

OnTraQ

QUANTUM CORPORATION CODE OF CONDUCT

March 2020

Welcome to OnTraQ, the next generation of Quantum’s Code of Conduct. OnTraQ provides a guide regarding how Quantum does business, including how we interact inside and outside the company, how we sell, and how we support Quantum’s growth. Quantum’s future presents a host of opportunities for us, and naturally, challenges will come with them.

Anyone conducting business on behalf of Quantum or any of its subsidiaries, including all employees, officers, directors, contractors, consultants, and agents (collectively the “Quantum Team”), must comply with the expectations OnTraQ describes. Failure to comply with these expectations, or other violations of legal or internal policy requirements, may result in disciplinary action, up to and including termination of the employment or business relationship.

Any member of the Quantum Team who has questions or concerns about what to do is expected to contact Quantum’s ethics and compliance resources or the external EthicsPoint reporting hotline for assistance.

Please review each section that follows, and the related tools and resources, carefully. The tools and resources identified are intended to provide more information and direction about the topics included here. It’s important to be familiar with these additional references so we can all, individually and collectively, stay OnTraQ.



Jamie Lerner
Chairman of the Board and CEO



Marc Rothman
Audit Committee Chair

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GUIDING PRINCIPLES

The Policy

We will not tolerate retaliation or malicious reporting.

We apply our expectations with transparency.

We conduct appropriate due diligence before acting.

The Details

We expect the immediate reporting of violations of any OnTraQ provision or any applicable law, rule, or regulation. In support of that, we will not tolerate acts of retaliation or retribution against anyone who makes an honest report. Confirmed retaliatory acts will result in disciplinary action, up to and including termination of employment or the business relationship. Anyone who intentionally provides misleading or false information regarding violations or during any investigation process will likewise be subject to disciplinary action.

Only the Board of Directors or its committees may grant amendments or waivers regarding the application of OnTraQ to a Quantum director or executive officer. If approved, those changes must be promptly disclosed to Quantum shareholders in accordance with applicable reporting requirements.

Many of the compliance rules that apply to Quantum carry due diligence expectations with them, meaning that we are expected to conduct a reasonable exploration of how we, and our partners, conduct business in certain countries and certain transactions. All members of the Quantum Team are expected to cooperate with due diligence processes.

Tools and Resources

[Policy on Reporting Concerns](#)
[Reporting and Investigation Process](#)

[8-K Filings](#)

[Supplier Code of Conduct Requirements](#)
[Supplier Compliance Requirements Certification](#)
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HOW WE TREAT EACH OTHER

The Policy

We treat each other with respect.

We encourage a diverse and supportive work environment.

We are committed to upholding human rights for everyone.

We make privacy a priority.

The Details

Every member of the Quantum Team has a job to do and contributes to Quantum's success. Minimalizing another person's contribution or pressuring people to ignore rules, policies, or processes they are responsible for upholding does not help Quantum's business performance. In addition, acting in a way that can be perceived as harassing, bullying, or disrespecting another person is never appropriate.

We do not tolerate unlawful discrimination or harassment, and no person shall be discriminated against in any condition of employment because of any characteristic legally protected under applicable law. This applies to team members, applicants, contractors, business partners, and anyone else with whom we have working relationships.

That commitment includes team members of Quantum and its business partners. We only support employment and contracting arrangements that adhere to applicable child and voluntary labor laws and minimum wage standards.

Working at Quantum may involve handling other people's personal information, including that of other team members, partners, and customers. Strong and specific privacy requirements may apply to that personal information, even if it doesn't seem confidential. All members of the Quantum Team are expected to comply with applicable data privacy, security, handling, and sharing requirements at all times.

Tools and Resources

[Policy Against Harassment](#)

[EEO Policy](#)

[Policy Against Harassment](#)

[Supplier Code of Conduct Requirements](#)

[Supplier Compliance Requirements Certification](#)

[Privacy Management Program](#)

[Privacy by Design Policy](#)

[Written Information Security Program](#)

[Computing Security and Acceptable Use Policy](#)

[HIPAA Policies](#) (Benergy login required)

HOW WE SELL



The Policy

We champion efforts to prevent bribery and corruption.

We are mindful about marketing promotions.

We strictly adhere to applicable antitrust and competition laws.

