

SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549

FORM SD
SPECIALIZED DISCLOSURE REPORT

Date of Report (Date of earliest event reported): **May 26, 2020**



SYNALLOY CORPORATION

(Exact name of registrant as specified in its charter)

Delaware

(State or other
jurisdiction of
incorporation)

0-19687

(Commission File Number)

57-0426694

(IRS Employer
Identification No.)

4510 Cox Road, Suite 201, Richmond, Virginia

(Address of principal executive offices)

23060

(Zip Code)

Registrant's telephone number, including area code: **(804) 822-3260**

Inapplicable

(Former name or former address if changed since last 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, 2019.

Indicate by check mark whether the registrant is an emerging growth company as defined in Rule 405 of the Securities Act of 1933 or Rule 12b-2 of the Securities Exchange Act of 1934.

Emerging growth company

If an emerging growth company, indicate by check mark if the registrant has elected not to use the extended transition period for complying with any new or revised financial accounting standards provided pursuant to Section 13(a) of the Exchange Act.

SECTION 1 - Conflict Minerals Disclosure

Synalloy Corporation evaluated its current product lines and determined that certain products we manufacture contain tungsten and/or tantalum. The survey of our suppliers determined that our supply chain is Conflict Free or sourced from recycled or scrap material, and as a result, we have filed a Conflict Minerals Report.

Conflict Minerals Disclosure

A copy of Synalloy Corporation's Conflict Minerals Report is filed as Exhibit 1.01 hereto and is publicly available at www.synalloy.com under the "Investor Relations" tab.

SECTION 2 - Exhibits

[Exhibit 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 behalf by the undersigned hereunto duly authorized.

SYNALLOY CORPORATION

By: /S/ DENNIS M. LOUGHRAN

Dennis M. Loughran
Chief Financial Officer

Dated: May 26, 2020

Conflict Minerals Report of Synalloy Corporation
in Accordance with Rule 13p-1 under the Securities Exchange Act of 1934

This is the Conflict Minerals Report of Synalloy Corporation (herein referred to as “Synalloy” the “Company,” “we,” “us,” or “our”) for calendar year 2019 in accordance with Rule 13p-1 (“Rule 13p-1”) under the Securities Exchange Act of 1934 (the “1934 Act”). Please refer to Rule 13p-1, Form SD and the 1934 Act Release No. 34-67716 for definitions to the terms used in this Report, unless otherwise defined herein. The information contained in this report includes the activities of all subsidiaries of the Company.

In accordance with the rules, the Company undertook due diligence to determine the status of the necessary Conflict Minerals used in any of its operating business units - the production of stainless steel pipe and tube, galvanized pipe and tube, fiberglass and steel storage tanks, specialty chemicals and the master distribution of seamless carbon pipe and tube. In conducting its due diligence, the Company implemented the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (“OECD Framework”), an internationally recognized due diligence framework. In accordance with the OECD Framework, the Company established (i) “reasonable country of origin inquiry” procedures that provided methods to determine sourcing of Conflict Minerals and to confirm that they are DRC conflict free, and (ii) “reasonable inquiry” procedures to establish that any Conflict Minerals used in its products originated from recycled or scrap material.

The Company has determined in good faith that, for calendar year 2019, its Conflict Minerals status resulting from its due diligence efforts shows that Conflict Minerals, specifically tantalum and tungsten, are present in a small portion of the products manufactured by its pipe manufacturing business unit. The Company performed internal due diligence to determine which of its products contained Conflict Minerals. We defined the scope of our Conflict Minerals due diligence by identifying and reaching out to our current suppliers that provide us with raw materials or components, or engage in manufacturing activities that are likely to contain Conflict Minerals. The Company performed supply chain due diligence, based on the Electronic Industry Citizenship Coalition and Global e-Sustainability initiative, with all suppliers who provide raw materials or other components for those products. In response to the Company’s outreach, all suppliers selected for due diligence provided written certification to the Company that confirmed the subject Conflict Minerals originate from recycled or scrap sources or are “DRC conflict free.”

In the next compliance period, the Company intends to implement steps to continue the development of its Conflict Minerals policy and to improve the speed and accuracy of the information gathered from its due diligence efforts with suppliers.