



Code of Business Ethics

OUR VALUES

Integrity:

We conduct business responsibly and honestly.

Safety:

We provide safe workplaces and require safe work practices.

People:

We build respectful relationships and create an environment where talented people thrive.

Performance:

We strive for excellence, act on opportunity and deliver on commitments.

Community:

We improve the communities where we work and live.

MISSION

We are a customer focused, growth oriented manufacturing partner providing innovative, customer specific solutions to world class brands. We succeed by investing in our people, processes, and technology while enhancing our profitability.

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INTRODUCTION

BTD Manufacturing, Inc. (the “Company”) believes in integrity and honesty in all workplace relationships. The decisions we make and the actions we take with each other and our customers are vitally important in maintaining our hard-earned reputation.

The actions of our suppliers, vendors, and contractors as well as their employees, agents, and subcontractors (hereinafter referenced as “Supplier” or “You”) are a representation of who we are. We expect the people and companies with which we conduct our business to reflect our values. As a Supplier, you are obligated to abide by this policy and follow its principles of conduct. Suppliers doing business with the Company are also expected and required to conduct business in accordance with all applicable laws, rules, and regulations.

If you have doubts or questions regarding this Supplier Code of Business Ethics or a situation arising under, please contact your Company representative.

WORKPLACE SAFETY AND HEALTH

BTD Manufacturing is committed to the safety and health of its employees and conducts its operations in compliance with all applicable laws and regulations. Similarly Suppliers are expected to comply all applicable laws and regulations and provide to their employees a safe working environment minimizing exposure to health risks.

THE ENVIRONMENT

We are committed to conducting business in an environmentally responsible manner. Suppliers are required to comply with all applicable environmental laws and regulations and should operate in a way that minimizes their impact on the environment and values sustainability. We encourage Suppliers to share with us their practices to improve their sustainability.

RESPECTFUL WORKPLACE AND EQUAL OPPORTUNITY

BTD has been and will continue to be an equal opportunity employer. We are committed to maintaining a workplace and culture free from discrimination and harassment. We do not allow discrimination or harassment based on: race, color, creed, religion, national origin, sex, marital status, disability, public assistance, age, sexual orientation, gender identity, familial status, veteran status, genetic information, citizenship; or any other basis prohibited under federal, state, or local laws. Additionally, we encourage diversity, equity, and inclusion. A wide variety of business relationships help us better reflect our customers and communities while providing economic growth opportunities.

As our suppliers, vendors and contractors, we expect you to comply with all applicable laws and regulations related to discrimination and harassment in the workplace.

LABOR AND HUMAN RIGHTS STATEMENT

We respect and promote human rights. BTD Manufacturing will not engage in or support the use of child labor or forced or indentured labor. Suppliers are expected to comply with applicable local child labor laws. BTD Manufacturing has a no tolerance policy for forced labor and child labor and will immediately terminate business activities with a supplier not following this requirement. Suppliers will ensure that their employees are free from undue risk or physical harm or exploitation and are compensated in accordance with all applicable wage and work hour laws and regulations. All of BTD Manufacturing's suppliers are expected to adhere to its Human Rights Policy which can be found at the following location: <https://www.ottertail.com/governance/overview/default.aspx>. If you become aware of a violation of the Human Rights Policy, you must promptly notify BTD Manufacturing or the Otter Tail Corporation Helpline (see below).

EXPORT CONTROLS

Export controls and economic sanctions regulate where and with whom we can do business. The laws of more than one (1) country may govern a particular transaction. Failure to comply with these laws can seriously impact our Company and reputation, lead to significant fines, and can even result in the loss of our export privileges.

We are committed to ensuring that these business transactions are accomplished in full compliance with applicable sanctions or trade controls and laws. If you are involved in the transfer of goods or services across international borders on behalf of our Company or our customers, you must comply with these laws, regardless of where you are located.

CONFLICTS OF INTEREST

BTD Manufacturing wants to avoid even the appearance of making business decisions for improper reasons. As our Supplier, you and your employees must avoid actual or potential conflicts of interest with the Company. A conflict of interest is a situation where your personal interests, as a supplier could directly or indirectly conflict with the best interests of the Company. A conflict may include where you have a family member working for BTD Manufacturing or its affiliates, using BTD Manufacturing's proprietary information while contracting with competitors or taking opportunities that are discovered through your position with BTD Manufacturing.

Should an actual or potential conflict of interest arise, you are expected to immediately disclose it to your BTD Manufacturing representative or affiliate contact.

RETALIATION / SPEAKING UP

The Company will not permit retaliation in any form because of information provided related to this Supplier Code of Business Ethics.

If you witness or know of a violation you are required to report it to BTD Manufacturing's helpline managed through its parent company, Otter Tail Corporation. The potential or suspected violation will be fully investigated, and corrective action will be taken, as necessary.

Otter Tail Corporation Helpline

Call: 800-461-9330
SMS/Text: 218-394-7272
Website Portal: coc.ottertail.com]

If a situation arises, you can call or text the helpline. You may contact this toll-free service 24 hours a day, seven (7) days a week, to discuss ethical concerns or to report information about a possible violation of this Supplier Code of Business Ethics. A trained specialist who is employed by an outside organization answers the Helpline and callers may remain anonymous if they wish, although identifying yourself allows us to act as quickly and appropriately as possible. You can also report a possible violation of this Supplier Code of Business Ethics through the Company's helpline website portal. Information reported to the helpline will be fully investigated and corrective action will be taken as necessary.