

---

---

**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, 2016.

---

---

## **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, 2016 to December 31, 2016, 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 31, 2017

Nortech Systems Incorporated  
(Registrant)

/s/ Paula M. Graff  
Paula M. Graff, CFO

## Conflict Minerals Report May 19, 2017

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:                    Global Sourcing  
    Manager Supply Chain  
    Managers  
    Global Supplier Quality Manager

Executive Sponsors:            President & CEO  
    VP & Chief Financial Officer  
    VP of Operations

### **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 83% 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 Conflict-Free Sourcing Initiative (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 Tables 1 and 2.
- Certain suppliers identified Fidelity Printers and Refiners, Sudan Gold Refinery, Kaloti Precious Metals, and Universal Precious Metals Refining Zambia 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 in the list following Tables 1 and 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 Conflict Free Sourcing 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 2016.

## **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: Refineries**

### **CFSI Audited Gold Refineries**

Abington Reldan Metals, LLC  
Advanced Chemical Company  
Aida Chemical Industries Co., Ltd.  
Al Etihad Gold  
Allgemeine Gold-und Silberscheideanstalt A.G.  
Almalyk Mining and Metallurgical Complex (AMMC)  
AngloGold Ashanti  
Argor-Heraeus SA  
Asahi Pretec Corporation  
Asahi Refining Canada Limited  
Asahi Refining USA Inc.  
Asaka Riken Co., Ltd.  
AU Traders and Refiners  
Aurubis AG  
Bangalore Refinery  
Bangko Sentral ng Pilipinas (Central Bank of the Philippines)  
Boliden AB  
C. Hafner GmbH + Co. KG  
CCR Refinery - Glencore Canada Corporation  
Cendres + Métaux SA  
Chimet S.p.A.  
Daejin Indus Co., Ltd.  
Daye Non-Ferrous Metals Mining Ltd.  
DODUCO GmbH  
Dowa  
DSC (Do Sung Corporation)  
Eco-System Recycling Co., Ltd.  
Emirates Gold DMCC  
Geib Refining Corporation

---

Gold Refinery of Zijin Mining Group Co., Ltd  
Great Wall Precious Metals Co., Ltd. of CBPM  
Heimerle + Meule GmbH  
Heraeus Metals Hong Kong Ltd  
Heraeus Precious Metals GmbH & Co. KG  
Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd.  
Ishifuku Metal Industry Co., Ltd.  
Istanbul Gold Refinery  
Italpreziosi S.p.A.  
Japan Mint  
Jiangxi Copper Company Limited  
JSC Ekaterinburg Non-Ferrous Metal Processing Plant  
JSC Uralelectromed  
JX Nippon Mining & Metals Co., Ltd.  
Kazzinc  
Kennecott Utah Copper LLC  
KGHM Polska Miedź Spółka Akcyjna  
Kojima Chemicals Co., Ltd.  
Korea Zinc Co., Ltd.  
Kyrgyzaltyn JSC  
LS-NIKKO Copper Inc.  
Marsam Metals  
Materion  
Matsuda Sangyo Co., Ltd.  
Metalor Technologies (Hong Kong) Ltd.  
Metalor Technologies (Singapore) Pte., Ltd.  
Metalor Technologies (Suzhou) Co Ltd  
Metalor Technologies SA  
Metalor USA Refining Corporation  
METALÚRGICA MET-MEX PEÑOLES, S.A. DE C.V  
Mitsubishi Materials Corporation  
Mitsui Mining and Smelting Co., Ltd.  
MMTC-PAMP India Pvt., Ltd.  
Modeltech Sdn Bhd  
Moscow Special Alloys Processing Plant  
Nadir Metal Rafineri San. Ve Tic. A.Ş.  
Navoi Mining and Metallurgical Combinat  
Nihon Material Co., Ltd.  
Ögussa Österreichische 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.  
Prioksky Plant of Non-Ferrous Metals  
PT Aneka Tambang (Persero) Tbk  
PX Precinox SA

---

Rand Refinery (Pty) Ltd.  
Republic Metals Corporation  
Rio Tinto Group  
Royal Canadian Mint  
SAAMP  
SAFINA A.S.  
Sanduck Precious Metals  
SAXONIA Edelmetalle GmbH  
Schone Edelmetaal B.V.  
SEMPSA Joyería Platería SA  
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.  
Sumitomo Metal Mining Co., Ltd.  
Sungeel Hitech 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.  
Tony Goetz NV  
Torecom  
Umicore Brasil Ltda.  
Umicore Precious Metals Thailand  
Umicore SA Business Unit Precious Metals Refining  
United Precious Metal Refining, Inc.  
Valcambi SA  
Western Australian Mint trading as The Perth Mint  
WIELAND Edelmetalle GmbH  
Yamamoto Precious Metal Co., Ltd.  
Yokohama Metal Co., Ltd.  
Zhongyuan Gold Smelter of Zhongjin Gold Corporation

