
External Communication Policy

(as adopted on October 1, 2014)

1. INTRODUCTION.

This External Communications Policy (the "Policy") sets forth the policies of 6D Global Technologies, Inc. and its affiliated entities (collectively, the "Company") regarding how Company representatives may communicate with outside parties¹, particularly securities market professionals and those who may own or trade in our shares. Capitalized terms used in this Policy have the meanings set forth in the section entitled "Key Terms" appearing at the end of this document.

This Policy applies to all Company employees, directors, officers, consultants and contractors. Any violation of this Policy should be brought to the attention of the Company's head of legal affairs or other Authorized Spokesperson and may constitute grounds for termination of employment.

2. GENERAL POLICY

It is the Company's policy that all its communications with Third Parties comply with applicable law, and that Material, Non-Public Information of the Company is Publicly Disseminated in a non-exclusionary and non-selective way.

As a general rule, no Insider, other than an Authorized Spokesperson, may communicate Material, Nonpublic Information of the Company to a Third Party. No other individual is authorized to speak on behalf of the Company with respect to such information.

Occasionally, Insiders may be contacted by outside sources or the media requesting information about the Company or its employees, directors or officers or operations. In order to avoid providing inaccurate, incomplete or Material Information to outside sources, all outside inquiries regarding the Company or its employees, directors or officers or operations must be referred to an Authorized Spokesperson. Only an Authorized Spokesperson is authorized to make or approve public statements pertaining to the Company or its employees, directors or officers or operations.

An Authorized Spokesperson may only provide Material, Nonpublic Information to a Third Party if such information has been previously or is simultaneously Publicly Disseminated or if such information is disclosed in accordance with applicable law.

In the event of non-intentional disclosure by an Insider of information that might be Material, Nonpublic Information, the Insider must immediately inform an Authorized Spokesperson, who, in turn, may consult with the Company's legal department as to whether prompt public dissemination of this information is required. If required, the information must be Publicly Disseminated within 24 hours of the discovery of the inadvertent disclosure by an Authorized Spokesperson (or the commencement of trading of the Company's stock on the exchange on which it is listed).

Please note the following important interpretation rules for this Policy. The word "Company" is used throughout this Policy to refer to each company its affiliated entities, including Six Dimensions, Inc., except where this Policy applies differently, in which case specific reference is made to the relevant entity using the separate defined term for that entity.

Whenever an Authorized Spokesperson is uncertain about this Policy or U.S. federal securities laws, the Authorized Spokesperson should consult with the Company's legal department to insure compliance.

An Authorized Spokesperson may not depart from the principles set forth in this Policy without the explicit prior approval of the Company's Chief Executive Officer or the Company's head of legal affairs.

3. **FINANCIAL INFORMATION**

No Insider may provide "guidance" to Third Parties on a selective basis, directly or indirectly, and may not disclose to Third Parties any information regarding the Company's internal projections of future operating results, business transactions, customer, partner, or supplier developments or other Material Information that has not been Publicly Disseminated, either in a press release, SEC filing or other appropriate method. Additionally, no Insider shall comment on past guidance, even though it has been Publicly Disseminated.

4. **QUIET PERIOD**

The Company will maintain a quiet period beginning fourteen (14) days prior to the end of each fiscal quarter and continuing through the date of the earnings announcement for that quarter. During this period, the Company will refuse to provide public comment or new guidance regarding earnings prospects or other material information relevant to the Company's current or future financial results.

5. **ANALYST INFORMATION**

Except as set forth below, no Insider may review or comment on analysts' reports, send analysts' reports to investors or prospective investors, comment on an analyst's model, provide analysts' phone numbers for people to call them directly, endorse or ratify revenue or earnings projections made by an analyst, or express comfort or disagreement with "the range" or how the analysts arrived at their estimates. An Authorized Spokesperson may, however, review an analyst report solely for the purpose of confirming or correcting Publicly Disseminated information that may be contained in such analyst report. To the extent that an analyst asks a question in which an analyst is seeking an answer to refine the analyst's own projections, those questions should be answered by an Authorized Spokesperson by reference to Publicly Disseminated materials.

6. **PRESS RELEASES**

The Company will issue press releases from time to time to disclose information that is important or of use to the public. Press releases will be prepared and reviewed in accordance with the Company's established practices and applicable law, including review by the Company's auditors and counsel, if appropriate. Press releases will be approved by and issued under the supervision of an Authorized Spokesperson and the Director of Marketing.

7. **PRODUCT AND COMPANY INFORMATION**

No Insider shall disclose to Third Parties any Material, Nonpublic Information regarding the Company or its products and services.

8. **SHARE PRICE**

No Insider shall comment on how the Company's share price will change over time, on whether people should buy or sell the Company's shares or whether he or she believes that the share price reacted or will react to a particular event (i.e., business transaction, Company press release, etc.).

9. **COMPETITOR INFORMATION**

No Insider shall discuss financial or operational information about competitors. An Authorized Spokesperson should say that the Company does not comment about its competitors and suggest that the Third Party call the competitor directly.

