

Edgar Filing: Science Applications International Corp - Form SD

Science Applications International Corp  
Form SD  
May 27, 2016

UNITED STATES

SECURITIES AND EXCHANGE COMMISSION

Washington, D.C. 20549

FORM SD

Specialized Disclosure Report

Science Applications International Corporation

(Exact Name of Registrant as Specified in Its Charter)

Delaware (State or other jurisdiction of incorporation or organization) 1710 SAIC Drive McLean, Virginia (Address of principal executive offices)	001- 35832 Commission File Number	46-1932921 (I.R.S. Employer Identification No.)  22102 (Zip Code)
--	---	--

Steven G. Mahon

Executive Vice President, General Counsel and Corporate Secretary, (703) 676-2064

(Name and telephone, 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:

SRule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) under the Exchange Act for the reporting period from January 1 to December 31, 2015.



Section 1 – Conflict Minerals Disclosure

Item 1.01 Conflict Minerals Disclosure and Report

Conflict Minerals Disclosure

This Form SD of Science Applications International Corporation (“we” or “us”) is filed pursuant to Rule 13p-1 under the Securities Exchange Act of 1934, as amended, for the reporting period from January 1 through December 31, 2015.

Rule 13p-1 requires us to disclose annually whether any conflict minerals that are necessary to the functionality or production of products that we manufactured or contracted for manufacture during the reporting period originated in the Democratic Republic of the Congo or any adjoining country (each a “Covered Country” and collectively, the “Covered Countries”), or were from recycled or scrap sources. “Conflict minerals” are gold, cassiterite, columbite-tantalite, wolframite or their derivatives, which are limited to tin, tantalum and tungsten.

Accordingly, we conducted in good faith a reasonable country of origin inquiry, which was reasonably designed to determine whether any of the necessary conflict minerals in our products originated in a Covered Country or came from recycled or scrap sources.

We are a leading provider of technical, engineering and enterprise information technology services primarily to the U.S. government, including the Department of Defense, the intelligence community and federal civilian agencies. We provide engineering, systems integration and information technology offerings for large, complex government projects and offer a broad range of services with a targeted emphasis on higher-end, differentiated technology services. We are primarily a services provider. As such, we generally do not manufacture or contract for manufacture products, except only in isolated occurrences typically relating to special purpose products for U.S. or foreign government customers manufactured in very small quantities. Those isolated occurrences of manufacturing products represented approximately one-tenth of one percent (0.1%) of our total revenue in calendar year 2015. Accordingly, only a small portion of our business constitutes manufacturing or contracting to manufacture products.

We used contract data and evaluated our revenue recognition methodology to determine contracts and programs in which we manufactured products that may have contained conflict minerals. From this process, we derived a list of fifteen (15) vendors and suppliers associated with each such program and contract. We sent each of those identified suppliers a survey based on the standard template designed by the Electronics Industry Citizenship Coalition/Global e-Sustainability Initiative, Conflict-Free Sourcing Initiative, known as the Conflict Minerals Reporting Template (“CMRT”). All 15 vendors and suppliers responded, by either a letter or completed CMRT, and we reviewed the responses for completeness and against our conflict minerals policy. When we determined that our suppliers’ CMRT responses contained information we believed to be incomplete or potentially inconsistent with our conflict minerals

## Edgar Filing: Science Applications International Corp - Form SD

policy, we followed up with those suppliers by e-mail and by phone to seek additional information or clarification about those responses. As a result of those responses and our follow-up activities, we have no reason to believe that the necessary conflict minerals contained in products that we manufactured during the reporting period may have originated in the Covered Countries.

The information contained in this Form SD is publicly available at <http://investors.saic.com/sec-filings>. The content of any website referred to in this Form SD is not incorporated by reference in this Form SD.

---

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.

Science Applications International Corporation

By: /s/ Steven G. Mahon  
Steven G. Mahon  
Executive Vice President, General Counsel  
and Corporate Secretary

Date: May 27, 2016