

AVEPOINT, INC.

CORPORATE DISCLOSURE POLICY

Last Updated and Approved: December 26, 2023

AvePoint, Inc., a Delaware corporation (the “*Company*”), is committed to providing timely, transparent, and accurate information to the investing public consistent with applicable legal and regulatory requirements, including the Fair Disclosure Regulation, as amended (“*Regulation FD*”) of the Securities Exchange Commission (“*SEC*”). The Company is therefore adopting this Corporate Disclosure Policy (this “*Policy*”) to set forth the procedures on the communication of material non-public information, and to further the Company’s goal to maintain an active and open dialogue with investment professionals, security holders, and potential investors, consistent with all legal and regulatory requirements.

This Policy covers all employees, officers, directors, consultants, and agents of the Company, whether located in the United States or internationally. This Policy covers all public disclosures of Company information, plans, developments, or other business or financial matters with persons outside the Company.

A. COMPLIANCE GUIDELINES.

This Policy is intended to prevent the selective disclosure of material non-public company information, matters, plans or developments with anyone outside the Company. This Policy identifies those persons who are authorized to speak on behalf of the Company and establishes procedures associated with investor relations and corporate communications activities. Compliance with this Policy is critical to ensure that communications from the Company are made on a consistent basis and in compliance with applicable legal and regulatory requirements. Failure to comply with this Policy and applicable legal and regulatory requirements could result in significant liability for the Company and any employees involved in such noncompliance.

The Company’s policies and procedures on the communication of such information, as set forth herein, further the Company’s goal to maintain an active and open dialogue with Investment Professionals (as defined below), security holders, and potential investors, consistent with all legal and regulatory requirements.

B. PERSONS TO WHOM THIS POLICY APPLIES.

Company employees are prohibited from selectively disclosing any material non-public information (“*MNPI*”) to persons or groups outside of Company prior to the broad public dissemination of that information. Regulation FD prohibits the selective disclosure of MNPI to certain persons in the securities industry (“*Investment Professionals*”) such as: stock analysts; broker-dealers (and persons associated with them, including investment analysts); investment advisors, certain institutional managers, and their associated persons; and investment companies, hedge funds, and affiliate persons.

Selective disclosure to Investment Professionals is not only a violation of Company policy (including this Policy) but also a violation of U.S. federal law. Except as specifically permitted by this

Policy, all employees are prohibited from discussing material non-public company matters or developments with anyone outside the Company, including family members, relatives, friends, security holders, analysts, media or other third parties. Selective disclosure of such information to the holder of any Company security (a “*Securityholder*”) is also prohibited if made under circumstances in which it is reasonably foreseeable that the Securityholder would purchase or sell securities on the basis of the information.

If the Company chooses to disclose MNPI, it will do so on a widely disseminated basis, such as by means of a news release, SEC filing, publicly accessible webcast or by posting such information on the Company’s corporate website as soon as it is reasonably practicable. Exceptions to this Policy, including any disclosures to persons who are obligated in writing to maintain the confidentiality of the Company’s information, shall only be made in advance by an authorized attorney in the Company Legal Department (the “*Legal Department*”).

Communications in the ordinary course of business with customers, suppliers, or strategic partners, as well as communications with the press or news organizations, rating agencies, or the government, are not covered by Regulation FD.

C. AUTHORIZED SPOKESPERSONS

The following individuals (“*Authorized Spokespersons*”) are the only persons authorized to communicate with Security Professionals and Securityholders on behalf of the Company:

1. The Executive Chairman;
2. The Chief Executive Officer;
3. The Chief Financial Officer;
4. The Chief Operating Officer;
5. The Chief Legal and Compliance Officer; and
6. Any other person who is specifically designated in advance by an Authorized Spokesperson to speak with respect to a particular topic or purpose, and who has received appropriate education and training regarding this Policy.

D. “MATERIAL” AND “NON-PUBLIC” INFORMATION.

Prior to any communication with an Investment Professional or Securityholder regarding Company information, a determination should be made, whether such information is “material” and “non-public”. It is not always easy to figure out whether you are aware of MNPI, and if in doubt, you should consult with the Legal Department to decide. You should also review and become familiar with our “*Insider Trading Policy*” which provides additional guidance on determination of whether you hold MNPI at any given time.

1. Materiality.

Information is “material” if there is a substantial likelihood that a reasonable investor would consider it important in making an investment decision or if it could reasonably be expected to have a substantial effect on the market price or value of the company’s shares of common stock or would likely be considered important, or “material,” by investors who are considering trading in that company’s shares of common stock. Certainly, if the information makes you want to trade, it would probably have the same effect on others. Material information may be either negative or positive. There is no bright-line standard for assessing materiality; rather, materiality is based on an assessment of all of the facts and circumstances, and is often evaluated by relevant enforcement authorities with the benefit of hindsight.

