



ACACIA RESEARCH CORPORATION

BUSINESS PARTNER CODE OF CONDUCT

Acacia Research Corporation (the “Company”) conducts business with an ethical approach and places a high priority on compliance by our business partners. The Company has developed this Business Partner Code of Conduct based on its own internal policies, and in adherence to the United Nations Universal Declaration of Human Rights, Responsible Business Alliance Code of Conduct, and the International Labor Organization’s Fundamental Conventions. The Company, through the Human Resources and Legal Departments with oversight from the Nomination, Governance, and Sustainability Committee of the Board of Directors, will perform ongoing monitoring of internal compliance.

This Code of Conduct is meant to assist our business partners in understanding and complying with our minimum expectations of conduct. This Business Partner Code of Conduct shall serve to inform those parties of what minimum moral and ethical standards should be practiced worldwide. Business partners are expected to self-monitor their compliance with this code while conducting business with or on behalf of the Company, and to inform us in a timely manner of any non-compliance. The Company will seek appropriate assurance from business partners that they comply with this Code of Conduct through periodic review of compliance. The scope of review will depend on the nature and delivery of the service and may range from self-assessment through to independent audit. Any business partner that does not comply fully with this code, is expected to remediate any lapses to the Company’s satisfaction in a timely manner.

1. **Ban on Discrimination.** We expect our business partners to offer equal employment to all, to treat all workers with dignity and respect, and to maintain a work environment that is free from intimidation, violence, and abuse of any kind. Discrimination or harassment on any grounds, including but not limited to race, color, creed, religion, sex (including pregnancy, childbirth, or related medical conditions), genetic information, gender, gender identity, gender expression, sexual orientation, national origin, citizenship status, age, ancestry, marital status, medical conditions, disability (including physical or mental disability), military and veteran status, or any other factors prohibited by applicable law is prohibited. Business partners are expected to provide training to employees to prevent discrimination or harassment in the workplace.
2. **Working Conditions and Remuneration.** We expect our business partners to adhere to local laws and regulations to provide safe and healthy workplace conditions to prevent accidents, injuries, or exposure to health risks. Business partners are expected to comply with minimum compensation requirements and maximum working hours, including overtime pay, as defined by applicable local laws and regulations. Further, in compliance with such local laws and regulations, workers should be compensated for overtime at pay rates greater than regular hourly rates. Working conditions must conform to minimum legal standards to ensure a safe and healthy working environment.

3. **Freedom of Association**. We expect our business partners to respect the right of all workers to engage in peaceful assembly as well as the right of workers to refrain from such activities. Our business partners should respect open communication and freedom of association in all aspects of their operations and assure the right of their employees to engage in collective action, including collective bargaining and unionization, as determined by applicable local regulation or legislation.
4. **Compliance With Laws**. The Company adheres to all applicable laws and regulations in our business activities. We likewise require our business partners to comply with all applicable laws and regulations, including, but not limited to: anti-trust and fair trade policies, anti-money laundering and anti-terrorist financing laws, anti-bribery and anti-corruption laws, tax laws, wage and hour laws, privacy and information security laws, environmental laws, and laws that address child labor, forced labor, modern slavery, human trafficking, equal pay, and nondiscrimination and occupational safety and health.
5. **Ethical Standards**. The Company respects our applicable jurisdiction's moral and ethical standards. Business partners are also expected to respect the standards set out by the countries in which they operate, in addition to conventions between countries. The Company has procedures for business partners to be able to confidentially report any suspected case of fraud, bribery, or corruption.
6. **Ban on Child Labor**. Our business partners must take all necessary steps to ensure that there is no child labor within their organizations or supply chains. A "child" is any person under the age of 16 (or as otherwise stated in the law of the applicable country), or under the local legal minimum age for work or mandatory schooling, whichever is greatest. ILO Conventions 138 and 182 provide further detail.
7. **Ban on Forced Labor and Disciplinary Action**. All forms of forced labor are forbidden. All forms of mental and physical coercion, verbal abuse, and corporal punishment are not permitted. Indentured servitude, trafficked labor, or the forced labor of individuals against their will or subject to intimidation or under threat of any kind is prohibited.
8. **Environmental Responsibility**. The Company expects its suppliers and business partners to demonstrate a clear understanding of the environmental risks, impacts and responsibilities associated with the products and services they provide. The Company expects its suppliers and business partners to have in place an effective environmental policy, statement or program to mitigate environmental risks. The Company expects its suppliers and business partners to make practical efforts to minimize the use of energy, water and raw materials and using renewable or sustainably sourced energy, where possible. The Company expects its suppliers and business partners to consider the environmental credentials and performance of business partners within their own supply chain and require them to operate to a minimum set of standards. Suppliers will authorize the Company and its representatives to engage in monitoring activities to confirm compliance with this Business Partner Code of Conduct, including on-site inspections of the supplier's sites, and reviews of records relating to environmental management. The Company commits to reviewing and monitoring on a regular basis the environmental impact of its suppliers and business partners.