

GLOBAL BRASS & COPPER HOLDINGS, INC.  
Form SD  
May 26, 2016

**United States**  
**Securities and Exchange Commission**  
**Washington, D.C. 20549**

**FORM SD**

**SPECIALIZED DISCLOSURE REPORT**

**GLOBAL BRASS AND COPPER HOLDINGS, INC.**

**(Exact name of registrant as specified in its charter)**

|                                                           |                                        |                                           |
|-----------------------------------------------------------|----------------------------------------|-------------------------------------------|
| <b>Delaware</b><br><b>(State or other jurisdiction of</b> | <b>001-35938</b><br><b>(Commission</b> | <b>06-1826563</b><br><b>(IRS Employer</b> |
| <b>incorporation or organization)</b>                     | <b>File Number)</b>                    | <b>Identification No.)</b>                |

**475 N. Martingale Road Suite 1050**

|                                                                          |                                   |
|--------------------------------------------------------------------------|-----------------------------------|
| <b>Schaumburg, IL</b><br><b>(Address of principal executive offices)</b> | <b>60173</b><br><b>(Zip Code)</b> |
|--------------------------------------------------------------------------|-----------------------------------|

**Scott B. Hamilton**

**General Counsel**

**(847) 240-4700**

**(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, 2015.

## **Section 1 - Conflict Minerals Disclosure**

### **Item 1.01 Conflict Minerals Disclosure and Report**

#### **Conflict Minerals Disclosure**

This Form SD of Global Brass and Copper Holdings, Inc. (the *Company*) is filed pursuant to Rule 13p-1 promulgated under the Securities Exchange Act of 1934, as amended, for the reporting period January 1, 2015 to December 31, 2015. Rule 13p-1 (the *Rule*) 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 gold, columbite-tantalite (coltan), cassiterite and wolframite, including their derivatives, which are limited to tantalum, tin and tungsten (collectively, the *Conflict Minerals*).

The *Company*'s primary line of business is the production of copper and copper-based alloys and fabricated products made from copper and copper-based alloys. Some of the products fabricated or produced by the *Company* either (i) contain small amounts of tin as a component of the alloy or (ii) are plated with tin or gold for functional reasons. For certain of the *Company*'s products, tin is an alloy agent necessary to produce those products and achieve the particular properties required of those alloys. Both tin and gold are considered *Conflict Minerals* under the Rule.

The vast majority of tin used in the *Company*'s manufacturing operations is sourced through scrap. However, a small amount of tin used to manufacture alloys, and the tin and gold used in plating operations, are indirectly sourced from smelters by purchases through brokers or dealers.

As required by the Rule, the *Company* has conducted a good faith, reasonable country of origin inquiry ( *RCOI* ) regarding the *Conflict Minerals* used in its products to determine whether any such *Conflict Minerals* originated in the Democratic Republic of the Congo or an adjoining country and/or whether any of the *Conflict Minerals* were from recycled or scrap sources. Where applicable, the *Company* has conducted additional due diligence regarding the sources of the *Conflict Minerals*.

The *Company*'s *Conflict Minerals Report* for the Reporting Period is filed as Exhibit 1.01 hereto and can be found on its website at [www.gbcholdings.com](http://www.gbcholdings.com).

#### **Item 1.02 Exhibit**

The *Company*'s *Conflict Minerals report* for the year ended December 31, 2015 is filed as Exhibit 1.01 to this Form SD.

## **Section 2 - Exhibits**

### **Item 2.01 Exhibits**

Exhibit 1.01 - *Conflict Minerals Report* dated May 26, 2016 as required by Items 1.01 and 1.02 of this Form.

**SIGNATURES**

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

GLOBAL BRASS AND COPPER  
HOLDINGS, INC.

By: */s/ John J. Wasz*  
John J. Wasz  
Chief Executive Officer

Date: May 26, 2016

**EXHIBIT INDEX**

**Exhibit**

| <b>Number</b> | <b>Description</b>                           |
|---------------|----------------------------------------------|
| 1.01          | Conflict Minerals Report dated May 26, 2016. |