To provide clear procedures for reporting and handling such concern(s);
- d. To proactively prevent and deter misconduct which could impact the financial performance and damage the Group`s reputation;
- e. To provide assurance that all disclosures will be handled seriously, treated as confidential and managed without fear of reprisal of any form; and
- f. To help promote and develop a culture of openness, accountability and integrity.

3. Scope of the Policy

This Policy is designed to enable employees and other relevant stakeholders to report any perceived act of impropriety which should not be based on mere speculation, rumors and gossips but on knowledge of facts. Reportable misconducts covered under this Policy, include:

- ✦ All forms of financial malpractices or impropriety such as fraud, corruption, bribery, theft and concealment;
- ✦ Failure to comply with legal obligations, statutes, and regulatory directives;
- ✦ Actions detrimental to health and safety or the work environment;
- ✦ Any form of criminal activity;
- ✦ Improper conduct or unethical behavior that undermines universal and core ethical values such as integrity, respect, honesty, accountability and fairness;



- ✦ Other forms of corporate governance breaches;
- ✦ Connected transactions not disclosed or reported in line with regulations;
- ✦ Insider abuse;
- ✦ Non-disclosure of interests;
- ✦ Sexual or physical abuse of staff, customers, prospective staff, service providers and other relevant stakeholders; and
- ✦ Attempt to conceal any of the above listed acts.

The above listed reportable misconducts or concerns are not exhaustive. However, judgment and discretion are required to determine misconduct that should be reported under this Policy. The general guide in identifying reportable misconduct is to report concerns which are repugnant to the interest of the Group and the general public and appropriate sanctions applied.

This Policy covers the activities of Aricoma Group International AB and all the subsidiaries within the Group. This is without prejudice to the requirements by regulators of the various subsidiaries to put in place their respective whistleblowing policies, if needed. Furthermore, this Policy shall also be read in conjunction with the whistleblowing guidelines that may be issued by relevant regulatory agencies with oversight on the operations of the Group's subsidiaries.

4. Group Management Commitment to the Policy

The Group Management is aware that a robust internal system for employees and other relevant stakeholders to disclose workplace malpractices without fear of reprisal shows that employees take their responsibilities seriously, and also helps to avoid the negative publicity that often accompanies disclosures to external parties.



Hence the Group Management is committed towards promoting a culture of openness, accountability and integrity, and will not tolerate any harassment, victimization or discrimination of the whistleblower provided such disclosure is made in good faith with reasonable belief that what is being reported is fact.

5. Policy Statement

Qinshift is committed to the highest standards of openness, probity, accountability and high ethical behavior by helping to foster and maintain an environment where employees and other stakeholders can act appropriately, without fear of reprisal. To maintain these standards, the Group encourages employees and relevant stakeholders who have material concerns about suspected misconduct or any breach or suspected breach of law or regulation that may adversely impact the group, to come forward and report them through appropriate channels (in certain cases on a confidential basis) without fear of retribution or unfair treatment.

The Group conducts its business on the principles of fairness, honesty, openness, decency, integrity and respect. It is the intention of this policy to encourage employees and other relevant stakeholders to report and disclose improper or illegal practices or activities. The Group is committed to investigate promptly any reported misconduct and to protect those who come forward to report such activities. The Group further assures that all reports shall be treated in strict confidence.

The Group`s operating procedures are intended to detect and prevent or deter improper activities. However, the best systems of controls may not provide absolute safeguards against irregularities. This Policy is intended to investigate and take appropriate action against any reported misconduct or concern.