Depending on the specific details, the following items may be considered material nonpublic information until publicly disclosed within the meaning of this Policy. There may be other types of information that would qualify as material information as well; use this list merely as a non-exhaustive guide:

- a) financial results or forecasts, and any changes, revisions or withdrawals thereof;
- b) status of and new developments related to product development;
- c) communications with government agencies;
- d) potential mergers, amalgamations, acquisitions or dispositions of assets, divisions or companies;
- e) public or private sales of debt or equity securities;
- f) changes in the capital structure of the Company, share splits, dividends or changes in dividend policy;
- g) the establishment of a repurchase program for the Company’s securities;
- h) Significant changes in relationships with suppliers or customers (e.g., the award, cancellation, or loss of major contracts);
- i) establishment of, or developments in, strategic partnerships, joint ventures or similar collaborations;
- j) changes or new corporate partner relationships or collaborations;
- k) notice of issuance or denial of patents, the acquisition of other material intellectual property rights or notice of a material adverse change in intellectual property or patents owned by Company;
- l) regulatory developments;
- m) board, management, or control changes;

- n) employee layoffs;
- o) a disruption in the Company's operations or breach or unauthorized access of its property or assets, including its facilities and information technology infrastructure;
- p) tender offers or proxy fights;
- q) accounting restatements;
- r) litigation or settlements, including significant litigation exposure due to actual or threatened litigation;
- s) events of default under financing or other agreements;
- t) Changes in auditors or auditor notification that the Company may no longer rely on audit information; and
- u) impending bankruptcy or financial liquidity problems.

2. Non-Public.

For information to be considered publicly disseminated, it must be widely disclosed through a press release, a public filing on EDGAR (in the United States) or another widely disseminated announcement. Additionally, once disseminated, a sufficient amount of time must have passed to allow the information to be fully disclosed. Generally speaking, information will be considered publicly disseminated after two full trading days have elapsed since the information was publicly disclosed.

Disclosure to one or more Investment Professionals or Securityholders (such as at an investor conference) does not constitute disclosure to the public; for this reason, MNPI should never be disclosed at an investor conference or in conversations or meetings with investors, potential investors, or analysts.

E. PROCEDURES - GENERAL

No employee, contractor, officer, director, agent, or representative of the Company is authorized to communicate any MNPI about the Company, to any person, except through public disclosure approved in advance by an Authorized Spokesperson or for business purposes pursuant to a non-disclosure agreement or other confidentiality agreement that has been reviewed and approved by the Legal Department.

F. PROCEDURES - PRESS RELEASES AND CONFERENCE CALLS.

1. News and Financial Results Releases.

The Company will promptly issue a news release upon new, material developments, unless senior management (with the advice of legal counsel) determines that doing otherwise is appropriate and permissible under the circumstances. Any new, material information that is to be intentionally discussed or presented in any meeting or conversation with Investment Professionals will be preceded by the issuance

of a broadly disseminated news release. To the extent practicable, a member of the Company's Investor Relations group will accompany senior management officers in any meetings or discussions with the media, analysts, or investors in order to, at a minimum, monitor the conversation for any unintentional disclosure of new material information and to facilitate the prompt release of that information.

In compliance with U.S. federal securities disclosure rules, a financial results news release will be furnished on a Form 8-K within four business days from its release. Under normal circumstances, however, the Company will furnish its financial results news release on Form 8-K prior to the commencement of the financial results conference call. In compliance with 17 CFR § 244.100 - General rules regarding disclosure of non-GAAP financial measures ("**Regulation G**"), if the Company presents any non-GAAP information in its financial results release, the Company will provide a reconciliation of such non-GAAP measures to GAAP in such release. Similarly, should the Company provide any additional non-GAAP measures on any financial conference call, it will promptly post that information on its website, in accordance with Regulation G requirements.

The Legal Department shall review all press releases concerning matters that may be material to the Company prior to distribution.

If a meeting or conference call is held after the issuance of a press release, the purpose of which is to give Investment Professionals or a major Securityholder an opportunity to seek more information or ask questions concerning the information disclosed in the press release, the meeting or call shall be open to analysts, media representatives and the general public. Reasonable advance public notice shall be provided in the manner set forth above. If a director or employee discovers information which causes them to believe that a disclosure may have been misleading or inaccurate when made, or may no longer be true, they shall immediately report that information to the Legal Department.

