

**AVEPOINT, INC.**  
**OPEN DOOR POLICY**  
**FOR**  
**ACCOUNTING MATTERS AND LEGAL ALLEGATIONS**

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**Approved: June 29, 2021**  
**Effective: July 1, 2021**

AvePoint, Inc., a Delaware Corporation (the “*Company*”) is committed to providing a workplace conducive to open discussion of our business practices and is committed to complying with the laws and regulations to which we are subject. Accordingly, the Company will not tolerate conduct that is in violation of such laws and regulations. To facilitate the reporting of complaints regarding accounting or auditing matters, the audit committee (the “*Audit Committee*”) of the Company’s Board of Directors has established this Open Door Policy for Accounting Matters and Legal Allegations (the “*Policy*”) and procedures for (i) the receipt, retention and treatment of complaints regarding accounting, internal accounting controls, or auditing matters (“*Accounting Matters*”) as well as any suspected illegal acts or violations of Company policies by the Company, its employees, or its agents (“*Legal Allegations*”) and (ii) the confidential, anonymous submission by Company employees of concerns regarding questionable Accounting Matters or Legal Allegations. Each Company employee is encouraged to promptly report a good faith complaint regarding Accounting Matters and Legal Allegations in accordance with the provisions of this Policy. Any other third party, such as vendors, collaborators, partners, stockholders, or competitors, also may report, under the procedures provided in this Policy, a good faith complaint regarding Accounting Matters or Legal Allegations. 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.

**A. SCOPE OF MATTERS COVERED BY POLICY.**

While employees are encouraged to submit reports regarding any suspected violation of law or Policy, this Policy applies to complaints relating to:

1. Accounting Matters: including, without limitation, the following types of conduct:
  - a) fraud, deliberate error or gross negligence or recklessness in the preparation, evaluation, review or audit of any financial statement of the Company;
  - b) fraud, deliberate error or gross negligence or recklessness in the recording and maintaining of financial records of the Company;
  - c) deficiencies in, or noncompliance with, the Company’s internal accounting controls;

- d) misrepresentation or false statement to management, regulators, the outside auditors or others by a senior officer, accountant or other employee regarding a matter contained in the financial records, financial reports or audit reports of the Company; or
  - e) deviation from full and fair reporting of the Company's results or financial condition.
2. Legal Allegations: including, without limitation, non-compliance with legal and regulatory requirements promulgated by the SEC and The Nasdaq Stock Market LLC; and
  3. Retaliatory Acts: as described in detail below under "Policy of Non-Retaliation."

## **B. 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 Accounting Matters or Legal Allegations. If any employee believes he or she has been subjected to any harassment, threat, demotion, discharge, discrimination or retaliation by the Company or its agents for reporting complaints regarding Accounting Matters or Legal Allegations in accordance with this Policy, he or she may file a complaint with our Compliance Officer (as hereinafter defined). If it is determined that an employee has experienced any improper employment action in violation of this Policy, we endeavor to promptly take appropriate corrective action.

## **C. COMPLIANCE OFFICER.**

Our Compliance Officer for this Policy is our Chief Operations Officer and General Counsel, who may be reached at 1-804-314-5903 or [brian.brown@avepoint.com](mailto:brian.brown@avepoint.com). The Compliance Officer is responsible for administering this Policy. The Compliance Officer may also designate additional individuals to assist him or her in carrying out all duties of the Compliance Officer. The Compliance Officer is responsible for receiving, reviewing, and investigating (under the direction and oversight of the Audit Committee) complaints under this Policy. If an employee has a complaint regarding an Accounting Matter or Legal Allegation, he or she should report such matter to the Compliance Officer. If the suspected violation involves the Compliance Officer, the employee should instead report the suspected violation to the chairperson of the Audit Committee, who may be reached at [auditcommittee@avepoint.com](mailto:auditcommittee@avepoint.com).

## **D. ANONYMOUS REPORTING OF COMPLAINTS.**

We have also established a procedure under which complaints regarding Accounting Matters or Legal Allegations may be reported anonymously. Employees may anonymously report these concerns to either (i) our Compliance Hotline at 1-877-811-1703, (ii) our Compliance Email Box at [legal@avepoint.com](mailto:legal@avepoint.com) or (iii) by delivering the complaint 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**". 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 he or she believes 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 Compliance Officer and other persons investigating the report to adequately assess the nature, extent and urgency of the investigation.

**E. POLICY FOR RECEIVING AND INVESTIGATING COMPLAINTS.**

Upon receipt of a complaint, the Compliance Officer (or his or her designee) will determine whether the information alleged in the complaint pertains to an Accounting Matter or Legal Allegation. The Audit Committee shall be notified promptly of all complaints determined to pertain to an Accounting Matter or Legal Allegation and 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 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 Audit Committee or such other persons as the Audit Committee determines to be appropriate under the circumstances. The Compliance Officer will confidentially inform the reporting person (if his or her 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.

**F. RETENTION OF COMPLAINTS.**

The Compliance Officer will maintain a log of all complaints, tracking their receipt, investigation and resolution, and shall prepare a periodic summary report thereof for each member of the Audit Committee. Each member of the Audit Committee and, at the discretion of the Compliance Officer, other personnel involved in the investigation of complaints, shall have access to the log. Copies of the log and all documents obtained or created in connection with any investigation will be maintained in accordance with our Document Retention and Destruction Policy.