

---

---

**UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION**

WASHINGTON, D.C. 20549

**FORM SD**

**Specialized Disclosure Report**

**NORTECH SYSTEMS INCORPORATED**

(Exact name of registrant as specified in charter)

**Minnesota**  
(State or other jurisdiction  
of incorporation)

**0-13257**  
(Commission  
File Number)

**41-16810894**  
IRS Employer  
Identification No.)

**7050 Meridian Circle N, Suite 15  
Maple Grove, MN 55369**  
(Address of principal executive offices)

**(952) 345-2244**  
(Registrant's telephone number, including area code)

**Not Applicable**  
(Former name or former address, if changed from 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 (17CFR 240.13p-1) for the reporting period from January 1 to December 31, 2017.

---

---

## **Section 1 – Conflict Minerals Disclosure**

### **Item 1.01 Conflict Minerals Disclosure and Report**

Nortech Systems Incorporated (the “Company”) has prepared and filed a Conflict Minerals Report for the reporting period January 1, 2017 to December 31, 2017, which is provided as an Exhibit hereto and is publicly available at <http://www.nortechsys.com/wp-content/uploads/Conflict-Minerals-Disclosure.pdf>.

### **Item 1.02 Exhibit**

The Company has filed, as Exhibit 1.01 to this Specialized Disclosure Report on Form SD, a Conflict Minerals Report.

## **Section 2 – Exhibits**

### **Item 2.01 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 its behalf by the duly authorized undersigned.

Date: May 18, 2018

Nortech Systems Incorporated  
(Registrant)

/s/ Constance Beck  
Constance Beck, Chief Financial Officer

## Conflict Minerals Report May 9, 2018

Nortech is a full-service electronics manufacturing (EMS) provider of wire and cable assemblies, printed circuit boards assemblies and higher-level complete box build assemblies for a wide range of industries. Metallic forms of tin, tantalum, tungsten and gold ("Conflict Minerals") are present in some of the products, components and materials we purchase and are necessary to the functionality of many of the products we manufacture. We do not buy any ores directly, nor do we directly purchase these processed metals in their raw form.

Nortech's corporate policy regarding Conflict Minerals and disclosure regarding whether any Conflict Minerals necessary to the functionality or production of a product originated in Covered Countries is made public on our website at: <http://www.nortechsys.com/about-nortech/quality-regulatory-compliance/conflict-minerals-policy/>

### **Design of Due Diligence Framework**

Our due diligence procedures are in compliance with the Organization for Economic Co-operation and Development (OECD) *Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (Third Edition)* and its supplements.

Nortech's policy regarding Conflict Minerals was communicated to employees internally and to suppliers externally via e-mail and posted to our website.

Our cross functional conflict minerals team was established to carry out the necessary due diligence and reporting requirements. The team currently includes the following roles:

Team Members:	Document Specialist
	Global Supplier Quality Manager

Executive Sponsors:	President & CEO
	Chief Financial Officer

### **Due Diligence Measures Performed**

Our RCOI (reasonable country of origin inquiry) and due diligence procedures include the following:

- Due to the size of the Nortech's sourcing functions, we focused on our largest suppliers that provide components and materials directly incorporated into our final products, ranked by the amount the Company spends with each such supplier, and the suppliers that had the highest probability of supplying us with products or components containing Conflict Minerals (e.g. electronics).
- We surveyed relevant suppliers representing 80% of our total company supplier spend on components and materials directly incorporated into our final products.
- Relevant suppliers were evaluated to identify whether the products, materials or components supplied to Nortech contain Conflict Minerals.

- Data was collected directly from suppliers using the Conflict Minerals Reporting Template developed by the Responsible Minerals Initiative (RMI) formerly known as CFSI.
- Supplier declarations were reviewed for completeness, accuracy and conformance to Nortech requirements.
- An escalation process was initiated with relevant suppliers who were non responsive after the initial contact was made, or whose initial response was incomplete, unclear or nonconforming.

#### Analysis of Supplier Survey Responses

- We were unable to confirm through our RCOI that Conflict Minerals contained in our products did not originate from the Covered Countries or were from recycled/scrap materials. Therefore we conducted due diligence on the processing facilities identified by our suppliers and prepared this Conflict Minerals Report.
- Conflict minerals information from some suppliers was presented to Nortech at a "company-level" rather than a Nortech product-specific response. As a result, it is likely that our lists of smelters, refiners and countries of origin (discussed below) include sources that are actually not in our supply chain.

