

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

**FORM SD  
Specialized Disclosure Report**

**CyberOptics Corporation**  
(Exact name of Registrant as Specified in its Charter)

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

**0-16577**  
(Commission File Number)

**41-1472057**  
(IRS Employer Identification No.)

**5900 Golden Hill Drive, Minneapolis, Minnesota**  
(Address of principal executive offices)

**55416**  
(Zip Code)

**Jeffrey Bertelsen (763) 542-5000**  
(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, 2016 to December 31, 2016.

## INFORMATION TO BE INCLUDED IN THE REPORT

### Section 1 - Conflict Minerals Disclosure

#### Item 1.01 Conflict Minerals Disclosure and Report

##### Conflict Minerals Disclosure

This Form SD of CyberOptics Corporation (the "Company") is filed pursuant to Rule 13p-1 (the "Rule") promulgated under the Securities Exchange Act of 1934, as amended, for the reporting period from January 1, 2016 to December 31, 2016.

A copy of the Company's Conflict Minerals Report is provided as Exhibit 1.01 to this Form SD, and is publicly available under the SEC Filings section under the Investor tab at [www.cyberoptics.com](http://www.cyberoptics.com).

##### Item 1.02 Exhibit

As specified in Item 1.01 of this Form SD, the Company is hereby filing its Conflict Minerals Report as Exhibit 1.01 to this report.

### Section 2 -- Exhibits

#### Item 2.01 Exhibits

The following exhibit is filed as part of this report.

Exhibit No.	Description
1.01	Conflict Minerals Report of CyberOptics Corporation

**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.

CyberOptics Corporation

/s/ Jeffrey Bertelsen  
By Jeffrey Bertelsen, Executive Vice President & CFO/COO

May 16, 2017  
(Date)

**CyberOptics Corporation**

**Conflict Minerals Report**

**For the reporting period from January 1, 2016 to December 31, 2016**

This Conflict Minerals Report (the “**Report**”) of CyberOptics Corporation (the “**Company**”) has been prepared pursuant to Rule 13p-1 and Form SD (the “**Rule**”) promulgated under the Securities and Exchange Act of 1934, as amended, for the reporting period from January 1, 2016 to December 31, 2016.

The rule requires disclosure of certain information when a company manufactures or contracts to manufacture products and the minerals specified in the Rule are necessary to the functionality or production of those products. The specified minerals, which we collectively refer to in this Report as the “**Conflict Minerals**,” are gold, columbite-tantalite (coltan), cassiterite and wolframite, including their derivatives, which are limited to tantalum, tin and tungsten. The “**Covered Countries**” for purposes of the Rule and this Report are the Democratic Republic of the Congo, the Republic of the Congo, the Central African Republic, South Sudan, Uganda, Rwanda, Burundi, Tanzania, Zambia and Angola. As described in this Report, certain of the Company’s operations manufacture, or contract to manufacture, products, and the Conflict Minerals are necessary to the functionality of those products.

If a registrant can establish that the Conflict Minerals originated from sources other than the Covered Countries, or from recycled and scrap sources, or if it has no reason to believe that its Conflict Minerals may have originated in the Covered Countries, or if based on its reasonable country of origin inquiry the registrant reasonably believes that its Conflict Minerals did come from recycled or scrap sources, they must submit a Form SD which describes the Reasonable Country of Origin Inquiry completed. However, if a registrant has reason to believe that any of the Conflict Minerals in their supply chain may have originated in the Covered Countries, or if they are unable to determine the country of origin of those Conflict Minerals, then the issuer must exercise due diligence on the Conflict Minerals source and chain of custody. The registrant must annually submit a report, Conflict Minerals Report (CMR), to the SEC that includes a description of those due diligence measures.

Pursuant to SEC guidance, this Report is not audited and is not required to be audited as none of the Company’s products have been found to be “DRC conflict free”.