2. Quarterly Earnings Conference Calls

The Company holds quarterly conference calls to discuss its financial results. Each quarterly earnings conference call shall be available to the public via webcast. A replay of the webcast of each such earnings conference call shall be made available on the Company's website within 24 hours following the webcast, and shall remain available for a reasonable period of time thereafter, as determined by management. Reasonable advance public notice of each quarterly conference call and webcast shall be made through Company press release and posting on the Company's website. Such notice shall include the date, time, telephone number and webcast URL for the earnings conference call.

3. Other Company Conference Calls

From time to time, the Company may hold investor conference calls on an "ad hoc" basis with respect to significant developments or announcements concerning the Company. These conference calls will be made available to the public via live webcast in the same manner as quarterly earnings conference calls, with reasonable advance public notice provided via Company press release and posting on the Company's website.

4. Forward Looking Statements

From time to time, the Company may provide in conference calls, webcast accessible presentations and news releases, forward-looking information to enable the investment community to better evaluate the Company and its future prospects for performance. This forward-looking information may consist of forecasted financial measures, significant new product developments, market conditions and other information as the Company determines appropriate. When making such forward-looking statements, the Company will use the safe harbor as prescribed in the 1995 Private Securities Litigation Reform Act. A forward-looking statement made in the Company's written disclosures will be accompanied with meaningful cautionary language that warns investors that there is a risk the statement could change materially. In the case of oral forward-looking statements, the Company will refer to the risk factors enumerated in other readily available public disclosure documents. If a forward-looking statement has been made (i.e., one that has a forward intent and connotation upon which parties can reasonably be expected to rely), any employee with knowledge thereof shall promptly report to the Legal Department any facts or events that might cause that meaning to change.

G. PROCEDURES - INTERACTIONS WITH INVESTMENT PROFESSIONALS AND SECURITYHOLDERS.

1. Day to Day Communications

Inquiries from Investment Professionals or Securityholders or others received by any director or employee other than an Authorized Spokesperson should be forwarded to the Company's Investor Relations team. Under no circumstances should an attempt be made to handle these inquiries without prior authorization from an Authorized Spokesperson. If practicable, communications with Investment Professionals or Securityholders should be planned in advance so that (i) the Authorized Spokesperson can prepare a script in advance of communications with analysts detailing the matters the spokesperson is willing to discuss, (ii) the Chief Financial Officer may participate, and (iii) a determination may be made as to whether any MNPI will be disclosed. If so, the MNPI shall be disclosed prior to, or simultaneously with, the planned communication by the issuance of a press release, the filing or "furnishing" of a report on Form 8-K, or other means reasonably designed to provide broad, non-exclusionary distribution of the information to the public.

2. Quiet Periods

The Company shall observe a "quiet period", during which the Company shall not schedule any meetings or conferences with, or initiate any communications with, any Security Professionals or Securityholders. In responding to any inquiries from any Security Professionals or Securityholders during this period, Authorized Spokespersons should not discuss current business conditions or, obviously, quarterly results. Because of the danger of saying something inappropriate during this period, such discussions should be avoided if at all possible.

The quiet period shall begin at the end of the quarter and continue until the Company's earnings information for the applicable period is made public.

3. Commenting on Analysts' Models or Reports

With regard to responding to financial models or drafts of analysts' research reports, the Authorized Spokespersons should disclaim any responsibility for and not comment on the analyst's forecasts or subjective analysis. Authorized Spokespersons may review the factual content of such documents and suggest corrections only when assumptions have been made on the basis of factual content that is incorrect when compared to information publicly disseminated by the Company, which commentary should be accompanied by a written disclaimer stating that (i) it is not the company's usual practice to comment on such reports and (ii) the fact that certain factual corrections were made should not be construed as an endorsement of any of the opinions expressed by the analyst or of the accuracy of any other statements in the report. No correction should be made that would reveal material and non-public information.

Authorized Spokespersons shall not provide "comfort" with respect to an earnings estimate or otherwise "walk the Street" (i.e., suggest adjustments to an analyst's estimates). If an analyst inquires as to the reliability of a previously, publicly disseminated projection, the Authorized Spokesperson should follow a "no comment" policy. Analyst reports and earnings models may be reviewed only to correct errors that can be corrected by referring to publicly available, historical, factual information, or to correct any mathematical errors, subject to the requirements set forth in the first paragraph of this section. No other analyst feedback or guidance on earnings models may be communicated to an analyst. In addition, the Company will not comment on any particular analyst's estimate(s) in relation to the Company's financial guidance, except to refer the analyst to what the Company has stated publicly.

