

CONFLICT MINERALS POLICY

"Conflict Minerals" refers to certain minerals and their derivatives, some of which are mined in the Democratic Republic of the Congo ("DRC") and in the adjoining countries ("DRC Region") where revenues generated by their sale may be directly or indirectly financing armed groups engaged in civil war resulting in serious human rights and environmental abuses. In July 2010, the United States Congress passed the Dodd-Frank Financial Reform Bill. Section 1502 of this bill requires all U.S. publicly traded companies and their suppliers to disclose their use and sources of Conflict Minerals.

Harvest Tec Corporation fully supports efforts to eliminate the use of Conflict Minerals from improper sources that could support human rights abuses in the DRC Region and is routinely engaged in the process of obtaining information from its metal suppliers concerning the origin of the metals that are used to manufacture Harvest Tecs' products. Harvest Tec Corporation does not directly source Conflict Minerals from mines or smelters but uses refined metals in the manufacture of some of its products. Therefore, it relies on the information provided by its suppliers regarding their sourcing of metals. Harvest Tec expects its suppliers to source materials from socially responsible suppliers and that all of its suppliers will comply with the Dodd-Frank requirements and provide all necessary declarations and supporting information. Suppliers must pass these requirements through to their supply chain if they do not source directly from mines or smelters and determine the source of the Conflict Minerals used in the product Harvest Tec Corporation purchases. We will assess future business with suppliers who are not cooperative with the conflict-free sourcing initiative and not compliant with this Policy.

Harvest Tec Corporation will continue to regularly survey its suppliers to verify compliance with this Policy.

Harvest Tec Corporation is committed to ethical practices and compliance with applicable laws and regulations wherever it does business.