

IROBOT CORP
Form SD
May 29, 2015

SECURITIES AND EXCHANGE COMMISSION

Washington, D.C. 20549

FORM SD

Specialized Disclosure Report

iROBOT CORPORATION

(Exact Name of Registrant as Specified in its Charter)

Delaware
(State or other jurisdiction of
incorporation or organization)

001-36414

(Commission File Number)

77-0259 335
(I.R.S. Employer
Identification No.)

8 Crosby Drive, Bedford, MA
(Address of principal executive
offices)

01730
(Zip Code)

Glen D. Weinstein
Chief Legal Officer and Secretary
(781) 430-3000
(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, 2014.

Item 1.01 Conflict Minerals Disclosure and Report

iRobot Corporation (the "Company") has determined that conflict minerals (as defined in Item 1.01(d)(3) of Form SD) were necessary to the functionality or the production of products that were contracted to be manufactured for the Company during the 2014 calendar year. Accordingly, the Company conducted in good faith a reasonable country of origin inquiry that was designed to determine whether any of those conflict minerals originated in the Democratic Republic of the Congo (the "DRC") or any adjoining country (as defined in Item 1.01(d)(1) of Form SD), or were from recycled or scrap sources (as defined in Item 1.01(d)(6) of Form SD).

Conflict Minerals Disclosure

Based on the Company's reasonable country of origin inquiry ("RCOI"), the Company has reason to believe that certain of its necessary conflict minerals originated in the DRC or an adjoining country. In each of these cases, information obtained for the Company from its suppliers indicates that such necessary conflict minerals were derived through smelters that are compliant with the Conflict-Free Smelter Program ("CFSP"), which has been established by the Conflict-Free Sourcing Initiative created in 2008 by members of the Electronic Industry Citizenship Coalition ("EICC") and the Global e-Sustainability Initiative ("GeSI"). Since the Company has reason to believe that certain of its necessary conflict minerals may have originated in the DRC or an adjoining country, it is filing the attached Conflict Minerals Report, which describes the Company's RCOI and due diligence efforts that have been undertaken in connection with attempting to determine the source of the conflict minerals in its products.

The Company's RCOI efforts included utilizing the Conflict Minerals Reporting Template ("Template") created by EICC and GeSI on sourcing information, which was distributed to all of the Company's contract manufacturers and key suppliers to those manufacturers, to gather data dealing with whether conflict minerals were contained in materials supplied to the Company, or to the Company's contract manufacturers, the source of those minerals, and whether the minerals were or were not DRC conflict free.

Responses to the Template were received from all seven companies that manufacture products for the Company, as well as from the four key suppliers to those manufacturers to whom Templates were sent. Interviews were performed to gain further clarification and understanding of the responses as well as the due diligence procedures in place at the manufacturers and key suppliers. The Templates combined with the interviews revealed that conflict minerals are utilized in products that are contracted to be manufactured for the Company. As of the date of this report, any respondent that was aware of conflict minerals in its products that came from the DRC or an adjoining country had also confirmed that such conflict minerals were sourced through smelters that were compliant with the Conflict-Free Smelter Program.

The Company's Conflict Minerals Report has been posted on the Company's Internet website.

Item 1.02 Exhibit

A Conflict Minerals Report covering calendar year 2014, has been filed as Exhibit 1.01 to this Form SD.

Item 2.01 Exhibits

Exhibit 1.01 - Conflict Minerals Report as required by Items 1.01 and 1.02 of this Form.

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 undersigned hereunto duly authorized.

iRobot Corporation

May 29, 2015

By: /s/ Glen D. Weinstein
Name: Glen D. Weinstein
Title: Chief Legal Officer and Secretary