

A modern office lobby with a reception desk in the foreground. The desk has a white sign with the Quantum logo. In the background, there are stairs with a metal railing and a balcony with a glass railing. The floor is made of light-colored wood tiles. The ceiling has recessed lighting.

# OnTraQ

## Quantum's Code of Conduct

Quantum

Quantum

# QUANTUM TEAM,

Welcome to the Quantum team. Our mission is to become a worldwide leader in video and unstructured data solutions. We enable superior data protection and utilization, recognizing that customer experience is paramount.

Quantum conducts business ethically, honestly, and in compliance with all applicable laws and regulations. We value and respect diversity among our global workforce. We protect the confidentiality of business information and the personal information of employees and customers. We provide numerous, confidential ways for team members to report any concerns they may have about ethical or legal violations of OnTraQ.

As we travel the path to becoming the world leader in video and unstructured data solutions, we will have new opportunities and face new challenges. OnTraQ is meant to help us successfully navigate 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 that reads "Jamie Lerner".



Marc Rothman  
Audit Committee Chairman

A handwritten signature in black ink that reads "Marc Rothman".

# CODE OF CONDUCT – KEY PILLARS



## Mutual Respect

We:

- Treat each other with respect
- Choose our words carefully
- Uphold human rights
- Value diversity
- Prioritize privacy
- Set a good example



## Professionalism

We:

- Grow our business ethically
- Maintain accurate records
- Document open-source use
- Get approvals if needed
- Negotiate with integrity
- Keep relationships professional



## Accountability

We:

- Know Quantum's policies
- Follow policies & processes
- Engage in on-going training
- Report OnTraQ violations
- Preserve confidentiality
- Protect company assets

# MUTUAL RESPECT

A photograph of a woman in a wheelchair shaking hands with a man in a hallway. The woman is seated in a black wheelchair, wearing a light-colored long-sleeved shirt and light-colored pants. She is smiling and looking towards the man. The man is standing, wearing a light-colored polo shirt with a white scarf draped over his shoulders, light-colored pants, and glasses. He has a beard and braided hair. They are in a modern hallway with glass walls and doors. The lighting is bright, and the overall tone is positive and professional.

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# MUTUAL RESPECT

Every member of the Quantum Team contributes to our 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.

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 Gaggle platform.

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

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

We are trusted to carefully handle employee, supplier, partner, and customer personal information. We should treat personal information and business contact details as confidential information.

Managers have 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.

# PROFESSIONALISM

A close-up photograph of a hand holding a black pen, marking a checklist on a document. The document is white with a green tint, and the checklist consists of several square boxes, some of which are already marked with checkmarks. The background is a solid green color.

# GROW THE BUSINESS ETHICALLY

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.

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.

# RECORDS AND DOCUMENTATION

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.

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.





# GET APPROVALS

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.

The Ethics Committee must pre-approve 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.

We must 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.

# KEEP RELATIONSHIPS PROFESSIONAL

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.

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.



# ACCOUNTABILITY



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# KNOW POLICIES

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.

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.

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.**

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.

Only Quantum-authorized spokespeople should conduct official communications. 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.

# FOLLOW POLICIES

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 we express are our own not Quantum's corporate opinion.

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.

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



# REPORT OnTraQ VIOLATIONS

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.

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.

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.**

# PRESERVE CONFIDENTIALITY

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.

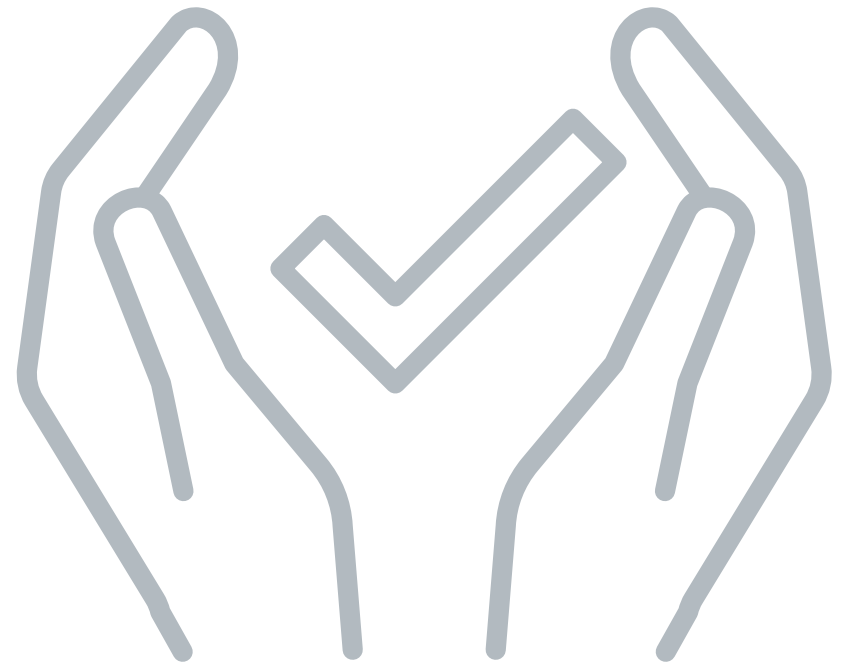
Our confidentiality obligations continue even after employment with the Company ends, so Quantum information should not be leveraged to create a competitive advantage for another company. Likewise, when a new member of the Quantum team has confidential information about our competitors due to a former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

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.



# PROTECT COMPANY ASSETS

The legal team must 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.





# ACKNOWLEDGEMENT AND ADDITIONAL INFO

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 \_\_\_\_\_

To view our policies in detail, please visit our [SharePoint site](#).

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## Quantum.

Quantum technology, software, and services provide the solutions that today’s organizations need to make video and other unstructured data smarter – so their data works for them and not the other way around. With over 40 years of innovation, Quantum’s end-to-end platform is uniquely equipped to orchestrate, protect, and enrich data across its lifecycle, providing enhanced intelligence and actionable insights. Leading organizations in cloud services, entertainment, government, research, education, transportation, and enterprise IT trust Quantum to bring their data to life, because data makes life better, safer, and smarter. Quantum is listed on Nasdaq (QMCO) and the Russell 2000® Index. For more information visit [www.quantum.com](http://www.quantum.com).

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