

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

**Form SD  
Specialized Disclosure Report**

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**ACTUANT CORPORATION**

(Exact name of Registrant as specified in its charter)

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Wisconsin  
(State or other jurisdiction of incorporation or  
organization)

1-11288  
(Commission File  
Number)

39-0168610  
(I.R.S. Employer  
Identification No.)

N86 W12500 WESTBROOK CROSSING  
MENOMONEE FALLS, WISCONSIN 53051

Mailing address: P.O. Box 3241, Milwaukee, Wisconsin 53201  
(Address of principal executive offices) (Zip code)

Andrew G. Lampereur  
Executive Vice President and Chief Financial Officer  
(262) 293-1500  
(Name and telephone number, including area code,  
of the person to contact in connection with this 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 (17CFR 240.13p-1) for the reporting period from January 1 to December 31, 2015.

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**Section 1 - Conflict Minerals Disclosure**

Item 1.01 Conflict Minerals Disclosure and Report

*Conflict Minerals Disclosure*

A copy of Actuant Corporation's Conflict Minerals Report for the calendar year ended December 31, 2015 is provided as Exhibit 1.01 hereto and is publicly available at [www.actuant.com](http://www.actuant.com).

**Section 2 - Exhibits**

Item 2.01 Exhibits

Exhibit 1.01 - Conflict Minerals Report as required by Items 1.01 and 1.02 of Form SD.

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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.

ACTUANT CORPORATION  
(Registrant)

By: /s/ Andrew G. Lampereur  
Andrew G. Lampereur  
Executive Vice President and  
Chief Financial Officer

May 27, 2016  
(Date)

ACTUANT CORPORATION  
Conflict Minerals Report  
For The Year Ended December 31, 2015

Background:

In recent years, there has been increased international attention on certain minerals originating from the Democratic Republic of Congo and adjoining countries ("Covered Countries") due, in part, to concerns that the exploitation and trade of these minerals is funding regional conflict and violence. In response, the Securities and Exchange Commission (the "SEC"), as mandated by Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010, implemented reporting and disclosure requirements related to tantalum, tin, tungsten and gold (collectively "Conflict Minerals"). The rules impose certain reporting obligations on public companies that manufacture, or contract to manufacture, products containing Conflict Minerals that are necessary to the functionality or production of the product.

This report is being presented to comply with Rule 13p-1 under the Securities Exchange Act of 1934 (the "Exchange Act").

Company Overview:

Actuant Corporation (the "Company," "Actuant," or "we") is a global manufacturer of a broad range of industrial products and systems and is organized into three reportable segments: Industrial, Energy and Engineered Solutions. The Industrial segment is primarily engaged in the design, manufacture and distribution of branded hydraulic and mechanical tools to the maintenance, industrial, infrastructure and production automation markets. The Energy segment provides joint integrity products and maintenance services, customized offshore vessel mooring solutions, as well as rope and cable solutions to the global oil & gas, power generation and energy markets. The Engineered Solutions segment provides highly engineered position and motion control systems to original equipment manufacturers ("OEM") in various on and off-highway vehicle markets, as well as a variety of other products to the industrial and agricultural markets. While we have extensive manufacturing capabilities including machining, stamping, injection molding and fabrication, our manufacturing primarily consists of light assembly of components we source from a network of global suppliers.

Conflict Mineral Policy:

As a global diversified industrial company with operations in more than thirty countries, Actuant and its subsidiaries are committed to ensuring the safety, health and protection of people and the environment worldwide. The Company promotes these principles in its business practices, code of conduct and conflict mineral policy (which is available in the Investors - Corporate Governance section of the Company's website at [www.actuant.com](http://www.actuant.com)).

Actuant's conflict mineral policy affirms its commitment to the responsible sourcing of Conflict Minerals used in its products and states that Actuant will not knowingly provide support to, contribute to, assist with, or facilitate armed conflict in the Covered Countries. However, if the Company determines that any supplier is violating this policy, it will either suspend or discontinue the use of the supplier in a timely fashion or require the supplier to commit to a suitable corrective action or risk mitigation plan. Any supplier's continued failure to adhere to Actuant's policies and/or refusal on its part to address issues of concern will likely lead to suspension or termination of the Company's business relationship with the supplier.