6. Roles & Responsibilities

The following are the roles and responsibilities of key parties in the whistleblowing process:



S/N	Responsible Person/Officer	Responsibilities
1	Whistleblower	Whistleblowers are expected to act in good faith and should refrain from making false accusations when reporting his/her concern(s), and also provide further evidence at his/her disposal to aid investigation of the issues reported.
2	Suspect	Suspect has a duty to cooperate during the period of investigation including provision of relevant information, documents or other materials as may be required by the Investigator.
3	Appointed person for receipt and dealing with reports	<p>An independent and autonomous person who shall be authorized to, on behalf of the Group company,</p> <ol style="list-style-type: none"> 1. receive reports and have contact with reporting persons, 2. follow up what is reported, and 3. provide feedback on the follow-up to reporting persons. <p>Each Appointed person for receipt and dealing with reports shall be the main contact for receiving whistleblowing reports. Also, each Appointed person shall have its proxy, which, in case of Appointed person`s absence due to any reasons, shall act as their replacement.</p> <p><i>The List of Appointed persons for receipt and dealing with reports per Group company, along with their proxies, is appended to this Policy as Appendix I.</i></p>
4	Investigator	<p>An Investigator is appointed per case, every time when a certain misconduct has been reported through the available reporting channels, i.e., to the Appointed person for receipt and dealing with reports. The Investigator will get familiarized with the content of the received report, without having the knowledge about the identity of the whistleblower.</p> <p>The Investigator is expected to handle all matters with high professionalism, confidentially and promptly. He/She shall be independent and unbiased in carrying out investigation.</p> <p>The Investigator has the responsibility of acknowledging all concern(s) reported and reporting on the progress of investigation to the</p>



		<p>Appointed person for receipt and dealing with reports, in order for the latter to inform the whistleblower accordingly.</p> <p>The Investigator shall on a quarterly basis provide to the Group Chief Compliance Officer (GCCO) a summary of all cases reported and the result of the investigation.</p> <p>The Investigator shall refrain from discussing or disclosing matters under investigation.</p>
5	Group Chief Compliance Officer (GCCO)	<p>Group Chief Compliance Officer (GCCO) shall handle the reports of investigation and will be the only one knowing the identity of the whistleblower, unless the whistleblower used a local channel for reporting the misconduct in question. In such case, the Appointed person for receipt and dealing with reports shall, also, have knowledge about the identity of the whistleblower.</p> <p>Also, Group Chief Compliance Officer (GCCO) shall be responsible for review, update the Whistleblowing policy and procedure and obtain requisite Board's approval.</p>

7. Whistleblowing Procedure

The whistleblowing procedure involves steps that should be taken by the whistleblower in reporting misconduct, and steps required for the investigation of the reported misconduct.

The following procedures shall guide the whistleblowing process:

7.1 Internal Whistleblowing Procedure

Internal whistleblowing involves staff members across the Group raising concerns about unethical conduct. The following procedure shall be adopted for the purpose of internal whistleblowing:



S/N	Steps	Action
1	Step One Raising concern(s) by whistleblower - medium and format.	<p>An internal whistleblower may raise concern through any of the following media (this can be done either by declaration or in confidence/ anonymously):</p> <ul style="list-style-type: none">✦ Formal letter marked Whistleblower Protection, addressed to the affected Group company`s registered seat✦ By phone, to a dedicated phone number✦ By email, to a dedicated email address✦ Via Group`s website: www.qinshift.com/whistleblowing <p><i>All relevant contact information (company name, contact address, relevant persons, mailing lists and phone numbers) per Country, for submission of reports, is appended to this Policy as Appendix II and Appendix III.</i></p>



