

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

**Form SD**  
**Specialized Disclosure Report**

**inTEST Corporation**

(Exact Name of Registrant as Specified in its Charter)

**Delaware**

(State or other jurisdiction of  
incorporation or organization)

**1-36117**

(Commission File Number)

**22-2370659**

(I.R.S. Employer  
Identification No.)

**804 East Gate Drive, Suite 200**

**Mt. Laurel, New Jersey**

(Address of principal executive offices)

**08054**

(Zip Code)

**Hugh T. Regan, Jr., (856) 505-8800**

(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, 2013

**Section 1 - Conflict Minerals Disclosure**

**Item 1.01 Conflict Minerals Disclosure and Report**

inTEST Corporation's (the "Company") Form SD is being filed pursuant to Rule 13p-1 under the Securities and Exchange Act of 1934, as amended, for the reporting period January 1, 2013 to December 31, 2013. The Company conducted an analysis of its products and determined that all of its products (the "Covered Products") contained one or more "conflict minerals" as defined in Item 1.01(d)(3) of Form SD. After exercising due diligence, the Company determined that it could not yet determine whether or not the conflict minerals in the Covered Products originated in the Democratic Republic of the Congo or an adjoining country, as defined in Item 1.01(d)(1) of Form SD, and, if so, whether the conflict minerals were from recycled or scrap sources or were or were not from other conflict free sources. Consequently, we determined that these products are "DRC conflict undeterminable" as defined in Item 1.01(d)(5) of Form SD.

**Conflict Minerals Disclosure**

The Company is filing herewith as Exhibit 1.02 a Conflict Minerals Report. The Conflict Minerals Report is publicly available at [www.intest.com](http://www.intest.com) under About Us, Conflict Minerals Report, as well as on the SEC's EDGAR database at [www.sec.gov](http://www.sec.gov).

**Item 1.02 Exhibit**

A copy of the Company's Conflict Minerals Report is filed as Exhibit 1.02 hereto.

**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 SD.

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**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.

**inTEST CORPORATION**

By: /s/ Hugh T. Regan, Jr.  
*Hugh T. Regan, Jr.*  
*Secretary, Treasurer and Chief Financial Officer*

Date: June 2, 2014

**inTEST Corporation**  
**Conflict Minerals Report**  
**For the Year Ended December 31, 2013**

This Conflict Minerals Report ("CMR") of inTEST Corporation ("inTEST") for the year ended December 31, 2013 has been prepared pursuant to Rule 13p-1 under the Securities Exchange Act of 1934 (the "Rule"). The Rule imposes certain reporting obligations on Securities and Exchange Commission ("SEC") registrants when any conflict minerals are necessary to the functionality or production of a product manufactured by the registrant or contracted by the registrant to be manufactured (the "Covered Products"). Conflict minerals are defined as cassiterite, columbite-tantalite, gold, wolframite, and their derivatives, which are limited to tin, tantalum, and tungsten ("Conflict Minerals") for the purposes of this assessment. Tin, tantalum, tungsten and gold are also referred to in this report as "3TG".

If after conducting a reasonable country of origin inquiry ("RCOI") as required by SEC rules, a registrant has reason to believe that any of the Conflict Minerals in its supply chain may have originated in the Democratic Republic of the Congo ("DRC") or an adjoining country (the "Covered Countries"), or if it is unable to determine the country of origin of those Conflict Minerals, then the registrant must exercise due diligence with respect to the source and chain of custody of the Conflict Minerals. The registrant must annually submit a CMR to the SEC, as and when required, that, among other items, includes a description of those due diligence measures.

The report presented herein is not audited, as we have concluded that our products manufactured in 2013 are "DRC conflict undeterminable", and therefore under the Rule, the CMR is not subject to an independent private sector audit. A copy of this report is publicly available on our website at [www.intest.com](http://www.intest.com) under About Us, Conflict Minerals Report.