4. Distribution of Analyst's Reports

The Company will not provide copies of financial analysts' research reports covering the Company as part of marketing or investor information packages. The Company also will not provide such information to customers, potential customers, industry analysts or media, nor will it use analyst reports as part of its efforts to recruit potential employees. Persons requesting such information will be referred to the authoring organizations.

5. One-on-One Meetings

Authorized Spokespersons, along with other officers and employees of the Company invited to participate by an Authorized Spokesperson, may meet privately with Investment Professionals or Securityholders, in person or by telephone, from time to time. The Company does not intend to disclose any material non-public information during these meetings. However, if material non-public information is inadvertently disclosed at one of these meetings, appropriate public disclosure shall be made by the prompt filing of a Form 8-K (i.e., within 24 hours).

6. Investor Conferences/Roadshows and Other Public Forums

The Company may, from time to time, also participate in investment banker conferences and roadshows (other than roadshows undertaken in connection with a public offering of the Company's securities, to which Regulation FD does not apply). Prior to any such conference or roadshow, the Company shall disclose either through a press release, an open conference call, or a webcast, or any combination of these, any MNPI which may be discussed or presented at the conference or the roadshow. If the Company's

participation in such conference or roadshow will be available to the public via live webcast, the Company will provide reasonable advance public notice of the webcast through a Company press release and posting on the Company's website. This advance notice shall also provide instructions for accessing any replay of the webcast. If the Company determines that MNPI has been inadvertently disclosed at one of these conferences or roadshows, appropriate public disclosure shall be made by the prompt (within 24 hours) filing of a Form 8-K as soon as reasonably practical.

H. PROCEDURES – MEDIA AND MARKET RUMORS.

1. Providing Material Information to the Media.

While Regulation FD does not prohibit selective disclosure of material non-public information to the media, the Company's policy is that the media will receive new, material information at the same time that the investment community and the public receive it. Therefore, the Company will not engage in providing exclusive stories to the media of upcoming material events that have not been publicly announced.

2. Social Media.

Company employees are prohibited from discussing or disclosing material or other confidential information about the company or its securities in online chat rooms, message boards, websites, social networking sites, weblogs, microblogs, "wiki" pages or comparable social media channels or outlets. In this regard, all employees, including Authorized Spokespersons, must comply with the Company's Code of Ethics and Business Conduct.

3. Market Rumors.

The Company does not comment on market rumors in the normal course of its business. If it is discovered that rumors about the Company are circulating, Authorized Spokespersons shall state only that it is the policy of the Company to not comment on rumors. If the source of the rumor is found to be internal, the Legal Department should be consulted to determine the appropriate response.

I. REVIEW OF PRIOR DOCUMENTATION.

The Company will periodically review all prior public disclosures to ensure ongoing consistency. This serves two functions. First, it helps ensure that the Company has been consistent in its public statements or in its statements to analysts. Also, it will provide an opportunity to check whether any previously-issued information that now appears to be false, misleading or inaccurate needs to be corrected or updated.

J. VIOLATIONS OF THIS POLICY

Violations of Regulation FD are subject to SEC enforcement action, which may include administrative action seeking a cease-and-desist order, or a civil action against the Company or an individual, seeking injunctive or monetary penalties. Any violation of this Policy shall be brought to the

immediate attention of the Legal Department, and may constitute grounds for disciplinary action, up to and including termination.

K. FURTHER INFORMATION ABOUT REGULATION FD

All inquiries regarding the provisions and procedures of this Policy, or Regulation FD generally, should be addressed to the Office of the Chief Legal and Compliance Officer at legal@avepoint.com.

L. EXISTING POLICIES AND PROCEDURES.

Any action taken pursuant to the policies and procedures contemplated hereunder must also comply with the Company's existing policies and procedures, including the Company's Code of Ethics and Business Conduct Policy (the "*Code*"), and any policies and/or procedures included in the Company's bylaws. No approval or ratification of a transaction under this Policy shall be deemed to satisfy or supersede the requirements of the Code applicable to any employee, contractor, officer, or director. All other corporate requirements for approval of transactions, generally, must also be followed, as applicable.

M. REVIEW OF POLICY.

The Company is committed to continuously reviewing and updating its policies and procedures. The Company therefore reserves the right to amend, alter, or terminate this Policy at any time and for any reason. A current copy of the Company's policies regarding Regulation FD and MNPI receipt, disclosure, and retention may be obtained via the Company's website at www.avepoint.com.

N. DISCLAIMER.

This Policy is intended to provide general rules to follow to ensure that the Company complies with its legal obligations under Regulation FD; however, it may not cover every situation or circumstance that employees may face in the course of their work for the Company. Any questions regarding this Policy should be directed to the Chief Legal Officer or another attorney in the Legal Department.