

ROGERS CORP
Form SD
June 02, 2014

UNITED STATES

SECURITIES AND EXCHANGE COMMISSION

Washington, D.C. 20549

FORM SD

Specialized Disclosure Report

ROGERS CORPORATION

(Exact name of Registrant as specified in Charter)

Massachusetts

1-4347

06-0513860

(State or Other Jurisdiction of Incorporation) (Commission File Number) (I.R.S. Employer Identification No.)

One Technology Drive, P.O. Box 188, Rogers, Connecticut 06263-0188

(Address of Principal Executive Offices and Zip Code)

(860) 774-9605

(Registrant's telephone number, including area code)

Not Applicable

(Former Name or Former Address, if Changed Since Last Report)

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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, 2013

Item 1.01 Conflicts Minerals Disclosure and Report.

Rogers Corporation (the “Company,” “we” or in the possessive form, “our”) has evaluated the products it manufactured or contracted to manufacture in calendar year 2013 and determined that certain of those products contained “Conflict Minerals,” as such term is defined in Form SD as promulgated by the United States Securities and Exchange Commission (“SEC”), and that said Conflict Minerals were necessary to the functionality or production of said products. The Conflict Minerals necessary to the functionality or production of those products were tin and gold. Based on a reasonable country of origin inquiry, as summarized below, the Company does not know that necessary tin or gold originated in the Democratic Republic of the Congo or any adjoining country (the “Covered Countries”) nor does it have reason to believe that any necessary tin or gold may have originated in any Covered Country.

Description of Reasonable Country of Origin Inquiry

The Company has established a Conflict Minerals Policy (the “Policy”). The Policy is posted on the Company’s public website. The Company has established its Vice President of Supply Chain as the executive responsible for managing its Conflict Minerals compliance effort. The Company’s Legal and Environmental functions supported the Supply Chain organization with its compliance efforts, and external consultants assisted in the development of the country of origin inquiry process.

In preparing for compliance with Rule 13p-1 under the Securities and Exchange Act of 1934, all products manufactured and sold by the Company in 2013 were reviewed for their potential to contain Conflict Minerals. All of the products we manufactured for sale were in scope for the Supply Chain inquiry process.

With respect to all raw materials that were used in the manufacture of products for sale prior to 2013, and continued to be used in 2013, the Supply Chain and Environmental compliance functional teams reviewed the Rogers Chemical Inventory and, by using the Chemical Abstract Services (CAS) registry number and Material Safety Data Sheet information, identified raw materials that potentially contained Conflict Minerals. Raw materials that were used for maintenance or research and development activities were not included in the inquiry process.

With respect to raw materials introduced into production for the first time during 2013 or raw materials provided by new suppliers during 2013, the standard Rogers material review process was utilized to evaluate compliance. As part of that process, our Environmental compliance team reviewed each new material to determine whether it contained Conflict Minerals. For redundancy, we also monitored additions to the Rogers Chemical Inventory System for certain CAS registry numbers to ensure that materials that contain Conflict Minerals were flagged for review prior to being used to manufacture products for sale.

For both historically-used and new materials, the list of materials which could potentially contain Conflict Minerals and suppliers of such materials compiled by the Environmental team was provided to the Supply Chain team, which

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was charged with identifying which materials had been procured for the manufacture of products sold to our customers in 2013. The Supply Chain team utilized purchasing data from our enterprise resource planning system to identify which

suppliers provided those materials and therefore should be included in our reasonable country of origin inquiry. Supplier contact information was obtained either from the Rogers Chemical Inventory system or from the Supply Chain team.

As part of our inquiry, all suppliers that provided raw materials to the Company that contained Conflict Minerals were surveyed and asked to certify by way of the Electronic Industry Citizenship Coalition®/Global e-Sustainability Initiative template (known as the Conflict-Free Sourcing Initiative, or CFSI, template) that the materials they sell to the Company did not originate in the Covered Countries or were from recycled or scrap sources. They were also asked to provide information which supported their certification, including smelter information.

During the inquiry process, all identified suppliers provided certification that the materials provided to Rogers Corporation did not originate in the Covered Countries or were from recycled or scrap sources. Of the four suppliers not supplying from recycled or scrap sources, all except for one provided smelter information, and none of the identified smelters were located in a Covered Country. The remaining supplier indicated that the tin contained within the copper it supplied to us was not necessary to the functionality or production of the copper, and therefore the tin would also not be necessary to the functionality or production of our products.

After review of the evidence provided by its suppliers of Conflict Minerals, the Company has no reason to believe that the Conflict Minerals contained in its products which were necessary to the functionality or production of said products may have originated in a Covered Country.

The Conflict Minerals Disclosure provided in this Form SD is available here:

<http://www.rogerscorp.com/cg/documents.aspx>

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 undersigned hereunto duly authorized.

ROGERS CORPORATION

By: /s/ Terrence W. Mahoney

Terrence W. Mahoney
Vice President and General Counsel

Date: June 2, 2014