#### Due Diligence Results

- Suppliers that responded to our survey provided lists of smelters and refiners on which we conducted due diligence.
- Our due diligence process included comparing the supplier-provided names of smelters/refiners against lists of audited and verified smelters and refiners from CFSI, LBMA, RJC, TI-CMC and the US Department of Commerce. The lists of smelters and refiners are included as Table 1.
- Certain suppliers identified Kaloti Precious Metals, Sudan Gold Refinery, Tony Goetz NV, Universal Precious Metals Refining Zambia, and African Gold Refinery as sources of gold in their supply chains. These refineries are not audited by the CFSI and public information indicates the possibility that these are high-risk facilities. Because the conflict minerals information from these suppliers was presented to Nortech as "company-level" responses rather than Nortech product-specific responses, it is uncertain if these facilities are actually in our supply chain. As part of our due diligence process, Nortech implemented our risk mitigation plan for the subject suppliers, engaging them to conduct additional research on whether these facilities are, in reality, present in our supply chain. At this time, those suppliers have not completed their investigation. If we determine that material sourced from these facilities is present in Nortech's supply chain, we will work with our suppliers to explore alternatives.
- Country of origin information was obtained where reasonably available to Nortech and is presented as Table 2.

#### CMRT Reporting to our customers.

- Nortech issues a standard response using the EICC CMRT.

#### Third Party Audits of Processing Facilities

- Nortech does not conduct audits of smelters or refiners. We support the Responsible Mineral Initiative's Conflict Free Smelter program through our corporate policy and procurement requirements by encouraging suppliers to source from audited facilities.

#### Annual Reporting

- In accordance with the OECD Guidance and the Rule, this report is available on our website: [www.nortechsys.com](http://www.nortechsys.com)

## Declaration

- Based on our due diligence results, Nortech has determined that our products are 'DRC Conflict Undeterminable'.

## Independent Private Sector Audit

- Not required for reporting year 2017.

## Limitations

Conflict Minerals sourcing and traceability information is limited at this time. Moreover, there are inherent limitations and risks in the information that is available. We are reliant on the information provided to us by our suppliers and industry initiatives such as the CFSI. Our processes are intended to provide reasonable assurance – not absolute certainty- about the identification of processing facilities and the sources of their ores.

## **Table 1: Smelters/Refiners**

### **Gold Smelters/Refiners**

Abington Reldan Metals, LLC  
Advanced Chemical Company  
African Gold Refinery  
Aida Chemical Industries Co., Ltd.  
Al Etihad Gold Refinery DMCC  
Allgemeine Gold-und Silberscheideanstalt A.G.  
Almalyk Mining and Metallurgical Complex (AMMC)  
AngloGold Ashanti Corrego do Sitio Mineracao  
Argor-Heraeus S.A.  
Asahi Pretec Corp.  
Asahi Refining Canada Ltd.  
Asahi Refining USA Inc.  
Asaka Riken Co., Ltd.  
Atasay Kuyumculuk Sanayi Ve Ticaret A.S.  
AU Traders and Refiners  
Aurubis AG  
Bangalore Refinery  
Bangko Sentral ng Pilipinas (Central Bank of the Philippines)  
Boliden AB  
C. Hafner GmbH + Co. KG  
Caridad  
CCR Refinery - Glencore Canada Corporation  
Cendres + Metaux S.A.  
Chimet S.p.A.  
Chugai Mining  
Daejin Indus Co., Ltd.  
Daye Non-Ferrous Metals Mining Ltd.  
Degussa Sonne / Mond Goldhandel GmbH  
DODUCO Contacts and Refining GmbH

Dowa  
DS PRETECH Co., Ltd.  
DSC (Do Sung Corporation)  
Eco-System Recycling Co., Ltd.  
Elemetal Refining, LLC  
Emirates Gold DMCC  
Fidelity Printers and Refiners Ltd.  
GCC Gujrat Gold Centre Pvt. Ltd.  
Geib Refining Corporation  
Gold Refinery of Zijin Mining Group Co., Ltd.  
Great Wall Precious Metals Co., Ltd. of CBPM  
Guangdong Jinding Gold Limited  
Guoda Safina High-Tech Environmental Refinery Co., Ltd.  
Hangzhou Fuchunjiang Smelting Co., Ltd.  
HeeSung Metal Ltd.  
Heimerle + Meule GmbH  
Heraeus Metals Hong Kong Ltd.  
Heraeus Precious Metals GmbH & Co. KG  
Hunan Chenzhou Mining Co., Ltd.  
HwaSeong CJ CO., LTD.  
Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd.  
Ishifuku Metal Industry Co., Ltd.  
Istanbul Gold Refinery  
Italpreziosi  
Japan Mint  
Jiangxi Copper Co., Ltd.  
JSC Ekaterinburg Non-Ferrous Metal Processing Plant  
JSC Uralelectromed  
JX Nippon Mining & Metals Co., Ltd.  
Kaloti Precious Metals  
Kazakhmys Smelting LLC  
Kazzinc  
Kennecott Utah Copper LLC  
KGHM Polska Miedz Spolka Akcyjna  
Kojima Chemicals Co., Ltd.  
Korea Zinc Co., Ltd.  
Kyrgyzaltyn JSC  
Kyshtym Copper-Electrolytic Plant ZAO  
L'azurde Company For Jewelry  
Lingbao Gold Co., Ltd.  
Lingbao Jinyuan Tonghui Refinery Co., Ltd.  
L'Orfebre S.A.  
LS-NIKKO Copper Inc.  
Luoyang Zijin Yinhui Gold Refinery Co., Ltd.  
Marsam Metals  
Materion

