AvePoint

Memorandum

To:	Directors, Officers, and Employees of AvePoint, Inc. (collectively with its subsidiaries, the "***Company***")
From:	Office of the Company's Chief Legal and Compliance Officer
Re:	Open Trading Window Periods

To ensure compliance with the Company's Insider Trading Policy (the "***Insider Trading Policy***") and applicable federal securities laws, and to avoid even the appearance of trading among insiders on the basis of material, non-public information ("***MNPI***"), the Company requires that the Company' Designated Insiders (as defined below, and each of which have or have access to the Company's internal financial statements or other MNPI regarding the Company and its performance during annual and quarterly fiscal periods) refrain from conducting transactions involving the purchase or sale of the Company's securities during the Blackout Periods (as defined below) established in the Insider Trading Policy.

Such Designated Insiders may only trade in Company securities during limited open trading window periods (each, an "***Open Trading Window***") that generally will begin after two full trading days have elapsed since the public dissemination of the Company's annual or quarterly financial results and end at the beginning of the next quarterly trading Blackout Period. Of course, even during an Open Trading Window, Designated Insiders, employees, contractors, and consultants may not (unless an exception applies) conduct any trades in Company securities if such persons are otherwise in possession of MNPI.

Failure to abide by the restrictions imposed by the Insider Trading Policy and applicable federal securities laws by engaging in trade activity during a Blackout Period or while in possession of MNPI may result in civil penalties, including monetary fines, clawbacks, and disgorgement of gains, and cease and desist orders prohibiting the Designated Insider from trading in the Company's securities, and criminal penalties including monetary fines and potential jail sentences.

Announcement of Open Trading Window Period

An announcement will be made by the Company's Office of the Chief Legal and Compliance Officer ahead of every Open Trading Window. For a copy of the most recent announcement, contact the Office of the Chief Legal and Compliance Officer

From time to time, an event may occur that is material to the Company and is known by only a few directors, officers and/or employees which would trigger the Open Trading Window to close early. So long as the event remains material and nonpublic, the persons designated by the Chief Legal and Compliance Officer in his capacity as the Company's Clearing Officer (the "***Clearing Officer***") may not trade in Company securities. In that situation, the Clearing Officer will notify the designated individuals that neither they nor their Related Persons (as defined below) may trade in Company securities. The existence of an event-specific trading blackout should also be considered MNPI and should not be communicated to any other person. Employees that have not been designated as a person who should not trade due to an event-specific trading blackout should not trade while aware of MNPI. Exceptions will not be granted during an event-specific trading blackout.

Designated Insiders

The following groups and individuals (each, a "***Designated Insider***") are subject to trading restrictions when the Open Trading Window closes (each such period during which there is no Open Trading Window, a "***Blackout Period***"):

1) Members of the Company's Board of Directors
2) Executive Officers
3) Identified Members of the Legal Team
4) Identified Members of the Finance and Accounting Team
5) Other employees or consultants as designated by the Clearing Officer
6) All "***Related Persons***" of the foregoing:
    a. immediate family,
    b. persons with whom the foregoing share a household,
    c. persons who economic dependents of the foregoing, and
    d. any other individuals or entities whose trading or transactions in securities the foregoing influence, direct, or control.

Any Company employee that is not a Designated Insider (to the extent such person is not in possession of MNPI) may trade AvePoint, Inc. securities even during a Blackout Period.

In the future, Blackout Periods will generally begin at the end of the day that is one week prior to the last trading day of each fiscal quarter and end after two full trading days have elapsed since the public dissemination of the Company's financial results for such quarter. The quarterly trading Blackout Period may commence early or may be extended if, in the judgment of the Clearing Officer, there exists undisclosed information that would make trades by Company employees, directors and designated consultants inappropriate. It is important to note that the fact that the quarterly trading Blackout Period has commenced early or has been extended should be considered MNPI that should not be communicated to any other person.

Exceptions for Transactions During Blackout Period

Designated Insiders may engage in the following types of transactions in AvePoint, Inc. securities even during a Blackout Period:

1) Option Exercises[1]
2) 10b5-1 Trading Programs
3) Tax Withholding Transactions (to satisfy tax withholding obligations as a result of the issuance of shares upon vesting or exercise of restricted stock units, options or other equity awards granted)
4) Employee Share Purchase Plan
5) Bona Fide Gifts (if pre-cleared by the Clearing Officer)

The foregoing is qualified in its entirety by the full text of the Insider Trading Policy and should be read only in conjunction therewith. The Insider Trading Policy is incorporated by reference herein.

[1] However, broker-assisted cashless exercises (also called same-day sales) will NOT be permitted during a Blackout Period. Broker-assisted cashless exercises consist of some or all of the exercised shares being sold into the market and the requisite amount of the sale proceeds being used to pay the Company for the exercise. The holder keeps the net proceeds and any unsold shares. A broker-assisted cashless exercise necessarily involves a contemporaneous sale to the market. The holder thus could be in a position to take advantage of an informational asymmetry, to the detriment of a buying member of the public.