

The background of the entire page is a photograph of a signpost with four directional arrows. The signpost is a dark metal pole with four white arrows pointing in different directions: up-left, up-right, down-right, and down-left. The sky is a mix of blue, purple, and red, with some white clouds visible. The overall color scheme is vibrant and modern.

Quantum<sup>®</sup>

# OnTraQ

QUANTUM CORPORATION

CODE OF CONDUCT

# Welcome to OnTraQ, Quantum's Code of Conduct.

We are transforming Quantum to be the world's leader in video and unstructured data solutions, enabling our customers to optimize and protect their data in ways no one else can. We constantly strive to provide an unparalleled customer experience, built on an unparalleled commitment to doing the right thing.

The path ahead of us will bring new opportunities and new challenges. OnTraQ is meant to help us successfully navigate both by enabling effective business processes, relationships, and solutions.

Compliance with OnTraQ is a foundational element of our growth strategy and potential. Please review each section that follows carefully, and [contact our compliance team](#) with any questions you have. We, and our customers, are counting on your commitment to help us all stay OnTraQ.



Jamie Lerner  
Chairman of the Board and CEO

A handwritten signature in black ink, appearing to read "Jamie Lerner".

Marc Rothman  
Audit Committee Chair

A handwritten signature in black ink, appearing to read "Marc Rothman".

# KEY EXPECTATIONS

## HOW WE TREAT EACH OTHER

- We treat each other with respect.
- We uphold human rights.
- We prioritize privacy.
- We set a good example.

## HOW WE SUPPORT GROWTH

- We generate revenue responsibly.
- We use technology appropriately.
- We practice social media manners.
- We follow internal controls.
- We respect intellectual property rights.
- We comply with trade regulations.
- We represent Quantum well.
- We maintain political neutrality.

## HOW WE WORK WITH THIRD PARTIES

- We refuse bribery and corruption.
- We encourage business partner success.
- We negotiate with integrity.
- We maintain appropriate relationships.

## HOW WE HANDLE INFORMATION

- We respect confidential information.
- We trade stock responsibly.
- We maintain accurate records.

## WHEN WE NEED HELP

- We ask for help when we need it.
- We encourage responsible reporting.

## RESPONSIBILITY

Anyone conducting business on behalf of Quantum Corporation or any of its subsidiaries (Quantum or the Company), including all employees, officers, directors, contractors, consultants, and agents (the Quantum Team) is required to comply with these OnTraQ standards. Quantum suppliers are also expected to adhere to these guidelines.

## ACCOUNTABILITY

Quantum will investigate any reports of potential violations of OnTraQ or other internal or external requirements. Our Board of Directors (or its appointed representatives, including the Ethics Committee) will determine any appropriate actions to be taken, reasonably designed to deter wrongdoing and to promote accountability. Those actions may include individual discipline, up to and including termination of the employment or business relationship.

## TRANSPARENCY

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.

# HOW WE TREAT EACH OTHER



## What We Do

We treat each other with respect.

We uphold human rights.

We prioritize privacy.

We set a good example.

## How We Do It

Every member of the Quantum Team contributes to Quantum's success. Our working relationships are built on recognizing and supporting the responsibilities and talents of the entire Quantum Team, without engaging in harassment, bullying, or other disrespectful communications.

We thrive on incorporating the rich and differentiated viewpoints and experiences that only a diverse culture can bring and will not discriminate against anyone due to a legally protected personal characteristic.

We support employment and contracting arrangements that adhere to applicable child and voluntary labor laws and minimum wage standards. We also encourage our business partners to implement living wage standards for their personnel.

We are trusted to carefully handle employee, supplier, partner, or customer personal information. Even if personal information doesn't seem confidential or is limited to business contact details, the entire Quantum Team should treat that data with the highest level of respect by safeguarding it appropriately.

Anyone who manages others at Quantum has an increased responsibility to provide a clear, consistent example of staying OnTraQ. Managers are expected to foster an environment that encourages reporting ethical questions or concerns without fear of retaliation, and to escalate those matters to Quantum's ethics and compliance resources for resolution.

## Learn More

[Policy Against Harassment](#)  
[Equal Employment Opportunity Policy](#)

[Business Partner Code of Conduct Requirements](#)  
[Supplier Compliance Requirements Certification](#)

[Privacy Management Program](#)

[When We Need Help](#)  
[Policy on Reporting Concerns](#)  
[Reporting and Investigation Process](#)  
[OnTraQ Helpline](#)



# HOW WE SUPPORT GROWTH



## What We Do

We generate revenue responsibly.

We use technology appropriately.

