



Conflict Minerals

DOUGLAS DYNAMICS, INC. CONFLICT MINERALS

A. Purpose

1. This document sets forth the policy of Douglas Dynamics, Inc. (the "Company") concerning the use of "conflict minerals," defined as columbite-tantalite, cassiterite, gold, wolframite, or their derivatives, which are initially limited to tantalum, tin, and tungsten (collectively, "Conflict Minerals"), that originated in the Democratic Republic of Congo ("DRC") or the adjoining countries (collectively, together with the DRC, the "Covered Countries").
2. The purposes of the policy are to provide clarity concerning the Company's view of Conflict Minerals, ensure a consistent approach to Conflict Minerals and facilitate compliance with the disclosure requirements of Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act and the rules of the U.S. Securities and Exchange Commission thereunder mandating disclosure concerning Conflict Minerals (the "Conflict Mineral Disclosure Requirements").
3. This policy is not intended to ban completely procurement of Conflict Minerals or other products from Covered Countries, but to promote sourcing from responsible sources.

B. Scope

This policy applies to the Company and its subsidiaries world-wide.

C. Policy

In furtherance of the Company's commitment to complying with the Conflict Mineral Disclosure Requirements, it is the policy of the Company to make reasonable efforts to:

1. Identify all Conflict Minerals that are necessary to the functionality or production of products manufactured by the Company.
2. Seek the cooperation of the Company's suppliers in complying with the Conflict Mineral Disclosure Requirements and any related laws and rules by requesting that any suppliers whose materials supplied to the Company consist of, contain or use any Conflict Minerals (a) represent or warrant to the Company that such Conflict Minerals do not originate from the Covered Countries or (b) disclose to the Company the sources of Conflict Minerals used in such materials.
3. Assist, upon request, the Company's business partners in complying with their obligations under the Conflict Mineral Disclosure Requirements to the extent applicable.
4. Limit, where practicable, the Company's use of Conflict Minerals that are not "DRC conflict free" within the meaning of the Conflict Mineral Disclosure Requirements.