



The High Road

***Quantum's
Code of Business
Conduct and
Ethics***

Updated July 2006



Quantum.

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The High Road – Introduction

More Than Words

Quantum’s good name and reputation are a result of the dedication and hard work of all of us. Together, we are responsible for preserving and enhancing this reputation, a task that is fundamental to our continued well-being. Our goal is not just to comply with the laws and regulations that apply to our business; we strive to abide by the highest standards of business conduct.

The following pages describe Quantum’s Code of Business Conduct and Ethics, which has been approved by our Board of Directors. The purpose of this guide is to reinforce and enhance our commitment to an ethical way of doing business. The contents of this guide are not new, however. The policies described here are part of Quantum’s long-standing tradition of ethical business standards.

Any person conducting business on behalf of Quantum or any of its subsidiaries – including all employees, officers (including Quantum’s principal executive officer, principal financial officer and principal accounting officer), consultants and directors (each, a “Quantum Representative”) -- is expected to comply with the policies set forth in this guide. Each of us must read the guide carefully and make sure that we understand it, the consequences of non-compliance, and its importance to Quantum’s success.

We at Quantum are committed to providing the best and most competitive storage products and solutions to meet the needs of our customers. Adherence to the policies set forth in this guide will help us achieve that goal.



OVERVIEW

Purpose

The purpose of this guide is to provide the basic framework for conducting business at Quantum so that we apply good judgment and the highest standards of business conduct when dealing with customers, shareholders, vendors, communities, coworkers, and others.

Your Personal Commitment

All Quantum employees and directors must acknowledge their commitment to *The High Road -- Quantum's Code of Business Conduct and Ethics* by signing the acknowledgment, "Your Personal Commitment to Integrity" when they join Quantum. The form of the acknowledgement is included on the last page of this guide. Quantum may also periodically update or modify *The High Road* and distribute it for re-acknowledgment and to reinforce its importance.

Scope

This guide applies to all Quantum Representatives throughout the world.

Our Basic Approach

This guide can't specifically cover every possible situation that we might encounter. For this reason, all of our standards and guidelines are governed by two simple rules that we all must follow:

- **Use Good Judgment** - Nothing can replace thoughtful and informed decisions.
- **When In Doubt, Ask** - If a situation doesn't feel right, ask for help. See "[For Further Information or to Report a Concern](#)" below.

Our Fundamental Standards

Our fundamental standards for conducting business at Quantum are:

- To avoid conflicts of interest (or the appearance of such conflicts) in conducting Quantum business. For further details, please see "[Avoiding Conflicts of Interest](#)" below.
- To not (i) compete with Quantum, (ii) take for personal gain any opportunity discovered through the use of Quantum's property, information or position, or (iii) misuse for personal gain Quantum's assets, information,



resources (e.g., e-mail or phone services), influence, or reputation.


- To respect and maintain the confidentiality of information. For further information, please see the sections of this guide addressing confidential information, beginning with [“Quantum Confidential Information”](#) below.
- To deal fairly with customers, suppliers, competitors and employees, and to avoid taking unfair advantage through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing. For further details, please see [“Customer and Supplier Confidential Information”](#) and [“Competitors and Antitrust Law”](#) below.
- To protect Quantum’s assets, including its intellectual property assets, and ensure their efficient use for legitimate business purposes.
- To conduct business in compliance with applicable rules, regulations and laws (including, e.g., the foreign corrupt practices act and the insider trading laws). For further information regarding compliance with these and other applicable laws, please consult the relevant sections below.
- To report any violations, or potential violations, of this guide, or any law, rule or regulation, as described below and in [“Seeking Guidance and Reporting Concerns.”](#)

For Further Information or to Report a Concern

If at any time you have a question about what is proper conduct, or have a concern, you should promptly raise that question or concern within Quantum. There are a number of ways you can do this, such as by discussing it with your management, your Human Resources (HR) representative or the Legal department. In addition, the following resources are available to you for situations where the traditional avenues are impractical:

Ethics Committee. Quantum has established an Ethics Committee, consisting of leadership from the



Finance, Legal, HR and Risk Management organizations. The Ethics Committee is available to address any questions regarding *The High Road*, and to conduct investigations of reported concerns. In addition, the Ethics Committee maintains an [ethics and compliance community](#) on  to provide useful background information and FAQs. The Ethics Committee can be reached at compliance@quantum.com.

