

DONALDSON CO INC
Form SD
May 24, 2018

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

FORM SD

SPECIALIZED DISCLOSURE REPORT

Donaldson Company, Inc.
(Exact name of the registrant as specified in its charter)

Delaware 1-7897 41-0222640
(State or other jurisdiction of (Commission (IRS Employer
incorporation or organization) File Number) Identification No)

1400 West 94th Street
Minneapolis, Minnesota 55431
(Address of principal executive offices) (Zip code)

Amy Becker 952-887-3984
(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, 2017.

1. Introduction

Founded in 1915, Donaldson Company, Inc. (“Donaldson” or “the Company”) is a global leader in the filtration industry with sales, manufacturing, and distribution locations around the world. Donaldson’s innovative technologies are designed to solve complex filtration challenges and enhance customers’ equipment.

The Company has two reporting segments: Engine Products and Industrial Products. Products in the Engine Products segment consist of replacement filters for both air and liquid filtration applications, air filtration systems, liquid filtration systems for fuel, lube and hydraulic applications, and exhaust and emissions systems. The Engine Products segment sells to original equipment manufacturers (“OEMs”) in the construction, mining, agriculture, aerospace, defense, and truck end markets and to independent distributors, OEM dealer networks, private label accounts, and large equipment fleets. Products in the Industrial Products segment consist of dust, fume, and mist collectors, compressed air purification systems, air filtration systems for gas turbines, polytetrafluoroethylene (PTFE) membrane-based products, and specialized air and gas filtration systems for applications including hard disk drives and semi-conductor manufacturing. The Industrial Products segment sells to various dealers, distributors, OEMs of gas-fired turbines, and OEMs and end users requiring clean air filtration solutions and replacement filters.

The Company manufactures and contracts to manufacture products containing certain minerals and their derivatives, generally described as tantalum, tin, tungsten, and gold (“Conflict Minerals”). Conflict Minerals were identified in products from both of the Company’s reporting segments, Engine Products and Industrial Products.

As these materials are necessary to the Company’s products, the Company will continue to work with its supply chain partners to take reasonable steps to assure Conflict Minerals are not sourced by the Company or its supply chain partners in a way that would directly or indirectly benefit armed groups responsible for serious human rights abuses in the Democratic Republic of the Congo or adjoining countries.

2. Conflict Minerals Disclosures

The Company has determined in good faith that during 2017,

a) The Company manufactured and contracted to manufacture products for which Conflict Minerals (as defined in Section 1502(e)(4) of the Dodd-Frank Wall Street Reform and Consumer Protection Act) are necessary to the functionality or production.

b) Based on a reasonable country of origin inquiry (“RCOI”) and subsequent due diligence, the Company is unable to exclude the possibility that its products contained Conflict Minerals that originated in the Covered Countries and were not from recycled or scrap sources.

In accordance with Rule 13p-1 under the Securities Exchange Act of 1934 (“Rule 13p-1”), the Company has filed this Form Specialized Disclosure (“Form SD”) and the associated Conflict Minerals Report and both reports are posted to a publicly available Internet site at: <https://ir.donaldson.com/financial-information/sec-filings/default.aspx>

3. Reasonable Country of Origin Inquiry Description

To implement the RCOI, the Company’s first-tier suppliers were engaged to collect information regarding the presence and sourcing of Conflict Minerals in the suppliers’ products. Information was collected and stored using an online platform provided by a third-party vendor. Suppliers were asked to submit the Responsible Business Alliance - RBA and Global e-Sustainability Initiative Conflict Minerals Reporting Template (“CMRT”) version 5.01 or higher. The data provided by suppliers was reviewed and analyzed.

4. Due Diligence

A description of the measures the Company took to exercise due diligence is provided in the Conflict Minerals Report attached hereto as Exhibit 1.01. Due diligence was performed on the source and chain of custody of the Company's Conflict Minerals for which it knew or had reason to believe were sourced from the Covered Countries based on the RCOI described above.

5. Exhibits

Exhibit 1.01 - Conflict Minerals Report.
