

AMETEK INC/
Form SD
May 29, 2015

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
Washington, D.C. 20549

FORM SD

Specialized Disclosure Report

AMETEK, Inc.

(Exact name of registrant as specified in its charter)

Delaware
(State or other jurisdiction of
incorporation or organization)

1-12981
(Commission
File Number)

14-1682544
(I.R.S. Employer
Identification No.)

1100 Cassatt Road
Berwyn, Pennsylvania
(Address of principal executive offices)
Donald W. Carlson

19312-1177
(Zip Code)

(610) 647-2121

(Name and telephone number, including area code, of the person to contact in connection with this report.)

Check the appropriate box to indicate the rule pursuant to which this form is being filed, and provide the period to which the information in this form applies:

- ☐ Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2014.

Section 1 Conflict Minerals Disclosure

Item 1.01 Conflict Minerals Disclosure and Report

This report for the year ended December 31, 2014 is presented to comply with Rule 13p-1 under the Securities Exchange Act of 1934 (Rule 13p-1). For the purpose of the required Reasonable Country of Origin Inquiry (RCOI), AMETEK, Inc. (AMETEK) continued to receive supply chain responses through May 28, 2015. Rule 13p-1 was adopted by the Securities and Exchange Commission (SEC) to implement reporting and disclosure requirements related to conflict minerals as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act, HR 4173, Section 1502 of 2010 (Conflict Minerals Act). Rule 13p-1 imposes certain reporting obligations on SEC registrants whose manufactured products contain conflict minerals which are necessary to the functionality or production of their products. Conflict minerals are defined as cassiterite, columbite-tantalite, gold, wolframite, and their derivatives, which are limited to tin, tantalum, tungsten, and gold for the purposes of this assessment. These requirements apply to registrants whatever the geographic origin of the conflict minerals and whether or not they fund armed conflict.

This Report has not been subject to an independent private sector audit as allowed under Rule 13p-1, which provides a temporary accommodation for the first two years following November 13, 2012.

AMETEK's due diligence approach has been to define our conflict-free minerals (CFM) process, establish baseline metrics and demonstrate improvements in supplier transparency and reporting over time. AMETEK's due diligence measures were based on the Electronic Industry Citizenship Coalition® (EICC®) and the Global e-Sustainability Initiative (GeSI) with the smelters and refiners of conflict minerals who provide those conflict minerals to our suppliers. EICC®/GeSI created the standard Conflict Minerals Reporting Template (Template) as a common means for the collection of sourcing information related to conflict mineral from the supply base. This Template is consistent with EICC® and GeSI's related activities including the Conflict Free Smelter (CFS) Program and AMETEK has adopted it as an element of our due diligence program used to actively solicit CFM statuses from our supply base.

Our CFM process includes identification of items and suppliers that are exempt from the regulation, collection of supplier contact information and distributing a request to the suppliers for completion of the Template. Upon receipt of the Template, a repository of the CFM status is updated and the supplier responses are archived. AMETEK is committed to continuing to work with our suppliers to confirm that their supply of materials do not contain conflict minerals that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo (DRC) or adjoining countries.

We have completed changes to the Terms and Conditions of our purchase orders such that our suppliers are required to 1) disclose their CFM status on a yearly basis or as requested and 2) provide immediate notification when there is a change in status. AMETEK's focus continues to be in obtaining completed Templates from our supplier base to increase the response rate for the next reporting period with the goal of achieving conflict free minerals status. To date, we have received Conflict Mineral Status updates for more than 90% of our total annual spend. To the best of our knowledge all direct suppliers of one or more of the four CFM elements have been certified as Conflict-Free or are currently being re-certified. The overwhelming majority of suppliers with unknown CFM statuses have declared they are not subject to the Dodd-Frank Act as 1) foreign entities not subject to the SEC ruling, 2) distributors exempt from the Act, or 3) small revenue companies taking advantage of the additional 2-year grace period for usage of the Undeterminable CFM status.

AMETEK has determined in good faith that for calendar year 2014, its conflict minerals status as DRC conflict undeterminable (as defined in the 1934 Act). As such, AMETEK is unable to determine whether or not any of their products originate in the DRC or an adjoining country.

Product Description

AMETEK consists of two business groups: Electronic Instruments and Electromechanical. Electronic Instruments is in the design and manufacture of advanced instruments for the process, aerospace, power, and industrial markets. Electromechanical is a differentiated supplier of electrical interconnects, precision motion control solutions, specialty metals, thermal management systems, and floor care and specialty motors. We have over 150 operating locations around the world and have solicited CFM statuses from our many thousands of suppliers as a part of our RCOI.

The Conflicts Mineral Report is available at www.AMETEK.com/conflictmineralsreport. The content of any website referred to in this Form SD is included for general information only and is not incorporated by reference in this Form SD.

Item 1.02 Exhibit

Exhibit

Number	Description
1.01	Conflict Minerals Report as required by Item 1.01 of this Form.
Section 2	Exhibits

Item 2.01 Exhibits

Exhibit

Number	Description
1.01	Conflict Minerals Report as required by Items 1.01 and 1.02 of this Form.

SIGNATURES

Pursuant to the requirements of the Securities Exchange Act of 1934, the registrant has duly caused this report to be signed on its behalf by the duly authorized undersigned.

AMETEK, Inc.
(Registrant)

By: /s/ William J. Burke
William J. Burke
Senior Vice President - Comptroller &
Treasurer
May 29, 2015