

AVEPOINT, INC.

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

Last Updated and Approved: December 26, 2023

AvePoint, Inc., a Delaware corporation, (the “*Company*,” “*we*,” “*us*,” or “*our*”) is committed to a work environment that is free from human trafficking and modern slavery, which for purposes of this Anti-Slavery and Human Trafficking Policy (this “*Policy*”) includes forced labor, unlawful child labor, slavery, servitude, debt bondage, sex trafficking, forced and compulsory labor, unlawful recruitment and use of child soldiers, and human trafficking (collectively the aforementioned are referred to herein as “*Modern Slavery and Human Trafficking*”). The Company will not tolerate or condone Modern Slavery and Human Trafficking in any part of our global organization. Our directors, officers, and employees (our “*Employees*”), our domestic and international subsidiaries, and affiliates (collectively, our “*Affiliates*”) as well as our contractors, subcontractors, vendors, suppliers, partners, and others through whom we conduct business (such persons, our “*Suppliers*”) must avoid complicity in any practice that constitutes Modern Slavery and Human Trafficking.

Modern Slavery and Human Trafficking is a crime, or collection of related crimes, and a violation of fundamental human rights. In all of the forms in which Modern Slavery and Human Trafficking can manifest, one trait is common: the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. The Company is dedicated to supporting, restoring, and maintaining human rights and personal liberties and is therefore committed to supporting the elimination of Modern Slavery and Human Trafficking. Any activity, operation, transaction, dealing, practice, venture, partnership, investment, or other endeavor which in any way involves or is complicit with or supportive of Modern Slavery and Human Trafficking is strictly prohibited.

This Policy is a supplement to the Company’s Code of Ethics and Business Conduct Policy (the “*Code*”) and should be read in conjunction with the Code and our other Company Conduct Policies (as defined below).

The U.S. Government's policy prohibiting trafficking in persons is available at 48 CFR § 52.222-50 and is summarized below under the section titled “*Summary of U.S. Government Policy of Prohibiting Trafficking in Persons*.”

A. SCOPE OF MATTERS COVERED BY POLICY.

This Policy applies to all personnel employed by or engaged to provide services to the Company, including, but not limited to, our Employees, Affiliates, and Suppliers (collectively referred to herein as “*Personnel*”).

All Personnel are responsible for reading, understanding, and complying with this Policy. Company managers are responsible for ensuring that Personnel who report to them, directly or indirectly, comply with this Policy and complete any certification or training required of them (including as set forth in the section titled “*Training*” below). If any Personnel has any questions or concerns relating to this Policy or has information to report related to suspected or actual misconduct hereunder, refer to the section titled

“Questions, Concerns, and Reporting of Complaints” below.

As further described in this Policy, the Company encourages its Personnel to raise ethical and legal concerns including with respect to Modern Slavery and Human Trafficking and, more generally, any concerns about human rights issues. We also stress that we have zero tolerance for retaliation against anyone who reports a complaint in good faith. We respect and comply with laws, rules, and regulations which apply to our Business (as defined herein) around the world, as well as human rights and fair employment best practices.

B. AVEPOINT’S BUSINESS.

I. History and Current State of Operations

The Company was founded in 2001 and has its principal corporate headquarters in Jersey City, New Jersey, with its principal operating headquarters in Richmond, Virginia, and additional offices in North America, Europe, Asia, Australia and the Middle East. The Company provides a cloud-native software platform that organizations rely on to optimize operations, manage critical data and secure the digital workplace. As companies around the world embrace the new normal of hybrid work, they must build and deliver a new, seamless workplace experience for knowledge workers, centered around an extensive portfolio of SaaS solutions and productivity applications aimed at improving collaboration across the organization.

II. Products and Services

The Company is a global company that is primarily engaged in providing licenses for its commercial off-the-shelf software products, including support and maintenance services (the “**Primary Business**”). The Company also performs a variety of additional professional services, such as consulting, trainings, workshops, and customizations of its software (the “**Additional Business**,” and together with the Primary Business, the “**Business**”).

III. Supply Chain

All of the Company’s products are self-developed software and associated services. As a result, the Company has no relevant supply chains that it uses routinely other than through its wholly-owned subsidiaries, majority-owned subsidiaries and its other Affiliates.

C. APPROACH TO ELIMINATING SLAVERY AND HUMAN TRAFFICKING WITHIN OUR BUSINESS.

The Company is committed to ensuring that there is no Modern Slavery and Human Trafficking in our supply chains or in any other part of our Business. This underpins the Company’s commitment to support, in any way it can, the elimination of Modern Slavery and Human Trafficking.

I. Due Diligence Process

The Company assesses and manages the risk of Modern Slavery and Human Trafficking occurring in our Business on an ongoing basis. In response to developing codification of anti-Modern Slavery and Human Trafficking law throughout the world, the Company has developed and is in the process of

implementing a Supplier Code of Conduct which addresses Modern Slavery and Human Trafficking (as well as other applicable policies). In addition, the Company continues to promote the use of its Whistleblower Hotline for reports of violations of all corporate policies.