The Details

Most countries we work in forbid making payments or giving gifts in an effort to influence a business decision. In addition, the US Foreign Corrupt Practices Act and UK Bribery Act prohibit Quantum from engaging in those activities anywhere in the world.

Despite these laws, some countries continue to tolerate the presence of bribery in business transactions. This can make it very hard to do business ethically, but we must remain fully committed to compliance with anticorruption requirements.

Members of the Quantum Team must refrain from offering, giving, or accepting payments, gifts, services, or other items of value to or from anyone if such an offer would be, or would appear to be, intended to influence or reward any decision or action to assist Quantum in obtaining, retaining, or receiving a business opportunity. Furthermore, everyone is required to cooperate with Quantum's anticorruption due diligence efforts and to maintain complete and accurate records regarding Quantum business transactions.

Marketing and incentive promotions can create concerns if they are not managed appropriately, as they may be confused as gifts or bribes. Because of this, marketing promotions should be carefully designed with transparency and fairness in mind. Incentive programs with clear eligibility rules that are equally available to anyone who objectively meets them will help ensure that such programs are not perceived as inappropriate. Any new customer hospitality or incentive programs should be introduced only after answering the following questions:

1. What are the eligibility rules? Are government customers excluded?
2. What actions must be taken to qualify for the incentive?
3. What actions must be taken once the incentive is received?
4. Would the same actions be taken if no incentive was provided?
5. Would the customer consider the incentive to be a payment or reward for the actions taken?

While these laws are complex and difficult to summarize, they generally focus on behavior or agreements that affect prices, terms or conditions of sale, or fair competition. Antitrust laws are enforced vigorously, and violations may result in substantial penalties. Some basic antitrust guidelines are that we must avoid:

1. Sharing information with competitors about pricing, costs, sales territories, customer allocations, strategies, product roadmap, or other important market factors;
2. Creating differences in pricing or other important business terms among customers, or refusing to do business with a third party, without firm business justification for doing so; or

Tools and Resources

[How We Work with Third Parties](#)

[OnQ – Global Marketing Page](#)

[OnQ - Legal Page](#)

[Antitrust Law FAQ](#)



3. Tying a customer or supplier transaction to another, separate transaction for a different product.

We must also be mindful of how market intelligence is collected. It is fine to pick up handouts at a trade show, attend seminars, or rely on other publicly available information. As a general rule, you should avoid using competitive information that was not provided by a public source.

We respect government requirements.

When we work with any government body (including national, state, or local divisions), there are a number of special contractual requirements and policies that may apply. You should identify and review these requirements with the legal department to ensure that Quantum is able to adhere to them. Similarly, when we are involved in bid and proposal preparations or negotiations with government bodies, we should be certain that all statements, communications, certifications, and representations we make are truthful in every respect.

[Contracts Policy](#)

We do not rely on aggressive sales practices to generate revenue.

Deal arrangements that significantly differ from our standard terms can create revenue recognition, cash collection, and regulatory compliance challenges. Specifically, the following practices are strictly prohibited:

[Contracts Policy](#)

[Revenue Recognition Policy](#)

1. Channel stuffing, or leveraging distribution partners to stock more inventory than they actually want or need;
2. Entering into deal-specific sales to distribution partners before the expected end user purchase order is created;
3. Offering purchase price discounts or payment term extensions that are outside company policy; or
4. Engaging in a side deal, which is an arrangement of or agreement to terms and conditions that have not been approved by the legal and accounting departments.

Anyone who discusses, enters into, or has knowledge of but fails to report those prohibited arrangements may be subject to disciplinary action, up to and including termination.

Distributor relationships offer increased risk for failing to meet our sales practices expectations. In particular, the following situations may create opportunity to violate company policy:

1. Requests to store an order for a customer;
2. Acceptance of distributor stock rotations or returns outside of the parameters allowed for in the applicable agreement; or
3. Inclusion of enterprise products in inventory stocking orders.

Because of that, these activities must be reviewed and approved by the accounting department in advance. Failure to obtain such approval may result in disciplinary action, up to and including termination.



HOW WE HANDLE INFORMATION

The Policy

We respect the importance of information.

We do not inappropriately disclose Quantum confidential, proprietary, or trade secret information.

We rigorously protect sensitive information.

The Details

Quantum's business activities and business relationships revolve around sensitive, valuable information. Maintaining the privacy and confidentiality of this information is essential to us and our business partners and is a responsibility that we all share.