Supply Chain Due Diligence:

Actuant performed a review of its products and concluded that Conflict Mineral are included in certain of its products. As a result, we conducted a reasonable country of origin inquiry and undertook due diligence to seek to determine the source and chain of custody of Conflict Minerals in the components and materials supplied to the Company that are contained in the products Actuant manufactures and contracts to manufacture. Actuant designed its due diligence measures to be in conformity, in all material respects, with the internationally recognized due diligence framework in the Organisation for Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and related supplements for each of the Conflict Minerals (the "OECD Guidance"). Summarized below is the five step framework set forth in the OECD Guidance and the related due diligence process we undertook.

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#### Establish Company Management Systems:

We have established a cross functional Conflict Mineral team that included employees from supply chain, legal, finance and operations. This team is responsible for administering our Conflict Mineral compliance program, communicating regular updates to senior management and providing guidance on the rules. As part of our compliance program we have established a Conflict Mineral Policy and grievance mechanism to enable the reporting of exceptions to our policies, conducted supplier engagement and have included Conflict Mineral clauses in purchase orders and contracts.

#### Identify and Assess Risk in the Supply Chain:

Actuant and its operating subsidiaries are several steps removed from the mining of minerals and do not directly source minerals. As part of our diligence efforts, we conducted a reasonable country of origin inquiry to determine whether any of the Conflict Minerals in our products originated in the Covered Countries. Because of the diversity of our products and the global nature of our supply chain, we rely on our suppliers to provide us with information about the source and content of components that we purchase from them and incorporate into our products. Similarly, our direct suppliers also rely on information provided by their suppliers. This chain of information creates a level of uncertainty and risk related to the accuracy of the information.

Our reasonable country of origin inquiry process and due diligence efforts included:

- reviewed supplier data and generated a list of direct material suppliers that we purchased from in 2015 and it was reasonably possible that the products contained conflict minerals necessary to their functionality or production.
- sent a copy of our conflict mineral policy and a survey to these direct material suppliers (over 1000 suppliers) using the Conflict Free Sourcing Initiative Conflict Minerals Reporting Template (“CMRT”).
- evaluated responses from suppliers and reviewed the results of due diligence efforts to ensure the completeness and accuracy of the responses received from the supply chain.
- utilized a conflict minerals data management tool to (1) track communications with direct suppliers, (2) automate the identification of quality issues (e.g., incomplete CMRTs, inconsistent responses and red flags based on defined criteria) and (3) aggregate CMRT responses for analysis and reporting.
- determined if the processing facilities reported to us by our suppliers adhere to responsible sourcing practices by verifying whether they are included on the list of Conflict Free Sourcing Initiative - compliant processing facilities.

We believe that the inquires and due diligence efforts described above represent a reasonable effort to determine the mines or locations of origin of the Conflict Minerals in our products, including (1) seeking information about Conflict Mineral smelters and refiners in our supply chain by requesting that our suppliers complete a CMRT, (2) verifying those smelters and refiners against the Conflict Free Sourcing Initiative list of smelters, (3) conducting due diligence procedures on vendor responses, and (4) obtaining additional documentation and verifications, as applicable.

#### Design and Implement a Strategy to Respond to Identified Risks:

We expect our suppliers to source minerals from socially and environmentally responsible sources and believe in establishing and maintaining long-term relationships with suppliers. However, if as a result of our due diligence process we determine that a supplier is violating our Conflict Mineral Policy, we will either suspend or discontinue the use of the supplier or require it to commit to a suitable corrective action or risk mitigation plan.

#### Carry Out Independent Third Party Audit of Smelter/Refiner’s Due Diligence Practices:

Actuant does not perform or direct audits of Conflict Minerals smelters and refiners within its supply chain since it is a downstream consumer and is many steps removed from smelters and refiners that provide minerals and ores.

#### Report on Supply Chain Due Diligence:

The Company is filing this report (and the related Form SD) with the SEC and it is also publicly available on the Investors - Corporate Governance section of the Company’s website at [www.actuant.com](http://www.actuant.com).

