

QUALYS, INC.  
Form SD  
May 31, 2016

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

**FORM SD**

**SPECIALIZED DISCLOSURE REPORT**

**QUALYS, INC.**

**(Exact name of registrant as specified in its charter)**

**Delaware**  
**(State or other jurisdiction of**

**001-35662**  
**(Commission**

**77-0534145**  
**(IRS Employer**

**incorporation)**

**File Number)**

**Identification No.)**

**1600 Bridge Parkway, Redwood City, California 94065**

**(Address of principal executive offices) (Zip Code)**

**Bruce K. Posey, Vice President, General Counsel and Corporate Secretary**

**(650) 801-6100**

**(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, 2015.

## **Section 1 Conflict Minerals Disclosure**

### **Item 1.01 Conflict Minerals Disclosure and Report**

With respect to the reporting period from January 1, 2015 to December 31, 2015, Qualys, Inc. ( Qualys or the Company ) conducted a reasonable country of origin inquiry and additional due diligence designed to conform with the Organisation for Economic Co-operation and Development ( OECD ) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, including the related supplements on gold, tin, tantalum and tungsten (the Framework ), in order to determine whether the products that we manufacture which contain any gold, columbite-tantalite (coltan), cassiterite and wolframite, including their derivatives ( Conflict Minerals ) originate from the Democratic Republic of Congo, the Republic of Congo, the Central African Republic, South Sudan, Uganda, Rwanda, Burundi, Tanzania, Zambia and Angola (collectively, the Covered Countries ). Based on these due diligence efforts, we have reason to believe that certain Conflict Minerals contained in our products may have originated in the Covered Countries and may not be Conflict Minerals from recycled or scrap sources. However, we do not have sufficient information to conclusively determine the countries of origin of the Conflict Minerals contained in our products or whether the Conflict Minerals in our products are from scrap or recycled sources. We therefore conducted due diligence on the source and chain of custody of these Conflict Minerals and have prepared the Conflict Minerals Report attached hereto as Exhibit 1.01.

### **Conflict Minerals Disclosure**

This Form SD of Qualys is filed pursuant to Rule 13p-1 promulgated under the Securities Exchange Act of 1934, as amended, for the reporting period January 1, 2015 to December 31, 2015.

A copy of Qualys 's Conflict Minerals Report is provided as Exhibit 1.01 to this Form SD, and is publicly available at <http://investor.qualys.com/sec.cfm>.

### **Item 1.02 Exhibit**

As specified in Section 2, Item 2.01 of this Form SD, Qualys is hereby filing its Conflict Minerals Report as Exhibit 1.01 to this report.

## **Section 2 Exhibits**

The following exhibit is filed as part of this report.

### **Item 2.01 Exhibits.**

Exhibit 1.01 2015 Conflict Minerals Report of Qualys, Inc. as required by Items 1.01 and 1.02 of this Form SD.

**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.

**Qualys, Inc.**

By: /s/ Bruce K. Posey  
Name: Bruce K. Posey  
Title: Vice President, General Counsel and  
Corporate Secretary

Date: May 27, 2016

**EXHIBIT INDEX**

**Exhibit**

| <b>No.</b> | <b>Description</b>                            |
|------------|---|
| 1.01       | 2015 Conflict Minerals Report of Qualys, Inc. |