Such information should not be disclosed to anyone outside of Quantum unless a written confidentiality or nondisclosure agreement is in place. Appropriate nondisclosure agreements are relevant to the purpose of exchanging the information and applicable to the timeframe when the information will be used.

Examples of Quantum confidential information include:

1. Strategic or objective information or product specification, development, or manufacturing information beyond what is available on quantum.com or in published white papers or marketing materials;
2. Internal information about product quality challenges and solutions;
3. Internal product cost or pricing information, nonpublic historical financial information, sales forecasting, or financial planning or budgeting information;
4. Product marketing plans or competitive market analysis information; and
5. Content or status of Quantum's proposals to potential customers and partners, or responses to a customer bidding process.

In addition, we should all remember that our confidentiality obligations continue even if our employment relationship with Quantum ends. We must avoid using our familiarity with Quantum inappropriately in subsequent business endeavors, including by attempting to gain a competitive advantage for another company by leveraging information that belongs to Quantum.

Many of us work with information that, by its nature, is held in strict confidence even within Quantum. Examples include:

1. Team member benefits enrollment or utilization information;
2. Private individual information such as organizational planning or compensation information; or
3. Closely held information about strategic initiatives that would have significant personnel, community, or competitive implications.

Any member of the Quantum Team who works with or has access to sensitive internal information must take appropriate steps to protect it and should not discuss it with anyone who does not have a business-related need to know.

Tools and Resources

[Proprietary Information and Invention Agreement](#)

[Contracts Policy](#)

[NDA Request Application](#)

[Proprietary Information and Invention Agreement](#)

[HIPAA Policies](#) (Benergy login required)

[Privacy Management Program](#)

[Proprietary Information and Invention Agreement](#)



We respect the confidential, proprietary, and trade secret information of others.

No one on the Quantum Team may use or disclose any information belonging to a third party unless authorized by that third party or required by law to do so. In addition, we might have friends or family members who work for Quantum competitors or other industry participants; despite those personal relationships, it is never appropriate to ask personal connections to share confidential information with us. If confidential information is shared, we must not act on it outside of authorized parameters.

[NDA Request Application](#)
[Proprietary Information and Invention Agreement](#)

Protecting customer and supplier confidential information is of particular importance at Quantum because our customers and suppliers might also be our competitors. Customer and supplier confidential information may only be used to conduct the normal business activities of the Quantum groups receiving this information and may not be used in any other manner, including to place Quantum in an improved competitive position.

Beyond that, there may be special data security requirements that apply when we service the products we provide to customers. Anyone involved in the installation, service, or ongoing management of customer products must understand these obligations and strictly conform to them.

We carefully handle unsolicited confidential information.

If you receive unsolicited confidential information, you should contact Quantum's legal department to discuss any appropriate actions to be taken, including deleting or destroying it. In doing so, we protect Quantum's information value by avoiding any allegations that we accepted and profited from someone else's information or ideas without paying for them.

[Proprietary Information and Invention Agreement](#)
[OnQ - Legal Page](#)

Special care must be taken when a new team member comes to Quantum from a competitor or a related industry. We may not use confidential or proprietary information obtained through the team member's former position without prior authorization.

We lawfully trade securities.

We observe trading windows and policies established by Quantum's stock administration department and Insider Trading Policy. Quantum policy prohibits us (and others with whom we have close relationships) from conducting transactions in any securities when we may have material nonpublic information about the companies related to them. Once inside information has been made public, we are required to wait at least two full business days before trading in the relevant securities so that the information can be thoroughly broadcasted to the public.

[Insider Trading Policy](#)

We record Quantum information accurately and completely.

We must create accurate and complete records of Quantum's business interests and transactions. Once those records are created, we must then retain and dispose of them in a manner that is consistent with Quantum's Records Retention program and any applicable litigation holds.

[Record Retention Program](#)
[Litigation Hold Notices](#)



HOW WE WORK WITH THIRD PARTIES

The Policy

We exchange gifts and provide entertainment responsibly.

The Details

We should use good judgment in determining if a gift is acceptable; if it seems inappropriate, it probably is. As a general rule, you should neither give nor receive gifts worth more than the equivalent of US\$150 or entertainment worth more than the equivalent of US\$500 per person without approval from your functional vice president and our compliance team. Frequency limits, as more fully explained in Quantum's Gifts and Entertainment Policy, may also apply to the giving or receiving of gifts and entertainment. However, members of the Quantum Team should never offer, provide, or accept gifts and payments in conjunction with a major business decision such as a contract award or sales opportunity, regardless of its status, unless the gift or payment:

1. Falls within the scope of an approved marketing incentive program or promotion; or
2. Has been approved in advance by Quantum's compliance team.

