

STEEL DYNAMICS INC  
Form SD  
May 28, 2015

**UNITED STATES**  
**SECURITIES AND EXCHANGE COMMISSION**

WASHINGTON, DC 20549

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**FORM SD**

**Specialized Disclosure Report**

**STEEL DYNAMICS, INC.**

(Exact name of registrant as specified in its charter)

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

**0-21719**  
(Commission File Number)

**35-1929476**  
(IRS Employer  
Identification No.)

**7575 West Jefferson Blvd, Fort Wayne, Indiana 46804**

(Address of principal executive offices) (Zip Code)

**Theresa E. Wagler 260-969-3500**

(Name and telephone number, including area code, of the person to contact in connection with this report.):

Check the appropriate box below to indicate the rule pursuant to which this form is being filed, and provide the period to which the information in this form applies:

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x Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1, 2014 to December 31, 2014.

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**Section 1 Conflict Minerals Disclosure**

**Item 1.01 Conflict Minerals Disclosure and Report**

*Conflict Minerals Disclosure*

This Form SD of Steel Dynamics, Inc. (the company) is filed pursuant to Rule 13p-1 promulgated under the Securities Exchange Act of 1934 (the Rule) for the reporting period January 1, 2014 to December 31, 2014. Rule 13p-1 requires disclosure of certain information when a company manufactures or contracts to manufacture products for which the minerals specified in the Rule are necessary to the functionality or production of those products. The specified minerals are defined as cassiterite, columbite-tantalite, wolframite, gold and their derivatives, which are limited to tin, tantalum, tungsten and gold (the Conflict Minerals). The Covered Countries for the purposes of the Rule 13p-1 are the Democratic Republic of the Congo, the Republic of the Congo, the Central African Republic, South Sudan, Uganda, Rwanda, Burundi, Tanzania, Zambia and Angola.

1. Determination Disclosure, Company and Products Overview

Steel Dynamics, Inc. is one of the largest steel producers and one of the largest metals recyclers in the United States. The primary sources of our revenues are from the manufacture and sale of steel products, processing and sale of recycled ferrous and nonferrous metals, and fabrication and sale of steel joist and decking products. Our operations are managed and reported based on three operating segments: steel operations, metals recycling and ferrous resources operations, and steel fabrication operations.

Our internal and supply chain assessment yielded no Conflict Minerals contained on and/or within, and necessary to, the functionality of products we manufacture and sell. Our metals recycling operations acquire and process post-industrial and post-consumer scrap or recycled metals that on occasion may contain any of the Conflict Minerals.

2. Reasonable Country of Origin Inquiry Results

Due to the fact that our internal and supply chain assessment yielded no Conflict Minerals contained on and/or within, and necessary to, the functionality of products we manufacture and sell, the company was not required by the Rule to conduct a good faith reasonable country of origin inquiry regarding identified Conflict Minerals. Conflict Minerals acquired and processed by our metals recycling operations are all from recycled or scrap sources, and thus, as defined in Rule 13p-1, are considered Conflict Free.

3. Reasonable Country of Origin Inquiry Process

Although not required by the Rule, the company voluntarily conducted a reasonable country of origin inquiry for calendar year 2014, which was designed in conjunction with the establishment of internal assessment teams at each of our subsidiaries and/or divisions. These internal assessment teams consisted of persons in a position to know and understand the material inputs and processes utilized in the manufacture of our products, including the location's General Manager (or their equivalent), and as appropriate, personnel in purchasing, metallurgy, quality control, engineering, and other areas. The internal assessment teams identified the raw materials that are introduced and/or contained in, or on, our manufactured products that are necessary to the functionality or production of said products, and assessed if they may contain Conflict Minerals. We identified the vendors of any such raw materials and requested vendor certifications, in the form of the Conflict Minerals Reporting Template (CMRT) developed by the Conflict Free Sourcing Initiative (cfsi), an initiative of the Electronic Industry Citizens Coalition (EICC) and Global e-Sustainability Initiative (GeSI), concerning the absence or possible presence of Conflict Minerals in the products they supplied to us. If any Conflict Minerals were noted (of which none were), vendors were requested to indicate whether such Conflict Minerals originated from a Covered Country, or from a recycler or scrap supplier. All vendor certifications were thoroughly analyzed, including the absence or existence of Conflict Minerals, and if present (of which none were), country of origin information, and recycled or scrap source composition. This subsidiary and/or division level information was accumulated and summarized to determine whether further due diligence procedures were necessary, and to determine the applicable Form SD reporting requirements. No further due diligence procedures were required.

4. Link to Website

This information is publically available at the company's website: [www.steeldynamics.com](http://www.steeldynamics.com) under the Investor Relations section, SEC Filings, Form SD.

**Item 1.02 Exhibit**

None

**Section 2 Exhibits**

None

**SIGNATURE**

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 hereto duly authorized.

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STEEL DYNAMICS, INC.

/s/Theresa E. Wagler

Date: May 28, 2015

By:  
Title:

Theresa E. Wagler  
Executive Vice President and  
Chief Financial Officer