

Code of Ethics and Business Conduct

Cobalt Design and Manufacturing, LLC dba Hex Head Art

Statement of Our Core Values

Cobalt Design and Manufacturing LLC is dedicated to the ethical and responsible stewardship of our resources. We place the highest value on ensuring that everyone connected with our company works to enhance our ethical standards. To help achieve our vision, Cobalt Design and Manufacturing LLC adopts the following Code of Ethics and Business Conduct.

Company Vision

Our vision is more than artwork, we offer our customer's an experience. From custom corporate projects to stock collegiate items, each piece is unique and touched by the hands of our in house artists. We are completely American made and always will be, that's our commitment to our community and our country.

Values

Values are at the core of our business. We are in the business of happy customers and friendly faces. Our pieces of artwork are "want" items, not "need" items. For us, every customer should be overwhelmed with what we deliver that's 100%..... not 99%.

Mission

Our company mission is to provide our customers with unique vintage artwork that both encapsulates creativity and precision. We are committed to doing business the "right way", that intangible dynamic that equates a great value and exceeding customer expectations. This also follows the basis for how we conduct business internally, as we strive to pay wages that allow our employees to live comfortably, keep strong supplier relationships and above board ethics in all activities.

Build Trust and Credibility

The success of our business is dependent on the trust and confidence we earn from our employees, customers and shareholders. We gain credibility by adhering to our commitments, displaying honesty and integrity and reaching company goals solely through honorable conduct. It is easy to say what we must do, but the proof is in our actions. Ultimately, we will be judged on what we do.

When considering any action, it is wise to ask: will this build trust and credibility for Cobalt Design and Manufacturing? Will it help create a working environment in which we can succeed over the long term? Is the commitment I am making one I can follow through with? The only way we will maximize trust and credibility is by answering "yes" to those questions and by working every day to build our trust and credibility.

Respect for the Individual

We all deserve to work in an environment where we are treated with dignity and respect. Cobalt Design and Manufacturing is committed to creating such an environment because it brings out the full potential in each of us, which, in turn, contributes directly to our business success. We cannot afford to let anyone's talents go to waste.

Cobalt Design and Manufacturing is an equal employment/affirmative action employer and is committed to providing a workplace that is free of discrimination of all types from abusive, offensive or harassing behavior. Any employee who feels harassed or discriminated against should report the incident to his or her manager or to human resources.

Equal Employment Opportunity

The company is strongly committed to a policy of equal opportunity for all individuals, and intends to provide equal employment opportunity without regard to race, color, religion, sex, national origin, marital status, gender, age, sexual orientation, gender identity, mental or physical disability, or any classification protected by federal, state, or local law. Equal Employment Opportunity applies to all personnel practices. Our goal is to establish and maintain a work environment free from discrimination, coercion and harassment. While the company will not hire or promote any person who is not qualified for a job, we intend for our company to be known as one that welcomes women, minorities, disabled and veteran applicants at all job levels.

Women's Rights

Female workers have all of the same work opportunities of men, without arbitrary restriction on the types of jobs or special limits on hours of work.

Marital or reproductive status will not be considered as a condition of employment.

New mothers shall be entitled leaves of absence (with the right to return to work) for childbirth or recovery from childbirth.

Nondiscrimination

No person shall be subject to any discrimination in employment, including hiring, salary, benefits, advancement, discipline, termination or retirement, on the basis of gender, race, religion, age, disability, sexual orientation, nationality, political opinion, or social or ethnic origin.

Suppliers

Cobalt Design and Manufacturing, designs, manufactures and distributes all artwork they produce at their facilities located in Louisville, KY USA. No raw material or assembled merchandise is made from outside sources inside or outside of the USA.

Abuse and Anti-harassment Policy

Cobalt believes in a positive work environment and each employee is treated with dignity and respect. Cobalt has a zero-tolerance policy with respect to unlawful employee harassment. Cobalt prohibits any form of unlawful employee harassment based on race, color, national origin, religion, sex, pregnancy, age, disability, veteran status, or status in any group protected by law.

With respect to sexual harassment, Cobalt prohibit:

- Unwelcome sexual advances, requests for sexual favors, and all other verbal or physical conduct of a sexual or otherwise offensive nature
- Offensive comments, jokes, innuendoes, and other sexually-oriented statements.

Examples of the types of conduct prohibited by this anti-harassment policy include, but are not limited to the following:

- Offensive or derogatory comments or actions relating to any group protected by law.