#### Due Diligence Results:

Actuant manufactures and contracts to manufacture certain products that are subject to the reporting obligations of Rule 13p-1 of the Exchange Act. The quality of the responses that we received from our suppliers continued to vary as most suppliers provided responses to the CMRT template at a company level or provided us with interim responses or incomplete information. The most frequently utilized smelters, as reported by our suppliers, are included in schedule A to our Conflict Mineral Report. Several suppliers did identify a tin smelter (Phoenix Metal Ltd) that is located in one of the Covered Countries (Rwanda). This smelter is currently listed as “active” in the conflict-free smelter program however it has not yet completed

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the audit process. Given the incomplete information provided by our supplier, we are unable at this time to determine whether certain of the conflict minerals reported by the suppliers were contained in components or parts supplied to us, or to validate that any of these smelters or refiners are actually in our supply chain.

Steps to Improve Due Diligence:

During the 2016 compliance period we intend to take certain actions to improve our due diligence procedures to further mitigate the risk that Conflict Minerals in our products benefit armed groups in the Covered Countries. We will continue to incorporate requirements related to Conflict Minerals in supplier contracts, increase direct engagement with suppliers who we have reason to believe may supply us with components that include Conflict Minerals, encourage our suppliers to use smelters and refiners that are listed as conflict-free and work with suppliers to obtain smelter lists specifically related to the products we purchase (rather than Company level responses). Over time we anticipate that the amount of information globally on the traceability and sourcing of these minerals and ores will increase and result in an improved understanding of our supply chain.

Independent Audit:

For the year ended December 31, 2015, pursuant to SEC rules and related guidance, an independent private sector audit of this report is not required.

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**Schedule A to  
Conflict Minerals Report of  
Actuant Corporation  
For the Year Ended December 31, 2015**

The following smelters and refiners were most frequently reported by our suppliers as being in their supply chains. Facilities that have been certified as conflict-free by the Conflict Free Sourcing Initiative list of smelters and refiners are designated below in the fourth column.

<b>METAL</b>	<b>SMELTER/REFINER NAME</b>	<b>FACILITY LOCATION</b>	<b>CONFLICT FREE?</b>
Gold	Allgemeine Gold-und Silberscheideanstalt A.G.	Germany	Yes
Gold	Argor-Heraeus S.A.	Switzerland	Yes
Gold	Asahi Refining USA Inc.	United States	Yes
Gold	Asaka Riken Co., Ltd.	Japan	Yes
Gold	Elemetal Refining, LLC	United States	Yes
Gold	Heraeus Precious Metals GmbH & Co. KG	Germany	Yes
Gold	JX Nippon Mining & Metals Co., Ltd.	Japan	Yes
Gold	Matsuda Sangyo Co., Ltd.	Japan	Yes
Gold	Metalor Technologies S.A.	Switzerland	Yes
Gold	Metalor USA Refining Corporation	United States	Yes
Gold	Mitsui Mining and Smelting Co., Ltd.	Japan	Yes
Gold	Royal Canadian Mint	Canada	Yes
Gold	Shandong Zhaojin Gold & Silver Refinery Co., Ltd.	China	Yes
Gold	Sumitomo Metal Mining Co., Ltd.	Japan	Yes
Gold	Tanaka Kikinzoku Kogyo K.K.	Japan	Yes
Gold	The Refinery of Shandong Gold Mining Co., Ltd.	China	Yes
Gold	Umicore S.A. Business Unit Precious Metals Refining	Belgium	Yes
Gold	United Precious Metal Refining, Inc.	United States	Yes
Gold	Western Australian Mint trading as The Perth Mint	Australia	Yes
Gold	Zhongyuan Gold Smelter of Zhongjin Gold Corporation	China	Yes
Tantalum	Changsha South Tantalum Niobium Co., Ltd.	China	Yes
Tantalum	Conghua Tantalum and Niobium Smeltry	China	Yes
Tantalum	Duoluoshan	China	Yes
Tantalum	Exotech Inc.	United States	Yes
Tantalum	F&X Electro-Materials Ltd.	China	Yes
Tantalum	Global Advanced Metals Boyertown	United States	Yes
Tantalum	H.C. Starck GmbH Goslar	Germany	Yes
Tantalum	Hi-Temp Specialty Metals, Inc.	United States	Yes
Tantalum	JiuJiang JinXin Nonferrous Metals Co., Ltd.	China	Yes
Tantalum	Jiujiang Tanbre Co., Ltd.	China	Yes
Tantalum	KEMET Blue Powder	United States	Yes
Tantalum	Mitsui Mining & Smelting	Japan	Yes
Tantalum	Ningxia Orient Tantalum Industry Co., Ltd.	China	Yes
Tantalum	Plansee SE Liezen	Austria	Yes
Tantalum	RFH Tantalum Smeltry Co., Ltd.	China	Yes
Tantalum	Solikamsk Magnesium Works OAO	Russian Federation	Yes
Tantalum	Taki Chemicals	Japan	Yes
Tantalum	Telex Metals	United States	Yes