## **Description of The Company's Products Covered by this Report**

We develop, manufacture and sell intelligent, non-contact sensors and systems for process control and inspection and general purpose metrology. Our product offerings are sold to OEMs and end-user customers in the SMT circuit board assembly, semiconductor and general purpose metrology markets. Our OEMs incorporate our sensor offerings into capital equipment serving these industries. We also sell sensors and stand-alone inspection systems directly to end-users. We create value-added solutions for the general purpose metrology market by integrating proprietary software and sensors with other hardware purchased from third parties, and sell these products as complete metrology systems. We also provide services for 3D mapping for those customers who cannot justify the capital cost of a scanning project, or need services for special projects.

Our principal products are used by manufacturers to increase operating efficiencies and yields, and to assist them in meeting rigorous demands for product quality. In addition to proprietary hardware designs that combine precision optics, various light sources and multiple detectors, our products incorporate software that controls the hardware and filters and converts raw data into application specific information. Our 3D scanning solutions and services help manufacturers quickly solve their most complex 3D inspection, analysis and product engineering challenges, allowing them to improve product yields and quality.

Seven main product types are covered by this Report.

*a) SMT Electronic Assembly Alignment Sensors*

These are Surface Mount Technology (SMT) electronic assembly alignment sensors that are customized and incorporated into the equipment manufactured by our customers for use in SMT circuit board assembly.

*b) 3D Solder Paste Inspection (SPI) Sensors*

These are custom designed 3D SPI sensors for use in our own family of Solder Paste Inspection systems (SPI systems) and in an OEM customer's SPI platforms.

*c) 3D MRS Sensors*

These are Multi-Reflection Suppression (MRS) sensors for application in the SMT industry, use in an OEM customer's back-end semiconductor package inspection systems, and for a customer's general purpose metrology application related to the inspection of finished goods.

*d) Strobe Inspection Modules (SIM)*

These are 2D sensors based on our strobe inspection module or SIM technology and proprietary Autonomous Image Interpretation (Ai<sup>2</sup>) software for use in automated optical inspection.

*e) SMT Inspection System Products*

These are solder paste inspection (SPI) and automated optical inspection (AOI) system products used in the SMT electronic assembly industry for process control and inspection. These systems are sold directly to end-user manufacturing customers that use them in a production line or along-side a production line to maintain process and quality control.

*f) 3D Scanning Solutions*

These are 3D scanning systems for the global general purpose metrology market, including a new 3D scanning system that incorporates our MRS technology and we believe will serve a wide range of inspection applications in the general purpose 3D metrology market. These solutions also include other types of 3D scanning equipment and computed tomography or X-ray scanning (CT) equipment manufactured by other suppliers.

*g) Semiconductor Products*

These include the WaferSense® and ReticleSense® family of products, which are a series of wireless sensors that provide measurements of critical factors in the semiconductor fabrication process. Other semiconductor products include sensors that inspect the presence and orientation of semiconductor wafers in cassettes and Front Opening Unified Pods (FOUPS) during the fabrication process, and frame grabber and machine vision subsystems.

**Reasonable Country of Origin Inquiry**

The Company has conducted a good faith reasonable country of origin inquiry regarding the Conflict Minerals. This was done using a survey of our suppliers. This good faith inquiry was designed to determine, to the extent reasonably possible, whether any Conflict Minerals in our products originated in the Covered Countries and whether any of the Conflict Minerals may be from recycled or scrap sources. Based on the good faith inquiry, the Company was unable to determine that all of the Conflict Minerals did not originate in the Covered Countries or did not come from recycled or scrap sources.

**Due Diligence**

**1.1 Due Diligence Design**

We exercised due diligence on the source and chain of custody of Conflict Minerals in our products. Our due diligence measures have been designed to conform, in all material respects, with the framework in the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas: Second Edition* and the related Supplements for gold and for tin, tantalum and tungsten.

**1.2 Supply Chain**

We do not purchase Conflict Minerals directly from mines, smelters or refiners and do not have any direct relationship with them. Our supply chain with respect to our products is complex and there are many parties in the supply chain between the manufacture of our products and the original source of Conflict Minerals.