Matsuda Sangyo Co., Ltd.  
Metalor Technologies (Hong Kong) Ltd.  
Metalor Technologies (Singapore) Pte., Ltd.  
Metalor Technologies (Suzhou) Ltd.  
Metalor Technologies S.A.  
Metalor USA Refining Corporation  
Metalurgica Met-Mex Penoles S.A. De C.V.  
Mitsubishi Materials Corporation  
Mitsui Mining and Smelting Co., Ltd.  
MMTC-PAMP India Pvt., Ltd.  
Modeltech Sdn Bhd  
Morris and Watson  
Morris and Watson Gold Coast  
Moscow Special Alloys Processing Plant  
Nadir Metal Rafineri San. Ve Tic. A.S.  
Navoi Mining and Metallurgical Combinat  
NH Recytech Company  
Nihon Material Co., Ltd.  
Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH  
Ohura Precious Metal Industry Co., Ltd.  
OJSC "The Gulidov Krasnoyarsk Non-Ferrous Metals Plant" (OJSC Krastsvetmet)  
OJSC Novosibirsk Refinery  
PAMP S.A.  
Pease & Curren  
Penglai Penggang Gold Industry Co., Ltd.  
Planta Recuperadora de Metales SpA  
Prioksky Plant of Non-Ferrous Metals  
PT Aneka Tambang (Persero) Tbk  
PX Precinox S.A.  
Rand Refinery (Pty) Ltd.  
Refinery of Seemine Gold Co., Ltd.  
Remondis Argentia B.V.  
Republic Metals Corporation  
Royal Canadian Mint  
SAAMP  
Sabin Metal Corp.  
Safimet S.p.A  
SAFINA A.S.  
Sai Refinery  
Samduck Precious Metals  
Samwon Metals Corp.  
SAXONIA Edelmetalle GmbH  
SEMPSA Joyeria Plateria S.A.  
Shandong Tiancheng Biological Gold Industrial Co., Ltd.  
Shandong Zhaojin Gold & Silver Refinery Co., Ltd.  
Sichuan Tianze Precious Metals Co., Ltd.

Singway Technology Co., Ltd.  
SOE Shyolkovsky Factory of Secondary Precious Metals  
Solar Applied Materials Technology Corp.  
State Research Institute Center for Physical Sciences and Technology  
Sudan Gold Refinery  
Sumitomo Metal Mining Co., Ltd.  
SungEel HiMetal Co., Ltd.  
T.C.A S.p.A  
Tanaka Kikinzoku Kogyo K.K.  
The Refinery of Shandong Gold Mining Co., Ltd.  
Tokuriki Honten Co., Ltd.  
Tongling Nonferrous Metals Group Co., Ltd.  
Tony Goetz NV  
TOO Tau-Ken-Altyn  
Torecom  
Umicore Brasil Ltda.  
Umicore Precious Metals Thailand  
Umicore S.A. Business Unit Precious Metals Refining  
United Precious Metal Refining, Inc.  
Universal Precious Metals Refining Zambia  
Valcambi S.A.  
Western Australian Mint (T/a The Perth Mint)  
WIELAND Edelmetalle GmbH  
Yamakin Co., Ltd.  
Yokohama Metal Co., Ltd.  
Yunnan Copper Industry Co., Ltd.  
Zhongyuan Gold Smelter of Zhongjin Gold Corporation

