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

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**FORM SD**

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**Specialized Disclosure Report**

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**NEOGEN CORPORATION**

(Exact name of registrant as specified in its charter)

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**Michigan**  
(State or other jurisdiction  
of incorporation or organization)

**0-17988**  
(Commission  
File Number)

**38-2367843**  
(IRS Employer  
Identification No.)

**620 Lesher Place**  
**Lansing, MI**  
(Address of principal executive offices)

**48912**  
(zip code)

**Steven J. Quinlan (517) 372-9200**  
(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 (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2020.

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## **Section 1 – Conflict Minerals Disclosure**

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

#### **Introduction:**

This is the Conflict Minerals Disclosure of Neogen Corporation (“Neogen” or the “Company”) for calendar year 2020. Certain terms in this report are defined in Rule 13p-1.

In accordance with Section 1502 of the Dodd Frank Wall Street Reform and Consumer Protection Act (“Act”) governing conflict minerals, registrants must determine whether any of the conflict minerals (defined by the Act as Tin (Cassiterite), Tungsten (Wolframite), Tantalum (Columbite-Tantalite or Coltan), and Gold (the “3TGs” or “Conflict Minerals”)) are necessary to the functionality or production of its manufactured products. If so, the registrant must conduct a Reasonable Country of Origin Inquiry (“RCOI”) to determine whether any of the Conflict Minerals in its manufactured products originated in the Democratic Republic of the Congo (“DRC”) or any adjoining country (together with the DRC, the “Covered Countries”).

#### **Conflict Minerals Disclosure:**

Neogen Corporation’s Conflict Minerals Report, filed as Exhibit 1.01 hereto, is publicly available on its website at [www.neogen.com/en](http://www.neogen.com/en) as well as on the Securities and Exchange Commission’s EDGAR database at [www.sec.gov](http://www.sec.gov). The content of any website referred to in this Form SD, and any information accessible through such websites, is included for general information only and is not incorporated by reference in this Form SD nor deemed filed with the Securities and Exchange Commission.

#### **Item 1.02 Exhibit**

Neogen Corporation’s Conflict Minerals Report for the year ended December 31, 2020 is filed as Exhibit 1.01 hereto.

## **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.

#### **Signature**

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.

Neogen Corporation  
(Registrant)

\_\_\_\_\_/S/  
Steven J. Quinlan  
Vice President and Chief Financial Officer

May 28, 2021  
Date

**Neogen Corporation  
Conflict Mineral Report  
2020**

**Company Overview**

Neogen Corporation develops, manufactures, and markets products for food and animal safety. The company's Food Safety Division markets dehydrated culture media and diagnostic test kits to detect foodborne bacteria, natural toxins, food allergens, drug residues, plant diseases, and sanitation concerns. Neogen's Animal Safety Division is a leader in animal genomics and manufactures and distributes a variety of animal healthcare products, including diagnostics, pharmaceuticals, veterinary instruments, wound, care and disinfectants. Neogen's global footprint includes Europe, Mexico, Brazil, Argentina, Uruguay, Chile, China, Canada, Australia, and India.

**Description of Neogen's Reasonable Country of Origin Inquiry and Due Diligence**

Neogen has designed and implemented a conflict minerals compliance plan intended to comply with Rule 13p-1. Neogen, in accordance with the Organization for Economic Co-operation and Development (OECD), conducts a supply chain assessment based upon OECD's established five-step framework:

1. Establish strong company management systems:
  - a. Continue to build and improve upon the internal conflict minerals team to help maintain Neogen's policy, reporting requirements, and a sustainable process for the future.
2. Identify and assess risk in the supply chain:
  - a. Assess existing and new suppliers via a supplier quality questionnaire to identify any potential conflict minerals in the supply chain;
  - b. Survey those suppliers that have been identified by submitting the Responsible Minerals Initiative (RMI) Conflict Minerals Reporting Template (CMRT); and
  - c. Monitor Neogen's ERP system, which includes identification of conflict minerals within the supply chain.
3. Design and implement a strategy to respond to identified risks:
  - a. Conduct a Reasonable Country of Origin Inquiry for suppliers who submit a CMRT;
  - b. Maintain a conflict minerals risk management plan to alleviate supplier risk; and
  - c. Search for alternate suppliers if the current supplier does not provide a conflict minerals response.
4. Carry out independent third-party audit of supply chain due diligence:
  - a. Neogen does not have sufficient information to determine whether its products are free of 3TG that originate in the Democratic Republic of the Congo (DRC). Therefore, an independent private sector audit is not required at this time.
5. Report annually on supply chain due diligence:
  - a. Neogen files a Form SD with the SEC annually; and
  - b. Using our supply chain due diligence processes, the Company hopes to further develop transparency into the supply chain.

**Results of Neogen's RCOI and Due Diligence**

After reviewing the submitted Conflict Minerals Reporting Template (CMRTs) from the surveyed suppliers, a review of Neogen's products was performed. Through database-driven reports of Neogen's end products and the information provided by suppliers, we identified four companies that supplied Neogen with 3TG products during the 2020 calendar year. Despite having conducted a good faith reasonable country of origin inquiry and due diligence, Neogen was unable to determine the origin of the 3TG in its supply chain due to insufficient information returned from its suppliers. 3TG is necessary to the functionality of certain Neogen products and must rely on third party suppliers to provide these components.

**Independent Private Sector Audit**

Neogen does not have enough information to determine or identify the origin of Conflict Minerals reported by their suppliers for parts and/or components purchased during the 2020 calendar year. As such, an independent private sector audit is not required at this time.

**Forward Looking Statements**

This Conflict Minerals Report contains forward-looking statements, which are based on our current expectations and involve numerous risks and uncertainties that may cause these forward-looking statements to be inaccurate. These statements include statements regarding our goals for future improvements to our reasonable country of origin process and to mitigate the risk associated with sourcing of our conflict minerals. All forward-looking statements involve risk and uncertainty. Risk that may cause these forward-looking statements to be inaccurate include: lack of cooperation or progress by our employees and suppliers, and our suppliers' respective suppliers and smelters; or these plans may not be effective. In addition, you should also consider the important factors described in reports and documents that we file from time to time with the SEC. Except as required by law, we disclaim any obligation to update information contained in the forward-looking statement whether because of new information, future events, or otherwise.