- Acting in a manner to show dominance over or to intimidate another person.
- Obscene or vulgar language.
- Sexually suggestive touching.
- Whistling, leering, staring and stalking.
- Unwanted or offensive writings.
- Gesturing sexually.
- Offensive or sexually explicit email, text messages or voice mail messages.
- Questions about one's sex life experiences.
- Repeated requests for dates.
- Any other conduct deemed inappropriate by Cobalt management.
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Labor Laws

Cobalt only manufactures products at our owned facilities and only in the United States. We adhere to local, state and federal laws regarding child or forced labor. Working Hours: Except in extraordinary business circumstances, hourly and/or quota-based wage employees shall (i) not be required to work more than the lesser of (a) 48 hours per week and 12 hours overtime or (b) the limits on regular and overtime hours allowed by the law of the country of manufacture or, where the laws of such country do not limit the hours of work, the regular work week in such country plus 12 hours overtime; and (ii) be entitled to at least one day off in every seven day period. Cobalt is a category D member of the Fair Labor Association (FLA) and integrates its policies into our company philosophy of operating in a fair and ethical manner.

Child Labor

Cobalt does not employ any person at an age younger than 16, which is well above the legal age for employment in Kentucky. The Child Labor Law of Kentucky does place additional restrictions on the employment of 16 and 17 year olds above what is found in federal law. A 16 or 17 year old must work no more than 6 hours per day on a school day, or 8 hours per day on a non-school day during the school year.

Forced Labor

There shall not be any use of forced prison labor, indentured labor, bonded labor or other forced labor.

Wages and Benefits

Cobalt recognizes that wages are essential to meeting our employees' basic needs. The starting pay at Cobalt is well above minimum wage and we are committed to pay employees fairly and provide legally mandated benefits.

Fair Labor Association

Cobalt is a member of the Fair Labor Association (FLA) as a category D participant, and adheres to the standards of the FLA.

Overtime Compensation

In addition to their compensation for regular hours of work, hourly and/or quota-based wage, employees shall be compensated for overtime hours at such a premium rate as is legally required. In our region that rate is 150% of their current pay.

Employee Relations

Cobalt believes that the work conditions, wages and benefits it offers to its employees are competitive with those offered by other employers in this area and in this industry. If employees have concerns about work conditions or compensation, they are strongly encouraged to voice these concerns openly and directly to their supervisors.

Our experience has shown that when employees deal openly and directly with supervisors, the work environment can be excellent, communications can be clear, and attitudes can be positive. We believe that Cobalt amply demonstrates its commitment to employees by responding effectively to employee ideas and concerns.

Health and Safety

Cobalt Design and Manufacturing is dedicated to maintaining a healthy environment. Each employee is expected to obey safety rules and to exercise caution in all work activities. Employees must immediately report any unsafe condition to the appropriate supervisor. Employees who violate safety standards, who cause hazardous or dangerous situations, or who fail to report or remedy such situation, may be subject to disciplinary action, up to and including termination of employment.

In the case of accidents that result in injury, regardless of how significant the injury may appear, employees must immediately notify the appropriate supervisor. Such reports are necessary to comply with the laws and initiate insurance and worker's compensation claims.

Freedom of Association and collective bargaining.

Workers are free to join associations of their own choosing. Factories shall not interfere with workers who wish to lawfully and peacefully associate, organize, or bargain collectively. The decision whether or not to do so should be made solely by the workers.

Create a Culture of Open and Honest Communication

At Cobalt Design and Manufacturing everyone should feel comfortable to speak his or her mind, particularly with respect to ethics concerns. Managers have a responsibility to create an open and supportive environment where employees feel comfortable raising such questions. We all benefit tremendously when employees exercise their power to prevent mistakes or wrongdoing by asking the right questions at the right times.

Cobalt Design and Manufacturing will investigate all reported instances of questionable or unethical behavior. In every instance where improper behavior is found to have occurred, the company will take appropriate action. We will not tolerate retaliation against employees who raise genuine ethics concerns in good faith.

For your information, Cobalt Design and Manufacturing's whistleblower policy is as follows: Employees are encouraged, in the first instance, to address such issues with their managers or the HR manager, as most problems can be resolved swiftly. If for any reason that is not possible or if an employee is not comfortable raising the issue with his or her manager or HR, [Company Name]'s [Title of Executive Officer] does operate with an open-door policy.

Set Tone at the Top

Management has the added responsibility for demonstrating, through their actions, the importance of this Code. In any business, ethical behavior does not simply happen; it is the product of clear and direct communication of behavioral expectations, modeled from the top and demonstrated by example. Again, ultimately, our actions are what matters.

To make our Code work, managers must be responsible for promptly addressing ethical questions or concerns raised by employees and for taking the appropriate steps to deal with such issues. Managers should not consider employees' ethics concerns as threats or challenges to their authority, but rather as another encouraged form of business communication. At Cobalt Design and Manufacturing we want the ethics dialogue to become a natural part of daily work.