**1.3 Controls Systems**

We have established a Conflict Minerals Steering Committee, which consists of the Chief Financial Officer / Chief Operating Officer, the Vice President of Worldwide Operations, the Corporate Counsel, the Operations Logistics Manager, and the Buyer/Logistics Associate. The team is responsible for implementing our Conflict Minerals compliance strategy. Senior management is briefed about the results of our due diligence efforts on a regular basis.

Other controls include, but are not limited to, our Conflict Minerals Policy which is available at: [http://www.cyberoptics.com/pdf/Support/QF74\\_013.pdf](http://www.cyberoptics.com/pdf/Support/QF74_013.pdf). The Conflict Minerals Policy is part of our supplier terms in our standard terms and conditions of purchase.

## 1.4 Supplier Information

We have identified 85 top tier suppliers of products that likely contain Conflict Minerals.

### Supplier Survey

We conducted a survey of those suppliers described above using the Electronics Industry Citizenship Coalition (EICC) Conflict Minerals Reporting Template (CMRT), as this template has become the standard in the industry and assists suppliers in providing their information to us.

### Survey Responses

We received responses from 82 of the 85 identified top tier suppliers surveyed. We reviewed the responses against criteria developed to determine which required further engagement with our suppliers. These criteria included untimely or incomplete responses as well as inconsistencies within the data reported in the template.

Of the 82 suppliers that did respond to our survey, 42 included a CMRT. Of these 42 supplier provided CMRT's, 29 included a completed smelter list. We used these 29 supplier provided CMRT's to create our own, consolidated CMRT, which is posted on our corporate website at <http://cyberoptics.com/company/> under the tab titled, "Most Current Conflict Minerals Reporting Template" ("CyberOptics Consolidated CMRT").

Of the 29 suppliers that did complete a CMRT that did identify smelters and refiners, 10 were able to specify all the smelters or refiners used in components or products supplied to their customers. Some of these suppliers identified only one smelter or refiner for Tin, Tungsten and/or Gold. As such, we know these identified smelters or refiners, which are listed below, must have processed the Conflict Minerals used in the components or products supplied to us. We checked each of these smelters against the Conflict Free Sourcing Initiative (CFSI) list and all of them have been certified as conflict free.

Mineral	Smelter Name	Location of Smelter	Status According to CFSI
Tungsten	ALMT Tungsten Corp.	JAPAN	Conflict-free
Tin	Yunnan Tin Company, Ltd.	CHINA	Conflict-free
Tin	Minsur	PURU	Conflict-free
Gold	Mitsubishi Materials Corporation	JAPAN	Conflict-free
Gold	Royal Canadian Mint	CANADA	Conflict-free
Gold	Zhongyuan Gold Smelter of Zhongjin Gold Corporation	CHINA	Conflict-free

In all, the CyberOptics Consolidated CMRT included 1,824 smelter name entries. Seven of these smelters indicated that the location of the mines for the ore processed by the smelter *may* be in one or more of the covered counties. However, of these 7 smelters, which are listed below, all were certified as conflict free by the CFSI.

Mineral	Smelter Name	Status According to CFSI
Tantalum	H.C. Starck Inc.	Conflict-free
Tantalum	H.C. Starck GmbH Goslar	Conflict-free
Tantalum	H.C. Starck Smelting GmbH & Co.KG	Conflict-free
Tantalum	F&X Electro-Materials Ltd.	Conflict-free
Tantalum	Jiujiang Tanbre Co., Ltd.	Conflict-free
Tantalum	KEMET Blue Metals	Conflict-free
Tin	Malaysia Smelting Corporation (MSC)	Conflict-free

Lastly, not all of the smelters and refiners included in the CyberOptics Consolidated CMRT are believed by us to have processed the necessary Conflict Minerals contained in the products that we manufacture, since the large majority of our suppliers who reported such information via a completed CMRT reported Conflict Minerals contained in all of their products at a “company level”, not just those in the products they sold to us. Some suppliers may have reported to us smelters and refiners that were not in their supply chain due to over-inclusiveness in the information received from their suppliers. In addition, the smelters and refiners reflected in our CyberOptics Consolidated CMRT may not be all of the smelters and refiners in our supply chain since some suppliers did not identify any smelters or refiners in their CMRT, some responding suppliers did not provide a CMRT, and some suppliers did not respond to our survey.

