

AVEPOINT, INC.

WHISTLEBLOWER POLICY

Approved: June 10, 2025

Effective: June 10, 2025

AvePoint, Inc., a Delaware corporation (collectively with its subsidiaries, the “*Company*”), is committed to maintaining the highest standards of ethical conduct, transparency, and accountability in all its business activities. The Company encourages its employees, contractors, vendors, and other stakeholders to report any concerns or suspected violations of legal or ethical standards without fear of retaliation. This Whistleblower Policy (this “*Policy*”) is meant to serve as a set of umbrella standards for reporting allegations of unethical conduct or violations of policy outside of the scope of the Company’s Open Door Policy for Accounting Matters and Legal Allegations. This Policy is applicable to all employees, contractors, vendors, and stakeholders of the Company.

A. PURPOSE AND DEFINITIONS.

The purpose of this Policy is to establish a framework for reporting and addressing concerns related to unethical behavior, fraud, or violation of Company policies, laws, or regulations without fear of retaliation.

A “whistleblower” is an individual who has and reports insider information regarding unethical behavior, fraud or a violation of Company policies, laws, or regulations.

B. REPORTING MECHANISMS.**1. Internal Reporting.**

The Company’s employees are encouraged to report concerns related to unethical behavior, illegal activities, or policy violations to their immediate supervisor, manager, or the legal department. Such reports may be made orally or in writing.

2. Anonymous Reporting

The Company has established a procedure under which reports can be made anonymously. Employees may anonymously report their 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 hereto, (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 Chief Legal and Compliance Officer at Riverfront Plaza, West Tower 901 East Byrd Street, Suite 900 Richmond, VA 23219. Complaints delivered by regular mail to the 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 they believe is engaged in prohibited conduct under this Policy, or for incidents or allegations where anonymity is preferred by the reporting employee. Anonymous reports should be factual, instead of speculative or conclusory, and should contain as much specific information as possible to allow the Company's Chief Legal and Compliance Officer and other persons investigating the report to adequately assess the nature, extent and urgency of the investigation.

C. PROTECTED DISCLOSURES.

AvePoint prohibits any form of retaliation against individuals who, in good faith, report concerns, or cooperate with an investigation. Any employee found to be engaging in retaliatory actions will be subject to disciplinary measures, up to and including termination.

D. CONFIDENTIALITY

AvePoint will handle all whistleblower reports with the utmost confidentiality to the extent permitted by law. However, it should be noted that absolute confidentiality may not always be guaranteed, especially when conducting a thorough investigation requires disclosure of information.

E. PROMPT INVESTIGATION

Upon receiving a whistleblower report, AvePoint will initiate a prompt, thorough, and impartial investigation. The investigation will be conducted by qualified individuals who are independent of the reported concern, where possible.

F. BOARD REPORTING

The Company's Board of Directors will be kept informed of all material and substantiated reports and the actions taken in response to them. This reporting ensures transparency and accountability at the highest level of the organization.

G. REVIEW OF AND AMENDMENTS TO 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.

H. IMPLEMENTATION

Successful implementation of this Policy shall include:

1. Documenting the total number of whistleblower report received per quarter
2. Measuring of the resolution time
3. Calculating the number of reports receive anonymously
4. Monitoring any complaints of retaliation after the filing of a report
5. Tracking the outcomes of investigations of reports
6. Conducting employment awareness assessments
7. Measuring the completion rate of any training

8. Reporting the number of whistleblower reports presented to the Board of Directors and actions taken in response
9. Assessing the effectiveness of the Policy based on feedback from the whistleblowers and stakeholders

Exhibit A

Anonymous Reporting System Details

1. Web-Based Reporting.

- a. Primary Website: <https://www.lighthouse-services.com/avepoint>
- b. Direct Anonymous Reporting Websites:
 - i. English: www.lighthousetogo.com/avepoint/eng
 - ii. Spanish: www.lighthousetogo.com/avepoint/spa

2. Anonymous App-Based Reporting.

- a. Instructions to Access the App can be found here: [Using the Lighthouse Anonymous Reporting App](#).

3. Toll-Free Telephone Hotline Reporting.

- a. Direct Dial:
 - i. English speaking USA and Canada: 833-950-4544
 - ii. Spanish speaking USA and Canada: 800-216-1288
 - iii. French speaking Canada: 855-725-0002
 - iv. Spanish speaking Mexico: **01-800-681-5340**
 - v. China- North, Beijing CNCG: **108-888**
 - vi. China, PRC- South, Shanghai (China Telecom): **10-811**
- b. All other countries must dial their country access code (found here with dialing instructions: [International Toll-free Hotline Access Instructions](#)) and then 800-603-2869

4. E-mail Reporting.

- a. reports@lighthouse-services.com (must include the name “AvePoint, Inc.” or, if different, the name of the AvePoint subsidiary for which you work)

5. Fax-Based Reporting: (215) 689-3885 (must include the name “AvePoint, Inc.” or, if different, the name of the AvePoint subsidiary for which you work)