		<p>Where the concern is received by staff other than the Appointed person for receipt and dealing with reports, the recipient of such concerns shall be required to;</p> <ul style="list-style-type: none"> ✦ Immediately pass the concern(s) to the Appointed person for receipt and dealing with reports with copy to the Group Chief Compliance Officer (GCCO). <p>The concern(s) shall be presented in the following format;</p> <ul style="list-style-type: none"> ✦ Background of the concerns (with relevant dates) ✦ Reason(s) why the whistleblower is particularly concerned about the situation. <p>Disciplinary measures in line with the applicable local legislation, shall be taken against any staff that receives concerns and fails to escalate. Also, disciplinary measure shall be taken against an internal whistleblower who acted out of malice.</p>
2	<p>Step Two Investigation of concerns and update on progress of investigation.</p>	<p>The Appointed person for receipt and dealing with reports shall, on receipt of the concern(s) acknowledge receipt of the concern from the whistleblower within 7 days of receipt, and immediately inform the Group Chief Compliance Officer (GCCO) who initiates the investigation and appoints the Investigator in charge for that particular case.</p> <p>The purposes of investigation are to:</p> <ol style="list-style-type: none"> a. Establish if a wrongdoing has occurred based on the concern(s) raised, and if so to what extent; and b. To minimize the risk of further wrongdoing, prevent any further loss of assets, damage to the group`s reputation and if possible, protect all sources of evidence. <p>If preliminary investigation shows that the concern falls within the whistleblowing reportable concerns, then further investigation shall be carried out.</p> <p>Once receives information about the investigation progress from the Investigator, the Appointed person for receipt and dealing with reports shall provide update of the progress of investigation to the whistleblower if the concerns fall within the reportable concerns. In any case, the Appointed person</p>



		for receipt and dealing with reports, shall follow up on the results of the investigation, in a form of a written report to the whistleblower, within 8 days from the case closure.
		Finally, if the concern raised by the whistleblower is frivolous or unwarranted, the Appointed person for receipt and dealing with reports shall ignore such concern, and where necessary, disciplinary measure in line with the local legislation, shall apply to staff involved.
3	Step Three Report of Investigation and action on report.	<p>Upon conclusion of investigation, the Investigator shall submit his/her report to the Group Chief Compliance Officer (GCCO) or the appropriate authority for further action(s). Where necessary the Group Chief Compliance Officer (GCCO) shall escalate to the Legal Counsel of KKCG. However, quarterly report to keep the Group Board abreast of developments in whistleblowing shall be submitted by the Group Chief Compliance Officer (GCCO) for receipt and dealing with reports.</p> <p>All disciplinary action relating to the report shall follow the statutory procedure as prescribed under the applicable local legislation.</p>
4	Step Four Non-Satisfaction with result of investigation/action	In the event that the whistleblower is not satisfied with the extent of investigation and or the action taken based on the outcome of the investigation, the whistleblower is at liberty to report to the relevant local state authority.
Any internal whistleblower that feels victimized can report his/her grievance(s) to the Group Board. This is without prejudice to the fundamental right of the internal whistleblower to seek redress in the court of law.		

7.2 External Whistleblowing Procedure

External whistleblowers are non-staff of the Group. External whistleblowers can fall into any of these categories: contractors, service providers, shareholders, partners, consultants, job applicants, and the general public. External whistleblowing shall follow the same procedure as for internal whistleblowing, as described in Section 7.1.



8. Time Limit for Investigation

It shall be the policy of the Group to handle investigations promptly and as fairly as possible. While it might not be possible to set a specified time frame for the conclusion of investigation, since the diverse nature of potential concerns may make this impracticable. The Investigator shall endeavor to resolve all concerns within 30 days from receiving the report. Where for any reason, proper resolution is unable to be achieved within this time frame, it will be achieved as soon as practicably feasible.

9. Protection for Whistleblower

The Group commits to offer proper and necessary protection to whistleblowers who disclose concerns, provided the disclosure is made;

- ✦ in the reasonable belief that that it is intended to show malpractice or impropriety;
- ✦ to an appropriate person or authority;
- ✦ and, in good faith without malice or mischief.

While all disclosures resulting from whistleblowing shall be treated with high level of confidentiality, staff and other relevant stakeholders are encouraged to disclose their name to make the report more credible. The Group shall take the following into consideration in considering unanimous disclosure:

- ✦ seriousness of the issues being reported;
- ✦ the significance and credibility of the concern;
- ✦ and, the possibility of confirming the allegation.



The Group shall not subject a whistleblower to any detriment. Where a whistleblower feels unfairly treated owing to his/her actions, the whistleblower shall be at liberty to report to the relevant local state authority (for ex. Ministry of justice) and any other regulatory body with oversight on the Group`s businesses. This is without prejudice to the right to take appropriate legal action.

