



## Anticorruption Policy

August 2016

Quantum directors, officers, team members, and agents will refrain from offering payments, gifts, services, or other items of value to anyone if such an offer would be, or would appear to be, intended to influence or reward any decision or action to assist Quantum in obtaining or retaining a business opportunity. Furthermore, all Quantum directors, officers, team members, and agents are required to cooperate with Quantum's anticorruption due diligence efforts and to maintain complete and accurate records regarding Quantum business transactions.

### BACKGROUND

There is a broad collection of US and international laws aimed at preventing bribery and corruption with which Quantum must comply. The United States Foreign Corrupt Practices Act of 1977 prohibits payments to foreign officials by US citizens and others who work for US companies for the purpose of obtaining or retaining business. It also requires US corporations and their foreign subsidiaries and affiliates to maintain accurate records of corporate transactions and establish effective internal control procedures. The United Kingdom Bribery Act, which applies to any company with operations in the United Kingdom, prohibits bribery of both public officials and private citizens and allows companies to face criminal charges for failure to prevent bribery.

In addition, the United Nations Convention Against Corruption, the Organization for Economic Cooperation and Development Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, the Organization of American States Inter-American Convention Against Corruption, the African Union Convention on Preventing and Combating Corruption, and the Council of Europe's Criminal Convention on Corruption have similar requirements and prohibitions.

With respect to activity within the United States, the Anti-Kickback Act of 1986 prohibits the actual or attempted offering, soliciting, or providing of a kickback as well as impacting the price charged to the US government as a result of a kickback. In addition, under certain circumstances involving interstate travel or communication, the US Travel Act can be used to pursue bribery charges.

For purposes of this document, all of the above laws and regulations shall be referred to as the "Anticorruption Requirements."

### PURPOSE AND SCOPE

Quantum is committed to full compliance with the Anticorruption Requirements, and has created this Anticorruption Policy (the "Policy") to assist Quantum and its directors, officers, team members, suppliers, contractors, subcontractors, consultants, and agents (the "Quantum Parties") in understanding Quantum's obligations under Anticorruption Requirements. This Policy applies to all Quantum Parties worldwide.

### SUMMARY OF REQUIREMENTS

While each law is different, Anticorruption Requirements generally prohibit affected companies and their employees from making payments for the purpose of improving or rewarding the company's business position. These prohibitions can be interpreted broadly, in that:

- Making payments may include offering, paying, promising to pay, or giving money, gifts, services, or beneficial opportunities as part of the business transaction. Such opportunities are hard to define, but can include offering employment or scholarships, providing enhanced social status, releasing confidential information, or other activities intended to provide benefits to the recipient in such a transaction.
- Such gifts of value do not have to be made by the company itself. Gifts of value made by a third party on behalf of a company, *even without that company's knowledge*, may be treated as though they were made directly.
- Improving business position includes obtaining business or securing an improper advantage and means an activity that is intended to assist in winning, retaining, or enabling a business opportunity. Examples include selling product, obtaining licenses, permits, or waivers of those requirements, or accessing competitor information.



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Anticorruption Requirements also mandate the maintenance of books, accounts, and internal controls to accurately guide and record the business transactions of the company. The impact of the record retention requirements is significant because records violations are often pursued as they can be easier to substantiate than bribery itself.

### GUIDELINES FOR ANTICORRUPTION COMPLIANCE

Failing to comply with Anticorruption Requirements can have severe repercussions, including significant fines and *criminal prosecution and fining of individuals involved*. Therefore, it is imperative that all Quantum Parties strictly adhere to Anticorruption Requirements and refrain from offering or providing items of value to anyone if it would be, or would appear to be, intended to influence or reward any decision or action to assist Quantum in obtaining or retaining a business opportunity. Furthermore, all Quantum Parties are required to cooperate with Quantum's anticorruption due diligence efforts and to maintain complete and accurate records regarding Quantum business transactions.

Anticorruption Requirements are complex and contain only limited exceptions. If you have any questions about how they apply, you should contact the legal department for advice. Regardless of the intent, appearance, or value, no payments, gifts, or services are to be offered or provided to a government official without advance approval from Quantum's general counsel. Additional guidance on giving and receiving gifts is provided in *The High Road* – Quantum's Code of Business Conduct and Ethics.

You are expected to promptly report any actual or suspected anticorruption violation. Such reporting can be made in several ways, including through (i) your Quantum management team or contact; (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); or (iv) EthicsPoint, Quantum's third party reporting service, at [www.ethicspoint.com](http://www.ethicspoint.com).

### DUE DILIGENCE EFFORTS

Quantum may seek to perform anticorruption due diligence activities to reasonably verify compliance with this Policy by the Quantum Parties and certain Quantum business partners. These activities may include the implementation of contract provisions, compliance questionnaires, anticorruption audits, partner-specific risk assessments, or other efforts determined by Quantum to be appropriate. Cooperation with such due diligence activities, including by providing requested information in a timely manner, is required of all Quantum Parties.

### EXECUTIVE COMMITMENT

Full compliance with Anticorruption Requirements is of paramount importance to Quantum and its regular business practices. Because of that importance, Quantum requires certain senior management representatives to acknowledge, in writing, their commitment to ensuring Quantum's adherence to this Policy. Those acknowledgements can be found in Exhibit A to this Policy.