Offering or providing payments, gifts, or services to a government official requires pre-approval from Quantum's compliance team in all cases, regardless of value.

Offering, giving, or accepting cash or cash equivalent gifts is not permitted, with the narrow exception of low-value gift cards that are redeemable for consumable items, as described in more detail in Quantum's Gifts and Entertainment Policy.

In general, business gifts and entertainment are allowed if they:

1. Have a legal, business-related purpose appropriate to the nature of the relationship between giver and recipient;
2. Do not violate applicable laws or customs in the country of the giver or recipient or the corporate policies, contractual agreements, or codes of conduct applicable to either party;
3. Would not embarrass Quantum or its business partners if publicly disclosed;
4. Are appropriately documented, approved, and fully visible to senior management for both organizations;
5. Are not given to or received from government personnel or affiliates;
6. Are not intended to improperly influence or reward the recipient's actions or behaviors, and would not be perceived that way;
7. Comply with the requirements identified in Quantum's Gifts and Entertainment, Anticorruption, and Travel and Expense Policies; and
8. Are reported and treated in compliance with applicable national, state, or local tax requirements.

Tools and Resources

[Anticorruption Information](#)

[Business Travel and Expense Policy](#)



We book travel appropriately.

You should not accept travel from any source outside of Quantum or provide travel to others (excluding job applicants) without written approval from your functional vice president.

[Business Travel and Expense Policy](#)

We enter into contracts properly.

Contracts can raise numerous issues if they are handled inappropriately. Generally, we should:

1. Consider the need for a contract anytime we are working with a third party;
2. Not deviate from standard contract terms without the approval of the legal and accounting departments; and
3. Ensure that contracts are in writing, complete, properly authorized, and provided to the legal department for filing.

[Contracts Policy](#)

[Signature Authority Policy](#)

We avoid conflicts of interest.

Conflicts of interest occur when our private loyalties interfere with the interests of Quantum as a whole. It is important to remember that even the appearance of a conflict can be problematic.

[Email Ethics Committee](#)

Mixing Quantum business with personal relationships can subject us to accusations of favoritism or preferential treatment. Because of that, those working relationships must be approved by Quantum's ethics committee in advance. This includes engaging in any of the following activities with family, close friends, or partners in a business unrelated to Quantum:

1. Conducting Quantum business;
2. Forming a direct or indirect reporting relationship; or
3. Forming any type of financial or business relationship that could cause our loyalty to be divided between Quantum and another interest.

Activities or inventions that will involve Quantum time, knowledge, equipment, or materials should be approved by your functional vice president before they begin.

You may not invest or maintain a financial interest in other business if doing so would affect your ability to make decisions that are good for Quantum. You must also avoid taking personal loans or guarantees of obligations from Quantum competitors or business partners.

Members of our Board of Directors and our executive officers may not receive loans or extensions of credit from Quantum, nor may Quantum arrange for or renew an extension of credit to them.

We avoid financial or business relationships that might cause divided loyalty.

Before beginning any employment, business, consulting, financial, or other relationship with a third party, you must receive written permission from Quantum's ethics committee if the activity:

[Email Ethics Committee](#)



1. Is or could be relevant to Quantum's current or future business, whether from the supplier or customer perspective;
2. Might expose us to third party confidential, proprietary, or trade secret information, or could share our confidential, proprietary, or trade secret information with others; or
3. Is similar to the work you do at Quantum.

Our executive officers, members of our Board of Directors, certain security holders, and their family members are subject to additional rules around potential conflicts of interest arising from other business opportunities. Because of the nature of these rules, the Corporate Governance and Nominating Committee of Quantum's Board of Directors must review and approve these types of transactions in advance.

We do not solicit Quantum for personal business opportunities.

Quantum may utilize relationships with third party consultants to provide critical technical or market-based guidance to certain projects or teams. Due to the depth of their expertise, some of those consultants may be former Quantum team members. However, for the first twelve months after you leave Quantum, you may not provide consulting services to Quantum without written approval from the applicable functional vice president and the human resources department.