**Gold Refineries Not CFSI Audited**

Atasay Kuyumculuk Sanayi Ve Ticaret A.S.  
Caridad  
Changcheng Gold & Silver Refining Factory  
China Gold International Resources Corp. Ltd  
Chugai Mining  
CMP-COMPAGNIE DES METAUX PRECIEUX  
Degussa Sonne / Mond Goldhandel GmbH  
Fidelity Printers and Refiners Ltd.  
Gannon & Scott  
Gansu Seemine Material Hi-Tech Co Ltd  
Guangdong Jinding Gold Limited

---



Gujarat Gold Centre  
Guoda Safina High-Tech Environmental Refinery Co., Ltd.  
Hangzhou Fuchunjiang Smelting Co., Ltd.  
Henan Yuguang Gold & Lead Co., Ltd.  
HOMESTAKE MINING COMPANY  
Hunan Chenzhou Mining Co., Ltd.  
HwaSeong CJ Co. Ltd  
Jinlong Copper Co., Ltd.  
Johnson Matthey Chemicals Ltd.  
Kaloti Precious Metals  
L'azurde Company For Jewelry  
L'Orfebre S.A.  
Lingbao Gold Company Ltd.  
Lingbao Jinyuan Mining Co., Ltd.  
Lingbao Jinyuan Tonghui Refinery Co. Ltd.  
Luoyang Zijin Yinhui Gold Refinery Co., Ltd.  
METAUX PRECIEUX SA METALOR  
Minsur  
Morris and Watson  
Morris and Watson Gold Coast  
Pease & Curren  
Penglai Penggang Gold Industry Co Ltd  
Remondis Argentia B.V.  
Sabin Metal Corp.  
Sai Refinery  
SAMWON METALS Corp.  
Shandong Tiancheng Biological Gold Industrial Co., Ltd.  
So Accurate Group, Inc.  
Sudan Gold Refinery  
TongLing Nonferrous Metals Group Holdings Co., Ltd.  
Universal Precious Metals Refining Zambia  
Yunnan Copper Industry Co Ltd

**CFSI Audited Tantalum Smelters**

Changsha South Tantalum Niobium Co., Ltd.  
Conghua Tantalum and Niobium Smeltry  
D Block Metals, LLC  
Duoluoshan  
Exotech Inc.  
F&X Electro-Materials Ltd.  
FIR Metals & Resource Ltd.  
Global Advanced Metals Aizu  
Global Advanced Metals Boyertown  
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.  
Hi-Temp Specialty Metals, Inc.  
Jiangxi Dinghai Tantalum & Niobium Co., Ltd.  
Jiangxi Tuohong New Raw Material  
JiuJiang JinXin Nonferrous Metals Co., Ltd.  
Jiujiang Nonferrous Metals Smelting Company Limited  
Jiujiang Zhongao Tantalum & Niobium Co., Ltd.  
KEMET Blue Metals  
Kemet Blue Powder  
King-Tan Tantalum Industry Ltd.  
LSM Brasil S.A.  
Metallurgical Products India Pvt., Ltd.  
Mineração Taboca S.A.  
Mitsui Mining and Smelting Co., Ltd.  
Ningxia Orient Tantalum Industry Co., Ltd.  
NPM Silmet AS  
Power Resources Ltd.  
QuantumClean  
Resind Indústria e Comércio Ltda.  
RFH Tantalum Smeltry Co., Ltd.  
Solikamsk Magnesium Works OAO  
Taki Chemical Co., Ltd.  
Telex Metals  
Tranzact, Inc.  
Ulba Metallurgical Plant JSC  
XinXing Haorong Electronic Material Co., Ltd.  
Yichun Jin Yang Rare Metal Co., Ltd.  
Zhuzhou Cemented Carbide Group Co., Ltd.

**Tantalum Smelters Not CFSI Audited**

None

**CFSI Audited Tin Smelters**

Alpha  
Chenzhou Yunxiang Mining and Metallurgy Company Limited  
China Tin Group Co., Ltd.  
Cooperativa Metalurgica de Rondônia Ltda.  
CV Ayi Jaya  
CV Dua Sekawan  
CV Gita Pesona  
CV Serumpun Sebalai  
CV Tiga Sekawan  
CV United Smelting