Any retaliation, including, but not limited to, any act of discrimination, reprisal, harassment, suspension, dismissal, demotion, vengeance or any other occupational detriment, direct or indirect, recommended, threatened or taken against a whistleblower because he/she has made a disclosure in accordance with this Policy, will be treated as gross misconduct and dealt with accordingly.

Whistleblowers must ensure that they do not make disclosure outside of the prescribed channels (e.g. media-print or electronic), or their disclosures may not be protected.

10. Ownership and Frequency of Review

This Policy document remains the property of Qinshift. However, its custody and management shall rest with Group Chief Compliance Officer (GCCO).

This policy document and procedure manual shall be subject to review annually or as may be deemed necessary. All suggestions for review and or amendments shall be forwarded to the Group Chief Compliance Officer (GCCO) for necessary action.



11. Definition of Terms

Complaint	An allegation or concern that is subject to investigation by the appropriate authority.
Detriment	Victimization or reprisal of a whistleblower which can take any or a combination of the following forms; dismissal, termination, redundancy, undue influence, duress, withholding of benefit and/or entitlements and any other act that has negative impact on the whistleblower.
Good Faith	This is evident when a report or concern is made without malice or consideration of personal benefit and the employee has a reasonable basis to believe that the report is true; provided, however, a report does not have to be proven to be true to be made in good faith. Good faith is lacking when the disclosure is known to be malicious or false.
Investigation	A process designed to gather and analyze information in order to determine whether misconduct has occurred and if so, the party or parties responsible.
Misconduct	A failure by a staff member or other relevant stakeholder to observe the rules of conduct or standards of behavior prescribed by an organization.
Suspect	A person who is alleged to have committed a misconduct and subject of investigation.
The Group	Qinshift and all its subsidiaries.
Whistleblower	Any person(s) including employee, management, directors, depositors, service providers, creditors and other stakeholders of an institution who reports any form of unethical behavior or dishonesty to the appropriate authority.
Whistleblowing	The act of reporting an observed/perceived unethical misconduct of employees, management, directors and other stakeholders of an institution by an employee or other person to appropriate authority. It is an early warning system that enables an organization to find out when something is going wrong in time to take necessary corrective action.



Appendix I
List of Appointed persons for receipt and dealing with reports

Jurisdiction	Group company	Appointed person for receipt and dealing with reports	Proxy
Sweden	Qinshift AB	Joakim Fyhn	Biljana Stojcevska
Bosnia and Herzegovina	Qinshift doo Banja Luka	Mira Rodic	Nenad Andrejevic
Belarus	Seavus FLLC	Hanna Hutsko	Nenad Andrejevic
Switzerland	Seavus GmbH	Kiril Gelevski	Nenad Andrejevic
Moldova	Qinshift S.R.L.	Cristina Cazac	Nenad Andrejevic
Macedonia	Qinshift DOOEL	Violeta Arsovska	Nenad Andrejevic
Macedonia	Qinshift Academy DOOEL	Violeta Arsovska	Nenad Andrejevic
Serbia	Qinshift doo (Serbia)	Lidija Kaish	Nenad Andrejevic
Turkey	SEAVUS YAZILIM TEKNOLOJILERI ANONIM SIRKETI	Nil Gökçe	Nenad Andrejevic
United States of America	Qinshift USA Inc.	Kiril Gelevski	Nenad Andrejevic
Poland	Cleacode Services Sp. z o. o.	Jakub Zebik	Tomasz Chmielewski
Slovakia	Cleverlance Slovakia s.r.o.	Jan Rulíšek	Tomáš Roubík
	Komix SK s.r.o.	Jan Rulíšek	Tomáš Roubík
Czech Republic	QINSHIFT CE a.s.	Jan Rulíšek	Tomáš Roubík
	Cleverlance Enterprise Solutions s.r.o.	Jan Rulíšek	Tomáš Roubík
	Cleverlance H2B s.r.o.	Jan Rulíšek	Tomáš Roubík
	Komix Digital	Jan Rulíšek	Tomáš Roubík
Germany	Cleverlance Deutschland GmbH	Jan Rulíšek	Tomáš Roubík
Spain	QINSHIFT ESPAÑA, S.L.	Jan Rulíšek	Tomáš Roubík



