



**CORPORATE CODE OF CONDUCT
FOR CHIEF EXECUTIVE OFFICER
AND OTHER SENIOR FINANCIAL
OFFICERS**

**Statement of Policies and Procedures
Governing Ethical Standards and Compliance
with Applicable Laws, Rules and Regulations**

Effective February 2026

I. Purpose of Code

Acacia Research Corporation (the "**Company**") is committed to promoting high standards of ethical business conduct and compliance with applicable laws, rules and regulations. The Board of Directors (the "**Board**") of the Company has adopted this Code of Conduct (this "**Code**") for the Chief Executive Officer and other Senior Financial Officers (as defined below) as part of this commitment. This Code is intended to comply with, and qualify as a Code of Ethics under, Section 406 of the Sarbanes-Oxley Act of 2002 and Item 406 of Regulation S-K adopted thereunder by the Securities and Exchange Commission (the "**SEC**").

This Code requires that the Senior Financial Officers act in a manner that promotes:

- Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- Full, fair, accurate, timely and understandable disclosure in reports and documents filed by the Company with, or submitted to, the SEC and in the Company's other public communications;
- Compliance with applicable laws, rules and regulations as well as the listing standards of any national securities exchange on which the Company's securities are listed for trading ("**listing standards**");
- Prompt internal reporting of violations of this Code; and
- Accountability for adherence to this Code.

II. Applicability of Code

The Chief Executive Officer, Chief Financial Officer, Chief Administrative Officer, General Counsel, Controller, Secretary and other persons performing similar functions (collectively, the "**Senior**

Financial Officers”) are bound by this Code. The Senior Financial Officers are also bound by any other corporate governance policies and procedures that have been, or may hereafter be, adopted by the Company and are applicable to the Company’s officers or employees (including, without limitation, the Company’s Code of Conduct for Employees, Officers and Directors). By accepting this Code, each Senior Financial Officer agrees that he or she will adhere to the following principles and responsibilities promoting high standards of ethical business conduct and compliance with applicable laws, rules and regulations.

In addition, part of each Senior Financial Officer’s ethical responsibility is to help enforce this Code and encourage others to comply with this Code. The Company expects all of its Senior Financial Officers to help engender a sense of commitment to this Code, and to foster a culture of fairness, honesty and accountability within the Company. Each Senior Financial Officer should be alert to possible violations and promptly report violations or suspected violations of this Code to the Audit Committee of the Board (the “**Audit Committee**”).

A. Standard of Conduct. Each Senior Financial Officer has a duty to comply with applicable law, act with honesty and integrity, and use care and diligence in performing his or her responsibilities to the Company. Each Senior Financial Officer also has a duty to advocate compliance with these principles by other employees.

B. Relationship with Independent Auditors. Each Senior Financial Officer must work cooperatively with the Company’s independent auditors in the conduct of the audit of the Company’s annual financial statements, the review of the Company’s quarterly financial statements, and the evaluation of the Company’s internal controls.

C. Company Disclosures. Each Senior Financial Officer shall be responsible for full, fair, accurate and timely disclosure in the reports and documents that the Company files with, or submits to, the SEC and in other public communications made by the Company. In addition, each Senior Financial Officer shall be required to work cooperatively with the Company’s independent auditors in connection with the review and filing of the Company’s public disclosure documents.

Each Senior Financial Officer must promptly bring to the attention of the Audit Committee any material information that he or she may become aware of that is likely to materially affect the timing, accuracy or completeness of disclosures made by the Company in its SEC filings or other public communications. In addition, each Senior Financial Officer must promptly bring to the attention of the Audit Committee any information he or she may have or become privy to concerning (i) significant deficiencies in the design or operation of internal controls which could adversely affect the Company’s ability to record, process, summarize and report financial data, and (ii) any fraud, whether or not material, that involves management or other employees who have a significant role in the Company’s financial reporting, disclosures or internal controls.

D. Conflicts of Interest. Each Senior Financial Officer is expected to avoid conflicts of interest that interfere with the performance of his or her duties to the Company, or that deprive the Company of the Senior Financial Officer’s undivided loyalty in business dealings. Each Senior Financial Officer must report to the Audit Committee any actual or apparent conflicts of interest involving any employee who has a significant role in financial reporting, disclosures or internal controls.

E. Confidentiality. Each Senior Financial Officer must maintain the confidentiality of

Company information, except when authorized or legally required to make any disclosure and avoid any personal use of Company information.

F. Legal Compliance. Each Senior Financial Officer must comply with applicable laws, rules, regulations and listing standards, including, without limitation, the laws of the Company's state of incorporation, the rules and regulations of the SEC, and the rules and listing standards of any national securities exchange on which the Company's securities are listed for trading. Each Senior Financial Officer shall promptly bring to the attention of the Audit Committee any information he or she may have or become privy to concerning evidence of any violation of any laws, rules, regulations or listing standards applicable to the Company.

G. Violations of the Code. Each Senior Financial Officer shall promptly report violations of this Code to the Audit Committee. No person may engage in or participate in retaliation against another person who in good faith reports actual or suspected violations of this Code.

The Audit Committee shall have the authority to determine whether there has been any violation of this Code, as well as to determine (or designate appropriate persons to determine) the appropriate action to be taken as a result of any violation of this Code. Any such actions shall be reasonably designed to deter wrongdoing and to promote accountability for adherence to this Code, and may include, without limitation, demotion or re-assignment, suspension of employment with or without pay, or termination of employment.

H. Waivers and Amendments. The Audit Committee shall have the ability to waive or amend any provision of this Code provided that any such waiver or amendment is consistent with applicable law, rules or regulation. All such waivers or amendments shall be disclosed in accordance with applicable laws, rules and regulations.