

Gifts and Entertainment Policy

December 2023

This Gifts and Entertainment provides employees of Quantum Corporation and its subsidiaries (Quantum) with guidance regarding gifts and entertainment.

Gifts

Giving or receiving gifts in the context of business relationships is acceptable so long as the value of the gift is below US\$150.

Gifts cannot be:

- Cash;
- Given to, or received from, the same person more than twice in a calendar year;
- Given in conjunction with trying to gain an advantage in a business opportunity; or
- Given to a government employee or official without prior approval from a Vice President of the Legal Department.

Entertainment Expenses

Entertainment expenses include going with a business associate out for a meal, to a sporting event, or on a golf outing. Quantum's guidelines for entertainment expenses apply equally whether you are the person doing the entertaining, or the person being entertained. Entertainment expenses cannot:

- exceed US\$500;
- be given to, or received from, the same person more than four times per calendar year;
- be incurred in close proximity to the awarding of a business opportunity; and
- be spent on or with a government employee or official without prior approval from a Vice President of the Legal Department.

Propriety of Expenses

In all instances, the selection of gifts and entertainment should be lawful, tasteful, and in compliance with Quantum's corporate policies. Gifts and entertainment expenses should be reported in accordance with Quantum's expense reimbursement policy.

Exceptions

There may be circumstances where circumstances warrant an exception to the dollar values or frequency limits provided in this policy. In those instances, reach out to a VP of Legal for an exceptional approval.

Reporting Violations

If you believe the gifts and entertainment 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 or 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.