A Subsidiary of Eastham Enterprises, Inc.

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EASTHAM FORGE, INC. CONFLICT MINERALS POLICY

Eastham Forge, Inc. endeavors to comply with the requirements of the Dodd-Frank Act with regard to limiting sources of 3TG minerals to non-conflict countries.

We have done our due diligence by contacting all of our steel vendors and requested statements of compliance. Most of our sources have replied and are compliant with the requirements. However, this is a cumbersome task and all have not replied.

Eastham Forge, Inc. has instituted changes in our system that will only allow the use of material that has come from sources that state compliance to the Dodd-Frank Act - when this requirement has been requested by our customers and the material selected uses any of the 3TG minerals as alloying elements.

We will continue this process until all of our steel vendors have time to research their smelting sources and issue compliance statements to us.