#### **Tantalum Smelters/Refiners**

Asaka Riken Co., Ltd.  
Changsha South Tantalum Niobium Co., Ltd.  
D Block Metals, LLC  
Exotech Inc.  
F&X Electro-Materials Ltd.  
FIR Metals & Resource Ltd.  
Global Advanced Metals Aizu  
Global Advanced Metals Boyertown  
Guangdong Rising Rare Metals-EO Materials Ltd.  
Guangdong Zhiyuan New Material Co., Ltd.  
H.C. Starck Co., Ltd.  
H.C. Starck Hermsdorf GmbH  
H.C. Starck Inc.  
H.C. Starck Ltd.  
H.C. Starck Smelting GmbH & Co. KG  
H.C. Starck Tantalum and Niobium GmbH



Hengyang King Xing Lifeng New Materials Co., Ltd.  
Jiangxi Dinghai Tantalum & Niobium Co., Ltd.  
Jiangxi Tuohong New Raw Material  
Jiujiang Janny New Material Co., Ltd.  
JiuJiang JinXin Nonferrous Metals Co., Ltd.  
Jiujiang Tanbre Co., Ltd.  
Jiujiang Zhongao Tantalum & Niobium Co., Ltd.  
KEMET Blue Metals  
KEMET Blue Powder  
LSM Brasil S.A.  
Metallurgical Products India Pvt., Ltd.  
Mineracao Taboca S.A.  
Mitsui Mining and Smelting Co., Ltd.  
Ningxia Orient Tantalum Industry Co., Ltd.  
NPM Silmet AS  
Power Resources Ltd.  
QuantumClean  
Resind Industria e Comercio Ltda.  
RFH Tantalum Smeltery Co., Ltd./Yanling Jincheng Tantalum & Niobium Co., Ltd.  
Solikamsk Magnesium Works OAO  
Taki Chemical Co., Ltd.  
Telex Metals  
Ulba Metallurgical Plant JSC  
XinXing HaoRong Electronic Material Co., Ltd.

#### **Tin Smelters/Refiners**

Alpha  
An Vinh Joint Stock Mineral Processing Company  
Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.  
Chifeng Dajingzi Tin Industry Co., Ltd.  
China Tin Group Co., Ltd.  
CNMC (Guangxi) PGMA Co., Ltd.  
CV Ayi Jaya  
CV Dua Sekawan  
CV Gita Pesona  
CV United Smelting  
CV Venus Inti Perkasa  
Dowa  
Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company  
EM Vinto  
Estanho de Rondonia S.A.  
Fenix Metals  
Gejiu Fengming Metallurgy Chemical Plant  
Gejiu Jinye Mineral Company  
Gejiu Kai Meng Industry and Trade LLC

Gejiu Non-Ferrous Metal Processing Co., Ltd.  
Gejiu Yunxin Nonferrous Electrolysis Co., Ltd.  
Gejiu Zili Mining And Metallurgy Co., Ltd.  
Guangdong Hanhe Non-Ferrous Metal Co., Ltd.  
Guanyang Guida Nonferrous Metal Smelting Plant  
HuiChang Hill Tin Industry Co., Ltd.  
Huichang Jinshunda Tin Co., Ltd.  
Jiangxi Ketai Advanced Material Co., Ltd.  
Jiangxi New Nanshan Technology Ltd.  
Magnu's Minerais Metais e Ligas Ltda.  
Malaysia Smelting Corporation (MSC)  
Melt Metais e Ligas S.A.  
Metallic Resources, Inc.  
Metallo Belgium N.V.  
Metallo Spain S.L.U.  
Mineracao Taboca S.A.  
Minsur  
Mitsubishi Materials Corporation  
Modeltech Sdn Bhd  
Nghe Tinh Non-Ferrous Metals Joint Stock Company  
O.M. Manufacturing (Thailand) Co., Ltd.  
O.M. Manufacturing Philippines, Inc.  
Operaciones Metalurgical S.A.  
Pongpipat Company Limited  
PT Aries Kencana Sejahtera  
PT Artha Cipta Langgeng  
PT ATD Makmur Mandiri Jaya  
PT Babel Inti Perkasa  
PT Babel Surya Alam Lestari  
PT Bangka Prima Tin  
PT Bangka Serumpun  
PT Bangka Tin Industry  
PT Belitung Industri Sejahtera  
PT Bukit Timah  
PT DS Jaya Abadi  
PT Eunindo Usaha Mandiri  
PT Inti Stania Prima  
PT Karimun Mining  
PT Kijang Jaya Mandiri  
PT Lautan Harmonis Sejahtera  
PT Menara Cipta Mulia  
PT Mitra Stania Prima  
PT Panca Mega Persada  
PT Premium Tin Indonesia  
PT Prima Timah Utama  
PT Rajehan Ariq