EthicsPoint Hotline. Quantum has also established a confidential and anonymous reporting service through EthicsPoint, which can be accessed by phone in the U.S. at [1-866-ETHICSP \(1-866-384-4277\)](tel:1-866-ETHICSP) or via the Web at www.ethicspoint.com.

Further details regarding these resources can be found below in “Seeking Guidance and Reporting Concerns.”




What We Do

When We Hire - Equal Opportunity

We encourage a culturally diverse and supportive work environment at Quantum, and therefore we do not tolerate discrimination or harassment based on a person's race, color, sex, sexual orientation, religion, national origin, age, marital status, disability, or veteran status. This applies to co-workers, applicants for employment, contractors, and anyone else who is in the workplace.

If you ever feel that you have been discriminated against or harassed, or that you have witnessed such an action, please report the incident to management or your HR representative.

For further information, please consult Quantum's Employee Guidelines, which can be found on  under "Employee Essentials" → "Policies & Guidelines" or by clicking [here](#).


When We Use Information

Our business and business relationships revolve around sensitive, valuable information. Maintaining the confidentiality of this information is essential to Quantum and to those with whom we do business. It's a responsibility that we all share.

Quantum Confidential Information

We do not disclose Quantum confidential, proprietary, or trade-secret information to anyone outside Quantum unless a written nondisclosure agreement (in a form approved by the Quantum Legal department) has been signed by an authorized Quantum representative.

THE HIGH ROAD:

A nondisclosure agreement may be requested and created in the Legal Community of  under "Nondisclosure Agreements," or by clicking [here](#).

Here are some examples of Quantum confidential information:

- Unannounced products, products in R&D, and future development plans;
- Design information, know-how and intellectual property protection strategies concerning existing products, their development or manufacturing;
- Specific technical issues on products;



- Financial information that has not been publicly released, such as revenue, gross margin, unit shipments, pricing, or profitability by product line, business unit, form factor, or manufacturing site;
- Sales forecasts, ship rates, bookings, or back-order information;
- Yields or capacity by product line, business, or manufacturing site;
- Information concerning customer relationships, contract terms, sales trends, or product plans;
- Vendor names or relationships;
- Details about our relationships with our contract manufacturers or other significant vendors;
- Significant company plans, such as the expected closure of a company facility;
- Corporate organization charts; and
- Information about other Quantum employees or former employees, such as addresses, telephone numbers, work assignments and payroll information.

**Highly
Sensitive
Information**

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

- An employee in HR or Information Technology (IT) who regularly handles strictly private employee information such as personnel planning or compensation information; or
- A manager involved in the strategic planning process who receives closely held advance information about strategic initiatives that would have significant personnel, community, or competitive implications.

Any employee who works with sensitive internal information should take appropriate steps to protect it, and should not discuss it with anyone who does not have a business-related need to know, including people inside Quantum.

Employees receiving such information who fail to comply with this obligation will be subject to disciplinary action up to and including termination of employment.



External Information – General

Quantum also respects the confidential, proprietary, and trade secret information of others. Quantum employees, temporary workers, subcontractors, and consultants may not use or disclose any information belonging to a third party unless authorized by that third party to do so or required to do so by law. In addition, any third party providing confidential information to Quantum should be required to sign a nondisclosure agreement with Quantum in a form approved by the Quantum Legal department. Furthermore, once disclosed, this confidential information may only be used in connection with conducting the normal business activities of the Quantum product group receiving this information, and may not be used to advantage other Quantum product groups relative to their competitors.

External Information – New Hires

Special care must be taken when a new employee comes to Quantum from another company, especially a competitor. It may be tempting to use information the employee had access to at his or her old company, but this information may not be used at Quantum without prior authorization. Doing so may expose the new employee and Quantum to legal liability.


