

COBALT COMMUNICATIONS

Code of Conduct/Business Ethics Policy

At Cobalt Communications, we are committed to conducting business with the highest standards of integrity, ethics, and professionalism. Our reputation is built on providing creative thinking, innovative strategies, high-quality design, writing, and—above all—exceptional service to our clients. This Code of Conduct outlines the principles and policies that guide our actions and decisions, ensuring we uphold our values in all aspects of our work. It applies to all Cobalt employees, contractors, and representatives.

Compliance with Laws and Regulations

Employees must adhere to all applicable federal, state, and local laws, as well as any regulations governing our industry. Compliance is fundamental to maintaining the trust of our clients, partners, and stakeholders.

Ethical Workplace Conduct

Employees are expected to always conduct themselves with integrity and ethical behavior. This includes avoiding any activity that could present a conflict of interest with Cobalt, its customers, suppliers, contractors, or competitors. Any appearance of impropriety must also be avoided to protect the company's reputation.

Conflict of Interest

Employees must avoid any activity, practice, or relationship that conflicts—or appears to conflict—with Cobalt's interests. This includes personal relationships or financial interests that could interfere with impartial decision-making. Any potential conflicts of interest must be disclosed to management immediately.

Confidentiality and Intellectual Property

Employees must safeguard all confidential and proprietary information related to Cobalt, its clients, suppliers, and partners. This includes trade secrets, project details, processes, and other sensitive information.

All employees are required to sign a Nondisclosure Agreement (NDA) upon employment, outlining specific obligations regarding the handling of such information.

Respectful Workplace

Cobalt is committed to a work environment where all employees are treated with respect and dignity. Harassment, discrimination, and any form of unwelcome behavior—whether unlawful or otherwise—are strictly prohibited.

This policy applies to all interactions, including those with supervisors, co-workers, vendors, contractors, customers, and other third parties.

Feedback and Open Communication

Cobalt values open and honest communication. Employees are encouraged to provide feedback and raise concerns without fear of retaliation. The company is committed to addressing concerns fairly and transparently, fostering a culture of trust and mutual respect.

Reporting Violations and Whistleblower Protections

Cobalt encourages employees to report any actual or potential violations of laws, regulations, or this Code of Conduct. Reports can be made to a supervisor, the President/CEO, or the Human Resources Department.

Cobalt protects whistleblowers in two key areas:

- **Confidentiality:** To the extent possible, the whistleblower's identity will be kept confidential.
- **Protection from Retaliation:** Retaliation against employees who report concerns in good faith will not be tolerated.

Whistleblowers are not immune from accountability for personal wrongdoing but are safeguarded against retribution for reporting concerns. Investigations and corrective measures will be coordinated by the President/CEO.

Reporting and Accountability

All reports of unethical, illegal, or dishonest activities will be reviewed and investigated by the President/CEO or an appropriate member of the management team. Corrective actions will be taken as necessary to address any violations of this Code of Conduct.