Uphold the Law

Cobalt Design and Manufacturing's commitment to integrity begins with complying with laws, rules and regulations where we do business. Further, each of us must have an understanding of the company policies, laws, rules and regulations that apply to our specific roles. If we are unsure of whether a contemplated action is permitted by law or Cobalt Design and Manufacturing policy, we should seek the advice from the resource expert. We are responsible for preventing violations of law and for speaking up if we see possible violations. Because of the nature of our business, some legal requirements warrant specific mention here.

Competition

We are dedicated to ethical, fair and vigorous competition. We will sell Cobalt Design and Manufacturing products and services based on their merit, superior quality, functionality and competitive pricing. We will make independent pricing and marketing decisions and will not improperly cooperate or coordinate our activities with our competitors. We will not offer or solicit improper payments or gratuities in connection with the purchase of goods or services for Cobalt Design and Manufacturing or the sales of its products or services, nor will we engage or assist in unlawful boycotts of particular customers.

Proprietary Information

It is important that we respect the property rights of others. We will not acquire or seek to acquire improper means of a competitor's trade secrets or other proprietary or confidential information. We will not engage in unauthorized use, copying, distribution or alteration of software or other intellectual property.

Corporate Recordkeeping

We create, retain and dispose of our company records as part of our normal course of business in compliance with all Cobalt Design and Manufacturing policies and guidelines, as well as all regulatory and legal requirements.

All corporate records must be true, accurate and complete, and company data must be promptly and accurately entered in our books in accordance with Cobalt Design and Manufacturing's and other applicable accounting principles.

We must not improperly influence, manipulate or mislead any unauthorized audit, nor interfere with any auditor engaged to perform an internal independent audit of Cobalt Design and Manufacturing books, records, processes or internal controls.

Promote Substance Over Form

At times, we are all faced with decisions we would rather not have to make and issues we would prefer to avoid. Sometimes, we hope that if we avoid confronting a problem, it will simply go away.

At Cobalt Design and Manufacturing, we must have the courage to tackle the tough decisions and make difficult choices, secure in the knowledge that Cobalt Design and Manufacturing is committed to doing

the right thing. At times this will mean doing more than simply what the law requires. Merely because we can pursue a course of action does not mean we should do so.

Although Cobalt Design and Manufacturing's guiding principles cannot address every issue or provide answers to every dilemma, they can define the spirit in which we intend to do business and should guide us in our daily conduct.

Accountability

Each of us is responsible for knowing and adhering to the values and standards set forth in this Code and for raising questions if we are uncertain about company policy. If we are concerned whether the standards are being met or are aware of violations of the Code, we must contact the HR department.

Cobalt Design and Manufacturing takes seriously the standards set forth in the Code, and violations are cause for disciplinary action up to and including termination of employment.

Confidential and Proprietary Information

Integral to Cobalt Design and Manufacturing's business success is our protection of confidential company information, as well as nonpublic information entrusted to us by employees, customers and other business partners. Confidential and proprietary information includes such things as pricing and financial data, customer names/addresses or nonpublic information about other companies, including current or potential supplier and vendors. We will not disclose confidential and nonpublic information without a valid business purpose and proper authorization.

Use of Company Resources

Company resources, including time, material, equipment and information, are provided for company business use. Nonetheless, occasional personal use is permissible as long as it does not affect job performance or cause a disruption to the workplace.

Employees and those who represent Cobalt Design and Manufacturing are trusted to behave responsibly and use good judgment to conserve company resources. Managers are responsible for the resources assigned to their departments and are empowered to resolve issues concerning their proper use.

Generally, we will not use company equipment such as computers, copiers and fax machines in the conduct of an outside business or in support of any religious, political or other outside daily activity, except for company-requested support to nonprofit organizations. We will not solicit contributions nor distribute non-work related materials during work hours.

In order to protect the interests of the Cobalt Design and Manufacturing network and our fellow employees, Cobalt Design and Manufacturing reserves the right to monitor or review all data and information contained on an employee's company-issued computer or electronic device, the use of the Internet or Cobalt Design and Manufacturing's intranet. We will not tolerate the use of company resources to create, access, store, print, solicit or send any materials that are harassing, threatening, abusive, sexually explicit or otherwise offensive or inappropriate.

Questions about the proper use of company resources should be directed to your manager.

Do the Right Thing

Several key questions can help identify situations that may be unethical, inappropriate or illegal. Ask yourself:

- Does what I am doing comply with the Cobalt Design and Manufacturing guiding principles, Code of Conduct and company policies?
- Have I been asked to misrepresent information or deviate from normal procedure?
- Would I feel comfortable describing my decision at a staff meeting?
- How would it look if it made the headlines?
- Am I being loyal to my family, my company and myself?
- What would I tell my child to do?
- Is this the right thing to do?

Remediation

When a violation of the Code of Conduct occurs, remediation of the violation by Cobalt management is expected.

This Code of Ethics and Business Conduct is posted publicly on our website: hexheadart.com