PT Refined Bangka Tin  
PT Sariwiguna Binasentosa  
PT Stanindo Inti Perkasa  
PT Sukses Inti Makmur  
PT Sumber Jaya Indah  
PT Timah (Persero) Tbk Kundur  
PT Timah (Persero) Tbk Mentok  
PT Tinindo Inter Nusa  
PT Tommy Utama  
Resind Industria e Comercio Ltda.  
Rui Da Hung  
Soft Metais Ltda.  
Super Ligas  
Thaisarco  
Tuyen Quang Non-Ferrous Metals Joint Stock Company  
White Solder Metalurgia e Mineracao Ltda.  
Yunnan Chengfeng Non-ferrous Metals Co., Ltd.  
Yunnan Tin Company Limited

#### **Tungsten Smelters/Refiners**

A.L.M.T. TUNGSTEN Corp.  
ACL Metais Eireli  
Asia Tungsten Products Vietnam Ltd.  
Chenzhou Diamond Tungsten Products Co., Ltd.  
Chongyi Zhangyuan Tungsten Co., Ltd.  
Fujian Jinxin Tungsten Co., Ltd.  
Ganzhou Haichuang Tungsten Co., Ltd.  
Ganzhou Huaxing Tungsten Products Co., Ltd.  
Ganzhou Jiangwu Ferrotungsten Co., Ltd.  
Ganzhou Seadragon W & Mo Co., Ltd.  
Ganzhou Yatai Tungsten Co., Ltd.  
Global Tungsten & Powders Corp.  
Guangdong Xianglu Tungsten Co., Ltd.  
H.C. Starck Smelting GmbH & Co. KG  
H.C. Starck Tungsten GmbH  
Hunan Chenzhou Mining Co., Ltd.  
Hunan Chuangda Vanadium Tungsten Co., Ltd. Wuji  
Hunan Chunchang Nonferrous Metals Co., Ltd.  
Hunan Litian Tungsten Industry Co., Ltd.  
Hydrometallurg, JSC  
Japan New Metals Co., Ltd.  
Jiangwu H.C. Starck Tungsten Products Co., Ltd.  
Jiangxi Dayu Longxintai Tungsten Co., Ltd.  
Jiangxi Gan Bei Tungsten Co., Ltd.  
Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd.

Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.  
 Jiangxi Xinsheng Tungsten Industry Co., Ltd.  
 Jiangxi Xiushui Xianggan Nonferrous Metals Co., Ltd.  
 Jiangxi Yaosheng Tungsten Co., Ltd.  
 Kennametal Fallon  
 Kennametal Huntsville  
 Malipo Haiyu Tungsten Co., Ltd.  
 Moliren Ltd.  
 Niagara Refining LLC  
 Nui Phao H.C. Starck Tungsten Chemicals Manufacturing LLC  
 Philippine Chuangxin Industrial Co., Inc.  
 South-East Nonferrous Metal Company Limited of Hengyang City  
 Tejing (Vietnam) Tungsten Co., Ltd.  
 Unecha Refractory metals plant  
 Vietnam Youngsun Tungsten Industry Co., Ltd.  
 Wolfram Bergbau und Hutten AG  
 Woltech Korea Co., Ltd.  
 Xiamen Tungsten (H.C.) Co., Ltd.  
 Xiamen Tungsten Co., Ltd.  
 Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd.  
 Xinhai Rendan Shaoguan Tungsten Co., Ltd.

**Table 2: Aggregated Countries of Origin**

ANDORRA  
 AUSTRALIA  
 AUSTRIA  
 BELGIUM  
 BOLIVIA (PLURINATIONAL STATE OF)  
 BRAZIL  
 CANADA  
 CHILE  
 CHINA  
 CZECH REPUBLIC  
 ESTONIA  
 FRANCE  
 GERMANY  
 INDIA  
 INDONESIA  
 ITALY  
 JAPAN  
 KAZAKHSTAN  
 KOREA, REPUBLIC OF  
 KYRGYZSTAN  
 LITHUANIA

MACEDONIA, THE FORMER YUGOSLAV REPUBLIC  
OF  
MALAYSIA  
MEXICO  
MYANMAR  
NETHERLANDS  
NEW ZEALAND  
PERU  
PHILIPPINES  
POLAND  
RUSSIAN FEDERATION  
SAUDI ARABIA  
SINGAPORE  
SOUTH AFRICA  
SPAIN  
SUDAN  
SWEDEN  
SWITZERLAND  
TAIWAN, PROVINCE OF CHINA  
THAILAND  
TURKEY  
UGANDA  
UNITED ARAB EMIRATES  
UNITED STATES OF AMERICA  
UZBEKISTAN  
VIET NAM  
ZAMBIA  
ZIMBABWE