THE HIGH ROAD:

Suppose a recently hired sales rep has received a confidential customer list from his previous employer, a competitor of Quantum. This customer list may not be used by Quantum.

Customer and Supplier Confidential Information

Protecting customer and supplier confidential information is of particular importance at Quantum since, in some cases, our customers and suppliers have products that may compete with ours. Quantum's policy is that customer and supplier confidential information may only be used in connection with conducting the normal business activities of the product group receiving the confidential information, and may never be used to advantage other product groups relative to their competitors.

THE HIGH ROAD:

Quantum's complete Customer Confidentiality Policy can be found on  under "Employee Essentials" → "Policies & Guidelines" or by clicking [here](#).



Receiving Unsolicited Information

It is always a good idea to refuse unsolicited, confidential information. In doing so, we protect Quantum's interest in its research and development by avoiding any allegations that we accepted and profited from someone else's ideas without paying for them.


THE HIGH ROAD:

If you inadvertently receive unsolicited confidential information, please contact Quantum's Legal department (408-944-4467 or 8-500-4467) to discuss appropriate action.

Personnel and Medical Data Privacy

Like the business information discussed above, confidentiality concerns also apply to the personal information of Quantum employees, former employees, job applicants, and other persons. In this regard, Quantum is committed to the protection of your personal and medical data ("Employee Data") in its possession. Maintaining the security and integrity of Employee Data and handling it correctly is central to the way we conduct our business and reflects Quantum's values. Employee Data is collected, processed, stored and transferred with adequate precautions to ensure confidentiality and is accessible only to individuals with a legitimate need to know about or have access to it. When appropriate, employees may be asked for their consent to the collection, processing, transfer and storage of their Employee Data. Quantum has implemented a comprehensive Privacy and Security Program to better protect Employee Data as we carry out day-to-day business practices and communications around the globe.

THE HIGH ROAD:

More information regarding Quantum's privacy and security policies can be found on  under "Employee Essentials" → "Policies & Guidelines." Scroll through the list until you find "HIPPA Policy," It can also be accessed by clicking [here](#).

E-mail and Technology

While we can't control the content of the Internet or third-party e-mail, we can set clear standards for what we access and communicate electronically. Remember that when we access information or communicate electronically (either with others at Quantum or with third parties), we are representing Quantum. You should also understand that you are not guaranteed personal privacy in the use of Quantum's communication



systems, whether for business or personal communications. Any information or documents sent to, from or stored on Quantum's communications systems are Quantum's property and are subject to review at any time.

For further information, please consult the IT Acceptable Use policy, which can be found on [myQ](#) under "Employee Essentials" → "Policies & Guidelines," or by clicking [here](#).

When We Use Third-Party Copyrighted Material

Most of us use copyrighted material - such as licensed computer software or copyrighted print material - quite extensively in our jobs. Understanding and following copyright and license guidelines can avoid unnecessary legal problems. Contact the Legal department ([408-944-4467](#) or [8-500-4467](#)) if you have any questions.

Duplication of Software

The unauthorized duplication of copyrighted computer software is against the law. We must comply with all license and purchase terms regarding the duplication of any software we acquire or use.

Using Licensed Software

We always use licensed copies of all software that we use in the operation of our business. Whenever you receive new computer software, be sure that you are receiving a licensed copy. And remember, you should never: (i) install computer software from a home computer on Quantum PCs or networks; (ii) copy software from Quantum PCs or networks for installation and use on your home computer; nor (iii) exchange copies of software applications with co-workers without first consulting with Quantum's IT Department.

THE HIGH ROAD:

[Consult with the IT Department prior to installing any new software programs onto your Quantum PC.](#)

Using Copyrighted Material

It is against Quantum policy to copy, digitize, modify, translate, broadcast, perform, or distribute any part of a copyrighted work unless Quantum is legally authorized to do so.



THE HIGH ROAD:

Before using any third-party material, you will need to obtain the appropriate license. Many programs are licensed on a site-wide or company-wide basis. Contact the Legal department at 408-944-4467 or 8-500-4467 regarding any license or copyright issues.

