

Conflict Mineral Policy

MAXTEC is committed to sourcing materials from companies that share our values regarding human rights, ethics and environmental responsibility. On August 22, 2012, the final rule regarding sourcing of conflict minerals under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act ("the Dodd-Frank Act") was approved by the U.S. Securities and Exchange Commission ("SEC"). Conflict minerals include tantalum, tin, tungsten, gold or their derivatives.

The rule imposes reporting requirements on publicly traded companies subject to the SEC to annually report the presence of conflict minerals originating in the Democratic Republic of the Congo ("DRC") or adjoining countries ("Covered Countries") in the products they manufacture or contract to manufacture whereby the conflict minerals are necessary to the functionality or production of a product.

MAXTEC is committed to complying with the legislation and is implementing a comprehensive Conflict Minerals Compliance Program to meet our customer's obligations.

MAXTEC is committed to avoiding the use of conflict minerals which directly or indirectly finance or benefit armed groups in the DRC or adjoining countries.

MAXTEC suppliers will be required to declare that all products supplied either:

- Do not contain tantalum, tin, tungsten or gold that are necessary to their production or functionality; or
- If they do contain these materials, they originate from non-conflict areas or from smelters that have been validated by an independent party to be conflict free.

MAXTEC will routinely evaluate its supplier relationships to ensure continued compliance with this policy. We expect our suppliers to pass these expectations on to their suppliers. MAXTEC values its suppliers and appreciates their commitment to the goal of using conflict-free minerals.

Sharon Bracken

President and CEO of Maxtec, LLC