



ACACIA RESEARCH CORPORATION

HUMAN RIGHTS POLICY, OBJECTIVES AND PROCEDURES

Position Statement

It is Acacia Research Corporation's (the "Company") position that all businesses have a responsibility to respect human rights and that human rights are universal and indivisible.

More specifically this means that all people are born free and equal in value and rights. There are different types of rights, including civil and political rights, economic, social, and cultural rights. The Company does not discriminate against others on the basis of race, color, gender, age, sexual orientation or identity, national origin, ethnicity, religion, marital status, pregnancy, physical or mental disability, or veteran status. We believe in providing reasonable working hours, fair wages for our employees, and the right of access to water as a fundamental human right.

The Company's human rights policy is predicated on certain formalized globally recognized standards such as those outlined by the UN Guiding Principles on Business and Human Rights (UNGPs), as well as the PRI (Principles for Responsible Investment) principles. We strive to promote human rights in accordance with such principles in our relationships with our employees, as well as our vendors and business partners. As such, the adherence to the standards upheld in this Policy will be expected from all our dealings, both internally and with our vendors and business partners.

The Company respects that human rights are part of international law outlined in various types of international agreements and conventions. When states sign these conventions, they guarantee the individual that the rights will be respected. However companies also have a responsibility, namely, to respect human rights above and beyond what certain states may or may not adhere to. For example, and depending on circumstances, the Company may need to consider additional standards. For instance, there may be specific groups or populations that require particular attention and protection, where they may have adverse human rights impacts on them. In this connection, the United Nations has provided further elaboration on the rights of indigenous peoples; women; national or ethnic, religious and linguistic minorities; children; persons with disabilities; and migrant workers and their families. Additionally, the Company is committed to protecting the rights of minority groups and women. Moreover, in situations of armed conflict enterprises should respect the standards of international humanitarian law.

The Company's responsibility to respect human rights requires that business enterprises to at the least: (a) avoid causing or contributing to adverse human rights impacts through our activities and address such impacts when they occur; (b) seek to prevent or mitigate adverse human rights impacts that are directly linked to our operations, products, or services by our business relationships, even if we have not contributed to those impacts.

The Company believes that meeting international human rights standards – and preventing and mitigating actual and potential negative outcomes for people – leads to better financial risk management and helps to align their activities with the evolving demands of employees, investors, and regulators.

The following information constitutes the Company’s Corporate Human Rights Policy, which applies to all Company officers, directors, employees, and business partners, where applicable, 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.

Policy Commitment and Governance

Our commitment to respect human rights at the enterprise level will be:

- Approved at the most senior level of management;
- Informed by relevant human rights expertise;
- Made publicly available and actively communicated, both internally and externally; and
- Embedded throughout the business, including within other policies and procedures, and reinforced through training at all levels.

As an adherent to the Ten Principles of the United Nations (“UN”) Global Compact on human rights, labor, environment and anti-corruption, the Company has also adopted the following principles set forth in the UN Global Compact related to labor and employment matters:

- PRINCIPLE 1: Businesses should support and respect the protection of internationally proclaimed human rights.
- PRINCIPLE 2: Businesses should make sure that they are not complicit in human rights abuses.
- PRINCIPLE 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.
- PRINCIPLE 4: Businesses should uphold the elimination of all forms of forced and compulsory labor.
- PRINCIPLE 5: Businesses should uphold the effective abolition of child labor.
- PRINCIPLE 6: Businesses should uphold the elimination of discrimination in respect of employment and occupation.

Our goal is to operationalize our enterprise level human rights policy commitment and put in place robust governance structures and processes companywide, including all our company operations regardless of location. Some key characteristics of this include:

- Embedding the human rights policy commitment into other institutional policies and governance systems, including those related to ESG risk management;
- Allocation of responsibility and accountability for implementation of this human rights policy commitment to specific functions;
- Oversight by the Board of Directors;
- Adequate resource allocation;
- Ongoing training and education of employees regarding the Company’s Human Rights policies and procedures;

- Capacity building across all functions (e.g., internal business managers, research analysts, engagement specialists);
- Clear procedures for selection, engagement, oversight, and review of all business partners;
- Promote human rights and responsible behavior in our industries and communities; and
- Ensuring that the standards outlined in this policy are applicable to our vendors and business partners.

Due Diligence

To identify, prevent, mitigate, and account for how the Company will address any adverse human rights impacts from our business enterprises in a manner that considers proportionality and materiality in mind, we will carry out human rights due diligence. Our goal is to have this due diligence process to include, as much as is proportional to our size and industries:

- The assessment of actual and potential human rights impacts;
- Integrating, and acting upon the findings;
- Tracking results of our alleviatory actions;
- Maintaining an ongoing human rights due diligence process, recognizing that the human rights risks may change over time as the business enterprise's operations and operating contexts evolve; and
- Communicating how the results of our actions for internal and external audiences.

When conducting human rights due diligence, the Company will take the initial step of identifying and assessing the nature of the actual and potential adverse human rights impacts with which a business enterprise may be involved. Typically, this includes assessing the human rights context prior to a business activity under consideration, and, when possible; identifying who may be affected; cataloguing the relevant human rights standards and issues; and projecting how the proposed activity and associated business relationships could have adverse human rights impacts on those identified.

In this process the Company will attempt to seek to understand the concerns of shareholders and other stakeholders potentially affected by consulting them directly in a manner that takes into account language and other potential barriers to effective engagement. In situations where such consultation is not possible, the Company will consider reasonable alternatives such as consulting credible, independent expert resources.

Because human rights situations are dynamic, our assessments of human rights impacts will be undertaken at regular intervals: prior to a new activity or relationship; prior to major decisions or changes in the operation (e.g., market entry, product launch, policy change, or wider changes to the business); in response to or anticipation of changes in the operating environment (e.g., rising social tensions); and periodically throughout the life of an activity or relationship.

Equal Opportunity

The Company is committed to a policy of equal employment opportunity. The Company will not discriminate against employees or applicants for employment on any basis made unlawful by federal, state or local laws, including, but not limited to, race, color, creed, religion, national origin, ancestry, citizenship status, age, sex or gender, gender identity or gender expression (including transgender status), sexual orientation, marital status, military service and veteran status, physical or mental disability, or

genetic information. All such discrimination is prohibited by the Company. The Company is committed to establishing a culture that encourages collaboration, flexibility, and fairness to enable all employees to contribute to their potential. As part of this commitment to equal employment opportunity, and consistent with applicable law, the Company will provide reasonable accommodations for otherwise qualified applicants or employees with known physical or mental disabilities unless undue hardship would result.

Reporting System for Employees

The Company aims for open communication among all employees. Accordingly, the Company ensures compliance with this Policy through employee training and the availability of a confidential reporting procedure. Employees who would like to report a violation of this Policy or inquire further about this Policy should raise such issues with company management, Human Resources, or the Legal Department. Employees may also report Policy violations anonymously by calling the Company's whistleblower hotline, as set out in the Company's Employee Handbook.