If you are the author of an original work that will be important to Quantum's business and is intended for sharing with outside parties, you should investigate whether or not to obtain a copyright registration for that original work. Contact the Legal department for instructions (408-944-4467 or 8-500-4467).



How We Do It - Maintaining Good Business Practices


The quality of our products is meaningless if the process of creating them is compromised. Quantum places the highest value on maintaining proper ethical practices in conducting its business.

Competitors and Antitrust Law

We must always strictly adhere to all antitrust and fair competition laws wherever Quantum does business. While these laws are complex and difficult to summarize, they generally focus on behavior and/or agreements between Quantum and competitors that affect prices, terms or conditions of sale, or fair competition.

The risks from a violation are great because antitrust laws are enforced vigorously and may result in substantial financial penalties, and long prison sentences for those involved.

Some basic antitrust guidelines are that we must never: i) take part in discussions or share information with competitors about pricing (or other terms or conditions of doing business), allocation of customers or sales territories, costs, inventories, product plans, market share, geographical coverage, volume of production, or competitive strategies; ii) discriminate among customers (such as in pricing or in access to products) or refuse to do business with anyone without a legitimate business justification; or iii) tie a transaction with a customer or supplier with another, separate transaction for a different product.

That said, we cannot possibly cover all of the relevant rules in these guidelines. The goal is to raise your awareness of potential issues and to broadly outline some of the rules that may help avoid legal problems. If you are responsible for areas of the business where these laws apply you must be aware of them and are encouraged to contact the Legal department ([at 408-944-4467](tel:408-944-4467) or [8-500-4467](tel:8-500-4467)) to obtain further information about their implications, and in particular how they apply in the country where you operate. More general information, including the latest training presentation, is also available on  by clicking [here](#).



Market Intelligence

Market intelligence must also come by lawful and ethical means that do not involve either direct or indirect contact with competitors, such as picking up handouts at a trade show, attending a seminar or relying on other public sources of this information. However, we also need to be especially cautious at trade shows and similar functions, as they tend to be scrutinized by government regulators for anti-competitive activities since they involve contact between competitors. Remember --it is unfair and unlawful to ask current or former employees of other businesses - even if they are personal friends - to violate their confidentiality obligations to those businesses.

THE HIGH ROAD:

Whenever you obtain competitive information or receive documents, note directly on them where you got them, from whom, and when. This can avoid later allegations that they were improperly obtained. As a general rule of thumb, avoid all non-public sources of competitive information.

Public Reporting and Communications

Before speaking publicly on behalf of Quantum (such as at a conference, a trade show or by giving an interview), you must obtain prior approval from the Public Relations (PR) department, and notify the Investor Relations department. The PR team and the Legal Department will also need to review all presentation materials.

THE HIGH ROAD:

Your Quantum compensation includes time spent preparing for, attending, and delivering appropriate presentations. Therefore, you should not request or negotiate a fee or other compensation from the organization requesting the speech, unless authorized by a Quantum Vice President.

In addition, any persons involved in public communications made by Quantum, or in the preparation or review of the reports and documents that Quantum files with or submits to the Securities and Exchange Commission, must act so that these reports, documents and other public communications promote full, fair, accurate, timely and understandable disclosure.

Finally, 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, or Director of Investor Relations may conduct such communications.

Representing Quantum

We must take careful precautions not to seem to represent Quantum's corporate opinion to, or discuss private and confidential company information with, people outside Quantum.

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

THE HIGH ROAD:

When you go online or speak up elsewhere, indicate that the views you express are your own - not those of Quantum. But even with this disclaimer, you may well be identified with Quantum, so please maintain the highest level of professionalism in your communications. Bear in mind that whether you are speaking in your personal capacity, or formally on behalf of Quantum, it is never permissible to disclose material non-public information to the public, even if it is under the auspices of offering an "opinion."

Gifts and Entertainment

Business gifts and entertainment can be sensitive subjects. Usually, relying on common sense can safeguard Quantum from exposure to legal liability or potentially embarrassing situations. There is a difference between a complimentary gift and an inappropriate one. We must know when and how to avoid situations where gifts or business entertainment could be construed as inappropriate, such as by raising the appearance that they could influence business decisions.

