

## Anticorruption Policy

December 2023

This Anticorruption Policy provides employees of Quantum Corporation and its subsidiaries (Quantum) with guidance for avoiding business dealings that could be deemed corrupt. Bribery and kickbacks are the primary concerns of anticorruption laws. Offering, giving, or taking something of value in exchange for gaining a business advantage violates anticorruption laws. When in doubt, reach out to the legal team with questions or concerns.

### Gifts

There is no threshold limit for determining if something is valuable under anticorruption laws. Instead, the question is if the gift has a specific value to the recipient. Some examples of valuable gifts include money, favors, tickets, travel, entertainment, job offers, scholarships, loans, confidential tips, and kickbacks. Interestingly, the anticorruption laws focus on whether the gift or favor would appear to influence a business decision, not on whether the gift was accepted, or the business was won.

### Business Advantage

Example business advantages are reduced fees, reduced taxes, preferential treatment, securing an exemption from permitting or licensing requirements, or avoidance of customs duties.

### Hospitality Events and Incentive Promotions

Hospitality events and incentive promotions can be subjected to heightened scrutiny under anticorruption laws. Please reach out to the legal department during *the planning stages* of a hospitality event or before launching a promotion so we can help you create a successful, legally compliant event/promotion.

### Record Keeping

Business records are critical during corruption investigations. Important records include quotes, offers, counteroffers, pricing information, invoices, expense reports, accounts receivable, approvals for any discounts offered to customers, and thorough descriptions of services rendered or received. Employees must maintain accurate records.

### Public Officials

Business relationships with public officials can be particularly sensitive. Any gift or valuable item given to a public official, or an immediate family member of a public official, must be pre-approved by a Vice President from Legal. A public official is anyone who works for a local, state/provincial, or national government, or public international organization. Employees of government-run entities such as universities, banks, hospitals, and state-owned enterprises are also public employees. In some countries, individuals working for research companies, investment firms or transportation providers can also be public employees if their governments have invested in their company.

### Applicability

Quantum's anticorruption policy applies to direct employees, contract employees, directors, and officers in all locations, worldwide. Quantum's third-party suppliers, contractors, subcontractors, consultants, and agents are also covered because gifts offered or accepted by them can be attributed to Quantum.

### Reporting Violations

If you believe the anticorruption policy has been violated, please report any actual or suspected violation to (i) your manager; (ii) Quantum's Legal Department; (iii) Quantum's Ethics Committee at [ethics.committee@quantum.com](mailto:ethics.committee@quantum.com) or [compliance@quantum.com](mailto:compliance@quantum.com); (iv) the OnTraQ helpline at <https://app.convercent.com/en-us/LandingPage/4e23dc2d-ab06-ec11-a983-000d3ab9f062>; or (v) as otherwise described in Quantum's [Policy on Reporting Concerns](#).

If you have any questions, please reach out to Quantum's Legal Department.