

Compass Diversified Holdings  
Form SD  
May 30, 2014

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

**Form SD**  
**SPECIALIZED DISCLOSURE REPORT**

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

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

**001-34927**  
**(Commission**  
**File Number)**

**57-6218917**  
**(I.R.S. Employer**  
**Identification No.)**

**COMPASS GROUP DIVERSIFIED**  
**HOLDINGS LLC**  
**(Exact name of registrant as specified in its charter)**

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

**001-34926**  
**(Commission**  
**File Number)**  
**Sixty One Wilton Road**  
**Second Floor**  
**Westport, CT 06880**

**20-3812051**  
**(I.R.S. Employer**  
**Identification No.)**

**(Address of principal executive offices and zip code)**

**Please contact Carrie Ryan at (203) 221-1703 should you have any questions about 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:

- x Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2013.

This Form SD of Compass Group Diversified Holdings LLC and Compass Diversified Holdings (NYSE: CODI) (collectively, CODI or the Company) is filed pursuant to Rule 13p-1 under the Securities Exchange Act of 1934, as amended, for the reporting period from January 1 through December 31, 2013.

## **Section 1 Conflict Minerals Disclosure**

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

#### **Conflict Minerals Disclosure**

##### *Reasonable Country of Origin Inquiry*

The Company conducted an analysis of its subsidiaries' products and found that small quantities of conflict minerals (cassiterite, columbite-tantalite, gold, wolframite or their derivatives) are contained in some of its subsidiaries' products. Therefore, for the reporting period from January 1 to December 31, 2013, the Company conducted a reasonable country of origin inquiry (RCOI) which was reasonably designed to determine whether any of the necessary conflict minerals contained in its subsidiaries' products originated or may have originated in a Covered Country or came from recycled or scrap sources. Necessary conflict minerals are conflict minerals that are necessary to the functionality or production of products that the Company's subsidiaries manufacture or that the Company's subsidiaries contract with others to manufacture for us. A Covered Country is the Democratic Republic of the Congo or an adjoining country.

To conduct its RCOI, the Company engaged with its subsidiaries' suppliers of products containing necessary conflict minerals and made inquiries to those suppliers about the chain of custody of those necessary conflict minerals and about the smelters or refiners used to process those conflict minerals. In the Company's supplier engagement, it used the Electronic Industry Citizenship Coalition (EICC) and the Global eSustainability Initiative (GeSI) Conflict Minerals Reporting Template (CMRT) to request information from its subsidiaries' suppliers about their supply chain and to gather information about the country of origin of its subsidiaries' necessary conflict minerals. The Company and its subsidiaries do not have direct relationships with smelters or refiners in their supply chains, therefore it asked its subsidiaries' suppliers to engage with their own respective suppliers to gather the requested information.

##### *Conclusions*

The Company has concluded in good faith that during 2013:

- a) Certain of the Company's subsidiaries have manufactured and/or contracted to manufacture products as to which conflict minerals are necessary to the functionality or production of their products.
- b) Based on an RCOI, the Company knows or has reason to believe that some of the Company's necessary conflict minerals originated or may have originated in the Covered Countries and knows or has reason to believe that those necessary conflict minerals may not be solely from recycled or scrap sources.

Therefore, the Company conducted due diligence on the source and chain of custody of its subsidiaries' necessary conflict minerals. There is significant overlap between the Company's RCOI efforts and its due diligence measures performed. The due diligence measures it performed are discussed in the Conflict Minerals Report filed as Exhibit 1.02 hereto.

## Edgar Filing: Compass Diversified Holdings - Form SD

A copy of the Company's Conflict Minerals Report is provided as Exhibit 1.02 to this Form SD, and is publicly available at: [www.compassdiversifiedholdings.com](http://www.compassdiversifiedholdings.com)

### **Item 1.02 Exhibit**

A copy of the Company's Conflict Minerals Report, required by Item 1.01, is provided as Exhibit 1.02.

### **Section 2 Exhibits**

#### **Item 2.01 Exhibits**

Exhibit 1.02 Conflict Minerals Report as required by Items 1.01 and 1.02 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 duly authorized undersigned.

Date: May 30, 2014

COMPASS DIVERSIFIED HOLDINGS

By: /s/ Ryan J. Faulkingham  
Ryan J. Faulkingham  
*Regular Trustee*

**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.

Date: May 30, 2014

COMPASS GROUP DIVERSIFIED HOLDINGS LLC

By: /s/ Ryan J. Faulkingham  
Ryan J. Faulkingham  
*Chief Financial Officer*

**EXHIBIT INDEX**

| <b>Exhibit<br/>Number</b> | <b>Description of Exhibit</b>                                               |
|---------------------------|-----------------------------------------------------------------------------|
| 1.02                      | Conflict Minerals Report as required by Items 1.01 and 1.02 of this Form SD |