Accomplishing this is simple: We don't exchange valuable gifts - including gifts of equipment, money, discounts, or favored personal treatment - with people associated with Quantum vendors or customers.

THE HIGH ROAD:

What constitutes a "valuable gift" versus an "acceptable gift"? Well, remember to use good judgment. If a gift seems inappropriate, it probably is. As a general rule of thumb, no gift received or given should exceed \$150 in value absent extraordinary circumstances and approval from your Vice President.



While it is impossible to list all potential conflicts, the following general guidelines are meant to illustrate some of the conflicts of interest Quantum employees must avoid. Business gifts (including advertising novelties, favors, and entertainment) are allowed only if they:

- Are of limited value, as described above;
- Do not violate any applicable local law or custom;
- Would not embarrass Quantum if publicly disclosed;
- Are fully visible to senior management in the organization whose employee or representative gives or receives it;
- Are not given to or received from any government personnel or to anyone associated with the government (for further information, see below under [“Bribery and Corruption”](#));
- Are not, and would not appear to be, inappropriate, such as intended to improperly induce or reward favorable action or inaction; and
- Are not made or received on a regular or frequent basis.

In addition, specific guidelines apply to the following situations:

Meals, Entertainment and Travel. They should be infrequent, consistent with accepted business practice, not extravagant in nature and for the express purpose of furthering a business relationship. Whether you are providing or receiving a business meal or entertainment, *a representative from each company must be present.* In addition, you must not take a government official to a meal without prior approval from Quantum’s General Counsel.

Travel. We may never accept travel from any source outside Quantum or provide travel to representatives of Quantum customers, channel partners, suppliers, other business partners or competitors without written approval from your Vice President.



Valuable Gifts. There may be limited circumstances where the exchange of gifts having more than nominal value is appropriate, such as when, according to local customs, not doing so would be offensive and harm legitimate business relations. Guidelines for these circumstances are covered below under [“Valuable Gifts and Local Customs.”](#)

This policy isn't intended to prevent us from receiving appropriate complimentary products and services or from making a gift of equipment to a company or an organization. However, we must ensure that any gift is given openly, with full knowledge by the company or organization, and consistent with applicable law.

Valuable Gifts and Local Customs

Local customs in some countries may call for the exchange of gifts having more than nominal value as part of the business relationship. In these situations, any gift must:

- Be approved by your Vice President;
- Comply with all local laws and any written local guidelines as articulated by Quantum's managing director for the country based on his/her knowledge of the local culture;
- Not violate any anti-corruption standards or rules for U.S. public companies;
- Be given or received only on behalf of Quantum (not to or from an individual); and
- If received, reported to the Legal department.

In all cases, the exchange of gifts must be conducted without any possible appearance of impropriety.

Bribery and Corruption

Most countries in which we do business have laws that forbid making, offering or promising any payment or anything of value (directly or indirectly) to a governmental official, particularly when made to influence an official act or decision to award or retain business. In addition, a particularly important U.S. law, called the Foreign Corrupt Practices Act ("FCPA"), prohibits bribery anywhere in the world.


We are committed to full compliance with the FCPA and all such laws and the consequences for violating them



are severe, both to Quantum and to the individuals involved. For instance the penalty for a violation of the FCPA can include fines to Quantum of up to \$2 million and criminal penalties **to the individuals involved** consisting of fines of up to \$100,000 and prison terms of up to five years.

If you have any questions regarding whether an action or payment would be a violation of the FCPA, or any other law governing the giving or receiving of payments, please contact the Legal department (at 408-944-4467 or 8-500-4467) for advice.

Contract Matters - General

Contracts can raise numerous ethical or compliance-related issues if they are handled inappropriately. Key guiding principles in dealing with contracts are: i) to always involve the Legal Department; ii) to consider the need for a contract anytime Quantum is dealing with a third party; iii) that contracts should always be in writing and be complete (we avoid MOUs and LOIs if possible); and iv) never sign a contract without proper authority and approval from the Legal department. More information regarding contracting can be found on the  [Legal department website](#).

