

SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549

FORM SD  
SPECIALIZED DISCLOSURE REPORT



**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)

**Robert A. Peay**  
**804-822-3263**  
(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, 2020.

## **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](http://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/ Sally M. Cunningham

Sally M. Cunningham  
Chief Financial Officer

Dated: May 28, 2021

**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 2020 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 and distribution of piping, tubing and specialty chemicals. 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 2020, 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.