Rimini Street

Rule 10b5-1 Trading Plan Guidelines

Amended and Approved as of February 23, 2023

The following are guidelines for any Rule 10b5-1 trading plan relating to Rimini Street securities (a "**10b5-1 Plan**"). All 10b5-1 Plans (and any amendment or modification) must comply with Rule 10b5-1 of the Securities Exchange Act of 1934, as amended (the "**Exchange Act**"), and must meet the following minimum conditions:

Participants

Only members of Rimini Street's Board of Directors and Rimini Street employees (collectively, "**Insiders**," and each an "**Insider**"), as approved by a member of Rimini Street's Office of the Corporate Secretary, are eligible to adopt a 10b5-1 Plan. As used in these guidelines, the "**Office of the Corporate Secretary**" consists of (i) Rimini Street's GVP and Deputy General Counsel, Corporate and Corporate Secretary and (ii) Rimini Street's Managing Counsel and Assistant Corporate Secretary or (iii) the respective delegates of either (i) or (ii).

Plan and Approval

The 10b5-1 Plan must be in writing and signed by the Insider. Rimini Street will keep a copy of each 10b5-1 Plan in its files. Each 10b5-1 Plan or amendment used by an Insider must be approved in writing by a member of Rimini Street's Office of the Corporate Secretary. The 10b5-1 Plan must be entered in good faith and not as part of a plan or scheme to evade the prohibitions of Rule 10b5 of the Exchange Act. Further, Insiders must act in good faith with respect to any Rule 10b5-1 Plan that they adopt.

Timing and Term of Plan

Each 10b5-1 Plan used by an Insider must be adopted (a) during an open trading window under Rimini Street's Insider Trading Policy, and (b) when the Insider does not otherwise possess material nonpublic information about Rimini Street (and must include a representation to that effect). Each 10b5-1 Plan should be structured to remain in place for at least 12 months but no longer than 24 months after the effective date of such plan, with the exception of certain 10b5-1 Plans to effect "eligible sell-to-cover transactions," as described in paragraph (c)(1)(ii)(D)(3) of Rule 10b5-1 of the Exchange Act, which can be structured to remain in place for at least six months but no longer than 24 months after the effective date of such plan. However, it is expected that the 10b5-1 Plan will be earlier terminated within 90 days of termination of employment or directorship.

Timing of Plan Amendment, Modification, or Termination

Each 10b5-1 Plan used by an Insider may be amended, modified or terminated only (a) during an open trading window under the Insider Trading Policy, (b) when the Insider does not otherwise possess material nonpublic information about Rimini Street (and must include a representation to that effect), and (c) after approval by a member of Rimini Street's Office of the Corporate Secretary, unless terminated in the context of termination of employment or directorship. *Although amending, modifying or terminating a trading plan is permissible, doing so could raise significant legal concerns. Insiders are encouraged to consult with their legal advisors before terminating a trading plan.*

Termination

If an Insider terminates his/her 10b5-1 Plan prior to its stated duration, such Insider may not trade in Rimini Street securities (other than pursuant to another 10b5-1 Plan) until after the completion of the next quarterly blackout period following such

termination unless such termination was made in the context of termination of employment or directorship. 10b5-1 Plan terminations must be approved by a member of Rimini Street's Office of the Corporate Secretary.

Minimum "Cooling-Off Periods"

- <u>Directors and Officers</u> Each 10b5-1 Plan used by a member of the Rimini Street Board of Directors or an Officer, including any trust or similar entity for which the director or Officer has beneficial ownership of the securities held by such entity, must provide that the first trade after adoption, amendment or modification of the plan may not occur until the later of (a) two business days after the filing of Rimini Street's Quarterly Report on Form 10-Q or Annual Report on Form 10-K covering the fiscal quarter in which the plan was adopted, amended or modified or (b) 90 days after the adoption, amendment or modification of the plan, as applicable, in each case up to a maximum of 120 days after adoption of the plan. For purposes of these guidelines, an "Officer" means any employee of Rimini Street designated by Rimini Street's Board of Directors to be subject to the filing requirements of Section 16 of the Exchange Act.
- <u>Persons Other than Directors and Officers</u> Each 10b5-1 Plan used by an Insider who is not an Officer or director must provide that the first trade under the 10b5-1 Plan after adoption, amendment or modification of the 10b5-1 Plan may not occur until at least 45 days after the date of the adoption, amendment or modification of the 10b5-1 Plan, as applicable.

Modifications Trigger New "Cooling-Off Period"

Modifications to an existing 10b5-1 Plan will trigger a new cooling-off period if the modification changes the amount, price or timing of trades, including a change to a formula that affects these inputs. Modifications do not trigger a new cooling-off period if they are immaterial or administrative, such as an adjustment for a stock split or a change in account information.

