

AVEPOINT, INC.

CONFLICTS OF INTEREST POLICY

Last Updated and Approved: August 20, 2024

AvePoint, Inc., a Delaware corporation, (collectively with its subsidiaries, the “*Company*”) has adopted this policy on conflicts of interest (this “*Policy*”). The Board of Directors (the “*Board*”) of the Company recognizes that transactions which implicate a conflict of interest (defined below) may raise questions as to whether those transactions are consistent with the best interests of the Company and its stockholders. A conflict of interest occurs when your private interest interferes, appears to interfere, or is inconsistent in any way with the interests of the Company.

This Policy is a supplement to the Code of Ethics and Business Conduct Policy (the “*Code*”) and should be read in conjunction with the Code. It should also be read in conjunction with the Company’s policy on certain related person transactions (the “*Related Person Transaction Policy*”) and applied *in toto*.

A. POLICY BRIEF & PURPOSE.

The Board has adopted this Policy to provide guidance in identifying, managing, reporting, and avoiding actual or potential conflicts of interest involving the Company. This Policy works to ensure that directors, officers, employees, and contractors are obligated to identify, avoid, and disclose ethical, legal, financial, or other conflicts of interest involving the Company, and remove themselves from a position of decision-making authority with respect to any conflict situation involving the Company in accordance with the procedures set forth below.

This Policy will outline the rules regarding conflict of interest and the responsibilities of employees and the Company in resolving any such discrepancies.

B. SCOPE.

This Policy applies to all prospective or current directors, officers, employees of the Company, as well as independent contractors and persons acting on behalf of the Company.

1. Policy Rationale.

The relationship of the Company with its employees should be based on mutual trust. As the Company is committed to preserve the interests of people under its employ, it expects them to act only towards the Company’s own fundamental interests. Conflicts of interest may occur whenever an employee’s interest in a particular subject may lead them to actions, activities, or relationships that undermine the Company and may place it to disadvantage.

2. What is a conflict of interest?

Examples include, but are not limited to:

- a) Employees' ability to use their position with the Company to their personal advantage;
- b) Employees engaging in activities that will bring direct or indirect profit to a competitor;
- c) Employees owning shares of a competitor's stock;
- d) Employees using connections obtained through the Company for their own private purposes;
- e) Employees using Company equipment or means to support an external business; and
- f) Employees acting in ways that may compromise the Company's legality (e.g. taking bribes or bribing representatives of legal authorities).

In general, employees are advised to refrain from letting personal and/or financial interests and external activities come into opposition with the Company's fundamental interests. Employees must avoid any relationship or activity that might impair, or even appear to impair, their ability to make objective and fair decisions. At times, employees may be faced with situations where the business actions taken on behalf of the Company may conflict with that employee's own personal or family interests. The course of action that is best for an employee personally may not also be the best course of action for the Company. Employees, directors, officers, and contractors each owe a duty to the Company to advance its legitimate interests when the opportunity to do so arises. Such persons must never use Company property or information for personal gain or personally take for themselves any opportunity that is discovered through his or her position with the Company.

The same principles apply to the Company in regard to its clients. When applicable, the Company is committed to refrain from offering services or forming partnerships with companies which are in direct competition with one of the Company's existing clients.

3. Reporting Potential Conflicts.

The possibility that a conflict of interest may occur can be addressed and resolved before any actual damage is done. But a conflict of interest may not be immediately recognizable. Any potential conflicts must be reported immediately to the Office of the Chief Legal and Compliance Officer. Further, if you become aware of a conflict or potential conflict involving another employee, contractor, officer, or director, you should bring it to the attention of the Compliance Officer by using (i) by using 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 AvePoint Code of Ethics and Business Conduct, (ii) by using the **AvePoint Anonymous Reporting Email** at reports@lighthouse-services.com or (iii) by delivering the report via regular mail to the Compliance Officer 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.**" You may choose to remain anonymous in reporting any possible violation. Alternatively,

notification may be made by contacting a member of the Board at the principal executive offices of the Company.

If the concern requires confidentiality, including keeping particular individuals anonymous, then this confidentially will be protected, except to the extent necessary to conduct an effective investigation or as required by under applicable law, regulation, or legal proceedings.

The responsibility of resolving a conflict of interest starts from the employee and his immediate supervisor and reaches upward to senior management, the Office of the Chief Legal and Compliance Officer, and/or the Board. All conflicts of interest will be resolved as fairly as possible. The Office of the Chief Legal and Compliance Officer has the responsibility of determining the resolution of a conflict or escalating the issue to the Board for a final decision.

C. DISCIPLINARY CONSEQUENCES.

1. **General.** Any employee, officer, and/or director who fails to comply with this Policy or otherwise violates a provision in the Code, an applicable Employee Handbook or policy, or engages in illegal or improper behavior (particularly in cases when a conflict of interest is deliberately concealed), will be subject to disciplinary action, up to and including termination of employment (or, in the case of non-employees, termination of services); in appropriate cases, corrective action may also include referral of a matter to a regulator or law enforcement. Violations of this Code 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.

2. **Executive Officers and Directors.** The Office of the Chief Legal and Compliance Officer will determine, in conjunction with the Board, appropriate actions to be taken in the event of a violation of this Policy in relation to executive officers and directors. It may also result in the reduction or elimination entirely of any compensation awards. In determining what action is appropriate in a particular case, the Board or its designee 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.

D. EXISTING POLICIES AND PROCEDURES.

Any transaction must comply with the Company's existing policies and procedures, including the Company's Code, the Related Person Transaction Policy, and any policies and/or procedures included in the Code or 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 person. All other corporate requirements for approval of transactions, generally, must also be followed, as applicable.

E. REVIEW OF POLICY.

Each new employee, officer, and director of the Board (each, a "***Responsible Person***") shall be required to review a copy of this Policy and to acknowledge in writing that he or she has done so. Any amendments to this Policy approved by the Board, from time to time, shall be communicated immediately to all Responsible Persons.