

Quantum.

Statement of Policy Against Insider Trading and Rules with Respect to Certain Transactions in Company Securities

Adopted on August 18, 2010

This Statement of Policy provides rules to employees, officers, directors, consultants and agents of Quantum Corporation (the "Company") with respect to transactions in the Company's securities.

Applicability of Policy

This policy applies to all transactions in the Company's securities, including common stock, options for common stock and any other securities the Company may issue from time to time such as preferred stock, warrants and convertible debentures as well as to derivative securities relating to the Company's stock, whether or not issued by the Company, such as exchange-traded options. It applies to all officers, members of the Company's Board of Directors, and all employees, consultants and agents of the Company and its subsidiaries who receive or have access to Inside Information (defined below), which may include information about the Company or about other companies with which the Company does business. This group of people is sometimes referred to in this policy statement as "Insiders".

Any person who holds Inside Information is an Insider for so long as the information is not publicly known. Employees who obtain Inside Information in the course of employment regarding outside third parties may be Insiders with respect to these companies. Any employee can be an Insider from time to time and would at those times be subject to this policy.

The policy also applies to members of an Insider's immediate family and other members of an Insider's household, who may be deemed to share the knowledge of such persons. It applies further to any other person who receives Inside Information from any Insider or member of an Insider's immediate family or household.

Statement of Policy

General Policy

It is the policy of this Company to prevent the unauthorized disclosure of Inside Information acquired in the work-place and the misuse of Inside Information in securities trading.

Specific Policies

No director, officer, employee, consultant or agent of the Company, and no member of the immediate family or household of any such person, shall engage in any transaction involving a purchase or sale of the Company's securities, including any offer to purchase or offer to sell, during any period commencing with the date that he or she possesses Inside Information concerning the Company and ending at the beginning of the third full business day following public disclosure of the information. This restriction on trading does not apply to transactions made under a trading plan adopted pursuant to Securities and Exchange Commission Rule 10b5-1(c) (17 C.F.R. § 240.10b5-1(c)) ("Rule 10b5-1(c)") and approved by the Company (an "approved Rule 10(b)5-1 trading plan"). Any officer, director or employee of the Company may adopt an approved Rule 10(b)5-1 trading plan.

Furthermore, no Insider or related person shall assist any other person in engaging in such a transaction by improper disclosure of Inside Information of the Company, nor shall such Insider or related person make recommendations or express opinions on the basis of Inside Information as to trading in the Company's securities.

Inside Information relating to the Company is property of the Company and the unauthorized disclosure of such information is forbidden. In the event any officer, director, employee, consultant or agent of the Company receives any inquiry from outside the Company, such as from a stock analyst, for information (particularly financial results and/or projections) that may be Inside Information, the inquiry should be referred to the Company's Investor Relations group, which is responsible for coordinating and overseeing the release of such information to the investing public, analysts and others in compliance with applicable laws and regulations.

Officers, directors, employees, consultants and agents of the Company are also forbidden from disclosing or trading on Inside Information gained during the course of providing services to Quantum which relates to vendors, suppliers, distributors or other companies engaged in business with Quantum

Policies Regarding Derivative Securities and Hedging Activities

In addition, absent prior approval from the General Counsel, all persons subject to the Company's trading window (described below) are prohibited from engaging in transactions in publicly-traded options, such as puts and calls, and other derivative securities with respect to the Company's securities. This extends to any hedging or similar transaction designed to decrease the risks associated with holding Company securities. Stock options, stock appreciation rights and other securities issued pursuant to Company benefit plans or other compensatory arrangements with the Company are not subject to this prohibition.

While the securities laws do not strictly prohibit trading in derivatives, such trading can give rise to numerous complications under, and potential violations of, securities laws. Some hedging transactions may have legitimate tax or other objectives, but transactions in derivative securities may reflect a short-term and speculative interest in the Company's securities and may create the appearance of impropriety, even where a transaction does not involve trading on inside

information. In addition, the application of securities laws to derivatives transactions can be complex, and persons engaging in derivatives transactions run an increased risk of violating securities laws if not careful. For this reason, the company has decided that, absent prior approval from the General Counsel, company personnel may not engage in such transactions.

Policies Regarding Margin Loans and Pledges

Because a margin or foreclosure sale may occur at a time when individuals are aware of material nonpublic information or otherwise are not permitted to trade in Company securities, no person subject to the Company's trading window (described below) may take a margin loan where the Company's shares are used, directly or indirectly, as collateral for the loan. Such persons are also prohibited from pledging Company securities as collateral for a loan. An exception to this prohibition may be granted where you wish to pledge Company securities as collateral for a loan (not including margin debt) and clearly demonstrate the financial capacity to repay the loan without resort to the pledged securities. If you wish to pledge Company securities as collateral for a loan, you must submit a request for approval to the General Counsel at least two weeks prior to the proposed execution of documents evidencing the proposed pledge.

