(December 2011) Department of the Treasury

Report of Organizational Actions Affecting Basis of Securities

▶ See separate instructions.

OMB No. 1545-2224

Internal Revenue Service Reporting Issuer Part I 2 Issuer's employer identification number (EIN) 1 Issuer's name Harbor Commodity Real Return Strategy Fund 26-3062227 3 Name of contact for additional information Telephone No. of contact 5 Email address of contact Anmarie S. Kolinski 312-443-4470 anmarie.kolinski@harborfunds.com 6 Number and street (or P.O. box if mail is not delivered to street address) of contact 7 City, town, or post office, state, and Zip code of contact 111 South Wacker Drive, Suite 3400 Chicago, IL 60606 8 Date of action 9 Classification and description See Attached Schedule Regulated Investment Company - Institutional and Administrative Shares 10 CUSIP number 11 Serial number(s) 12 Ticker symbol 13 Account number(s) HACMX, HCMRX 411511397.411511389 Organizational Action Attach additional statements if needed. See back of form for additional questions. Describe the organizational action and, if applicable, the date of the action or the date against which shareholders' ownership is measured for the action Harbor Commodity Real Return Strategy Fund made cash distributions to shareholders during calendar year 2016. A portion of these distributions constitute a non-taxable return of capital to shareholders. Please see the attached schedule for distribution record dates, per share distributions and per share return of capital amounts for the Institutional and Administrative Class Shares. Describe the quantitative effect of the organizational action on the basis of the security in the hands of a U.S. taxpayer as an adjustment per share or as a percentage of old basis ► Amounts designated as a return of capital reduce the shareholder's cost basis in their shares. Please see the attached schedule for per share return of capital amounts for the Institutional and Administrative Class Shares. Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation dates ► The calculation of the return of capital is based upon the Harbor Commodity Real Return Stategy Fund's accumulated earnings and profits as of its fiscal year ended October 31, 2016. Accordingly, distributions in excess of earnings and profits are characterized as a non-taxable return of capital distribution that reduces the cost basis of shares.

Form 8937 (Rev. 12-2011) Page 2 Part II **Organizational Action** (continued) List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ Internal Revenue Code Section 301(c)(2) - Basis reduction for distribution in excess of Earnings & Profits and Internal Revenue Code Section 316(b)(4) - Special rule for allocation of distribution in excess of Earnings & Profits for the fiscal year of the Regulated Investment Company 18 Can any resulting loss be recognized? ► No Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ This action is effective on the distribution date listed on the attached schedule. Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge. Sign Here /s/ Anmarie S. Kolinski January 3, 2017 Signature ▶ Date ▶ Print your name ► Anmarie S. Kolinski Treasurer

Preparer's signature

Print/Type preparer's name

Firm's name

Paid

Preparer

Use Only

Title ▶

Check if

self-employed

Firm's EIN ▶

Harbor Commodity Real Return Strategy Fund

Tax ID: 26-3062227

2016 Return of Capital Distributions

Harbor Commodity Real Return Strategy Fund - Institutional Class

Record <u>Date</u>	<u>Cusip</u>	<u>Ticker</u>	Total Distribution <u>Per Share</u>	Return of Capital Distribution <u>Per Share</u>
03/29/2016	411511397	HACMX	0.00000	0.00000
06/28/2016	411511397	HACMX	0.02841	0.02795
09/28/2016	411511397	HACMX	0.00000	0.00000
12/16/2016	411511397	HACMX	0.00000	0.00000

Harbor Commodity Real Return Strategy Fund - Administrative Class

Record <u>Date</u>	<u>Cusip</u>	<u>Ticker</u>	Total Distribution <u>Per Share</u>	Return of Capital Distribution Per Share
03/29/2016	411511389	HCMRX	0.00000	0.00000
06/28/2016	411511389	HCMRX	0.02333	0.02295
09/28/2016	411511389	HCMRX	0.00000	0.00000
12/16/2016	411511389	HCMRX	0.00000	0.00000