An Authorized Spokesperson may discuss market share figures and facts from competitors' earnings announcements.

10. **RUMORS**

Generally, the Company will not comment on rumors or speculation. If the Company decides to comment on a rumor, only Authorized Spokespersons may speak on behalf of the Company. Rumors about the Company that are posted in Internet chat rooms are covered by this Policy. Insiders should not respond to rumors about the Company including those found in Internet chat rooms. All rumors should be referred to an Authorized Spokesperson for appropriate action.

11. **INDIRECT COMMUNICATIONS; SOCIAL NETWORKS, CHAT ROOMS**

Any communication that would constitute a violation of this Policy if made directly by an Insider to a Third Party shall also constitute a violation if made indirectly to a Third Party. No Insider shall contribute to or participate in "chat rooms OR social networks" or similar online forums with respect to the Company or companies engaged in business with the Company to the extent any such information regarding the Company or any other party is gained as a result of the Insider's relationship with the Company or any other Insider. The posts in these forums may contain misleading or unsubstantiated information and may be made by unsophisticated investors who are poorly informed. Accordingly, no Insider may discuss the Company or Company-related information in such a forum. Posts in these forums can result in the disclosure of Material Nonpublic Information and may bring significant legal and financial risk to the Company and are therefore prohibited.

12. **SPEECHES, INTERVIEWS AND CONFERENCES**

Any participation in public speeches, interviews or conferences by Insiders must be reviewed and approved by an Authorized Spokesperson. Once approved, Insiders should adhere to the approved script and not disclose any Material, Nonpublic Information about the Company during any questions-and-answer sessions.

13. **VIOLATION OF THIS POLICY**

Selective disclosure of Material, Nonpublic Information in any forum other than the approved methods listed above, and by any individual other than an Authorized Spokesperson, and without the express approval of the Chief Executive Officer or the Chief Financial Officer is considered a violation of this Policy and may be considered a violation of U.S. federal securities laws. A violation of this Policy may result in immediate termination of employment and, potentially, an SEC civil enforcement action against the individual offender, the Company, and its officers and directors. Insiders are encouraged to report possible violations of this Policy to an Authorized Spokesperson.

KEY TERMS

As used in this Policy, the following terms have the following meanings:

"Authorized Spokesperson" means:

- the Chief Executive Officer or person(s) performing similar functions;
- the Chief Financial Officer; or
- any other Company employee or representative who has been authorized by the Chief Executive Officer or the Company's head of legal affairs to speak with a Third Party with respect to a particular topic or on a particular occasion.

"Insider" means an employee, officer, director, consultant or contractor of the Company. All Insiders subject to this Policy are also subject to the Company's Insider Trading Prohibition Policy and Guidelines.

"Material Information": It is not possible to define all categories of material information. However, information should be regarded as material if there is a reasonable likelihood that it would be considered important to an investor in making an investment decision regarding the purchase or sale of the Company's securities or could reasonably be expected to have a substantial effect on the price of the Company's securities.

While it may be difficult under this standard to determine whether particular information is material, there are various categories of information that are particularly sensitive and, as a general rule, should always be considered material. Examples of such information may include:

- Financial results, financial condition, earnings information, projections or forecasts;
- Restatements of financial results or material impairments, write-offs or restructurings;
- Changes in independent auditors or changes in reliance on certain audit reports;
- Business plans or budgets;
- Creation of significant financial obligations or significant changes in financial obligations;
- Impending bankruptcy or financial liquidity problems;
- Significant developments involving customers, suppliers or business relationships (including the acquisition or loss of an important contract);
- Product/service announcements of a significant nature;
- Significant developments in research and development or relating to intellectual property;
- Significant legal or regulatory developments, whether actual or threatened;
- Major events involving the Company's securities (including financings, defaults on debt securities, calls of securities for redemption, repurchase plans, stock splits, public or private sales of additional securities);
- Significant corporate events, such as a pending or proposed merger, joint venture or tender offer, a significant investment, the acquisition or disposition of a significant business or asset or a change in control of the Company;
- Significant litigation; and
- Major personnel changes.

Either positive or negative information may be material.

"Nonpublic Information" means information that has not been Publicly Disseminated and is otherwise not available to the general public.

"Publicly Disseminated" means that information has been made available through:

- filing a current report on Form 8-K with the SEC or, if appropriate, including the disclosure in our quarterly report on Form 10-Q or annual report on Form 10-K;
- distributing a press release through a widely disseminated news or wire service;
- any other non-exclusionary method of disclosure that is reasonably designed to provide broad public access, such as broadcasting through the Company website after public notice of the broadcast; or
- a combination of the above methods.

"Third Party" means securities market professionals (including, but not limited to, analysts, broker-dealers, investment advisers and fund managers), existing or prospective shareholders (including anyone who may be reasonably expected to trade on the basis of Material, Nonpublic Information), reporters and any other party who is not bound by a duty of confidentiality to the Company.

¹ This policy is not intended to address disclosures that may be required by legal, governmental and regulatory authorities or otherwise by law.