## How We Do It

Business arrangements that significantly differ from our standard terms can create revenue recognition, cash collection, and recordkeeping challenges. The following practices are strictly prohibited, and anyone aware of or involved with them may be subject to disciplinary action, up to and including termination:

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, payment term extensions, or inventory stocking arrangements or returns that have not been approved by the accounting team in advance; or
4. Engaging in a side deal, which involves accepting terms and conditions that have not been approved by the legal and accounting departments.

When we access information or communicate via a Quantum technology system, we represent the Company. We should not expect personal privacy when using Quantum's computing or communication systems, whether for business or personal purposes.

Even if you purchase and use your own personal device for Quantum business, it could become necessary for Quantum to access, copy, or remove all data from that device. The Computing Security and Acceptable Use Policy has more information about the important implications of mixing personal data and devices with Quantum business needs.

## Learn More

[Revenue Recognition Policy](#)

[Computing Security and Acceptable Use Policy](#)  
[Privacy by Design Policy](#)



## What We Do

We practice social media manners.

We follow internal controls.

We respect intellectual property rights.

## How We Do It

When we engage in any social networking, Quantum's rules regarding confidentiality, privacy, and appropriate communications still apply. To help manage those rules, we encourage you to share Quantum-approved social media content via our Gagggle platform.

We adhere to Quantum's finance and internal control structure, including SOX controls and our revenue recognition policy. If you are asked to represent that we are in compliance with those requirements, do so honestly and with full disclosure of any situations that might conflict with internal control procedures.

Use the [OnTraQ Helpline](#), Quantum's confidential and anonymous reporting service powered by Convercent, to promptly report any of the following situations as soon as you become aware of them:

1. The Company's failure to comply with accounting procedures mandated by applicable securities laws, the SEC, or other applicable rules, regulations, or official guidance;
2. Requests made to you, or anyone else you are aware of, to discharge assigned duties in a manner that fails to comply with any such rules, regulations, or guidance;
3. Requests to improperly report revenue or falsify any other records related to compliance with the SEC's rules, regulations or guidance; or
4. Anyone falsifying records at the Company.

Open source distribution licenses may contain specific limitations on how the software may be used or requirements for how resulting products are distributed. Document any open source software used in Quantum products and review any integration of new open source technology with Quantum's legal department.

## Learn More

[Computing Security and Acceptable Use Policy](#)  
[Gagggle Registration](#)

[Revenue Recognition Policy](#)

[When We Need Help](#)

[OnTraQ Helpline](#)

[Policy on Reporting Concerns](#)

[OnQ – Legal Page](#)



## What We Do

We comply with trade regulations.

## How We Do It

We respect antitrust and fair competition laws by using consistent and transparent pricing practices and by limiting the sharing of information about our pricing, costs, customers, or strategies with others. We also minimize usage of competitive information not provided by a public or known authorized source.

In addition, import or export control restrictions apply to most of our products and technical information, regardless of geographic location. We comply with applicable trade requirements, particularly when we:

1. Import or export products, equipment, technology, or software, including via offering software downloads or carrying equipment while traveling;
2. Develop or offer new products; or
3. Establish relationships with new customers or supply chain partners.

## Learn More

[Pricing Policy](#)

[Email Trade Compliance Team](#)

We represent Quantum well.

We obtain approval from the marketing and legal teams before speaking publicly on behalf of Quantum. When not speaking on behalf of Quantum, we are clear that the views expressed are our own and don't represent Quantum's corporate opinion.

[OnQ – Global Marketing Page](#)

[OnQ - Legal Page](#)

Quantum's public communication processes and securities filings promote full, fair, accurate, timely, and understandable disclosure. Special rules govern communications between Quantum, investment analysts and advisers, and shareholders. Only Quantum-authorized spokespeople should conduct official communications.

We maintain political neutrality.

The legal team needs to provide prior written approval for use of any Company assets (including Quantum premises, equipment, or employee work time) for any political candidate, party, or campaign. Federal election activities should always avoid using any Quantum assets or time.

[OnQ - Legal Page](#)

# HOW WE WORK WITH THIRD PARTIES



## What We Do

We refuse bribery and corruption.

## How We Do It

Most countries where we operate prohibit making payments or giving gifts to influence a business decision. Despite those laws, some countries continue to tolerate the presence of bribery in business transactions. Even in those environments, we remain fully committed to compliance with anticorruption requirements and always avoid improper payments or business arrangements.

We allow giving or accepting business gifts, meals, or entertainment in accordance with our Anticorruption and Gifts and Entertainment policies, including obtaining any required approvals in advance. Of special note, 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.

## Learn More

[Anticorruption Policy](#)  
[Gifts and Entertainment Policy](#)  
[Business Travel and Expense Policy](#)  
[OnQ – Global Marketing Page](#)  
[OnQ - Legal Page](#)

We encourage business partner success.

We require Quantum business partners to follow our Business Partner Code of Conduct, and encourage them to adopt their own 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.