The Company is committed to internal accountability standards and procedures for Personnel and contractors failing to meet our standards regarding Modern Slavery and Human Trafficking. The Company chooses our Suppliers with care through a number of evaluations based on their reputation and integrity.

II. Company Conduct Policies

The Company conducts its affairs in an ethical way, demonstrative of our commitment to identifying and tackling risks of Modern Slavery and Human Trafficking within our Business. The Company believes in acting with integrity, fairness, and accountability: principles which are fundamental to fostering an inclusive society and to furthering the Company's success. The Company works closely with its Suppliers and we expect the same integrity, fairness and accountability from them.

The Company's various corporate policies require Personnel to be honest and ethical in all work and professional relationships, to treat everyone fairly and courteously, to have mutual respect in the workplace, and not to engage in any unlawful, illicit, illegal, or unethical activity. In addition, we aim to foster a trusting, open, and inclusive environment within our Company and throughout our Business and treat each person the Company deals with in a manner that reflects our values. The Company expects all of its Personnel to treat each other, and those the Company and its Personnel deal with, respectfully and with dignity. The Company does not tolerate physical violence, threats, verbal abuse, disrespectful behavior, bullying, or harassment of any kind.

Violations of our Company corporate policies are investigated thoroughly and may result in disciplinary action, including immediate termination, as further described herein and in the Code.

D. QUESTIONS, CONCERNS, AND REPORTING OF COMPLAINTS BY EMPLOYEES.

The Company has also established a procedure under which questions, concerns, and complaints regarding Modern Slavery and Human Trafficking may be reported anonymously. Employees may anonymously report these concerns to either (i) to the **AvePoint Anonymous Reporting Hotline** at (A) <https://www.lighthouse-services.com/avepoint> or (B) the applicable phone numbers, URLs, fax number, or app details set forth in Exhibit A to the Code, (ii) to the **AvePoint Anonymous Reporting Email** at reports@lighthouse-services.com or (iii) by delivering the complaint via regular mail to the Company's Compliance Officer, Riverfront Plaza, West Tower, 901 East Byrd Street, Suite 900, Richmond, VA 23219. Complaints delivered by regular mail to the Company's Compliance Officer should be marked "Private and Strictly Confidential – **To be opened only by addressee**". Employees should make every effort to report their concerns using one or more of the methods specified above.

The complaint procedure is specifically designed so that Employees have a mechanism that allows the Employee to bypass a supervisor, manager, or other superior they believe is engaged in prohibited conduct under this Policy. Anonymous reports should be factual, instead of speculative or conclusory, and should contain as much specific information as possible to allow the Company's office of the Chief Legal and Compliance Officer "the ***Office of the Chief Legal and Compliance Officer***") and other persons investigating the report to adequately assess the nature, extent, and urgency of the investigation.

Employees who fail to report actual or suspected misconduct may be deemed in violation of this Policy.

E. POLICY OF NON-RETALIATION.

It is the Company's policy to comply with all applicable laws that protect our Employees, including Employees of any of our subsidiaries, against unlawful discrimination or retaliation by us or our agents as a result of their lawfully reporting information regarding, or their participation in, investigations involving Modern Slavery and Human Trafficking. If any Employee believes they have been subjected to any harassment, threat, demotion, discharge, discrimination or retaliation by the Company, its Employees, or its agents for reporting complaints regarding Modern Slavery and Human Trafficking in accordance with this Policy, they may file a complaint with the Office of the Chief Legal and Compliance Officer. If it is determined that a violation of this Policy has occurred, the Company endeavors to promptly take appropriate corrective action.

F. POLICY FOR RECEIVING AND INVESTIGATING COMPLAINTS.

Upon receipt of a complaint, the Office of the Chief Legal and Compliance Officer will determine whether the information alleged in the complaint pertains to a Modern Slavery and Human Trafficking allegation. The Office of the Chief Legal and Compliance Officer shall determine the planned course of action with respect to the investigation of the complaint, including determining that an adequate basis exists for commencing an investigation. The Company's Chief Legal and Compliance Officer (the "*Chief Legal and Compliance Officer*") will then appoint one or more internal and/or external investigators to promptly and fully investigate each viable claim under the direction and oversight of the Office of the Chief Legal and Compliance Officer or such other persons as the Chief Legal and Compliance Officer determines to be appropriate under the circumstances. The Chief Legal and Compliance Officer will confidentially inform the reporting person (if their identity is known) that the complaint has been received.

Confidentiality of the Employee submitting the complaint will be maintained to the fullest extent possible, consistent with the need to conduct an adequate investigation. In the course of any investigation, the Company may find it necessary to share information with others on a "need to know" basis. If the investigation confirms that a violation has occurred, the Company will promptly take appropriate corrective action with respect to the persons involved, including discipline up to and including termination, and, in appropriate circumstances, referral to governmental authorities, and will also take appropriate steps to correct and remedy any violation.