Government Contracts and Other Government Requirements

When we work with any government body (including national, state, provincial, municipal, or other similar government divisions), there are a number of special contractual requirements and policies that may apply. Please review these requirements with the Legal department - and make sure you understand them - before agreeing to them.

Employment of Former Government Employees

We are committed to observing all laws limiting the duties and types of services that former government and military employees may perform as Quantum employees or as consultants to Quantum.



Meeting Import and Export Requirements

Some of our technical information and products are subject to import and/or export control restrictions. All of us, including temporary employees and contractors, must comply with Quantum policies, trade programs and government regulations when:

- Importing or exporting Quantum products, equipment, technology and software;
- Working with or communicating technical data outside the United States or to non-US citizens inside the United States;
- Traveling overseas;
- Developing or offering new products inside and outside the United States;
- Importing or exporting third-party products;
- Making software available for downloading to anyone outside of Quantum; and
- Establishing new relationships with supply chain partners.


THE HIGH ROAD:

Questions relating to the application of Import and Export regulations should be referred to the Worldwide Import/Export Organization (719-536-5818 or 8-301-5818).

Environmental, Health and Safety

We are dedicated to producing our products in a manner that conserves the environment and protects the safety and health of our employees, customers, and communities. It is our responsibility to:

- Comply with corporate standards and environmental health and safety laws and regulations when we do business;
- Seek awareness of the regulations and policies that apply to our functions;
- Maintain a safe and healthful work environment;
- Anticipate and avoid potential environmental, health, and safety risks; and
- Use appropriate technology in the design and production of Quantum's products and services to minimize pollution and maximize conservation.


If not properly addressed, environmental, health and safety matters can pose significant risk to Quantum. For further information, please visit the [EHS and Security community](#) on  or contact the EHS department (719-536-6263 or 8-301-6263).



Records Management

Quantum maintains a Records Management Program to establish the framework for the identification, organization, preservation and disposal of Quantum's records. The Records Management Program consists of the Records Retention Policy, the Retention Schedules and standardized procedures for the storage, retrieval, returning, holding and disposal of records.

THE HIGH ROAD:

More information regarding Quantum's records management program can be found on  under [Employee Essentials > Records - Archiving](#) or by contacting the Compliance Records Manager at 408-944-4467 or 8-500-4467.



Avoiding Conflicts of Interest

A conflict of interest occurs when your private interest interferes in any way – or even appears to interfere – with the interests of Quantum as a whole. A conflict situation can arise when you take actions or have interests that may make it difficult to perform your work objectively and effectively. Remember - - having a conflict of interest does not necessarily mean that you are actually obtaining personal gain at the expense of Quantum. Rather, a conflict can exist if there is even the appearance or possibility of divided loyalty.

If you are aware of a potential conflict of interest or uncertain of whether a proposed action involves a conflict of interest, please promptly discuss the action with your management, your HR representative, the Ethics Committee or the Legal department ([408-944-4467](tel:408-944-4467) or [8-500-4467](tel:8-500-4467)). You may also use the confidential and anonymous reporting service described below in [“Reporting Concerns.”](#) Examples of some common conflict of interests situations are described in the following sections.

Interests in Other Businesses

We must avoid any financial or business relationship that might cause divided loyalty. This could include, for example, being on the board of directors of an outside company.

THE HIGH ROAD:

You need to receive written permission from Quantum’s General Counsel (contact at [408-944-4467](tel:408-944-4467) or [8-500-4467](tel:8-500-4467)) before beginning any employment, business, consulting, financial, or other relationship with another company where the proposed activity:

- Is or could be in Quantum's current or future business, whether from the supplier or customer side of our business;
- Exposes Quantum to third-party confidential, proprietary, or trade-secret information, or could expose third parties to Quantum’s confidential, proprietary, or trade-secret information; or
- Is similar to the work you do at Quantum.