[Business Partner Code of Conduct Requirements](#)  
[Supplier Compliance Requirements Certification](#)

We negotiate with integrity.

Proper contracting practices are an important part of our business. The legal and accounting teams need to review and approve deviations from our standard contracting terms in advance. In addition, contracts should be signed by someone with the proper signature authority to bind the company.

[Delegation of Authority Policy](#)





## What We Do

We maintain appropriate relationships.

## How We Do It

Certain engagements that mix Quantum business interests with personal relationships require approval from our Ethics Committee. Those include maintaining a direct or indirect reporting relationship, or forming a financial or business relationship that could conflict with Quantum's interests, with family members, romantic partners, close friends, or personal business partners.

Approval from the Ethics Committee is also required before beginning any non-Quantum activity that:

1. Is similar, competitive, or otherwise relevant to Quantum's current or future interests;
2. Might expose us to a third party's confidential information, or could share our confidential information with others;
3. Is similar to the work you do at Quantum; or
4. Involves Quantum time, knowledge, equipment, or materials.

Our executive officers, members of our Board of Directors, and their family members are subject to additional rules around conflicts of interest potentially arising from other business opportunities. Because of the nature of those rules, the Board's Corporate Governance and Nominating Committee must review and approve those transactions in advance. In addition, the Company will not provide or arrange loans or credit agreements for Board members or executive officers.

## Learn More

[Email Ethics Committee](#)

# HOW WE HANDLE INFORMATION



## What We Do

We respect confidential information.

## How We Do It

Protecting information is our business. Confidential or sensitive Quantum information should be kept within the Company unless a written confidentiality or nondisclosure agreement applicable to the information being exchanged is in place.

We also ensure we have proper authorization before using or disclosing confidential information belonging to a third party. If you receive unsolicited confidential information, contact Quantum's legal team to discuss any appropriate actions to be taken, including deleting or destroying it.

In addition, our confidentiality obligations continue even after employment with the Company ends, so Quantum information should not be leveraged to create a competitive advantage for another company. Likewise, when a new member of the Quantum team has confidential information about our competitors due to a former role, we shouldn't use it without proper authorization.

## Learn More

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

We trade stock responsibly.

Our ability to trade Quantum stock is limited when we have material nonpublic information, including unannounced information about financial results and strategic business plans. That trading limitation extends to others with whom we have close relationships, as well as the securities of our business partners if we have access to important information they have not yet made public.

[Insider Trading Policy](#)



## What We Do

We maintain accurate records.

## How We Do It

The emails and documents we create form a record of Quantum's business interests and transactions, so it's important we maintain them in accordance with the Company's Records Retention Program. In addition, full compliance with applicable litigation hold requirements is expected from all members of the Quantum Team.

## Learn More

[Record Retention Program](#)

[Litigation Hold Notices](#)

# WHEN WE NEED HELP



## What We Do

We ask for help when we need it.

## How We Do It

If you encounter a situation you don't know how to handle or have information about a potential violation of OnTraQ or any other applicable internal or external requirement, raise the concern via the [OnTraQ Helpline](#), powered by Convercent.

The OnTraQ Helpline allows you to confidentially and anonymously report ethics or compliance concerns. The service is operated by an external vendor with professionals trained to receive information in confidence and to relay concerns to the appropriate people for handling. The OnTraQ Helpline can be reached at +1 (800) 461-9330.

## Learn More

[OnTraQ Helpline](#)  
[Reporting and Investigation Process](#)

We encourage responsible reporting.

Speaking up should be celebrated, so we encourage reporting concerns by vigorously enforcing our policy prohibiting retaliatory actions against anyone who raises an ethics or compliance concern in good faith.

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

# MY COMMITMENT TO STAYING ONTRAQ



My signature on this page indicates my agreement with 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 applicable requirements, I am expected to report it promptly through the [OnTraQ Helpline](#) reporting service; and
3. I understand that I am expected to participate in ethics and compliance training programs that Quantum provides, and that my obligations under OnTraQ are not waived if I do not complete training.

Name \_\_\_\_\_

Signature \_\_\_\_\_

Title \_\_\_\_\_

Date \_\_\_\_\_



# Quantum®

## ABOUT QUANTUM

Quantum technology and services help customers capture, create and share digital content – and preserve and protect it for decades at the lowest cost. Quantum's platforms provide the fastest performance for high-resolution video, images, and industrial IoT, with solutions built for every stage of the data lifecycle, from high-performance ingest to real-time collaboration and analysis and low-cost archiving. Every day the world's leading entertainment companies, sports franchises, research scientists, government agencies, enterprises, and cloud providers are making the world happier, safer, and smarter on Quantum. See how at [www.quantum.com](http://www.quantum.com).

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