

CACI INTERNATIONAL INC /DE/
Form SD
May 29, 2014

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

FORM SD

SPECIALIZED DISCLOSURE REPORT

CACI International Inc

(Exact name of Registrant as specified in its charter)

Delaware
(State or other jurisdiction of
incorporation or organization)

001-31400
Commission

54-1345888
(I.R.S. Employer

File No.
1100 North Glebe Road,

Identification Number)

Arlington, VA 22201

(Address of Principal Executive Offices and Zip Code)

J. William Koegel, Jr.

CACI International Inc

1100 North Glebe Road

Arlington, Virginia 22201

(703) 841-7800

(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:

- x 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

CACI International Inc (CACI or the Company) provides information solutions and services to its clients. The Company serves clients in the U.S. federal government and commercial markets. Revenue from product sales represents a very small percentage of the Company's overall business.

Conflict Minerals Disclosure

This Form SD of CACI is filed pursuant to Rule 13p-1 promulgated under the Securities Exchange Act of 1934, as amended, for the reporting period January 1, 2013 to December 31, 2013. A copy of the Company's Conflict Minerals Report is provided as Exhibit 1.02 to this Form SD, and is publicly available at <http://www.caci.com/conflictmineralsreport2014>.

Product Review

Beginning in 2012, the Company conducted a review of the products that it manufactures and found that those products contained one or more of the minerals gold, columbite-tantalite (coltan), cassiterite, or wolframite, or their derivatives tantalum, tin, and tungsten (collectively, the Conflict Minerals). The Company believes that the Conflict Minerals included in its products are in most cases necessary to their functionality.

The product review included engagement with CACI Program Managers to identify both products that may contain Conflict Minerals and the suppliers that needed to be contacted as part of the Company's reasonable country of origin inquiry (supplier identification). Ultimately, at the conclusion of the supplier identification process, the Company identified 144 suppliers that needed to be contacted.

Reasonable Country of Origin Inquiry

Based on the results of the product review, CACI conducted a reasonable country of origin inquiry to determine whether any products that it manufactured during 2013 contained Conflict Minerals that either originated in the Democratic Republic of the Congo or in a country that shares an internationally recognized border with the Democratic Republic of the Congo (the Covered Countries). The Company also sought to evaluate whether Conflict Minerals contained in products that it manufactured in 2013 were from recycled or scrap sources.

To conduct the reasonable country of origin inquiry, the Company surveyed 144 suppliers. The Company used the conflict minerals reporting template developed by the Electronic Industry Citizenship Coalition (EICC) and the Global e-Sustainability Initiative (GeSI) Extractives Working Group (the EICC/GeSI Reporting Template).

The response rate to CACI's inquiry was low, with only 65% of the Company's suppliers replying in any form, despite the Company's repeated efforts to follow up with them. The Company believes that, during the reporting period, many suppliers were still working to assess how best to respond to inquiries submitted by companies that are required to file disclosures pursuant to Rule 13p-1. Notably, the responses that the Company received to its inquiry indicated that many suppliers were also working to establish their own due diligence processes with regard to the sourcing of Conflict Minerals. The Company has continued to engage with its suppliers and expects that response rates will increase in future years.

The Company has initiated a process to review the reasonableness and reliability of its suppliers' responses. This review has included a review of the completeness and internal consistency of responses, as well as a review of the extent to which suppliers' responses are reasonable based on the nature of the products they provide to the Company.

Conclusions from Reasonable Country of Origin Inquiry

The Company has concluded that the responses obtained in its reasonable country of origin inquiry were insufficient to form the basis for a reasonable belief that none of the Conflict Minerals necessary to the functionality or production of the Company's products originated in a Covered Country.

Item 1.02

A copy of the Company's Conflict Minerals Report is provided as Exhibit 1.02 to this Form SD. A copy of the Company's Conflict Minerals Report may be found at <http://www.caci.com/conflictmineralsreport2014>.

Section 2 Exhibits

Item 2.01 Exhibits

Exhibit No.	Description
1.02	Conflict Minerals Report of CACI International Inc

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 undersigned on May 29, 2014.

CACI INTERNATIONAL INC
(Registrant)

By: /s/ J. William Koegel, Jr.
J. William Koegel, Jr.

Executive Vice President, General
Counsel & Secretary