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Altra Industrial Motion Corp.
Form SD
June 01, 2015

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
Washington, D.C. 20549

FORM SD
Specialized Disclosure Report

ALTRA INDUSTRIAL MOTION CORP.
(Exact name of registrant as specified in its charter)

Delaware
(State or other Jurisdiction
of Incorporation)

001-33209
(Commission
File Number)

61-1478870
(IRS Employer
Identification No.)

300 Granite Street, Suite 201
Braintree, Massachusetts
(Address of Principal Executive Offices)

02184
(Zip Code)

Glenn Deegan (781) 917-5517

(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, 2014.

Section 1 – Conflict Minerals Disclosure.

Item 1.01. Conflict Minerals Disclosure and Report.

Overview

References in this report to “Altra,” “we,” “our,” or “us” mean Altra Industrial Motion Corp., together with its subsidiaries, except where the context otherwise requires.

Our Conflict Minerals Policy

Altra is committed to (i) conducting its business in full compliance with Rule 13p-1 under the Securities Exchange Act of 1934, as amended (the "Conflict Minerals Rule"), (ii) responsible sourcing of Conflict Minerals (as defined below), (iii) identifying the potential Conflict Minerals which are necessary to the functionality or production of a product manufactured by Altra or for Altra by a contract manufacturer, and (iv) determining the country of origin of any such Conflict Mineral.

In furtherance of the foregoing, we have adopted and communicated to our suppliers and the public a Policy Statement on Conflict Minerals (the "Conflict Minerals Policy"). As used herein and in the Conflict Minerals Policy, "Conflict Minerals" are columbite-tantalite (coltan), cassiterite, gold, wolframite and the derivatives tantalum, tin and tungsten, without regard to the location of origin.

Our Conflict Minerals Policy indicates that Altra will work with its suppliers to ensure compliance with the Conflict Minerals Rule in furtherance of Altra's ultimate goal that only “conflict free” materials and components are utilized in Altra's products.

Applicability of the Conflict Minerals Rule to Our Company

Altra is a leading global designer, producer and marketer of a wide range of mechanical power transmission products serving customers in a diverse group of industries, including energy, general industrial, material handling, mining, transportation, and turf and garden. Altra's product portfolio includes industrial clutches and brakes, enclosed gear drives, open gearing, belted drives, couplings, engineered bearing assemblies, linear components, gear motors, electronic drives, and other related products. We conducted a review of the products manufactured or contracted to be manufactured by Altra during the reporting period from January 1, 2014 to December 31, 2014 (the “Reporting Period”), and determined that Conflict Minerals could feasibly be found within or as part of certain of Altra's product lines.

Our global supply chain is complex and, in most cases, we are many levels removed from, and have no direct relationships with, the mines, smelters, refiners and other vendors in our supply chain that may have direct knowledge of the source and use of Conflict Minerals that are included in our products. However, through the efforts described in this Form SD and the Conflict Minerals Report included as an exhibit hereto, we seek to ensure that our sourcing practices are consistent with our Conflict Minerals Policy and to encourage conflict free sourcing in our supply chain.

Reasonable Country of Origin Information (RCOI)

As required by the Conflict Minerals Rule, we conducted a good faith reasonable country of origin inquiry (“RCOI”) regarding the Conflict Minerals included in, and necessary to the functionality or production of, products that we manufactured, or contracted to manufacture, during the Reporting Period, in order to determine whether any such Conflict Minerals originated in the Conflict Region (as defined in the Conflict Minerals Rule) and/or whether any such Conflict Minerals were from recycled or scrap sources. Where applicable, we conducted additional due diligence regarding the source and chain of custody of the Conflict Minerals included in, and necessary to the functionality or production of, our products. We designed our due diligence measures to conform in all material respects with the Organization for Economic Co-operation and Development's (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-affected and High-risk Areas, an internationally recognized due diligence framework.

As a result of Altra's good faith RCOI and ongoing due diligence, Altra does not yet have sufficient information from its suppliers or other sources to (1) determine the country of origin of the Conflict Minerals included in, and necessary to the functionality of, some of our products or (2) identify the facilities used to process those Conflict Minerals.

Website Disclosure

As required by the Conflict Minerals Rule, the foregoing information and our Conflict Minerals Policy is publicly available in the “Corporate Governance” section of Altra’s website located at: <http://ir.altramotion.com/governance.cfm>. The information contained on our website is not incorporated by reference into this Form SD or our Conflict Minerals Report and should not be considered part of this Form SD or our Conflict Minerals Report.

Conflict Minerals Report

As required by the Conflict Minerals Rule, a Conflict Minerals Report is provided as an exhibit to this Form SD and is publicly available in the “Corporate Governance” section of Altra’s website located at:

<http://ir.altramotion.com/governance.cfm>.

Section 2 – Exhibits.

Item 2.01. Exhibits.

The following exhibit is filed as part of this report:

Exhibit 1.01 – Conflict Minerals Report for the reporting period from January 1, 2014 to December 31, 2014, as required by Item 1.01 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 undersigned hereunto duly authorized.

ALTRA INDUSTRIAL MOTION CORP.

/s/ Glenn Deegan

Name: Glenn Deegan

Title: Vice President, Legal and Human Resources, General Counsel and Secretary

Date: June 1, 2015