

METHODE ELECTRONICS INC
Form SD
May 29, 2015

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

FORM SD
Specialized Disclosure Report

METHODE ELECTRONICS, INC.
(Exact name of registrant as specified in its charter)

Delaware
(State or other jurisdiction
of incorporation)

0-2816
(Commission
File Number)

36-2090085
(IRS Employer
Identification No.)

7401 West Wilson Avenue,
Chicago, Illinois
(Address of principal executive offices)

60706
(Zip Code)

Douglas A. Koman

(708) 867-6777

(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.

Company Profile:

Methode Electronics, Inc. (“we,” “our,” “us,” “Methode,” or the “Company”) is a global manufacturer of component and subsystem devices with manufacturing, design and testing facilities in China, Egypt, Germany, India, Italy, Lebanon, Malta, Mexico, the Philippines, Singapore, Switzerland, the United Kingdom and the United States. We design, manufacture and market devices employing electrical, radio remote control, electronic, wireless and sensing technologies. Our components are found in the primary end markets of the aerospace, appliance, automotive, construction, consumer and industrial equipment, communications (including information processing and storage, networking equipment, wireless and terrestrial voice/data systems), rail and other transportation industries.

Section 1 - Conflict Minerals Disclosure

Item 1.01 Conflict Minerals Disclosure and Report

In accordance with the disclosure requirements promulgated by the U.S. Securities and Exchange Commission, we have undertaken efforts to determine our conflict minerals⁽¹⁾ reporting requirements for the period from January 1 to December 31, 2014.

We have determined that during 2014 our company manufactured (or contracted to manufacture) products as to which conflict minerals are necessary to the functionality or production of such products. As is required, we have conducted a good faith reasonable country of origin inquiry (“RCOI”) reasonably designed to determine whether the necessary conflict minerals originated in the DRC or an adjoining country or came from recycled or scrap sources.

Methode’s RCOI process included conducting an inquiry of our direct suppliers using the Conflict-Free Sourcing Initiative’s Conflict Minerals Reporting Template. We relied upon our suppliers’ representations regarding the origin of their minerals and their smelter data to determine the source of the conflict minerals within our supply chain. In addition, Methode obtained additional country of origin information for the smelters within our supply chain through our membership to the Conflict-Free Sourcing Initiative. Based on the results of our RCOI, we exercised due diligence on the source and chain of custody of the conflict minerals.

The Company has filed this Specialized Disclosure Form and the associated Conflict Minerals Report, which appears as Exhibit 1.01 hereto and is publicly available on the Company’s website at <http://www.methode.com/> (under the “Policy on Conflict Minerals” subcaption of our “About” page).

Item 1.02 Exhibit

The Company’s Conflict Minerals Report is provided as Exhibit 1.01 hereto.

Section 2 - Exhibits

Item 2.01 Exhibits

The following exhibit is filed as part of this report.

Exhibit 1.01 - Methode Electronics, Inc.’s Conflict Minerals Report for the period January 1 to December 31, 2014.

⁽¹⁾. The term “conflict mineral” is defined in Section 1502(e)(4) of the Dodd-Frank Wall Street Reform and Consumer Protection Act as (A) columbite-tantalite, also known as coltan (the metal ore from which tantalum is extracted); cassiterite (the metal ore from which tin is extracted); gold; wolframite (the metal ore from which tungsten is extracted); or their derivatives; or (B) any other mineral or its derivatives determined by the Secretary of State to be financing conflict in the Democratic Republic of the Congo (“DRC”) or an adjoining country.

SIGNATURE

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.

Date:	May 28, 2015	METHODE ELECTRONICS, INC.
		By: /s/ Douglas A. Koman
		Douglas A. Koman
		Chief Financial Officer