MNPI Representations

Officers and directors adopting a Rule 10b5-1 Plan must certify in the plan that, at the time of adoption, they (i) are not aware of material, non-public information about Rimini Street or its securities and (ii) are adopting the plan in good faith and not as part of a plan or scheme to evade the prohibitions of Exchange Act Rule 10b-5.

Relationships with Plan Broker; No Subsequent Influence

Each 10b5-1 Plan used by an Insider must provide that, to the extent such plan permits any discretion to a broker regarding the details (e.g., timing, share amounts) of trading, such Insider must not communicate any material nonpublic information about Rimini Street to such broker, or attempt to influence how the broker exercises its discretion in any way. In addition, each 10b5-1 Plan used by an Insider must provide that any individual who executes the Insider's 10b5-1 Plan may not be the same individual who executes any trades in other securities for the benefit of the Insider.

Plan Specifications; Discretion Regarding Trades

The 10b5-1 Plan must either specify the amount of stock to be purchased or sold or specify or set an objective formula for determining the amount of stock to be sold. Each 10b5-1 Plan used by an Insider should specify the timing of trading or allow for the broker to exercise its discretion regarding the timing of trading under the 10b5-1 Plan.

No Other Trades

No Insider entering into a 10b5-1 Plan may make open market purchases or sales of Rimini Street securities during the effectiveness of their 10b5-1 Plan.

Limitation on Single-Trade Plans

Insiders may only enter into one "single-trade plan" during any consecutive 12-month period, other than certain 10b5-1 Plans to effect "eligible sell-to-cover transactions," as described in paragraph (c)(1)(ii)(D)(3) of Rule 10b5-1 of the Exchange Act. As used in these guidelines, a "single-trade plan" is a 10b5-1 Plan that is "designed to effect" a trade in a single transaction. Single-trade plans do not include 10b5-1 Plans that feature multiple different stock price triggers or that give trading discretion to a broker, even if transactions effected under the plan happen to execute in one single trade.

Only One Plan in Effect at Any Time

An Insider may have only one 10b5-1 Plan in effect at any time, other than certain 10b5-1 Plans to effect "eligible sell-tocover" transactions, as described in paragraph (c)(1)(ii)(D)(3) of Rule 10b5-1 of the Exchange Act. However, an Insider may adopt a new 10b5-1 Plan to replace an existing 10b5-1 Plan before the scheduled termination date of such existing 10b5-1 Plan, so long as the first scheduled trade under the new 10b5-1 Plan does not occur prior to the last scheduled trade(s) of the existing 10b5-1 Plan and otherwise complies with the guidelines regarding the first trade described above under the heading "Minimum 'Cooling-Off' Periods."

No Hedging

As described in Rimini Street's Insider Trading Policy, individuals subject to the policy are prohibited from engaging in any hedging or similar transactions designed to decrease the risks associated with holding Rimini Street securities. Further to this end, an Insider adopting a 10b5-1 Plan may not have entered into or altered a corresponding or hedging transaction or position with respect to the securities subject to the 10b5-1 Plan and must agree not to enter into any such transaction while the 10b5-1 Plan is in effect.

Mandatory Suspension

Each 10b5-1 Plan used by an Insider must provide for suspension of trades under such plan (a) at the discretion of the Rimini Street Legal Department, or (b) if legal, regulatory or contractual restrictions are imposed on the Insider, or other events occur, that would prohibit sales under such plan.

Compliance with Rule 144

Each 10b5-1 Plan used by an Insider must provide for specific procedures to comply with Rule 144 under the Securities Act of 1933, as amended, including the filing of Forms 144.

Broker Obligation to Provide Notice of Trades

Each 10b5-1 Plan used by an Insider must provide that the broker will provide notice of any trades under the 10b5-1 Plan to the Insider and Rimini Street in sufficient time to allow for the Insider to make timely filings under the Exchange Act (i.e., no later than the close of business on the day of the trade).

Insider Obligation to Make Exchange Act Filings

Each 10b5-1 Plan used by an Insider must contain an explicit acknowledgement by such Insider that all filings required by the Exchange Act, as a result of or in connection with trades under such plan, are the sole obligation of such Insider and not the Company.

Mandatory Form 4 and Form 5 Checkbox

As required by the SEC, Insiders must indicate, in a checkbox on Form 4 and Form 5, whether the disclosed transactions are intended to satisfy the affirmative defense requirements of Rule 10b5-1 and, if so, the date the 10b5-1 Plan was adopted.

Amendments to Guidelines

Any changes or amendments to these guidelines must be approved by the Rimini Street Board of Directors with the exception of non-substantive changes/amendments to update (i) the titles of any executive officer or member of management identified by title herein, (ii) the name of any regulatory agency identified herein or (iii) any Federal statue (or rules or regulations promulgated thereunder) referenced herein, which changes/amendments may be approved by the CEO upon the recommendation of the Company's Legal Department, or similar administrative changes.