Appendix II

List of relevant contact information (addresses for physical delivery of reports)

Group company	Registered address
Qinshift AB	Lilla Nygatan 7 3tr, 211 38 Malmö, Sweden
Qinshift doo Banja Luka	Svetozara Markovića 5 entrance 11 floor 2, 78000 Banja Luka, Bosnia and Herzegovina
Seavus FLLC	Internacionalnaya street, 25A, office 318 Minsk, 220030, Republic of Belarus Minsk, 22003
Seavus GmbH	Itziker Dorf Strasse 57, 8627 Gruningen, Switzerland
Qinshift S.R.L.	Calea Ieșilor 8/1, et.5, of.8, Chisinau, Moldova, MD-2068
Qinshift DOOEL	11 Oktomvri 33 a, Skopje, Republic of Macedonia
Qinshift Academy DOOEL	11 Oktomvri 33 a, Skopje, Republic of Macedonia
Qinshift doo (Serbia)	Vojvode Misica 9, 18000 Nis, Serbia
SEAVUS YAZILIM TEKNOLOJILERI ANONIM SIRKETI	FULYA MAH. BÜYÜKDERE CAD. PEKINTAS GROUP BLOK NO: 32 İÇ KAPI NO: 4 SISLI / ISTANBUL
Qinshift USA Inc.	125 High Street, Boston, Massachusetts 02110, USA
Clearcode Services Sp z o.o.	ul. sw. Antoniego 2/4, 50-073, Wrocław, Poland
QINSHIFT CE a.s.	Voctářova 2500/20a, Libeň, 180 00 Praha 8, Czech Republic
Cleverlance Enterprise Solutions s.r.o.	Voctářova 2500/20a, 180 00 Praha 8, Czech Republic
Cleverlance H2B s.r.o.	Tuřanka 1519/115a, 627 00 Brno, Czech Republic
Cleverlance Slovakia s.r.o.	Nivy Tower, Mlynské nivy 18890/5, 821 09 Bratislava, Slovakia
Cleverlance Deutschland GmbH	Eduard-Schopf-Allee 1a, D-28217 Bremen, Germany
QINSHIFT ESPAÑA, S.L.	Calle Barcas 2, Planta 2, 46002 Valencia, Spain
Komix Digital	Voctářova 2500/20a, 180 00 Praha 8, Czech Republic
Komix SK s.r.o.	Nivy Tower, Mlynské nivy 18890/5, 821 09 Bratislava, Slovakia



Appendix III

List of relevant contact information (mailing lists, contact phone numbers)

