

Alamo Group Inc.

Conflict Minerals Policy

This document contains the policy of Alamo Group Inc. and its direct and indirect subsidiaries (collectively, “AG”, “us,” “our,” or “we”) regarding the use of conflict minerals in its products. This policy will be reviewed and updated as needed. We are committed to working with our suppliers to comply with the legislation.

Legislation Overview

Rule 13p-1 (the “Rule”) and Form SD (“Form SD”) under the Securities Exchange Act of 1934 require the disclosure of certain information if a company manufactures or contracts to manufacture products for which certain “Conflict Minerals” (as defined below) are present in the products and reasonably necessary to the functionality of such products. To the extent that Conflict Minerals are necessary to the functionality or production of products that AG manufactures or contracts to manufacture, we are required to conduct reasonable country of origin inquiry (“RCOI”) supply chain diligence to determine whether the Conflict Minerals originated in mines controlled by armed groups in the “Covered Countries” (as defined below). The Rule is intended to reduce a significant source of funding from mines controlled by armed groups that are committing human rights abuses in the Covered Countries. Each report on Form SD must be filed no later than May 31, and will pertain to the prior calendar year.

“Conflict Minerals” are defined as cassiterite, columbite-tantalite (coltan), gold, wolframite and three specified derivatives: tin; tantalum; and tungsten. “Covered Countries” are defined as the Democratic Republic of the Congo and the following adjoining countries: (1) Angola; (2) Burundi; (3) Central African Republic; (4) Rwanda; (5) Sudan; (6) Tanzania; (7) Uganda; and (8) Zambia.

Actions by AG to Support Legislation

To the extent reasonably possible, AG will not knowingly procure materials, products or components which contain Conflict Minerals that directly or indirectly finance or benefit armed groups in the Covered Countries. AG supports industry efforts such as the Electronic Industry Citizenship Coalition (EICC) and Global e-Sustainability Initiative (GeSI) that help companies source conflict-free minerals.

As part of our due diligence process, we request that our suppliers (who provide products or components to AG that may contain Conflict Minerals):

- Complete annual surveys regarding the country of origin of any Conflict Minerals contained in such products or components, including what programs they have in place to track the source of minerals used in the products they manufacture;
- Agree to cooperate with AG in connection with any due diligence that we choose to perform with respect to our RCOI;
- Provide, when AG deems it necessary, reasonable written proof of the due diligence performed by the supplier to support the country of origin certification provided by the supplier to us; and
- Investigate their supply chain to make sure that any Conflict Minerals in their products or components have not contributed to armed conflict.

Each year, we conduct an evaluation of AG's product lines and an assessment of its suppliers. Since the database of suppliers is so large, we prioritize the results to focus our due diligence efforts on suppliers which sell us certain categories of products which are more likely to contain Conflict Minerals, regardless of volume. We ask these identified suppliers to complete the Conflict Minerals Reporting Template developed by the Electronic Industry Citizenship Coalition and Global e-Sustainability and return it to us.

Expectations for AG's Suppliers

AG expects its suppliers to source minerals from socially responsible suppliers, and to comply with the Rule. We also expect our suppliers to establish appropriate policies and due diligence programs to determine the source of specified Conflict Minerals within their supply chains. Suppliers who do not comply with these expectations may be reviewed by our purchasing departments for future business.

Effective January 1, 2015