[OnQ – Human Resources Page](#)

HOW WE SUPPORT GROWTH



The Policy

We set a good example.

The Details

Anyone who manages other team members at Quantum has an increased responsibility to provide a clear, consistent example of meeting the highest standards of ethical conduct for his or her team. If you are a manager, you should ensure that your team understands the importance of staying OnTraQ, that you are fostering an environment that encourages reporting ethical questions or concerns without fear of retaliation, and that you are escalating relevant complaints to Quantum's ethics and compliance resources for resolution.

Tools and Resources

[When We Need Help](#)

[Policy on Reporting Concerns](#)

[Reporting and Investigation Process](#)

[EthicsPoint](#)

We operate in a safe and secure environment.

We all have the responsibility to follow Quantum's personnel-, facility-, and supply chain-related security procedures, and to raise any concerns about behavior that might compromise individual or site security. In addition, you should ensure that you follow a clear desk, screen, and bulletin or whiteboard policy when you walk away from confidential or sensitive information, and dispose of sensitive information securely.

[Computing Security and Acceptable Use Policy](#)

[Email Security Team](#)

We are concerned about our environmental impact.

Quantum is dedicated to designing and making our products in a manner that conserves the environment and protects the safety and health of our team members, customers, suppliers, competitors, stakeholders, and communities. We all must comply with applicable corporate standards and environmental requirements.

[Environmental Requirements Specification](#) (Agile login required)

We encourage appropriate use of technology.

We should remember that when we access information or communicate electronically via a Quantum technology system, we are representing Quantum. Because of that, you should not expect personal privacy in the use of Quantum's communication systems, whether for business or personal communications. You should also avoid storing sensitive data for personal use on Quantum computers and always keep user identification and password information secure.

[Computing Security and Acceptable Use Policy](#)

[Privacy by Design Policy](#)

Keep in mind that if you use your own personal device (such as a cell phone you purchased) for Quantum business, it could become necessary for Quantum to access or copy all data from that device in the event of litigation or an internal investigation. In addition, Quantum may be able or obligated to remotely remove Quantum data from your personal device.

Quantum recognizes that new communication, collaboration, and engagement platforms arise very quickly in our technology-driven environment. However, it's important that we take the time to evaluate the productivity, privacy, security, and support implications of new technology platforms before implementing them. If a new tool is introduced that you would like to use in your work, please consult with the legal and IT departments before proceeding.



We use social networking tools responsibly.

Many of us participate in social media platforms like Twitter, LinkedIn, and Facebook for both personal and professional reasons. When we engage in any social networking, Quantum's rules regarding confidentiality, privacy, and appropriate communications still apply. No Quantum confidential, nonpublic, or financial information or forward-looking statements may be shared or posted in any public or private groups. Because social media content may be considered admissible information in litigation, both individuals and Quantum may be held liable for the content of social media communications. We encourage you to share Quantum-approved social media content via our Gaggle platform.

[Computing Security and Acceptable Use Policy](#)

[Gaggle Registration](#)

We comply with internal controls.

Internal controls govern how we perform and document business transactions in order to safeguard our assets and support the accurate reporting of financial results. We must adhere to Quantum's finance and internal control structure, including SOX controls and our revenue recognition policy, at all times. In addition, if you are asked to represent that we are in compliance with those requirements, you must do so honestly and with full disclosure of any situations that might conflict with internal control procedures. If you believe any internal controls are incomplete or otherwise lacking in some way (for example, if you believe they could be circumvented without detection), you should immediately alert the internal audit team.

[Revenue Recognition Policy](#)

[OnQ – Finance Page](#)

We use copyrighted material appropriately.

Understanding and following copyright and license guidelines can avoid unnecessary legal problems. It is against the law and Quantum policy to use or integrate any part of a copyrighted work (including print materials, licensed computer software, images, music, or video footage) unless we have appropriate permission to do so.

[OnQ – Information Technology Page](#)

We must comply with all license and purchase terms regarding the duplication of any software we acquire or use. Because of this, we should not:

1. Install computer software from a home computer on Quantum computers or networks, or vice versa;
2. Exchange copies of software applications with coworkers without first checking with the IT department; or
3. Install new software programs onto Quantum computers or networks without first consulting the IT department.

We respect open source requirements.

