

DECKERS OUTDOOR CORP
Form SD
May 30, 2018

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
Washington, D.C. 20549
FORM SD
Specialized Disclosure Report
DECKERS OUTDOOR CORPORATION
(Exact name of registrant as specified in its charter)

Delaware 001-36436 95-3015862
(State or other jurisdiction of incorporation) (Commission File Number) (IRS Employer Identification No.)

250 Coromar Drive, Goleta, California 93117
(Address of principal executive offices) (Zip Code)

Thomas Garcia (805) 967-7611
(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 (17CFR240.13p-1) for the reporting period from January 1 to
☒ December 31, 2017

Section 1 - Conflict Minerals Disclosure

Item 1.01 - Conflict Minerals Disclosure and Report

Conflict Minerals Disclosure

Introduction

This Form SD - Specialized Disclosure Report ("Form SD") has been prepared by Deckers Outdoor Corporation (herein referred to as "Deckers," the "Company" "we," "us," or "our") pursuant to Rule 13p-1 (the "Rule") promulgated under the Securities Exchange Act of 1934, as amended. Deckers is a global leader in designing, marketing and distributing innovative footwear, apparel and accessories. The Company's portfolio of brands includes UGG®, Koolaburra®, Teva®, Sanuk®, and HOKA ONE ONE®. We conducted a reasonable country of origin analysis of our products and found that columbite-tantalite (coltan), cassiterite, gold, wolframite, or their derivatives, which are limited to tin, tantalum, tungsten and gold ("3TG") are found in very few of our product lines. In fact, of the sixteen total hardware suppliers we surveyed, only four confirmed use of 3TG. Our investigation confirmed that the minerals used by three of these suppliers were sourced outside of the Democratic Republic of the Congo or an adjoining country (the "Covered Countries"). The remaining supplier was able to identify 90-94% of its suppliers and has certified that it has no reason to believe that any of the materials used in Deckers products comes from the Covered Countries.

Reasonable Country of Origin Inquiry and Due Diligence

The products that we manufacture are not highly complex, typically containing just a few components that are sourced from a few dozen suppliers. While we do not directly purchase 3TG from any of our suppliers, sometimes there are several tiers between the raw materials and the products made by our direct suppliers. For the few suppliers that do use 3TG in their products, we must rely on such suppliers to work with their upstream suppliers in order for them to provide us with accurate information about the smelters used and the origin of 3TG in the components we purchase. We have generally found our suppliers to be supportive of our investigative efforts, and can confirm that several of our suppliers participate in recognized Conflict-Free Smelter programs and/or follow best practices of the Conflict Free Sourcing Initiative ("CFSI"). As we enter into new contracts or renew existing contracts, we now require all suppliers to identify and confirm the source of 3TG used in products supplied to Deckers. Further, we have added 3TG to our Restricted Substances Policy, and require all suppliers to (a) notify the Company prior to shipment if 3TG is utilized in any materials or supplies provided to Deckers; and (b) provide verifiable origin documentation.

In order to determine the origin of any 3TG in our product lines, we focused efforts on all suppliers of metal components, materials or finishes. We developed a questionnaire based on the reporting template developed by the Electronic Industry Citizenship Coalition® ("EICC®") and the Global e-Sustainability Initiative ("GeSI"), known as the EICC-GeSI Conflict Minerals Reporting Template (the "Questionnaire"). The Questionnaire requires suppliers to certify if 3TG is utilized in any materials or components conveyed to Deckers' brands and, if so, requires them to determine and disclose the origin of the 3TG. In March 2018, the Questionnaire was conveyed to all of our suppliers of metal components, materials or finishes. We carefully reviewed each Questionnaire once it was received along with any additional documentation provided to us. We followed up with suppliers to obtain additional sourcing documentation, as needed. Of the sixteen total suppliers we surveyed, only four confirmed use of 3TG. Three of these suppliers were able to confirm that all 3TG material originated outside of the Covered Countries. The remaining supplier was able to identify 90-94% of its suppliers and has certified

that it has no reason to believe that any of the materials used in Deckers products comes from the Covered Countries. We determined that we have no reason to believe that our suppliers' responses to the Questionnaire were false or inaccurate, and based on such responses, we have determined in good faith that we have no reason to believe that the conflict minerals used in our products may have originated from the Covered Countries for the reporting period from January 1 to December 31, 2017.

Pursuant to Item 1.01(b) of Form SD, based on the results of our reasonable country of origin inquiry and due diligence, we are providing information pursuant to this Form SD and are not required to file a separate Conflict Minerals Report.

The Company has posted this Form SD to its website at www.deckers.com (Investor Information - Corporate Governance). The information contained on or accessed through the website shall not be deemed to be a part of this Form SD.

Item 1.02 - Exhibit

Not Applicable.

Section 2 - Exhibits

Item 2.01 - Exhibits

Not Applicable.

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.

DECKERS OUTDOOR CORPORATION

By: /s/ Thomas Garcia
General Counsel

May 30, 2018