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

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**FORM SD**

**SPECIALIZED DISCLOSURE REPORT**

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**PQ Group Holdings Inc.**

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

**001-38221**  
(Commission  
File Number)

**81-3406833**  
(I.R.S. Employer  
Identification No.)

**300 Lindenwood Drive**  
**Malvern, Pennsylvania**  
(Address of principal executive offices)

**19355**  
(Zip code)

**Joseph S. Koscinski**  
**Vice President, Secretary and General Counsel**  
**(610) 651-4209**  
(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, 2019.

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

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

#### **Conflict Minerals Disclosure**

This Form SD of PQ Group Holdings Inc. (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 January 1, 2019 to December 31, 2019 (the “Reporting Period”). The Rule implements reporting and disclosure requirements related to “conflict minerals” as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (“Dodd-Frank Act”). Conflict minerals are defined by the SEC as columbite-tantalite (coltan), cassiterite, gold, wolframite, or their derivatives, which are currently limited to tantalum, tin, and tungsten (the “Conflict Minerals”). The Rule imposes certain reporting obligations on SEC registrants that manufacture or contract to manufacture products for which Conflict Minerals are necessary to the functionality or production of those products and contained in the finished products. The Rule requires that SEC registrants conduct in good faith a reasonable country of origin inquiry designed to determine whether any such necessary Conflict Minerals originated in the Democratic Republic of the Congo or “adjoining countries” (as defined by the SEC) (collectively, the “Covered Countries”) or are from recycled or scrap sources.

The Company reviewed the finished products that it and its subsidiaries manufactures either internally or pursuant to arrangements with third-party manufacturers during the Reporting Period (the “Product Review”). The objective of the Product Review was to identify finished products that the Company and its subsidiaries manufactures or contracts to manufacture that may contain one or more Conflict Minerals. In this effort, the Manager of Product Stewardship of the Company routinely evaluated and verified the source and use of raw materials purchased and used by the Company and its subsidiaries globally to determine whether any Conflict Minerals used in the Company’s and its subsidiaries’ products are sourced from Covered Countries or are from recycled or scrap sources. The Company has determined that Conflict Minerals are contained in, and are necessary to the functionality or production of, certain finished products containing silicotungstic acid, a tungsten compound. The Company’s Zeolyst joint venture purchased a limited amount of such tungsten compound (in the aggregate an amount less than 0.01% of the Zeolyst joint venture’s overall raw material spend), which is used as a raw material to manufacture, and is contained in, a certain catalyst product (the “Covered Product”).

As a result of such determination, and in accordance with the Dodd-Frank Act and the Rule, the Company conducted in good faith a reasonable country of origin inquiry as to the tungsten compound contained in the Covered Product by seeking a certification from the joint venture’s direct, exclusive supplier of the tungsten compound (the “Covered Supplier”). The Covered Supplier has provided the Company with a signed certification of the name and location of each smelter from which the Covered Supplier sources the tungsten used in producing the tungsten compound contained in the Covered Product (the “Supplier Certification”). According to the Supplier Certification, none of the tungsten contained in the Covered Product was sourced from smelters in any Covered Country.

Based on the results of its reasonable country of origin inquiry, and its review of the information and the Supplier Certification, the Company has no reason to believe that the tungsten contained in the Covered Product may have originated in any of the Covered Countries or may not be from recycled or scrap sources.

This conflict minerals disclosure is publicly available on the Company’s website at <http://investor.pqcorp.com/corporate-governance/2019-conflict-minerals-form-sd>.

#### **Item 1.02 Exhibit**

Not Applicable.

## **Section 2 – Exhibits**

### **Item 2.01 Exhibits**

Not applicable.

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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.

PQ GROUP HOLDINGS INC.

By: /s/ JOSEPH S. KOSCINSKI

Name: Joseph S. Koscinski

Title: Vice President, Secretary and  
General Counsel

Date: June 1, 2020