Many of our products incorporate software made available through open source distribution licenses. Such licenses may contain specific limitations on how the software may be used or requirements for how resulting products are distributed. Because of that, you should be sure to document any open source software used in Quantum products and review any integration of new open source technology with Quantum's legal department.

[OnQ – Legal Page](#)



We strictly follow trade compliance requirements.

Import or export control restrictions apply to most of our products and technical information. As a result, all members of the Quantum Team must comply with applicable Quantum policies, trade programs, and government regulations, particularly when we:

1. Import or export products, equipment, technology, or software;
2. Make software available for download to people outside of Quantum;
3. Work with or communicate technical data outside the US or to non-US citizens inside the US;
4. Transport or ship Quantum equipment, computers, or software between countries, including when we travel;
5. Develop or offer new products; or
6. Establish new relationships with supply chain partners.

[Email Trade Compliance Team](#)

We support business partner compliance.

As part of our commitment to staying OnTraQ, we encourage Quantum suppliers to adopt their own codes of conduct if they haven't done so already. When we work with suppliers or vendors, promoting Quantum's supplier compliance requirements also supports Quantum's ability to grow the business in an appropriate way.

[Supplier Code of Conduct Requirements](#)

[Supplier Compliance Requirements Certification](#)

We represent Quantum well.

Before speaking publicly on behalf of Quantum (such as at a conference or trade show or by giving an interview), we should obtain approval from the marketing and legal departments. In addition, you must take careful precautions not to seem to represent Quantum's corporate opinion and be clear that the views you express are your own. We should also avoid discussing private, confidential, or inside company information with people outside of Quantum, even if it is presented as an opinion rather than fact.

[OnQ – Global Marketing Page](#)

[OnQ - Legal Page](#)

[When We Need Help](#)

[EthicsPoint](#)

[Policy on Reporting Concerns](#)

Members of the Quantum Team involved in Quantum's public communication processes, or in the preparation or review of securities filings, must ensure that the information promotes full, fair, accurate, timely, and understandable disclosure. Beyond that, special rules govern communications between Quantum and securities market professionals (such as financial analysts and investment advisers) and shareholders. Only Quantum's chief executive officer, chief financial officer, investor relations personnel, or other authorized spokespeople may conduct such communications.

It is also important to remember that most online public forums, newsgroups, chat rooms, or other services are not anonymous. Anything we say is a reflection of Quantum, so we must exercise good judgment and restraint when using electronic communications.

If you become aware of a failure by the Company to comply with accounting procedures mandated by the Federal Securities Laws, SEC rules, and any other applicable rules, regulations, or guidance, or if you, or anyone else you are aware of, are asked to discharge your/their respective duties in a manner that fails to comply with any such rules, regulations, or guidance, you shall immediately report the event to Quantum's ethics committee via email to ethics.committee@quantum.com or compliance@quantum.com, or by using



Quantum's confidential and anonymous reporting service, EthicsPoint, available at the following URL address, https://secure.ethicspoint.com/domain/en/default_reporter.asp.

If you are asked to improperly report revenue, or falsify any other records related to compliance with the SEC's rules, regulations or guidance, or are aware of falsification by anyone else in the Company, you shall immediately report the event via Quantum's ethics committee via email to ethics.committee@quantum.com or compliance@quantum.com, or by using Quantum's confidential and anonymous reporting service, EthicsPoint, available at the following URL address, https://secure.ethicspoint.com/domain/en/default_reporter.asp.

We are politically neutral.

Corporate contributions to political candidates or causes are illegal in many jurisdictions. We may not use Quantum assets (including Quantum premises, equipment, or team member work time) for any political candidate, party, or campaign without prior written approval from the legal department, and never in connection with any federal election activity.

[OnQ - Legal Page](#)



WHEN WE NEED HELP

The Policy

We will not tolerate retaliation or malicious reporting.

We ask for help when we need it.

We take ethics and compliance seriously.

We encourage using the EthicsPoint service.

The Details

We expect the immediate reporting of violations of any OnTraQ provision or any applicable law, rule, or regulation. In support of that, we will not tolerate acts of retaliation or retribution against anyone who makes an honest report. Confirmed retaliatory acts will result in disciplinary action, up to and including termination of employment or the business relationship. Anyone who intentionally provides misleading or false information regarding violations or during any investigation process will likewise be subject to disciplinary action.

