

J C PENNEY CO INC  
Form SD  
May 31, 2018

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

FORM SD

SPECIALIZED DISCLOSURE REPORT

J. C. PENNEY COMPANY, INC.  
(Exact name of registrant as specified in its charter)

Delaware                                      1-15274                      26-0037077  
(State or other jurisdiction                      (Commission (IRS Employer  
of incorporation or organization) File Number) Identification No.)

6501 Legacy Drive  
Plano, Texas                                      75024-3698  
(Address of principal executive offices) (Zip code)

Brandy L. Treadway  
Senior Vice President,  
General Counsel  
(972) 431-1000  
(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, 2017.

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Section 1 - Conflict Minerals Disclosure

Item 1.01 Conflict Minerals Disclosure and Report

Conflict Minerals Disclosure

The Conflict Minerals Report filed for the calendar year ended December 31, 2017 is available at <https://www.jcpenney.com/m/company-info?&pageId=pg40036000011>.

Conflict Minerals Report

A Conflict Minerals Report for the calendar year ended December 31, 2017 is filed herewith as Exhibit 1.01.

Item 1.02 Exhibit

The Conflicts Minerals Report required by Item 1.01 is filed as Exhibit 1.01 to this Form SD.

Section 2 - Exhibits

Item 2.01 Exhibits

Exhibit Number Description

1.01	<u>Conflict Minerals Report for the calendar year ended December 31, 2017</u>
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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.

J. C. Penney Company, Inc.

By: /s/ Brandy L. Treadway  
Brandy L. Treadway  
Senior Vice President,  
General Counsel

May 31, 2018  
(Date)