BTD Manufacturing Inc. - Conflict Minerals Policy

The Securities and Exchange Commission ("SEC") adopted annual disclosure requirements in connection with the conflict minerals provision of the Dodd-Frank Wall Street Reform and Consumer Protection Act, requiring publicly traded companies to disclose whether certain minerals necessary to the functionality or production of products manufactured or contracted to be manufactured originated in the Democratic Republic of Congo and its nine neighboring countries (the "DRC"). These certain minerals referred to as "conflict minerals" include tantalum (columbite-tantalite), tin (cassiterite), tungsten (wolframite) and gold ("3TGs").

BTD Manufacturing, Inc. ("BTD") supports the humanitarian goal of ending the violence and human rights violations in the DRC, which are believed to have been partially financed by the exploitation and trade of conflict minerals. BTD strives to have a conflict free supply chain and is committed to working with its suppliers to increase transparency regarding the origin of minerals contained in its products. BTD and its parent corporation Otter Tail Corporation have taken steps to identify any use of 3TGs and made reasonable country of origin inquiries with their suppliers to identify whether any use of 3TGs are sourced from the DRC.

BTD and its parent corporation Otter Tail Corporation are also committed to complying with all the conflict mineral requirements under the Act and all the rules and regulations issued by the SEC.