Family

Working with family or friends can subject Quantum to accusations of favoritism or preferential treatment. To avoid any legal problems, employees may not:

- Conduct Quantum business or participate in business organizations;
- Form a direct or indirect reporting relationship; or
- Form any direct or indirect financial, business, consulting or other relationship that could cause divided loyalty with persons who are members of one's own family, domestic partners, persons in



dating relationships, close personal friends, or business partners outside of Quantum in the absence of full disclosure and the documented approval of Quantum's General Counsel.

Projects or Inventions

You must receive written permission from the Vice President of your organization before beginning work on a non-Quantum project or invention that will involve Quantum time, equipment, or materials.

Political Contributions and Activities

Company contributions to political candidates or causes are illegal in many jurisdictions. We may not use Quantum assets - including employee work time, use of Quantum premises, or equipment - for any political candidate, party, or campaign, except with prior written approval of a Quantum Vice President and the Quantum Legal department, and never in connection with any Federal election.

THE HIGH ROAD:

Of course, you may always participate in political activities on an individual basis, with your own money, and on your personal time.

Investments

We may not invest in or maintain a financial interest in businesses that are direct competitors of Quantum if the investment is of a size that could influence our judgment in a way that is contrary to Quantum's best interests. In addition, we may not invest in businesses similar to Quantum - or in suppliers or customers of Quantum - if that investment might affect our judgment in making decisions for Quantum.

Loans

You should not receive loans from, or guarantees of obligations from, Quantum competitors or other companies with which Quantum has a business relationship. In addition, any loans from Quantum to employees are of special concern and should be carefully reviewed by management for compliance with our conflict of interest policies beforehand. Members of Quantum's Board of Directors and Quantum's executive officers may not receive loans or extensions of credit from Quantum, nor may Quantum arrange for an extension of credit to or renew an existing extension of credit to such a person.



Buying and Selling Stock


Quantum policy prohibits us from making transactions in Quantum securities (including its stock), or securities of businesses with whom Quantum does business, when we may possess insider information - that is, material information about Quantum or such other party that has not been publicly disclosed. This policy also applies to members of our households and others whose transactions may be attributable to us.

United States securities laws and Quantum policy regarding insider information also apply to any non-public information that Quantum employees may have about any Quantum customer, vendor, or third party.

Once insider information has been made public, we are required to wait at least two full business days before trading in the affected security so that the information can be thoroughly broadcast to the public.

Anyone who is in possession of insider information must trade Quantum securities in conformance with the trading window periods and policies established by Quantum's Stock Administration Department.

THE HIGH ROAD:

Questions relating to the application of these rules should be referred to Stock Administration or to the Legal department. You can also get more information on trading policies, procedures, and guidelines by referring to Quantum's Insider Trading Policy, which can be found on  in the [myFinance](#) community.



Reporting Concerns


Quantum expects all employees, officers and directors to comply with the provisions of this document, and is committed to accountability for adherence to this code.

Seeking Guidance and Reporting Concerns

If you have a question about these guidelines, or encounter a situation not covered by these guidelines, you should raise the question with your management, your HR representative, or the Quantum Legal department ([408-944-4467](tel:408-944-4467) or [8-500-4467](tel:8-500-4467)).

If you suspect you have witnessed or know of a violation of any provision of this document or of any applicable law, rule or regulation, you should promptly notify your management, your HR representative, or the Quantum Legal department ([408-944-4467](tel:408-944-4467) or [8-500-4467](tel:8-500-4467)).

If it is not practical, or if you are uncomfortable, raising your question or concern with Quantum management, two alternative reporting mechanisms are also available.

First, Quantum has established an Ethics Committee, consisting of leadership from the Finance, Legal, HR and Risk Management organizations. The Ethics Committee is available to address any questions regarding *The High Road*, and to conduct investigations of reported concerns. In addition, the Ethics Committee maintains an [Ethics and Compliance community](#) on  to provide useful background information and FAQs. The Ethics Committee can be reached at compliance@quantum.com.

