

AlphaTech Inc. Conflict Minerals Policy

On August 22, 2012, the U.S. Securities and Exchange Commission (SEC) approved the final rule regarding the sourcing of conflict minerals under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act). Under this rule, public companies must evaluate the products they manufacture or contract to manufacture and report to the SEC the presence of conflict minerals originating in the Democratic Republic of the Congo (DRC) or the adjoining countries. Conflict minerals refers to tin, tungsten, tantalum and gold (called the 3TG's). Companies using conflict minerals must also disclose their supply chain inquiries to verify whether these minerals originated in the DRC or adjoining countries. While the burden of compliance is on the public companies who manufacture those products, members of their supply chains for those products are also impacted. The intent of these requirements in the Dodd-Frank Act is to further the humanitarian goal of ending violent conflict in the DRC and surrounding countries, which has been partially financed by the exploitation and trade of conflict minerals.

AlphaTech Inc. (ATI) is committed to maintaining high standards and supports the goal of the rules to end violence and human rights abuses in the DRC and surrounding countries. We are committed to complying with all requirements applicable under these rules. ATI does not knowingly procure any 3TG that originates in the DRC or surrounding countries. ATI will work closely with our customers in connection with their conflict minerals programs and we expect our suppliers will support us in implementing our conflict minerals compliance program. ATI requires suppliers to provide us with conflict minerals declarations using the Conflict Minerals Reporting Template and other documentation as requested. We may reconsider our willingness to partner with suppliers that fail to comply with this Policy.

Should you have any questions or concerns regarding this statement, please do not hesitate to contact us.

