



ACACIA RESEARCH CORPORATION

ENTERPRISE LEVEL ENVIRONMENTAL POLICY

Acacia Research Corporation's (the "Company") corporate environmental responsibility efforts begin by making decisions and conducting our business in an environmentally sensitive and proactive manner by conserving natural resources, minimizing waste through recycling, and using renewable and cleaner energy sources when possible. Given that the Company can at any time be operating in several different industries, we approach our enterprise level environmental policy objectives and efforts from a risk-based and materiality standpoint.

The Company believes that material environmental risks and impact criteria are an evolving set of factors that should be considered in our business decisions and risk assessment process. For this reason, we commit to making this policy core to our business plan with implementation executed in a thoughtful and incremental manner to provide the most sustainable positive impact over the long term.

The following information constitutes the Company's Corporate Environmental Policy, which applies to all Company officers, directors, and employees under the oversight of the Nomination, Governance, and Sustainability Committee of the Company's Board of Directors (the "Committee"). This Policy was adopted by the Committee on March 15, 2022.

Our responsibility and commitment

We accept responsibility for all environmental impacts generated by our operations. We will continually seek opportunities to improve our environmental performance by establishing objectives and targets, measuring progress, and reporting our results; including but not limited to energy, water, paper and fuel consumption, and vehicle miles traveled.

Our employees are committed to the idea that a sustainable future requires attention to how we conduct our business. Employees are expected to adhere to thoughtful resource conservation, waste reduction, and respect for our environment.

The Company is committed to managing environmental impact as an integral part of our risk mitigation and management operations. It is our policy to always assure the environmental integrity of our processes and facilities.

We will do so by making the following commitments:

1. We will employ management systems and procedures specifically designed to track, disclose, and provide reduction targets to assist in : (i) minimizing the use of hazardous materials, energy, and other natural resources, (ii) minimizing the generation of waste, and (iii) enabling recycling and reuse of materials.

2. We will regularly evaluate and prioritize environmental risks posed by the Company as we build and grow our business.
3. We will continually seek opportunities to improve our environmental performance by establishing objectives and targets, measuring progress, and reporting our results; including but not limited to energy, water, paper and fuel consumption and the overall risks to the environment of our operations.
4. We will promote participation and communicate our commitment to responsible environmental management by promoting environmental responsibility among our employees; by providing the necessary training and support to enable them to implement this policy; by informing suppliers of, and ensuring their adherence to our environmental policy, and further encouraging them to adopt effective environmental management practices of their own; by regularly evaluating our suppliers' and vendors' environmental policies and re-evaluating our relationship with such suppliers and vendors if their environmental policies do not meet the standards of this policy, and by soliciting input from our employees, suppliers, customers, and board members in meeting our environmental goals.

Raw materials

In buying and using raw materials, we strive to conserve resources, avoid damage to the environment and protect the health of our employees and the public. It is The Company's responsibility and intention to avoid any actual or potential unacceptable risk arising from the use of environmental damaging chemicals, compounds, or practices.

We also will encourage our suppliers to work jointly with us on improving supply chain environmental safety and sustainability. By engaging proactively, we aim to promote innovation, manage performance and risk, ensure business continuity, and decrease negative environmental impacts.

Energy

For The Company, most of our operations are thought-based and take place in offices so energy consumption is relatively minimal. However, as part of our commitment to a sustainable development and the responsible use of resources, we will continuously endeavor to cut energy consumption while increasing the proportion of sustainable energy as well as energy efficient offices and equipment. Our strategy is to reduce our use first, then look for ways to substitute fossil fuels with sustainable energy when possible.

We seek to improve energy efficiency throughout our global operations. This, in turn, will reduce the environmental impact, the strain on the energy supply chain and costs. Our systematic approach to energy management includes:

- adjusting the range of acceptable temperatures in offices and other workplaces
- purchasing energy-efficient equipment, including Energy-Star rated equipment

- changing work processes
- reviewing employees' travel needs

Water

The Company is dependent on clean water for our operations and some production of certain goods and takes very seriously the effect that the misalignment of supply and demand for freshwater has on the environmental, social, and financial ecosystems on which we all rely. We believe access to clean and safe water is a fundamental human right and we support global efforts to protect and conserve water and to improve access to clean drinking water. Our goal in this effort is to stabilize water consumption despite the growth of our businesses through the evaluation of our operations, supply chain, and the wider basin health in the geographical areas in which we operate.

We will adopt water conservation and reduction programs according to local conditions and needs and will work to ensure that that we work with suppliers and business partners who are equally rigorous about their own contributions to water stress.

Air emissions

Our priorities are to avoid pollutants, reduce quantities of pollutants and control remaining pollutant emissions in line with our eco-balance goals. Our overall objective is to keep emissions to the low levels we have achieved in recent years.

Lowering greenhouse gas emissions

Most greenhouse gases emitted by the Company come from energy consumption and consist, for the most part, of CO₂. As the majority of our GHG emissions originate from the use of energy, our goal for improving energy efficiency also applies to GHG emissions, i.e., a 20% reduction, measured in tons per employee by 2032 from 2022 levels. We do not favor the use of carbon offset as an alternative to driving our own efforts to reduce emissions. We expect to achieve further reductions by substituting fossil fuels with energy from sustainable sources.

Chemical Waste

The Company, like other companies involved in the industrial and life-sciences industries may use relatively low volumes of chemicals and, thus, generate small quantities of chemical waste. Our goal is to reduce this waste to the lowest possible levels over time.

Waste management

At the Company, we are committed to the responsible use of resources to reduce waste. We also accept responsibility for all waste generated at our operations, including that previously deposited at our sites or at landfills.

We have adopted the following waste management policy:

First, avoid generating waste.

Second, re-use materials where possible.

Third, if re-use is not possible, the waste materials are recycled.

Only as a last resort do we dispose of waste – and only inert materials.

We permit landfilling only as a last resort and, even then, only for inert materials. Depending on the availability of suitable local waste-treatment plants, we may dispose of non-hazardous general waste in authorized landfills. We prohibit the landfilling of problematic chemical waste.

General waste

General waste encompasses all waste arising from activities other than chemical-pharmaceutical production. It includes paper, cardboard, glass, plastics, wood and electronic equipment and construction waste, which consists mainly of rubble. Waste minimization and reduction measures are not only restricted to production processes but are evaluated and implemented across all operations at the Company. We strive for eco-efficient solutions, which show both, a reduction in the environmental burden and an economic benefit, e.g., reduction in raw material and disposal cost.