

Fair Disclosure Policy

Climb Global Solutions, Inc. ("Company") is committed to fair disclosure of information to its shareholders, the financial community and the public.

Climb Global Solutions, Inc. and its management team believe the Company is best served by maintaining active and open communication with existing and potential investors regarding Climb Global Solutions, Inc.'s historical performance and future prospects. Climb Global Solutions, Inc. may enhance shareholder value by publicly articulating its strategies, business strengths and growth opportunities. The Company is also aware of its need for confidentiality about details of key business and operating strategies and may at times limit its comments for competitive reasons.

Standard Communications

Climb Global Solutions, Inc. will periodically and regularly communicate with its shareholders and other members of the investment community about its business operations. The Company employs press releases, telecommunications and potentially other media to convey to all interested persons communication including:

- A quarterly press release that discloses financial results for the prior quarter and the Company's fiscal year to date, and other general information.
- A quarterly conference call open to financial analysts, the media and the public that discusses the quarterly financial results and provides information that may impact operating results.
- A playback of the quarterly conference call, which will be made available at a phone number disclosed in the quarterly press release and on the Climb Global Solutions, Inc. Web site.

In addition to these periodic communications, Climb Global Solutions, Inc. may hold conference calls or other communications, such as webcasts or Web site postings, in which the Company may disclose new developments in its business and operations.

Analyst Communications

Climb Global Solutions, Inc. participates in conferences sponsored by securities firms, and other investor conferences. The Company will post all presentations made at these conferences on its Web site and, in the event of the release of material information, issue a media release describing the information. Climb Global Solutions, Inc. may, in some circumstances, also file a Form 8-K providing the same information.

Climb Global Solutions, Inc. may observe a "quiet period."

Climb Global Solutions, Inc. will also talk to individual analysts and investors, following clear guidelines, to provide background information concerning its business. Similarly, the Company will continue to participate in other public forums at which analysts or investors could be present, including industry seminars, trade shows, employee and annual shareholder meetings, and meetings with commercial partners, which may be shareholders. We do not intend to disclose any material, non-public information during these meetings. However, if it is determined that material, non-public information has been unintentionally disclosed, appropriate public disclosure in accordance with Regulation FD will be made.

Authorized Spokespersons

Climb Global Solutions, Inc. speaks to the financial community and shareholders through authorized representatives. The Chairman and Chief Executive Officer, the Vice President and Chief Financial Officer and other officers are authorized to communicate on behalf of the corporation to analysts, securities market professionals and major stockholders of the corporation.

Other officers or employees of the Company may from time to time communicate with analysts and investors as part of Climb Global Solutions, Inc.'s investor relations program. In such instances, an authorized representative will also be present. No employee is authorized to communicate business or financial information about the Company that is non-public, material information, except through company-sanctioned public disclosure or for business purposes under a non-disclosure agreement.

Employees will be notified that, except as specified in this policy, they shall not communicate to analysts and investors and shall refer all questions to the Chief Financial Officer or, in his/her absence, another authorized representative.

Media

Climb Global Solutions, Inc. endeavors to make appropriate announcements and to conduct interviews with the media about its business, technology and significant developments.