

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

FORM SD
SPECIALIZED DISCLOSURE REPORT

Curtiss-Wright Corporation

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

Delaware

1-134

13-0612970

(State or other jurisdiction of incorporation or organization)

(Commission File Number)

(IRS Employer Identification No)

130 Harbour Place Drive, Suite 300, Davidson, North Carolina

28036

(Address of principal executive offices) (Zip code)

(Zip code)

K. Christopher Farkas

Vice President and Chief Financial Officer

(704) 869-4600

(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, 2019.

Section 1 - Conflict Mineral Disclosure

Item 1.01 Conflict Minerals Disclosure and Report

1. Introduction

Curtiss-Wright Corporation and its subsidiaries (Curtiss-Wright) is a global company that delivers highly engineered, critical function products and services to the commercial, industrial, defense, and power generation markets. Curtiss-Wright's products include valves, pumps, motors, generators, instrumentation, shipboard systems, control electronics, mechanical actuation and drive systems, specialized sensors, motors and electronic controller units, embedded computing components and control systems. Curtiss-Wright also provides technical services to enhance the performance and durability, extend the life, and prevent premature fatigue and failure on customer-supplied metal components. In some cases, Tin, Tungsten, Tantalum or Gold (collectively "3TG") may be necessary to the functionality or production of a product Curtiss-Wright manufactures or contracts to manufacture. Curtiss-Wright is committed to sourcing components and materials from companies that share Curtiss-Wright's values regarding respect for human rights, ethics and environmental responsibility.

2. Conflict Minerals Disclosures

Curtiss-Wright has concluded in good faith that during the calendar year ended 2019,

- a) Curtiss-Wright manufactured or contracted to be manufactured products for which "conflict minerals" (as defined in Section 1502(e)(4) of the Dodd-Frank Wall Street Reform and Consumer Protection Act) are necessary to the functionality or production of its products.
- b) Based on a "reasonable country of origin inquiry" (RCOI) and subsequent due diligence, Curtiss-Wright was unable to determine whether the necessary conflict minerals i) originated in the Democratic Republic of the Congo (DRC) or an adjoining country or ii) came from recycled or scrap sources.

In accordance with Rule 13p-1 under the Securities Exchange Act of 1934 (Rule 13p-1), Curtiss-Wright has filed this Specialized Disclosure Form (Form SD) and the associated Conflict Minerals Report and both reports are posted to a publicly available Internet site at <http://www.curtisswright.com/investors/sec-filings/>.

3. Reasonable Country of Origin Inquiry Description

Curtiss-Wright conducted an applicability assessment to determine whether its manufactured or contracted to be manufactured products may contain conflict minerals 3TG. Based upon the findings of our applicability assessment, Curtiss-Wright surveyed Tier 1 suppliers thought to represent the highest risk of supplying components that do or may contain 3TG from one or more of the covered countries (RCOI). Supplier engagement followed these steps:

- A broad communication was sent to our supply-base regarding Section 1502(e)(4) of the Dodd-Frank Wall Street Reform and Consumer Protection Act.
 - Curtiss-Wright's standard contract terms and conditions of purchase were modified to incentivize compliance, and where possible, the terms and conditions of existing contracts were modified to incentivize compliance.
 - Engaged a third-party vendor (the Vendor) with recognized expertise in supply chain due diligence to facilitate supplier engagement activity and to assist the Company in collecting, analyzing, verifying, and storing supplier-provided data and performing due diligence as part of our conflict minerals program.
 - An email was sent to suppliers identified as being high risk of supplying 3TG requesting that they complete conflict minerals surveys. Curtiss-Wright's program utilized the Electronic Industry Citizenship Coalition
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(EICC) and Global e-Sustainability Initiative (GeSI) Conflict Minerals Due Diligence Template (EICC-GeSI Template) for data collection.