METAL	SMELTER/REFINER NAME	FACILITY LOCATION	CONFLICT FREE?
Tantalum	Ulba Metallurgical Plant JSC	Kazakhstan	Yes
Tantalum	Zhuzhou Cemented Carbide	China	Yes
Tin	Alpha	United States	Yes
Tin	China Tin Group Co., Ltd.	China	Yes
Tin	Cooperativa Metalurgica de Rondônia Ltda.	Brazil	Yes
Tin	CV United Smelting	Indonesia	Yes
Tin	EM Vinto	Bolivia	Yes
Tin	Gejiu Zili Mining And Metallurgy Co., Ltd.	China	Unknown
Tin	Malaysia Smelting Corporation (MSC)	Malaysia	Yes
Tin	Metallo-Chimique N.V.	Belgium	Yes
Tin	Mineração Taboca S.A.	Brazil	Yes
Tin	Minsur	Peru	Yes
Tin	Mitsubishi Materials Corporation	Japan	Yes
Tin	Operaciones Metalurgical S.A.	Bolivia	Yes
Tin	PT Bukit Timah	Indonesia	Yes
Tin	PT Refined Bangka Tin	Indonesia	Yes
Tin	PT Stanindo Inti Perkasa	Indonesia	Yes
Tin	PT Timah (Persero) Tbk Kundur	Indonesia	Yes
Tin	PT Timah (Persero) Tbk Mentok	Indonesia	Yes
Tin	Thaisarco	Thailand	Yes
Tin	Yunnan Chengfeng Non-ferrous Metals Co., Ltd.	China	Unknown
Tin	Yunnan Tin Group (Holding) Company Limited	China	Yes
Tungsten	A.L.M.T. TUNGSTEN Corp.	Japan	Yes
Tungsten	Chongyi Zhangyuan Tungsten Co., Ltd.	China	Yes
Tungsten	Dayu Weiliang Tungsten Co., Ltd.	China	Unknown
Tungsten	Fujian Jinxin Tungsten Co., Ltd.	China	Yes
Tungsten	Ganzhou Huaxing Tungsten Products Co., Ltd.	China	Yes
Tungsten	Ganzhou Jiangwu Ferrotungsten Co., Ltd.	China	Yes
Tungsten	Ganzhou Non-ferrous Metals Smelting Co., Ltd.	China	Unknown
Tungsten	Ganzhou Seadragon W & Mo Co., Ltd.	China	Yes
Tungsten	Global Tungsten & Powders Corp.	United States	Yes
Tungsten	Guangdong Xianglu Tungsten Co., Ltd.	China	Yes
Tungsten	H.C. Starck GmbH	Germany	Yes
Tungsten	Hunan Chenzhou Mining Co., Ltd.	China	Yes
Tungsten	Hunan Chunchang Nonferrous Metals Co., Ltd.	China	Yes
Tungsten	Hydrometallurg, JSC	Russian Federation	Yes
Tungsten	Japan New Metals Co., Ltd.	Japan	Yes
Tungsten	Jiangxi Gan Bei Tungsten Co., Ltd.	China	Yes
Tungsten	Kennametal Fallon	United States	Unknown
Tungsten	Kennametal Huntsville	United States	Yes
Tungsten	Wolfram Bergbau und Hütten AG	Austria	Yes
Tungsten	Xiamen Tungsten Co., Ltd.	China	Yes