# UNITED STATES SECURITIES AND EXCHANGE COMMISSION

Washington, D.C. 20549

# FORM SD Specialized Disclosure Report

## **AGCO CORPORATION**

A Delaware Corporation
IRS Employer Identification No. 58-1960019
SEC File Number 1-12930

4205 River Green Parkway Duluth, GA 30096 (770) 813-9200

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

AGCO Corporation (the "Company") has filed a Conflict Minerals Report, which is attached as an exhibit in Item 2.01 and is also publicly available on our website at <a href="http://investors.agcocorp.com/phoenix.zhtml?c=108419&p=irol-irhome">http://investors.agcocorp.com/phoenix.zhtml?c=108419&p=irol-irhome</a>.

## Item 1.02 Exhibit

The Company has filed a Conflict Minerals Report as Exhibit 1.01 to this Form SD.

## Section 2 - Exhibits

## Item 2.01 Exhibits

Exhibit 1.01 - Conflict Minerals Report

## **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 undersigned hereunto duly authorized.

AGCO Corporation

By: /s/ Andrew H. Beck

Andrew H. Beck Senior Vice President and Chief Financial Officer

Dated: May 23, 2016

## AGCO Corporation Conflict Minerals Report For the Calendar Year Ended December 31, 2015

#### I. Introduction

AGCO Corporation (the "Company") manufactures and sells products that contain Conflict Minerals. (Capitalized terms that are used but not defined in this Report have the meanings given to them in Form SD.) Due to the depth of the supply chain, the Company is far removed from the sources of ore from which these Conflict Minerals are produced and the smelters/refiners that process those ores. The efforts undertaken to identify the countries of origin of those ores reflect our circumstances and position in the supply chain. The amount of information globally on the traceability and sourcing of these ores is limited at this time; this situation is not unique to the Company.

The Company supports the initiatives embodied in Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act and the related SEC rule designed to limit the flow of funds to armed groups in the Democratic Republic of the Congo and adjoining countries from the production of conflict minerals, and it is the Company's policy to promote responsible sourcing.

The Company developed and published its Conflict Minerals Policy, which is available on the Company's website at <a href="http://www.agcocorp.com/content/dam/agcocorp/Suppliers/AGCO">http://www.agcocorp.com/content/dam/agcocorp/Suppliers/AGCO</a> Conflict Minerals Policy 092013.pdf.

During 2015 the Company identified its suppliers that had the potential to sell to the Company products that contain conflict minerals and asked these suppliers to identify, using a website established by the Company, the sources of the Conflict Minerals and products containing Conflict Minerals that they supply to the Company. The responses were reviewed by the Company for completeness and consistency of answers. The Company requested suppliers to provide corrections and clarifications where needed.

#### II. Due Diligence Program Design

The Company designed its overall Conflict Minerals procedures in conformity with the five step framework contained in the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas*, *Second Edition*, and the supplements on tin, tantalum, tungsten and gold. The principal features responding to each of the five steps are outlined below:

- 1. <u>Establish strong company management systems</u>. The Company did this by:
  - Creating an internal policy governing our conflict minerals compliance program;
  - Publishing its Conflict Minerals Policy a
     http://www.aqcocorp.com/content/dam/aqcocorp/Suppliers/AGCO Conflict Minerals Policy 092013.pdf;
  - Utilizing the Conflict Minerals Reporting Template developed by the Conflict Free Sourcing Initiative to identify smelters and refiners in the supply chain;
  - Reporting to senior management no less frequently than quarterly on (a) suppliers' responses to the Company's inquiries, and (b) supply chain risk;
  - Supporting an industry initiative that audits smelters' and refiners' due diligence activities. That industry initiative is the EICC and GeSI's Conflict-Free Sourcing Initiative;
  - Including conflict minerals expectations in standard contract language, new supplier on-boarding procedures and supplier audits;
  - Adding Conflict Minerals in discussion materials at Company-hosted supplier days;
  - Making available an Ethics Hotline for employees, suppliers, or other interested party to report violations or questions related to conflict minerals at AGCO.

### 2. <u>Identify and assess risk in the supply chain</u>. The Company did this by:

- Surveying suppliers of products that the Company identified that had the potential to sell Conflict Minerals;
- Reviewing internally-approved criteria to identify errors, omissions, and missed expectations on supplier Conflict Minerals Reporting Template submissions;
- For those suppliers who did not respond to our surveys, we conducted additional procedures, including personal contact with top-spend suppliers;
- Promoting the development of a consistent methodology to train suppliers on Conflict Minerals through collaboration with industry groups;
- Evaluating smelter information provided by the supply chain against data from the Conflict Free Sourcing Initiative.

## 3. Design and implement a strategy to respond to identified risks. The Company did this by:

- Reporting to senior management no less frequently than quarterly on (a) suppliers' responses to the Company's inquiries, and (b) supply chain risk;
- Providing an annual update to the Audit Committee of the Company's Board of Directors;
- Increasingly emphasizing the Company's Conflict Minerals Policy intent to 'limit purchases from the supplier to the extent practicable or seek alternative suppliers where commercially feasible' should a supplier be unwilling to adhere to the Company's Conflict Minerals policy.
- 4. <u>Carry out independent third-party audit of supply chain due diligence at identified points in the supply chain.</u> The Company did this by:
  - Encouraging hesitant smelters/refiners to participate in the Conflict-Free Smelter Program;
  - Participating in various industry groups to promote conflict minerals disclosure and best practice to manage conflict mineral processes.
- 5. Report on supply chain due diligence. The Company did this by:
  - Filing and making available on the Company's website an annual Form SD and Conflict Minerals Report with the Securities and Exchange Commission.

## III. Risk Mitigation – Future Due Diligence Measures

In future years the Company will continue to make inquiries to its suppliers, with its objective being to increase the response rate and completeness of responses each year. The Company conducts periodic reviews of key suppliers, and as part of those reviews has included questions relating to Conflict Minerals sourcing.

## IV. Product Description

The products subject to the disclosure are tractors, combines, hay tools, sprayers, forage equipment, grain storage and protein production systems, seeding and tillage implements and replacement parts.

## V. Independent Private Sector Audit

Not required for calendar year 2015.