G. VIOLATIONS OF THIS POLICY.

Any Employee who fails to comply with this Policy or otherwise violates a provision in this Policy or in any of the other Company Conduct Policies, or engages in illegal or improper behavior, including with respect to a failure to report a potential violation of Modern Slavery and Human Trafficking and other human rights matters, will be subject to disciplinary action, up to and including termination of employment (or, in the case of service providers, termination of services); in appropriate cases, corrective action may also include referral of a matter to a regulator or law enforcement.

Violations of this Policy may also constitute violations of law and may result in civil or criminal penalties for such person, such person's supervisors and/or the Company. The Office of the Chief Legal

and Compliance Officer, in conjunction with relevant management personnel, and, where appropriate, the Board of Directors of the Company (the “**Board**”), will determine, or designate appropriate persons to determine, appropriate actions to be taken in the event of a violation of this Policy. Such disciplinary action may also result in the reduction or elimination entirely of any compensation awards. In determining what action is appropriate in a particular case, the Office of the Chief Legal and Compliance Officer (or Board as applicable) will consider the nature and severity of the violation, whether the violation was a single occurrence or repeated occurrences, whether the violation was 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.

Any violations of this Policy identified pursuant to an investigation of a Supplier could, if such investigation determines a violation of applicable law, regulation, code, or rule has occurred, result in immediate termination of such Supplier for cause. In addition, and for the avoidance of doubt, violation of the U.S. Government’s policy against human trafficking (as described herein) as well as any domestic or international laws or regulations covering activity related to Modern Slavery and Human Trafficking may also result in criminal prosecution of responsible individuals.

H. EMPLOYEE TRAINING.

It is important to us that our Employees are aware of the issues surrounding Modern Slavery and Human Trafficking and support our values. The Company requires completion of mandatory compliance training for all Employees on an annual basis pertaining to applicable Company Conduct Policies. The curriculum consists of various training and refresher courses and includes several topics related to Modern Slavery and Human Trafficking, such as ethics, anti-discrimination, anti-harassment & sensitivity, anti-money laundering, and acknowledgment of the Code and the Company’s Employee Handbooks.

Importantly, the Office of the Chief Legal and Compliance Officer is aware of and responsive to the ever-growing framework of anti-Modern Slavery and Human Trafficking legislation and regulation, including domestic laws such as the Trafficking Victims Protection Act of 2017 (and its reauthorization in 2019), and the Abolish Human Trafficking Act of 2017, and international laws, regulations, and protocols including the UN Protocol to Prevent, Suppress & Punish Trafficking in Persons, the UK Bribery Act 2015, and ILO Conventions including 182 (Elimination of the Worst Forms of Child Labour) and 105 (Abolition of Forced Labour). In light of that, the Company continues to improve its response to a range of corporate social responsibility and human rights issues including Modern Slavery and Human Trafficking. The training given to our Employees will reflect the continued development of our response to such issues, and will result in a better-informed Employee populous, furthering our commitment to support, in any way the Company can, the elimination of Modern Slavery and Human Trafficking.

I. SUMMARY OF U.S. GOVERNMENT POLICY OF PROHIBITING TRAFFICKING IN PERSONS.

U.S. Government policy prohibits trafficking in persons and slavery. Government contractors (including the Company) and their employees, subcontractors, subcontractor employees, and agents must not engage in any practice that constitutes trafficking in persons or slavery. This includes, but is not limited to, the following activities:

- Engaging in any form of trafficking in persons.

- Procuring commercial sex acts.
- Using forced labor in the performance of any work.
- Destroying, concealing, confiscating, or otherwise denying access by an employee to the employee's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority.
- Using misleading or fraudulent practices during the recruitment of employees or offering of employment/contract positions, such as failing to disclose, in a format and language understood by the employee or applicant, basic information; or making material misrepresentations during the recruitment of employees regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, housing, and associated costs (if provided by the employer or agent), any significant cost to be charged to the employee or applicant, and, if applicable, the hazardous nature of the work.
- Using recruiters that do not comply with local labor laws of the country in which the recruiting takes place.
- Charging applicants recruitment fees.
- If required by law or contract, failing to provide return transportation or failing to pay for the cost of return transportation upon the end of employment.
- If required by law or contract, failing to provide or arrange housing that meets the host country housing and safety standards.
- If required by law or contract, failing to provide an employment contract, recruitment agreement, or other required work document in writing with legally required information and in a language the employee understands.

AVEPOINT, INC.**ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY****CERTIFICATION**

To: **AVEPOINT, INC.**

I, _____, have received and read a copy of the **AVEPOINT, INC.** Anti-Slavery and Human Trafficking Policy (the “*Policy*”). I hereby agree to comply with the specific requirements of the Policy in all respects during my employment or other service relationship with **AVEPOINT, INC.** I understand that this Policy constitutes a material term of my employment or other service relationship with **AVEPOINT, INC.** (or a subsidiary thereof) and that my failure to comply in all respects with the Policy is a basis for termination for cause.

(Signature)

(Name)

(Date)