### FURTHER INFORMATION


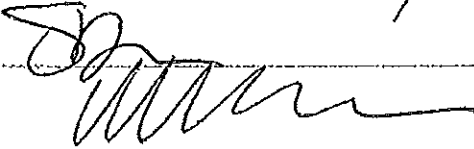
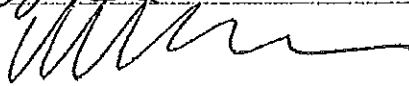
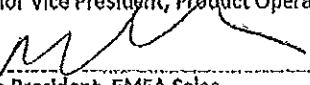
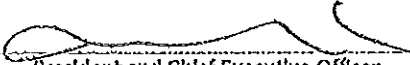
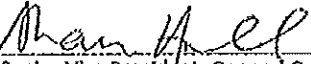

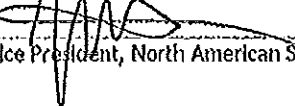

If you have questions or comments regarding compliance with this Policy, please contact Quantum's legal department or ethics committee for assistance.



**Anticorruption Policy**  
August 2016

**Exhibit A – Executive Commitment**

My signature below indicates my commitment to adhering to Anticorruption Requirements and this Policy.

Name	Title	Signature
Fuad Ahmad	Senior Vice President and Chief Financial Officer	
Steve Baum	Vice President, Supply Chain Management	
Bill Britts	Senior Vice President, Worldwide Sales	
Gabriel Chaher	Vice President, EMEA Sales	
Rob Clark	Senior Vice President, Product Operations	
Gilles Gabriel	Vice President, EMEA Sales	
Jon Gacek	President and Chief Executive Officer	
Shawn Hall	Senior Vice President, General Counsel, and Secretary	
Jeff Lebold	Area Vice President, APAC Sales	
John McKillop	Vice President, North American Sales	
Jim Mudd	Senior Vice President, Operations	
Yves Roumier	Senior Vice President, Worldwide Service	
Geoff Stedman	Senior Vice President, Marketing and Scale-Out Storage Solutions	
Jim Vaughan	Vice President, Service	



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The High Road

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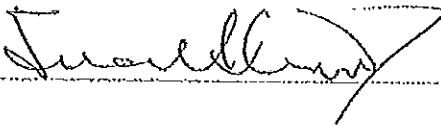
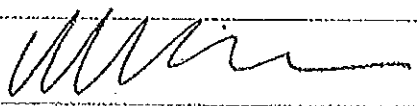


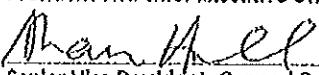
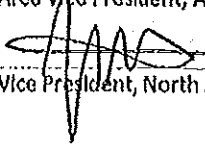
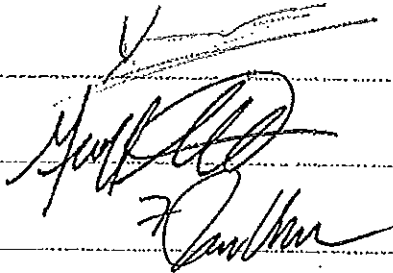

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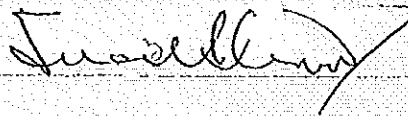
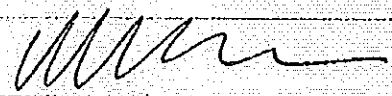
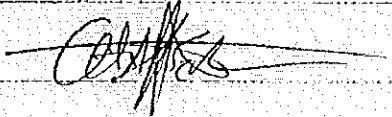


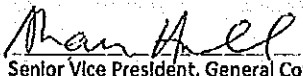
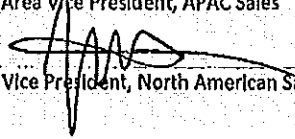
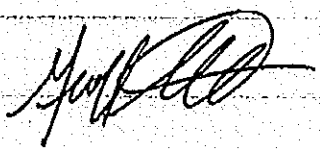
The High Road

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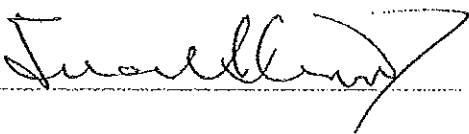
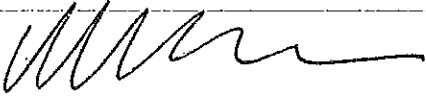
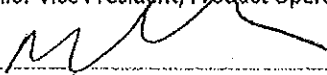
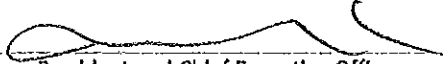


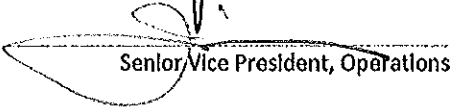
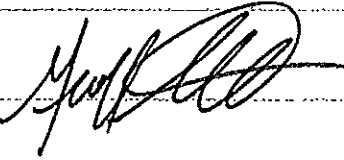
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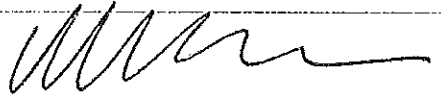
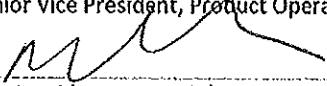


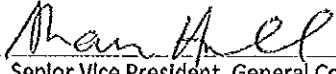
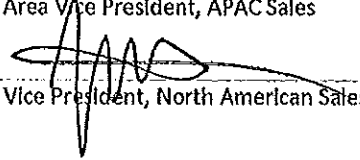



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