#	Country	Mailing List	Person 1 Name	Department	Person 1 Mail	Phone Number for forwarding
1	Czech Republic	WhistleblowingCzechia@qinshift.com	Jan Rulišek	Security	jan.rulisek@cleverlance.com	00420 226 211 295
2	Slovakia	WhistleblowingSlovakia@qinshift.com	Jan Rulišek	Security	jan.rulisek@cleverlance.com	00420 777929404
3	Sweden	WhistleblowingSweden@qinshift.com	Joakim Fyhn	P&C	joakim.fyhn@qinshift.com	0046 76 644 70 19
4	Poland	WhistleblowingPoland@qinshift.com	Jakub Zębik	Finance	j.zebik@clearcode.cc	0048 501 762 059
5	Macedonia	WhistleblowingMacedonia@qinshift.com	Violeta Arsovska	P&C	violeta.arsovska@qinshift.com	00389 78 499 176
6	Serbia	WhistleblowingSerbia@qinshift.com	Lidija Kais	Finance	lidija.kais@qinshift.com	00381 60 45 77 304
7	Bosnia and Herzegovina	WhistleblowingBosnia@qinshift.com	Mira Rodic	IDC	mira.rodic@qinshift.com	00387 65 463 957
8	Turkey	WhistleblowingTurkey@qinshift.com	Nil Gökçe	P&C	nil.gokce@qinshift.com	0090 537 644 1851
9	Moldova	WhistleblowingMoldova@qinshift.com	Cristina Cazac	P&C	cristina.cazac@qinshift.com	00373 68 932 233
10	Belarus	WhistleblowingBelarus@qinshift.com	Hanna Hutsko	P&C	hanna.hutsko@qinshift.com	00375296139010
11	USA	WhistleblowingUSA@qinshift.com	Kiril Gelevski	Sales	kiril.gelevski@qinshift.com	00389 77576530
12	Switzerland	WhistleblowingSwitzerland@qinshift.com	Kiril Gelevski	Sales	kiril.gelevski@qinshift.com	00389 77576530
13	Germany	WhistleblowingGermany@qinshift.com	Jan Rulišek	Security	jan.rulisek@cleverlance.com	00420 777929404
14	Spain	WhistleblowingSpain@qinshift.com	Jan Rulišek	Security	jan.rulisek@cleverlance.com	00420 777929404
16	Generic	whistleblowing@qinshift.com	Blagica Krsteva	Legal	blagica.krsteva@qinshift.com	0038978452315



#	Country	Mailing List	Person 2 Name	Department	Person 2 Mail	Phone Number for forwarding
1	Czech Republic	WhistleblowingCzechia@qinshift.com	Tomáš Roubík	Legal	tomas.roubik@akroubik.com	00420 226 211 295
2	Slovakia	WhistleblowingSlovakia@qinshift.com	Tomáš Roubík	Legal	tomas.roubik@akroubik.com	00420 777929404
3	Sweden	WhistleblowingSweden@qinshift.com	Biljana Stojcevska	Finance	biljana.stojcevska@qinshift.com	0046 76 644 70 19
4	Poland	WhistleblowingPoland@qinshift.com	Tomasz Chmielewski	Mng	t.chmielewski@clearcode.cc	0048 501 762 059
5	Macedonia	WhistleblowingMacedonia@qinshift.com	Nenad Andrejevic	Security	nenad.andrejevic@qinsift.com	00389 78 499 176
6	Serbia	WhistleblowingSerbia@qinshift.com	Nenad Andrejevic	Security	nenad.andrejevic@qinsift.com	00381 60 45 77 304
7	Bosnia and Herzegovina	WhistleblowingBosnia@qinshift.com	Nenad Andrejevic	Security	nenad.andrejevic@qinsift.com	00387 65 463 957
8	Turkey	WhistleblowingTurkey@qinshift.com	Nenad Andrejevic	Security	nenad.andrejevic@qinsift.com	0090 537 644 1851
9	Moldova	WhistleblowingMoldova@qinshift.com	Nenad Andrejevic	Security	nenad.andrejevic@qinsift.com	00373 68 932 233
10	Belarus	WhistleblowingBelarus@qinshift.com	Nenad Andrejevic	Security	nenad.andrejevic@qinsift.com	00375296139010
11	USA	WhistleblowingUSA@qinshift.com	Nenad Andrejevic	Security	nenad.andrejevic@qinsift.com	00389 77576530
12	Switzerland	WhistleblowingSwitzerland@qinshift.com	Nenad Andrejevic	Security	nenad.andrejevic@qinsift.com	00389 77576530
13	Germany	WhistleblowingGermany@qinshift.com	Tomáš Roubík	Legal	tomas.roubik@akroubik.com	00420 777929404
14	Spain	WhistleblowingSpain@qinshift.com	Tomáš Roubík	Legal	tomas.roubik@akroubik.com	00420 777929404
16	Generic	whistleblowing@qinshift.com	Nenad Andrejevic	Security	nenad.andrejevic@qinsift.com	0038978452315

*Person 1 and 2 are Qinshift employees that will receive e-mails sent to Whistleblowing'Country'@qinshift.com