If you have a question about staying OnTraQ, encounter a situation not covered by these guidelines, or have information about a violation of any provision of this document or of any applicable law, rule, or regulation, you are expected to raise the question with your management, the senior leadership team, or the human resources or the legal departments. However, if it is not practical or comfortable for you to use one of those channels, you should contact the ethics committee or the external EthicsPoint reporting service for assistance.

Quantum's ethics committee is comprised of leadership from the finance, internal audit, human resources, and legal organizations. The committee is available to address questions about staying OnTraQ as well as to review, investigate, and respond to reported concerns. The ethics committee can be reached at its email addresses (ethics.committee@quantum.com or compliance@quantum.com) or by directly contacting any of its members.

EthicsPoint allows for the confidential and anonymous reporting of ethics or compliance concerns. EthicsPoint is operated by an external vendor with professionals trained to take calls in confidence and to relay concerns to the appropriate people for handling. EthicsPoint can be reached at www.ethicspoint.com or by phone at 866-ETHICSP (866-384-4277). Local phone numbers for many countries are also available, as listed below:

Australia	800-339276
Belgium	0800-77004
Brazil	0800-8911667
Canada	866-384-4277
France	0800-902500
Germany	0800-1016582
Hungary	06-800-17199

Tools and Resources

[Policy on Reporting Concerns](#)
[Reporting and Investigation Process](#)

[Reporting and Investigation Process](#)
[Email Ethics Committee](#)
[EthicsPoint](#)

[Email Ethics Committee](#)

[EthicsPoint](#)



India	000-800-100-1071
Italy	800-786907
Japan	0066-33-112505
Korea	00308-110-480
Malaysia	800-80-8641
Netherlands	0800-0226174
Poland	0-0-800-1211571
Singapore	800-1204201
South Africa	080-09-92604
Spain	900-991498
Sweden	020-79-8729
Switzerland	0800-562907
Taiwan	00801-13-7956
Turkey	0811-288-0001
United Kingdom	0800 032 8483
United States	866-384-4277

We conduct internal investigations appropriately.

There are certain groups within Quantum that are tasked with handling internal investigations, including the finance, internal audit, human resources, or legal departments, or the ethics committee. If you are concerned about behavior you have witnessed or believe is occurring, tell someone who can investigate it appropriately. You should not attempt to investigate concerns on your own. If you are asked to provide information for an internal investigation, you must do so honestly and completely.

[Reporting and Investigation Process](#)

[Email Ethics Committee](#)

[EthicsPoint](#)

Quantum will investigate any reports of potential ethics or compliance violations and may take disciplinary action against anyone on the Quantum Team whose actions have been found to violate any provision of OnTraQ or any applicable law, rule, or regulation. In the event of such a violation, Quantum's Board of Directors (or its appointed representatives, including the ethics committee) will determine any appropriate actions to be taken, which will be reasonably designed to deter wrongdoing and to promote compliance accountability. These actions may include individual disciplinary actions, up to and including termination of the employment or business relationship.

We protect our legal interests.

The attorney–client privilege can help Quantum to more effectively obtain legal advice. The privilege allows a client to confidentially consult with an attorney for the purpose of obtaining legal assistance, and protects most confidential client communications in support of that process.

[OnQ - Legal Page](#)

To effectively protect this privilege, when seeking legal advice or responding to a request from an attorney working on behalf of the company, you should:

1. Direct the inquiry or concern to a Quantum attorney, and ensure that an attorney is copied on any emails related to the issue;
2. Avoid copying any third parties or discussing the communication with others; and
3. Label the communication as “attorney-client privileged.”

You should immediately notify the legal department of any legal notice, government inquiry, investigation, audit, or inquiry from outside attorneys. All press inquiries or requests for comment should be directed to our corporate communications or investor relations resources.





MY COMMITMENT TO STAYING ONTRAQ

My signature on this page indicates that I have read, acknowledged, and agreed to the following statements:

1. I have received and read OnTraQ, Quantum's Code of Conduct, and understand that I am required to comply with its policies and expectations;
2. I understand that if I have a concern about a possible violation of OnTraQ or other internal policies or legal requirements, I am expected to report it promptly through one of the reporting channels that Quantum provides; and
3. I understand that I am expected to participate in live or online ethics and compliance training programs that Quantum provides, and that my obligations under OnTraQ or other internal policies or legal requirements are not waived if I do not attend training.

Name

Title

Signature

Date

Employee Number