---

CV Venus Inti Perkasa  
Dowa  
Electro-Mechanical Facility of the Cao Bang Minerals & Metallurgy Joint Stock Company  
Elmet S.L.U.  
EM Vinto  
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.  
Guanyang Guida Nonferrous Metal Smelting Plant  
HuiChang Hill Tin Industry Co., Ltd.  
Huichang Jinshunda Tin Co. Ltd  
Jiangxi Ketai Advanced Material Co., Ltd.  
Magnu's Minerais Metais e Ligas Ltda.  
Malaysia Smelting Corporation (MSC)  
Melt Metais e Ligas S.A.  
Metallic Resources, Inc.  
Metallo-Chimique N.V.  
Mineração Taboca S.A.  
Minsur  
Mitsubishi Materials Corporation  
Modeltech Sdn Bhd  
Nankang Nanshan Tin Co., Ltd.  
O.M. Manufacturing (Thailand) Co., Ltd.  
O.M. Manufacturing Philippines, Inc.  
Operaciones Metalurgical S.A.  
PT Aries Kencana Sejahtera  
PT Artha Cipta Langgeng  
PT ATD Makmur Mandiri Jaya  
PT Babel Inti Perkasa  
PT Bangka Prima Tin  
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 O.M. Indonesia  
PT Panca Mega Persada

---

PT Prima Timah Utama  
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  
PT WAHANA PERKIT JAYA  
Resind Indústria e Comércio Ltda.  
Rui Da Hung  
Soft Metais Ltda.  
Thaisarco  
VQB Mineral and Trading Group JSC  
White Solder Metalurgia e Mineração Ltda.  
Yunnan Chengfeng Non-ferrous Metals Co.,Ltd.  
Yunnan Tin Group (Holding) Company Limited

**Tin Smelters Not CFSI Audited**

5NPLUS  
An Thai Minerals Company Limited  
An Vinh Joint Stock Mineral Processing Company  
Aoki Laboratories Ltd.  
CNMC (Guangxi) PGMA Co. Ltd.  
Complejo Metalurgico Vinto S.A.  
Elmet S.A. de C.V.  
Estanho de Rondônia S.A.  
Gejiu Zili Mining And Metallurgy Co., Ltd.  
Jean Goldschmidt International SA  
JX Nippon Mining & Metals Co., Ltd.  
Nghe Tinh Non-Ferrous Metals Joint Stock Company  
PT Cipta Persada Mulia  
PT Justindo  
PT Tirus Putra Mandiri  
Tuyen Quang Non-Ferrous Metals Joint Stock Company  
Yuntinic Chemical GmbH

**CFSI Audited Tungsten Smelters**

A.L.M.T. Corp.  
Asia Tungsten Products Vietnam Ltd.  
Chenzhou Diamond Tungsten Products Co., Ltd.  
Chongyi Zhangyuan Tungsten Co., Ltd.  
Fujian Jinxin Tungsten Co., Ltd.  
Ganzhou Huaxing Tungsten Products Co., Ltd.  
Ganzhou Jiangwu Ferrotungsten Co., Ltd.

---

Ganzhou Seadragon W & Mo 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.  
Hydrometallurg, JSC  
Japan New Metals Co., Ltd.  
Jiangwu H.C. Starck Tungsten Products Co., Ltd.  
Jiangxi Gan Bei Tungsten Co., Ltd.  
Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.  
Jiangxi Xincheng 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 Hütten 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.

**Tungsten Smelters Not CFSI Audited**

ACL Metais Eireli  
Ganzhou Haichuang Tungsten Industry Co., Ltd.  
Ganzhou Yatai Tungsten Co., Ltd.  
Jiangxi Dayu Longxintai Tungsten Co., Ltd.  
Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd.  
TaeguTec Ltd.

**Table 2: Aggregated Countries of Origin**

Angola  
Argentina  
Armenia

---

Australia  
Austria  
Bolivia  
Brazil  
Burundi  
Cambodia  
Canada  
Central African Republic  
Chile  
China  
Colombia  
Congo (Brazzaville)  
Czech Republic  
Djibouti  
DRC- Congo (Kinshasa)  
Ecuador  
Egypt  
Estonia  
Ethiopia  
Finland  
Germany  
Ghana  
Guinea  
Guyana  
India  
Indonesia  
Ireland  
Ivory Coast  
Japan  
Jersey  
Kazakhstan  
Kenya  
Korea, Republic of  
Kyrgyzstan  
Laos  
Madagascar  
Malaysia  
Mali  
Mexico  
Mongolia  
Morocco  
Mozambique  
Myanmar

---

Namibia  
Niger  
Nigeria  
Papua New Guinea  
Peru  
Philippines  
Poland  
Portugal  
Russian Federation  
Rwanda  
Saudi Arabia  
Sierra Leone  
Slovakia  
South Africa  
South Sudan  
Spain  
Suriname  
Sweden  
Switzerland  
Taiwan  
Tajikistan  
Tanzania  
Thailand  
Turkey  
Uganda  
United Kingdom  
United States  
Uzbekistan  
Viet Nam  
Zambia  
Zimbabwe

---