The majority our suppliers were not able to specify the smelters or refiners used for components or products supplied to us. We are therefore able to determine or to identify some of the smelters or refiners in our supply chain, but not all.

### Countries of Origin

As noted above, many of the declarations from suppliers are company-wide and not product specific. We believe these declarations may include smelters or refiners, and countries of origin for their Conflict Minerals, that do not provide the materials that are used in our products. Due to the many company-wide declarations and the multiple levels of suppliers in our supply chain, except in the limited circumstances noted above, we are unable to determine with certainty at this time which smelters or refiners or which countries of origin (to the extent provided) listed in the declarations actually provide the specific Conflict Minerals used in our products. Based on the information provided by our suppliers, the countries of origin for the Conflict Minerals for the smelters and refiners listed in this report are set forth in the Appendix I to this Report.

### 1.5 Risk Mitigation & Future Due Diligence Measures

In response to this risk assessment, we have approved a risk management plan, through which the Conflict Minerals program is implemented, managed and monitored. Updates to this risk assessment are provided regularly to senior management.

We intend to take the following steps to improve the due diligence conducted to further mitigate any risk that the necessary Conflict Minerals in our products could benefit armed groups in the DRC or adjoining countries:

- Engage with suppliers and direct them to training resources to attempt to increase the response rate and improve the content of the supplier survey responses.
- Engage any of our suppliers whom we have reason to believe are supplying us with Conflict Minerals from sources that may support conflict in the DRC or any adjoining country to establish an alternative source of Conflict Minerals that does not support such conflict, as provided in the OECD guidance.
- Continue to check smelters against known lists for conflict free smelters.



## **Conclusion**

After exercising the due diligence described above, the Company was unable to determine whether or not its products contain conflict minerals: (1) from recycled or scrap sources as defined in the Conflict Minerals Rule, (2) that did not originate in the Covered Countries, or (3) that did not directly or indirectly finance or benefit armed groups, as defined in the Conflict Minerals Rule, in the Covered Countries.

## **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 due diligence process and to mitigate the risk about the sourcing of our conflict minerals. All forward-looking statements involve risk and uncertainty. Risks that may cause these forward-looking statements to be inaccurate include: failure to carry out these plans in a timely manner or at all; lack of cooperation or progress by our suppliers, their respective suppliers and smelters; or lack of progress by smelter or refiner validation programs for conflict minerals (including the possibility of inaccurate information, fraud and other irregularities). In addition, you should also consider the important factors described in reports and documents that we file from time to time with the SEC, including the factors described under the sections titled "Risk Factors" in our most recently submitted Annual and Quarterly Reports on Form 10-K and Form 10-Q, respectively. Except as required by law, we disclaim any obligation to update information contained in these forward-looking statements whether as a result of new information, future events, or otherwise.

## APPENDIX I

ALGERIA	NETHERLANDS
AMERICAN SAMOA	NEW ZEALAND
ARGENTINA	NIGERIA
AUSTRALIA	NORWAY
AUSTRIA	PERU
BELGIUM	PHILIPPINES
BOLIVIA	POLAND
BRAZIL	RUSSIAN FEDERATION
CANADA	RWANDA
CHILE	SAUDI ARABIA
CHINA	SINGAPORE
CZECH REPUBLIC	SLOVAKIA
ESTONIA	SOUTH AFRICA
ETHIOPIA	SPAIN
FRANCE	SUDAN
GERMANY	SWEDEN
GHANA	SWITZERLAND
HONG KONG	TAIWAN
INDIA	THAILAND
INDONESIA	TURKEY
ITALY	UNITED ARAB EMIRATES
JAPAN	UNITED KINGDOM
KAZAKHSTAN	URUGUAY
KOREA, REPUBLIC OF	USA
KYRGYZSTAN	UZBEKISTAN
LUXEMBOURG	VIETNAM
MALAYSIA	ZIMBABWE
MEXICO	