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

FORM SD

Specialized Disclosure Report

Kewaunee Scientific Corporation

(Exact name of registrant as specified in its charter)

Delaware
(State or other jurisdiction
of incorporation)

0-5286
(Commission
File Number)

38-0715562
(I.R.S. Employer
Identification No.)

2700 West Front Street
Statesville, North Carolina
(Address of principal executive offices)

28677
(Zip Code)

Donald T. Gardner III; 704-873-7202
(Name and telephone number, including area code, of the person to contact in connection with this disclosure)

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 disclosure period from January 1 to December 31, 2019.

Section 1 – Conflict Minerals Disclosure

Item 1.01 Conflict Minerals Disclosure and Report

Kewaunee Scientific Corporation shares the concerns of Congress and the international business community that profits from the mining of certain minerals (“3TGs,” as defined below) in the Democratic Republic of Congo or its adjoining countries may be aiding human rights abuses. The term “3TGs” refers to columbite-tantalite (coltan), cassiterite, gold, wolframite or their derivatives, which are limited to tantalum, tin and tungsten.

We have established a committee, comprised of our Vice President of Manufacturing, Vice President of Product Development and International Sourcing, Global Sourcing Manager, Research and Development Manager and Environmental & Safety Manager, that is responsible for determining if 3TGs are present in, and necessary to the functionality or production of, any of our products. Based on the Committee’s work, we determined that several of our products may contain small traces of one or more of 3TGs that may be necessary to their functionality or production.

Accordingly, we have established a process whereby we conduct a country of origin inquiry (“RCOI”) reasonably designed to determine whether 3TGs contained in or used to produce these products, if any, originated in the Democratic Republic of Congo or an adjoining country (the Republic of the Congo, the Central African Republic, South Sudan, Uganda, Rwanda, Burundi, Tanzania, Zambia or Angola), or were from recycled or scrap sources.

Information about our RCOI, as well as the steps we have taken to exercise due diligence on the source and chain of custody of the 3TGs, is included in our Conflict Minerals Disclosure, which is included as an exhibit to this Form SD. In addition, our Conflict Minerals Disclosure is publicly available on our website at www.kewaunee.com, as well as the SEC’s EDGAR database at www.sec.gov.

Item 1.02 Exhibit

Our Conflict Minerals Disclosure required by Item 1.01 above is filed as Exhibit 1.01 to this Form SD.

Section 2 – Exhibits

Item 2.01 Exhibits

Exhibit 1.01 — Conflict Minerals Disclosure as required by Items 1.01 and 1.02 of this Form.

Signature

Pursuant to the requirements of the Securities Exchange Act of 1934, the registrant has duly caused this disclosure to be signed on its behalf by the undersigned hereunto duly authorized.

Kewaunee Scientific Corporation
(Registrant)

Date: May 11, 2020

By: /s/ Donald T. Gardner III

Donald T. Gardner III
Vice President, Finance and
Chief Financial Officer

EXHIBIT INDEX

1.01 Conflict Minerals Disclosure as required by Items 1.01 and 1.02 of Form SD.

Exhibit 1.01

Conflict Minerals Disclosure for the Year Ended December 31, 2019

This Conflict Minerals Disclosure (“Disclosure”) of Kewaunee Scientific Corporation has been prepared for the period from January 1, 2019 to December 31, 2019.

With respect to the year ended December 31, 2019, we identified several products for which 3TGs (as defined below) may be present in and necessary to their functionality or production. The term “3TGs” refers to columbite-tantalite (coltan), cassiterite, gold, wolframite or their derivatives, which are limited to tantalum, tin and tungsten.

We have developed a conflict minerals procedure, under the supervision of a committee consisting of our Vice President of Manufacturing, Vice President of Product Development and International Sourcing, Global Sourcing Manager, Research and Development Manager and Environmental & Safety Manager, reasonably designed to identify whether the 3TGs in the Covered Products, if any, originated in the Democratic Republic of the Congo or an adjoining country (the Republic of the Congo, the Central African Republic, South Sudan, Uganda, Rwanda, Burundi, Tanzania, Zambia or Angola) (the “Covered Countries”), or whether any of the 3TGs in the Covered Products are from recycled or scrap sources. Based on the Committee’s analysis, we determined that several of our products may contain small traces of one or more of 3TGs.

Description of the Company’s Reasonable Country of Origin Inquiry (RCOI)

We conducted a country of origin inquiry (“RCOI”) that was reasonably designed to determine whether the 3TGs in the Covered Products originated in a Covered Country, or whether any of the 3TGs in the Covered Products were from recycled or scrap sources.

To determine the origin of any 3TGs, a survey was sent to all of our suppliers whose products may contain them. The survey inquired about the origin of their 3TGs and whether they had a written policy for conflict-free sourcing of 3TGs, among other items. The survey was returned by all of our suppliers, which responses indicated that any 3TGs in materials provided by them did not originate from the Covered Countries. In addition to the responses received from our suppliers, management has no reason to believe that any 3TGs in or used in the production of our Covered Products may have originated in the Covered Countries.

If at any time we discover the use of any 3TGs originating from the Covered Countries, we will take appropriate measures to discontinue use of such materials or processes.

This information is also available on our website at www.kewaunee.com, as well as the SEC’s EDGAR database at www.sec.gov.