

Season Electronics Limited (SEL) - Code of Ethics - Gifts & Bribery Act

The giving and receiving of gifts is a common business practice. Appropriate business gifts and entertainment are welcome courtesies designed to build relationships and understanding among business partners. It is important however, that gifts and entertainment should not compromise, or appear to compromise, the ability of business partners to make objective and fair business decisions.

SEL are a responsible corporate entity and as such have published this code of Business Conduct and Ethics we are governed by, specifically related to business gifts:

- As a general rule, SEL employees may give or receive gifts or entertainment to or from customers or suppliers only if the gift or entertainment would not be viewed as an inducement to or reward for any particular business decision.
- SEL employees must not (directly or indirectly) solicit or receive money, gifts or services from a customer, partner or supplier that are, or could be construed to be, connected with the Company's business relationship with that company. If an SEL employee receives an unsolicited offer, gift or money, at either their office or home, they will inform their manager immediately. Appropriate arrangements will be made to return it or dispose of it; as well as advising the sender of the Company's policy on gifts.
- SEL employees may accept, or pay for, such customary business amenities as meals, provided the expenses are kept at a reasonable level, they are not against the other company's business practices, and they are not prohibited by law. Unless the Company specifies otherwise, it is reasonable to give or accept small promotional gifts of nominal value.
- Gifts and entertainment may not be offered or exchanged under any circumstances to or with any employees of international governing bodies or national, state or local governments to try to influence the decisions of those employees.