#### **Description of inTEST's Products Covered by this Report**

Our product lines are classified in the following categories: Thermal Products, Mechanical Products and Electrical Products. All of our products were found to contain one or more of 3TG and are therefore considered Covered Products. Our Covered Products include:

##### Thermal Products

- ThermoChambers
- Thermal Platforms
- ThermoChuck Products
- Thermonics Products

##### Mechanical Products

- Manipulator Products
- Docking Hardware Products

##### Electrical Products

- Tester Interface Products

#### **Supply Chain Overview**

Although our Covered Products contain some 3TG, inTEST does not purchase ore or unrefined Conflict Minerals from mines and is many steps removed in the supply chain from the mining of Conflict Minerals. We purchase materials used in our products from a large number of suppliers, who in turn may purchase from a large number of suppliers. We rely upon our suppliers to provide information on the origin of the 3TG contained in the component parts and materials supplied to us or, in one case, the finished products we have manufactured by a third party ("Contract Manufacturer"), including sources of 3TG that are supplied to them from their suppliers. While we have not adopted a formal Conflict Minerals policy, we have required that all our current suppliers or Contract Manufacturers that supply component parts, materials and finished products to us that contain 3TG provide us with sourcing information.

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

We conducted an analysis of our Covered Products and found that some 3TG is contained in all of our Covered Products. As a result, we conducted in good faith a RCOI designed to determine if any 3TG originated in the Covered Countries and whether any of the 3TG may be from recycled or scrap sources. Our supply chain is complex, and there are many third parties in the supply chain between the ultimate manufacturer of the Covered Products and the original sources of 3TG. We do not directly purchase Conflict Minerals from mines, smelters or refiners. Therefore, we must rely upon our suppliers and Contract Manufacturer to provide information regarding the country of origin of 3TG that are included in our Covered Products. Our suppliers and Contract Manufacturer, in turn, must rely upon their suppliers to provide information necessary to this process, and so on until the downstream supplier is the purchaser of the Conflict Minerals from a smelter or refiner.

We have not yet received responses from all of our suppliers and the Contract Manufacturer that we reached out to and, therefore, we cannot exclude the possibility that some of the Conflict Minerals may have originated in the Covered Countries. As a result, we have concluded that our Covered Products are "DRC conflict undeterminable" as defined in Item 1.01(d)(5) of Form SD. It will take time for many of our suppliers or the suppliers of our Contract Manufacturer to verify the origin of all the Conflict Minerals. Our RCOI primarily consisted of submitting the conflict minerals reporting template prepared by the Electronic Industry Citizenship Coalition and Global eSustainability Initiative ("EICC-GeSI") to all our suppliers and Contract Manufacturers of our Covered Products manufactured in 2013. Responses received were reviewed for completeness, reasonableness and consistency, and we followed up with our suppliers and Contract Manufacturer for corrections and clarifications as needed.

#### **Due Diligence Process**

Our due diligence processes, management, and measures were designed based upon the 2<sup>nd</sup> edition of The Organization for Economic Co-operation and Development ("OECD") Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (the "OECD Framework"), an internationally recognized due diligence framework. In accordance with the OECD Framework, our RCOI (described above) launched our

Conflict Minerals due diligence with the communication survey to our suppliers and Contract Manufacturer.

Our Conflict Minerals due diligence process includes: the establishment of cross functional teams made up of senior management and operational staff; communications to, and the engagement of, suppliers and Contract Manufacturers; due diligence compliance process and measurement, record keeping and follow up procedures. We have periodically reported to our Audit Committee of the Board of Directors with respect to our due diligence process and compliance obligations under the Rule.

The cross functional teams we established in each of our three product segments consisted of subject matter experts from relevant functions such as purchasing, manufacturing and finance. These teams were responsible for implementing our Conflict Minerals due diligence process. These teams were supported by senior management including the Chief Financial Officer, Senior Vice President and General Manager of the Mechanical and Electrical Products segments and Vice President and General Manager of the Thermal Products segment. These members of senior management are briefed about the results of our due diligence efforts on a regular basis to provide guidance and oversight.