Potential Criminal and Civil and/or Disciplinary Action

In addition to large civil penalties, Insiders may be subject to criminal penalties of up to five million dollars and up to twenty years in prison for engaging in insider trading, whether it were to consist of transactions in the Company's securities at a time when they have knowledge of Inside Information regarding the Company or in the securities of another company. Insiders may also be liable for improper transactions by any person (commonly referred to as a "tippee") to whom they have disclosed Inside Information regarding the Company or another company, or to whom they have made recommendations or expressed opinions on the basis of this information as to trading in the company's securities. The Securities and Exchange Commission (SEC) has imposed large penalties even when the disclosing person did not profit from the trading. The SEC and the New York Stock Exchange, Inc. (NYSE) use sophisticated electronic surveillance techniques to uncover insider trading.

Insiders and related persons who violate this policy shall also be subject to disciplinary action by the Company, which action may include termination of employment.

Trading Window

The purpose of the "trading window" period is to help establish a diligent effort to avoid any improper transaction.

Trading Window. The period commencing four weeks prior to the end of the fiscal quarter until the Company's financial results for the quarter have been announced to and considered by the public is a particularly sensitive period of time from the perspective of

securities laws. This is because officers, directors and certain other employees will often have, during such period, Inside Information about the expected quarterly results.

Accordingly, to ensure compliance with applicable federal and state securities laws, the Company has implemented a trading window whereby all directors, officers, vice presidents, director-level employees, employees in functions with access to Inside Information and certain other employees designated by the Company may conduct transactions in the Company's securities only during the period commencing at the beginning of the third full business day after public disclosure of the Company's quarterly or annual financial results and continuing until twenty-eight days prior to the end of the next quarter. This trading window is generally a safer time to trade because the market will have been advised of the most recent financial results. This restriction on trading does not apply to transactions made under an approved Rule 10(b)5-1 trading plan.

It is important to note, however, that even during this period, any person possessing any Inside Information concerning the Company which has not been disclosed to the public should not engage in any transactions in the Company's securities until the beginning of the third full business day after such information has been released to the public. This restriction on trading does not apply to transactions made under an approved Rule 10(b)5-1 trading plan. The trading window should not be considered a "safe harbor," and all directors, officers, employees and others should use good judgment at all times.

The Company may also require that directors, officers, selected employees and others suspend trading at another time or times because of developments known to the Company and not yet disclosed to the public. In such event, such persons may not engage in any transaction involving the purchase or sale of the Company's securities during such period. The Company would re-open the trading window at the beginning of the third full business day following the date of public disclosure of the information, or at such time as the information is no longer material.

Individual Responsibility. Every officer, director, employee, consultant and agent of the Company has the individual responsibility to comply with the policy against insider trading. The trading window restrictions are mandatory for those individuals specified in the third paragraph of the section above titled "Trading Window" as well as for those individuals advised that they may not engage in transactions involving the purchase or sale of the Company's securities during another period, as specified in the fourth paragraph of the section above titled "Trading Window". Appropriate judgment should be exercised in connection with any trade in the Company's securities.

An Insider may from time to time have to forego a proposed transaction in the Company's securities even if he or she planned to make the transaction before learning of the Inside Information and even though the Insider believes he or she may suffer an economic loss or forego anticipated profit by waiting.

Definition of Inside Information

Inside Information is information that is both material and nonpublic.

It is not possible to define all categories of material information. However, information should be regarded as material if there is a reasonable likelihood that it would be considered important to an investor in making an investment decision regarding the purchase or sale of the Company's or another company's securities.

While it may be difficult under this standard to determine whether certain information is material, there are various categories of information that are particularly sensitive and, as a general rule, should always be considered as material. Examples of such information may include financial results, projections of future earnings or losses, news of a pending or proposed merger, news of the disposition of a subsidiary, impending bankruptcy or financial liquidity problems, the gain or loss of a substantial customer or supplier, changes in dividend policy, new product announcements of a significant nature, significant product defects or modifications, material pricing changes, stock splits, new equity or debt offerings, acquisitions, significant litigation exposure via actual or threatened litigation, and similar matters. Either positive or negative information may be material.

Nonpublic information is information that has not been previously disclosed to the general public and is otherwise not available to the general public.

If any officer, director, employee, consultant or agent of the Company has questions as to whether information they possess would be considered Inside Information please contact the legal department.

Certain Exceptions

For purposes of this policy, the Company considers that the exercise of stock options under the Company's stock option plans or the purchase of shares under the Company's employee stock purchase plan (but not the sale of any such shares) is exempt from the policy, since the other party to the transaction is the Company and the price does not vary with the market but is fixed by the terms of the option agreement or the plan.

In addition, gifts of the Company's common stock may be made at any time. However, if the recipient of the gifted shares is a member of the Insider's family residing in the same household, then the gifted shares may not be sold by that recipient outside of one of the quarterly window periods. In no event may any Inside Information be disclosed to the recipient of the gifted shares.

Inquiries

Please direct your questions as to any of the matters discussed in this Statement of Policy to Josie Buensuceso, Stock Administrator, or Shawn Hall, General Counsel.