

Quantum Anticorruption Policy



The High Road

Quantum directors, officers, employees, and agents will refrain from offering payments or services to any private citizen or public official if such an offer would be, or would appear to be, intended to influence any decision or action to assist Quantum in obtaining or retaining a business opportunity. Furthermore, all Quantum directors, officers, employees, 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

The United States Foreign Corrupt Practices Act of 1977 ("FCPA") prohibits payments to foreign officials by US citizens and others who work for US companies for the purpose of obtaining or retaining business and requires US corporations and their foreign subsidiaries and affiliates to maintain accurate records of corporate transactions and establish effective internal control procedures. In addition, the United Kingdom Bribery Bill, 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. There are also numerous regulations throughout the world that prohibit bribery of private citizens. 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 requirements of all Anticorruption Requirements, and has created this Anticorruption Policy (the "Policy") to assist Quantum and its directors, officers, employees, 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 to private citizens or public officials for the purpose of improving 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.
- The definition of public official often includes employees of the government or government-run companies (such as state schools or hospitals), political parties or candidates, and international organizations and their representatives. Family members of such individuals may also be considered to be government officials. The term can be interpreted broadly to include anyone with political influence, even if there is no formal government tie.
- 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.

In addition to the above, the Anticorruption Requirements now allow any company with operations in the United Kingdom to be charged with a corporate offense of failure to prevent bribery if an inappropriate payment is made. Anticorruption Requirements also mandate the maintenance of books, accounts, and internal controls to accurately guide and record the business transactions of the company.

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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 payments or services to any private citizen or public official if such an offer would be, or would appear to be, intended to influence 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 must 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 must promptly report any actual or suspected anticorruption violation. Such reporting can be made in several ways, including through (i) your management; (ii) your local compliance representatives; (iii) your human resources business partners; (iv) the legal department; (v) Quantum's ethics committee at ethics.committee@quantum.com or compliance@quantum.com; or (vi) EthicsPoint, Quantum's third party reporting service, at 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.


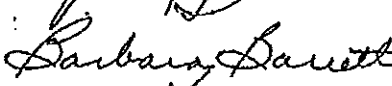
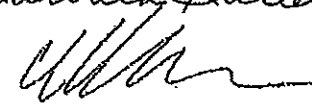



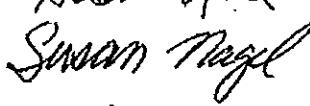

Further Information

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

Quantum
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Exhibit A - Executive Commitment

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

Name	Title	Signature	Date
Rick Belluzzo	Chairman of the Board and Chief Executive Officer		11/29/10
Barbara Barrett	Senior Vice President, Human Resources		11/29/10
Bill Britts	Executive Vice President, Sales and Marketing		11/22/10
Jim Mudd	Senior Vice President, Operations		11/29/10
Jon Gacek	Executive Vice President, Chief Financial Officer, and Chief Operating Officer		11/22/10
Shawn Hall	Senior Vice President, General Counsel, and Secretary		11/29/10
Sue Nagel	Senior Vice President, International Sales		12/1/10
Yves Roumier	Senior Vice President, Quality and Service		12/7/10