
◀ POLICY MANUAL ▶

1.02 CODE OF CONDUCT

Profit is the motivation behind every business while performance and sustainability are the primary challenges. Good governance is a cornerstone in the foundation for success, especially in today's complex and fast moving world.

SETCO's ownership, management and employees are committed a clear set of "good values". We believe that Our interests as individuals as a company are best served when our decisions and actions are guided by such values.

We may not always meet expectations but Our customer's principals and suppliers should know that, every day, we strive to *Do What's Right*.

A sound code of conduct is essential to maintaining a healthy business and a positive work environment. It protects the interests of both the shareholders and the employees. It also supports a healthy relationship with external stakeholders and the community at large.

All employees must conduct themselves in accordance with this code. Managers have a special responsibility to ensure that their decisions and actions, as well as those of their subordinates, are in compliance with the code.

Violations of this code of conduct will be subject to disciplinary action, including possible dismissal.

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COMPLIANCE WITH LAWS, RULES AND REGULATIONS

Without exception, all employees must respect and obey the laws, rules, and regulations of the countries in which we operate.

ATTITUDE AND PROFESSIONAL CONDUCT

We strive to promote a positive and productive working environment based on cooperation, teamwork and mutual respect. Each of us has a responsibility to understand and work harmoniously with those who hold alternate points of view. While personal conflict is inevitable, we must work to minimize its negative effects.

To succeed, we must also apply these principles to our relationships with external stakeholders: customers, suppliers, vendors and the community at large.

As a matter of pride and, of course, company success, we place a strong emphasis on maintaining a high quality of work and level of productivity.

We manage and conduct our business with transparency. Corporate policies, procedures and standards are provided to maintain a clear and equitable standard of governance.

DISCRIMINATION AND HARASSMENT

We are firmly committed to providing equal opportunity employment and will not tolerate discrimination or harassment based on race, color, religion, sex, national origin or any other protected class.

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CONFLICTS OF INTEREST

A “conflict of interest” exists when a person’s private interest interferes in any way, or appears to interfere, with the interests of the Company.

We define conflict of interest as a situation in which an employee takes actions or has interests that may make it difficult to perform his/her work objectively and effectively. This includes situations in which an employee (or a member of his/her family) receives unsanctioned personal benefits as a result of his/her position in the Company.

Conflict of interest includes, but is not limited to, working for or doing business with a competitor, customer or supplier while employed by the Company.

As a matter of policy, employees carry the burden of:

1. Recognizing “conflict of interest.”
2. Taking the necessary action to avoid it.

If you are unsure about a situation, consult with your supervisor, manager, or other appropriate personnel.

IMPROPER BUSINESS OPPORTUNITIES

Employees are prohibited from pursuing business opportunities for personal gain when such opportunities are discovered through the use of Company property, information or via an employee/officer position.

Employees are prohibited from competing with the Company directly or indirectly and are obligated to advance the Company’s interests when such ethical opportunities arise.

COMPETITION AND FAIR DEALING

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We strive to outperform our competition fairly and honestly. We seek competitive advantage through superior performance, rather than unethical or illegal business practices.

Stealing proprietary information, possessing trade secret information that was obtained without the owner's consent, or inducing such disclosures from past or present employees of other companies is strictly prohibited. Each employee and officer should endeavor to respect the rights of/and deal fairly with the Company's customers, suppliers, competitors and employees.

The purpose of business entertainment and gifts in a commercial setting is to create goodwill and sound working relationships, not to gain unfair advantage with customers.

No gift or entertainment should be offered, given, provided or accepted by any Company employee or officer, family member of an employee or officer, or agent unless it:

1. Is not a cash gift;
2. Is consistent with customary business practices;
3. Is reasonable in value;
4. And cannot be construed as a bribe or payoff.

CONFIDENTIALITY

Employees and officers must maintain the confidentiality of proprietary information entrusted to them by the Company or its customers or suppliers, except when disclosure is authorized by the appropriate person or is required by laws or regulations. Proprietary information includes all non-public information that might be of use to competitors or harmful to the Company or its customers or suppliers if disclosed.

EMPLOYMENT

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Employees work for the company based on a personalized written contract that clearly specifies the rights and obligations of both employee and employer. Our employment terms (wages, working hours and benefits) must be fair and comply with or exceed the legislated minimum requirements.

Employees must be granted relevant statutory rights, such as annual, sick, maternity and indemnity leaves.

Employees are free to leave the company after a 90-day notice and in accordance with their employment contract and local labor laws.

We follow a strict policy of no physical abuse or discipline and no forced labor in any form. The policy includes total refrain from threats of verbal, physical and sexual harassment or intimidation.

The minimum age for full time employment at our company is 18 years.

HEALTH, SAFETY AND ENVIRONMENT

All staff, especially supervisors and managers, are expected to seriously consider environmental, health and safety factors when making day-to-day, as well as strategic, decisions.

Each employee and officer has the responsibility to maintain a safe and healthy workplace for all other employees. This responsibility includes following security, environmental, safety, and health rules and practices as defined by Company policies and the laws of the country in which we operate.

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Employees and officers are expected to perform their Company-related work in a safe manner, free of the influences of alcohol, illegal drugs or controlled substances. These substances may not be consumed, distributed or possessed within Company facilities or on Company grounds. Such behavior will not be tolerated.

REPORTING ILLEGAL OR UNETHICAL BEHAVIOR

Employees are encouraged to talk to supervisors, managers or other appropriate personnel about behavior they believe may be illegal or a violation of this Code of Conduct or Company policy. (See the “Whistleblower” section of the Company Policy Manual.)

IMPROPER INFLUENCE ON CONDUCT OF AUDITORS

It is prohibited to directly or indirectly coerce, manipulate, mislead or fraudulently influence the Company’s independent auditors, or otherwise affect the veracity of Company financial statements.

ANNUAL ACKNOWLEDGEMENT – SUPERVISORS, MANAGERS, OFFICERS

To help ensure compliance with this Code of Conduct, the Company requires that all supervisors, managers and officers review the Code of Conduct and acknowledge their understanding and adherence by signing and submitting the Code of Conduct Acknowledgement form (1.02 F 1 COC Acknowledgement) at the time of submitting their annual Performance Evaluation form (2.05 SP Annual Performance Evaluation).