

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 Conflict Minerals Report for the calendar year ended December 31, 2017

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)