

SET, INC.
CONFLICT OF INTEREST
POLICY

STATEMENT OF PURPOSE

SET, Inc. ("Company") expects that all its directors, officers and employees ("Corporate Family") are and will remain loyal to, and will operate in the best interests of, the Company. The purpose of this policy is to ensure that all such personnel understand this principle and adhere to appropriate legal and ethical standards in their business relationships.

PROCEDURE

SET SEG Insurance Services Agency, Inc. will be responsible for collecting necessary signatures of all board members and key employees. The Executive Assistant will be responsible for obtaining these signatures on an annual basis. Signed documents will be filed appropriately and the master tracking spreadsheet will be updated to ensure all signatures have been collected.

See attached Conflict of Interest Statement.

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POLICY ON ETHICAL STANDARDS

It has been a long standing policy of the Company to maintain the highest ethical standards in the conduct of the Company affairs and in its relationships with its members, suppliers, employees and advisors as well as the communities in which we operate. All employees shall conform to ethical and legal standards and abide by the law and preserve the Company's integrity and reputation. Failure to adhere to this policy may result in disciplinary action.

I. RESPONSIBLE BEHAVIOR

As an integral part of the Company, the Corporate Family is expected to accept certain responsibilities, adhere to acceptable business principles and practices in matters of personal conduct, and exhibit a high degree of personal integrity at all times. This not only involves sincere respect for the rights of others but requires that in business, the Corporate Family refrain from any behavior that might be harmful to itself, co-workers or the Company or that which might be viewed unfavorably by the public at large.

II. GOOD JUDGMENT

It is important that each employee rely on his or her good judgment in the performance of duties and responsibilities. When situations arise wherein the proper course of conduct is unclear, employees are to request advice and counsel from their department head, director or advisor, as appropriate.

III. CONFLICTS OF INTEREST

Every member of the Corporate Family should be prohibited from partaking in any activity or association that creates a conflict between the employee's personal interest and the Company's business interest. An employee must not allow any situation or personal interest to interfere with the exercise of independent judgment or with that employee's ability to act in the best interests of the Company.

If an employee is hired for a position that gives the employee the authority to spend Company funds or set Company policy, it is an implicit condition of his or her employment that the employee uses the authority in the Company's best interest.

The term "conflict of interest" describes any circumstances that would cast doubt on an employee's ability to act with objectivity. Each employee is expected to avoid any action or involvement which would in any way compromise his or her actions on behalf of the Company.

IV. INVESTMENTS

All members of the Corporate Family are prohibited from investing in any of the Company's customers, suppliers, or competitors excepting those investments representing less than 10% of net worth, unless the securities are publicly traded and the investments are on the same terms available to the general public and not based upon any "inside information." This prohibition applies to all forms of investments and to all employees, directors, officers and agents of Company. In the event the director, officer or employee is unaware of the investment or fails to limit the investments, he or she should disclose the investment as soon as he or she becomes aware.

V. OUTSIDE EMPLOYMENT

No employee may serve as an employee, director or officer of any supplier or customer without the Executive Director or Board's approval. No member of the Corporate Family shall serve as an employee, director or officer of a competitor, but may serve as an advisor or consultant to a supplier or customer if he or she conducts business as a representative of this Company. Officers of the Company may not engage in any outside employment which interferes with the fulfillment of his or her duties to this Company.

VI. CONFIDENTIALITY

Company possesses and will continue to possess information that has been created, discovered and developed by it; has been disclosed to the Company under the obligation of confidentiality; or has otherwise become known to the Company or in which property rights have been assigned or conveyed to the Company, which information is confidential to the Company and which has commercial value to the Company. All such information, except such information as is known or becomes known to the public without violation of this provision, is hereinafter considered "confidential and proprietary information." Confidential and proprietary information includes, but is not limited to, customer lists, subscription lists, details of consultant contracts, pricing policies, financial statements, projections, marketing plans, new personnel acquisition plans, trade secrets, operation methods, software and computer programs.

During and after the Corporate Family's association with the Company, the Corporate Family member shall keep confidential all such confidential and proprietary information. Notwithstanding the foregoing, nothing contained in this provision shall

be deemed to prevent the employee from utilizing his or her general knowledge, intellect, experience and skills for gainful employment following his or her employment with the Company.

VII. GRATUITIES, FAVORS AND LOANS

No member of the Corporate Family may give or receive any gifts or favors of significant value to or from any customer, supplier or competitor without the consent of the Executive Director or the Board, as may be appropriate, for the purpose of influencing another in connection with the Company business or Company transaction. Nor shall any member of the Corporate Family solicit, demand, or accept any item of significant value with the intent of being influenced or rewarded in connection with any Company business or transaction.

Members of the Corporate Family are not prevented from incurring normal business related expenses for entertainment or from accepting personal mementos of nominal value or to occasionally allow a supplier or customer to provide for business related entertainment or meals. In no event shall any member of the Corporate Family personally make or receive a gift in the form of cash, stocks, bonds, options or similar types of items reflecting an interest in a business.

VIII. PAYMENTS

The Company will pay only those agents from whom it has an invoice detailing the amount to be paid. The Company regards as improper, the accommodation, endorsement or guarantee of a loan by any supervisor, department head or officer on behalf of any employee reporting to him or her, directly or indirectly.

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ACKNOWLEDGMENT

In accordance with the "Conflict of Interest" policy which I have received, read and understand, I hereby agree to abide by the "Conflict of Interest" guidelines.

Name

Date