With respect to the OECD requirement to strengthen engagement with suppliers, we conducted an outreach program with our suppliers and Contract Manufacturer to inform them of the Rule. We reviewed, evaluated and logged the received supplier and Contract Manufacturer responses to our RCOI. We created a follow-up process to identify and escalate any identified issues associated with non-responsive or problematic responses to our RCOI. Feedback from this process will be used to improve the future design of our Conflict Minerals due diligence process.

### **Identification and Assessment of Risks in the Supply Chain**

Because of our size, the breadth and complexity of our Covered Products, and the constant evolution of our supply chain, it is difficult to identify actors downstream from our direct suppliers and Contract Manufacturers. We have identified 626 direct suppliers and 1 Contract Manufacturer of our Covered Products. We have relied upon these suppliers' and Contract Manufacturer's responses to provide us with information about the source of Conflict Minerals contained in the component materials supplied to us. Our direct suppliers and Contract Manufacturer are similarly reliant upon information provided by their suppliers.

### **Design and Implementation of a Strategy to Respond to Identified Risks**

We will work with our suppliers and Contract Manufacturers to move towards using component materials that originate from materials provided by Conflict-Free Smelter Program ("CFSP") within a reasonable time frame. This time frame will be dependent upon the criticality of the specific component material and the availability of alternative suppliers.

### **Report on Supply Chain Due Diligence and Results**

We have taken the following measures to exercise due diligence on the source and chain of custody of Conflict Minerals. We conducted a survey of our suppliers and Contract Manufacturers using the template developed jointly by the EICC-GeSI, known as the Conflict-Free Sourcing Initiative (the "CFSI") Reporting Template (the "Template"). This Template was developed to facilitate disclosure and communication of information regarding smelters that provide material to a company's supply chain. It includes questions regarding a company's conflict-free policy, engagement with its direct suppliers, and a listing of smelters the company and its suppliers use. In addition, the Template contains questions about the origin of Conflict Minerals included in their products, as well as supplier due diligence. Written instructions and recorded training illustrating the use of the tool is available on CFSI's website. The Template is being widely adopted by many companies in their due diligence processes related to Conflict Minerals.

At the outset of our 2013 RCOI, we elected to survey all suppliers and the Contract Manufacturer in our supply chain that supply component materials, or that manufacture the Covered Products suspected to contain 3TG. This survey population initially consisted of 626 suppliers and 1 Contract Manufacturer who received the Template. As of May 14, 2014, 122 suppliers had not yet responded to our surveys; 181 suppliers (representing approximately one-third of the suppliers surveyed) responded that they could not yet make a Conflict Mineral determination and were still investigating their own supply chain. Because a significant portion of the supplier respondents indicated that they were unsure of the origin of the component parts containing 3TG that they supplied to us, we were unable to determine with certainty the facilities used to process the necessary Conflict Minerals used in our Covered Products, the country of origin of the necessary Conflict Minerals used in our Covered Products, or the mine or location of origin of the Conflict Minerals used in our Covered Products.

### **Future Due Diligence Measures**

Going forward, we will seek to develop further transparency into our supply chain using our due diligence processes to drive accountability within our supply chain. During 2014, we intend to follow up with those suppliers that have not yet responded to our surveys as well as those suppliers that could not yet make a Conflict Mineral determination to ascertain their status. On an annual basis, we intend to contact each of our suppliers and Contract Manufacturers to obtain updated information if there have been changes to their supply chains or confirmation that their prior responses remain correct.

### **Conclusion**

After exercising due diligence as described above in this CMR, we have concluded that we are unable to determine whether or not the Covered Products qualify as "DRC conflict free" under the Rule, and as a result, the Covered Products are "DRC conflict undeterminable" as defined in Item 1.01(d)(5) of Form SD. Our due diligence process continues as we press for further information relevant to this determination.