- Following the initial introductions to the program and information request, attempts were made to contact each non-responsive supplier requesting survey completion; Suppliers contacted were offered assistance. This assistance included, but was not limited to, providing further information regarding our inquiry, including an explanation of why the information was being collected, a review of how the information would be used, and clarification regarding how the information needed could be provided.
- Escalation protocols were initiated for suppliers who continued to be non-responsive after the above contacts were made.
- Supplier responses were evaluated for consistency, accuracy and gaps both in terms of which products were stated to contain or not contain necessary 3TG as well as the origin of those materials. Additional supplier engagement was conducted to address issues including incomplete data on EICC-GeSI reporting templates, responses that did not identify smelters or refiners, responses which indicated sourcing location without complete supporting information from the supply chain, and organizations that were identified as smelter or refiners, but not verified as such through further analysis and research.

4. RCOI Results and Due Diligence

A total of 1,618 suppliers were identified as in-scope for the RCOI process. Approximately 57% of these suppliers responded to the company's survey request. Of these responding suppliers, 49% responded yes as to having one or more of the regulated metals (3TG) as necessary to the functionality or production of the products they supply to Curtiss-Wright Corporation. Based on its RCOI mentioned above, Curtiss-Wright could not determine whether the necessary conflict minerals, i) originated in the DRC or an adjoining country or, ii) came from recycled or scrap sources.

Accordingly, Curtiss-Wright has exercised due diligence on the source and chain of custody of such conflict minerals that conforms to the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, Second Edition, an internationally recognized due diligence framework, as defined in Form SD under 17 CFR 249b.400.

Curtiss-Wright's due diligence on the source and chain of custody of its conflict minerals are more thoroughly described in the Conflict Minerals Report attached hereto as Exhibit 1.01; and can be found on the Company's website at <http://www.curtisswright.com/investors/sec-filings/>.

Item 1.02 Exhibits

Exhibit 1.01 - Conflict Minerals Report.

Section 2 - Exhibits

Item 2.01 Exhibits

Exhibit 1.01 - 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.

CURTISS-WRIGHT CORPORATION

(Registrant)

By: By: /s/ K. Christopher Farkas
K. Christopher Farkas
Vice President and Chief Financial Officer

Dated: May 13, 2020

Conflict Minerals Report of Curtiss-Wright Corporation
In accordance with Rule 13p-1 under the Securities Exchange Act of 1934

Exhibit 1.01

This is the Conflict Mineral Report of Curtiss-Wright Corporation (the “Corporation”) for calendar year 2019 in accordance with Rule 13p-1 under the Securities Exchange Act of 1934 (Rule 13p-1). Numerous terms in this report are defined in Rule 13p-1 and Form SD and the readers are invited to refer to those sources. In accordance with the instructions to Form SD, this Conflict Minerals Report has not been audited by an independent private sector auditor.

1. Introduction

The intent of this Conflict Minerals Report (CMR) is to describe the design and implementation of Curtiss-Wright Corporation’s due diligence process following Rule 13p-1 requirements.

2. Product Description

Curtiss-Wright Corporation is a global company that delivers highly engineered, critical function products and services to the commercial, industrial, defense and power markets. The products we provide include valves, pumps, motors, generators, instrumentation, shipboard systems, control electronics, mechanical actuation and drive systems, specialized sensors, motors and electronic controller units, embedded computing components and control systems. We also provide technical services to enhance the performance and durability, extend the life, and prevent premature fatigue and failure on customer-supplied metal components. In some cases, 3TG may be necessary to the functionality or production of a product we manufacture or are contracted to manufacture.

3. Design of Due Diligence Measures

The Company's due diligence measures were designed to be in conformity, in all material respects, with the internationally recognized due diligence framework as set forth in the Organisation for Economic Co-operation and Development's Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas; Second Edition, including the related supplements for gold and for tin, tantalum and tungsten (OECD Guidance).

4. Due Diligence Measures Implemented

Due Diligence measures undertaken by Curtiss-Wright Corporation included the following:

1) Management Systems

- a. The Corporation established a charter and identified a cross functional management team consisting of representatives from Legal, Finance and Supply Chain management to oversee the conflict mineral program.
 - b. The Corporation developed a risk mitigation and corrective action plan to support “Due Diligence efforts.”
 - c. The Corporation has adopted the following policy, which is available on our website:
<http://www.curtisswright.com/investors/corporate-governance/Conflict-Minerals-Policy-Statement/default.aspx>.
 - d. The Corporation’s policy provides a grievance mechanism for its suppliers to report concerns or seek guidance.
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- e. The Corporation distributed communications by way of contract provisions, training, and educational materials to its supply chain informing suppliers of their obligation for reporting and disclosure.
- f. The Corporation utilizes industry working groups to assist with interpretation and execution to the regulation and OECD Due Diligence Framework.

