

BUSINESS PARTNER CODE OF CONDUCT REQUIREMENTS

March 2021

QUANTUM STANDARDS

Quantum's goal is to abide by and model the highest standards of ethical business conduct. We expect that behavior from ourselves in order to provide the greatest benefit to our customers and suppliers, our competitors, our communities, and our stakeholders.

That commitment is explained in [OnTraQ - Quantum Corporation Code of Conduct](#). We encourage you to review the OnTraQ document and become familiar with its principles.

EXPECTATIONS FOR SUPPLIERS

We also strongly encourage you to make your own commitment to ethical behavior by developing and adhering to a code of conduct if you don't already have one. In addition, as a Quantum supplier, we expect you to:

Comply with All Applicable Laws

Quantum expects its suppliers to know and follow the laws that apply to them and their businesses. Legal requirements should be treated as the minimum applicable standard for business operations. Quantum suppliers are required to comply with all applicable laws and regulations in any jurisdictions in which they operate. Suppliers should alert Quantum's compliance team immediately if they become aware of any actual or potential legal violations involving or impacting Quantum business or employees.

Acknowledge and Adhere to the [Responsible Business Alliance Code of Conduct](#)

The Responsible Business Alliance Code of Conduct includes a set of social, environmental, and ethical industry standards that all Quantum suppliers should follow. These standards address human rights, labor, and minimum wage practices; environmental activities; and ethical business conduct. The code of conduct is available for review and download without a membership fee.

Conduct Business with Integrity and Transparency

Quantum expects its suppliers to fully comply with the United States Foreign Corrupt Practices Act of 1977, the United States Anti-Kickback Act of 1986, the United Kingdom Bribery Act, and any other local, state, or international regulations intended to prevent corruption. Quantum suppliers must act ethically and fairly in any endeavors relating to Quantum business. No bribes, kickbacks, payments, or inappropriate gifts or entertainment may be offered or accepted in conjunction with Quantum business. In addition, any personal relationships or other potential conflicts of interest with Quantum's employees or business must be promptly disclosed to Quantum's compliance team. Suppliers must keep complete and accurate records regarding their business transactions with Quantum.

Take Steps to Root Out Human Trafficking

Quantum strongly supports fair labor and compensation practices and expects its suppliers to understand, identify, and address any actual or potential occurrence of human trafficking in their supply chains. If applicable to their businesses, suppliers must adhere to and provide disclosures required by the California Transparency in Supply Chains Act and the United Kingdom Modern Slavery Act 2015.

Comply with Government Contracting Compliance Requirements

As a supplier to government contractors and schedule holders, Quantum expects its suppliers to fully comply with the ethics and compliance requirements applicable under United States Federal Acquisition Register requirements or other government contracting programs. Suppliers should, at a minimum, establish and maintain ethics and compliance programs with the depth and breadth required to meet government contracting ethics and compliance standards.

Comply with Trade and Competition Regulations

Quantum suppliers are required to comply with applicable import/export and fair competition requirements, including the appropriate declaration of import and export classifications and values. Suppliers must not take any action to circumvent or avoid applicable trade compliance or fair competition laws.

Protect Data from Unauthorized Use or Disclosure

Suppliers must maintain the integrity of any confidential information provided to them by Quantum or others, and comply with any applicable data privacy or security requirements, including those under GDPR, the California Consumer Privacy Act, or the California Privacy Rights Act. Personal information should only be shared as allowed by law, and personal information provided by Quantum may never be sold or used for a purpose not approved by Quantum in writing.

Support our Due Diligence Practices

Quantum conducts appropriate due diligence regarding its business partners and practices. Where those processes require information or support from suppliers, Quantum expects its suppliers to cooperate with those requests by providing the requested information accurately and in a timely manner.

Follow our Environmental Requirements Specification

Quantum products must comply with applicable environmental compliance regulations, including those applicable under REACH, RoHS, and regulations regarding the use of conflict minerals. Compliance with Quantum's [Environmental Requirements Specification](#), including the provision of a complete and accurate compliance declaration, is required from all applicable suppliers. In some cases, suppliers may be required to maintain compliance with ISO 14001 certification requirements.

Meet Our Facility and Personnel Security Requirements

Quantum suppliers must take the security of their facilities and supply chain seriously. Depending on the scope of the supplier relationship, Quantum may require compliance with the security requirements outlined in the United States Customs-Trade Partnership Against Terrorism, Certified Cargo Screening Program, or Transported Assets Protection Association.

Document and Audit Compliance

Quantum expects its suppliers to accurately document their compliance with the above expectations, and encourages the development of internal audit programs to verify ongoing compliance. In addition, suppliers must allow Quantum to audit or verify compliance, either directly or via an independent third-party audit, under appropriate circumstances.

QUESTIONS AND ASSISTANCE

If you have any questions about Quantum's Business Partner Code of Conduct Requirements or need assistance implementing any related programs, please contact your Quantum business partners or send an email to compliance@quantum.com.