Second, Quantum has established a hotline that allows you to communicate your question or concern in a confidential and anonymous manner by phone in the U.S. at [1-866-ETHICSP \(1-866-384-4277\)](tel:1-866-ETHICSP) or via the Web at www.ethicspoint.com. These resources are operated by an external third-party vendor with trained professionals to take your calls, in confidence, and to report your concerns to the appropriate persons for proper handling. There are also toll-free numbers available in international jurisdictions as follows:



Australia	800 339276
Canada	866 ETHICSP (866 384 4277)
China (Northern)	10 800 712 1239
China (Southern)	10 800 120 1239
France	0800 902500
Germany	0800 1016582
Hong Kong	800 964214
Hungary	06 800 17199
India	000 800 100 1071
Ireland	1 800615403
Japan	0044 22 11 2505
Korea	00308 110 480
Malaysia	800 80 8641
Scotland	08 000328483
Singapore	800 1204201
Switzerland	0800 562907
United Kingdom	08 00328483

Legal Notices and Inquiries

Immediately notify the Legal department ([408-944-4467](tel:408-944-4467) or [8-500-4467](tel:8-500-4467)) of any legal notice, government inquiry, investigation, audit or inquiry from outside attorneys.

All press inquiries should be directed to Corporate Communications ([408-944-4044](tel:408-944-4044) or [8-500-4044](tel:8-500-4044)).

Attorney-Client Privilege

The attorney-client privilege if used properly can protect Quantum from having potentially damaging communications used against it in later disputes or investigations. The privilege provides that if a client consults with an attorney for the purpose of obtaining legal assistance, all confidential communications of the client in furtherance of that end are protected.

When raising a potentially sensitive legal issue, you should endeavor to understand the attorney-client privilege implications. If possible, direct your inquiry or concern to a Quantum attorney, do not copy any third-party, and label the communication “attorney-client privileged.” Please contact the Legal department at ([408-944-4467](tel:408-944-4467) or [8-500-4467](tel:8-500-4467)) if you have any questions.



**No Retaliation
for Reporting of
Violations**

Acts of retaliation or retribution against an employee, officer or director who in good faith reports a suspected, planned or actual violation of any provision of this document or of any applicable law, rule or regulation are not permitted and will be dealt with appropriately by management or the Board of Directors. Such acts of retaliation may result in disciplinary action, including termination from employment or other working relationship.

**Enforcement of
Code and
Response to
Violations**

Quantum will investigate any reports of potential violations, and may take disciplinary action against any employee, officer, director, contractor or consultant whose actions have been found to violate any provision of this document or of any applicable law, rule or regulation.

The Board of Directors shall determine, or designate appropriate persons (including Quantum's Ethics Committee) to determine appropriate actions to be taken in the event of violations of this Code by any person subject to it. Such actions shall be reasonably designed to deter wrongdoing and to promote accountability for adherence to the provisions of this document, and may include action ranging from written notices or censure to suspension (with or without pay as determined by the Board of Directors or its designee) or termination with or without cause.

In determining what action is appropriate in a particular case, the Board of Directors or its designee shall take into account all relevant information, including the nature and severity of the violation, whether the violation was a single occurrence or repeated occurrences, whether the violation appears to have been intentional or inadvertent, whether the individual in question had been advised prior to the violation as to the proper course of action and whether or not the individual in question had committed other violations in the past.



**Amendments
and Waivers**

Any waiver of any of the provisions of this code for a director or executive officer of Quantum may be granted only by the Board of Directors or a committee of the Board of Directors, and must be promptly disclosed to the stockholders of Quantum if and as required by applicable law or the rules of the New York Stock Exchange.

Any amendment to any of the provisions of this code applicable to a member of Quantum's Board of Directors or an executive officer of Quantum must also be promptly disclosed to the same extent.



Your Personal Commitment to Integrity

I acknowledge that I have received *The High Road -- Quantum's Code of Business Conduct and Ethics*.

I understand that every employee and director is required to comply with the policies described in the guide.

When I have a concern about a possible violation of *The High Road*, I will raise the concern to my management, my Human Resources representative, the Legal department, the Ethics Committee or via Quantum's confidential and anonymous reporting service described in *The High Road* under the section titled "[Reporting Concerns](#)."

Print Name

Signature

Date