2) Identify and assess risks in the supply chain

- a. Based upon the size and complexity of our supply base, the various markets we participate in, and the number of products we provide, the Corporation took a supplier-centric approach for inquiry based upon the nature of the material and likelihood of 3TG content.
- b. The Corporation relies on our suppliers, whose components may contain 3TG, to provide us with information about the source of conflict minerals contained in the components supplied to us. Our direct suppliers are similarly reliant upon information provided by their suppliers.
- c. The Corporation leveraged the CMRT surveys to conduct our inquiry and gather information for our due diligence efforts.
- d. The Corporation and its Vendor performed a review of supplier responses identified through "Red Flag" checks.

3) Design and implement a strategy to respond to identified risks

- a. The Corporation designed a risk mitigation and corrective action plan through which the due diligence activities are implemented, managed and monitored.
- b. Non-responsive suppliers or inadequate responses are addressed through a predetermined schedule of email and telephonic follow-up communications.
- c. The Corporation and its Vendor evaluated responses and assessed smelter information provided against the Conflict Free Sourcing Initiative (CFSI) conflict-free smelters lists.
- d. We addressed supplier responses with follow-up communications where deemed appropriate.

4) Carry out independent third-party audit of smelter/refinery due diligence practices

- a. The Corporation does not typically have a direct relationship with 3TG smelters and refiners and does not perform or direct audits of these entities within our supply chain. We rely upon audits of smelters and refiners conducted by CFSI. The CFSI developed the CFSP which uses an independent third-party auditor to identify smelters and refiners that have systems in place to assure sourcing of only conflict-free materials.

5) Report annually on supply chain due diligence

- a. In compliance with U.S. Securities and Exchange Commission (SEC) rules, as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010, the Corporation files a Form SD and this Conflict Minerals Report with the SEC by May 31st of each year, covering the period of the prior calendar year.
- b. The Corporation's Form SD can be found at <http://www.curtisswright.com/investors/sec-filings/>.

5. Continuous Improvement Efforts to Mitigate Risk

Curtiss-Wright Corporation will endeavor to continuously improve upon its supply chain due diligence efforts with the goal of increasing the quality and response rate of its surveys. The Company will continue to engage its suppliers, support internal education and training, and seek to integrate expectations regarding its Conflict Minerals Program into new supplier contracts and those coming up for renewal.

Cautionary Note Concerning Forward-Looking Statements

This report contains statements which, to the extent they are not statements of historical or present fact, constitute “forward-looking statements” under the securities laws. These forward-looking statements are intended to provide management’s current expectations or plans for our future business practices and performance, based on assumptions currently believed to be valid. Forward-looking statements can be identified by the use of words such as “believe,” “expect,” “expectations,” “plans,” “intends,” “strategy,” “estimate,” “project,” “target,” “anticipate,” “will,” “should,” “see,” “guidance,” “confident” and other words of similar meaning in connection with a discussion of future performance. Forward-looking statements may include, among other things, statements relating to future supply management practices, policies and plans for procurement of materials, risk management practices, supply chain infrastructure and efforts to improve supply chain transparency. All forward-looking statements involve risks, uncertainties and other factors that may cause actual results to differ materially from those expressed or implied in the forward-looking statements. For those statements, we claim the protection of the safe harbor for forward-looking statements contained in the U.S. Private Securities Litigation Reform Act of 1995. Such risks, uncertainties and other factors include, without limitation, the ability of the Company, its suppliers, industry groups and supplier organizations to obtain reliable information as to the source of purchased production materials; the timing for the development of infrastructure allowing such information to be compiled and shared with others in a cost effective and efficient manner; the impact of changes in laws and regulations, and the interpretation thereof, and in political conditions; and other factors beyond our control. The forward-looking statements speak only as of the date of this report and we undertake no obligation to publicly update or revise any forward-looking statements, whether as a result of new information, future events or otherwise, except as required by applicable law.