



## WHISTLEBLOWER POLICY

ADOPTED AS OF OCTOBER 1, 2022

### I. PURPOSE

Adeia Inc. which includes its direct and indirect subsidiaries and affiliates (together, “Adeia” or our “Company”), is committed to ethical behavior. Our Company strives to foster an environment where concerns can be raised, and issues addressed without fear of retaliation. This policy (the “*Whistleblower Policy*”) translates this attitude into process, reflects our adherence to the highest prevailing standards, and demonstrates our commitment to an open culture of compliance.

A “whistleblower” is a person who discloses information he or she reasonably believes evidences (1) a potential violation of law, rules or policy, (2) mismanagement, inaccurate reporting, waste of funds, or theft, (3) a danger to safety or security or (4) wrongdoing, dishonesty, illegality or unethical conduct. Examples relevant to our Company include violations of our Code of Business Conduct and Ethics Policy, questionable internal accounting controls and fraudulent statements to investors, financial institutions or regulators.

This Whistleblower Policy is applicable to our entire Company worldwide. All of us—employees, officers and directors—are subject to it. We are expected to become familiar with and comply with this Whistleblower Policy, both in letter and spirit. In addition, we at Adeia have a responsibility to participate in training, and to communicate the values underlying this Whistleblower Policy in our interactions with fellow Adeia people and third parties outside the Company.

### II. REPORTING AND PROTECTION FROM RETALIATION

Adeia strongly encourages all employees, regardless of location, to raise questions or concerns promptly. Doing so allows the Company to address questions or concerns quickly and appropriately. This sentiment is echoed in our Code of Business Conduct and Ethics (“*Code*”) and Anti-Corruption Compliance Policy, as well as in other Company policies and procedures.

As a Company employee, if you are aware of a potential violation of the Code or other Company policies and procedures and do not report it according to this Whistleblower Policy, your inaction may be considered a violation itself, which may result in disciplinary action, up to and including termination of your employment or any other relationship that you may have with the Company.

You may make a report either orally or in writing (and on an anonymous basis, if you prefer, and allowed by local law), as further detailed below. The Company will treat all reports seriously and will use reasonable efforts to address them promptly and as confidentially as possible. Vendors, customers, business partners and other parties external to the Company will also be given the opportunity to report; however, the Company is not obligated to keep reports from non-employees confidential or to maintain the anonymity of non-employees. Adeia will not

tolerate retaliation, harassment or discrimination of any kind against anyone for making a report provided that the report was made in good faith. “*Good faith*” means you reasonably believed that your report was true, regardless of the outcome of the investigation.

Anyone who engages in retaliation—directly or indirectly—against someone who has made a report, or who encourages others to do so may be disciplined, up to and including discharge, to the extent permitted by applicable law.

This Whistleblower Policy provides a mechanism for the Company to be made aware of any alleged wrongdoings and address them as soon as possible. However, nothing in this Whistleblower Policy is intended to prevent any employee from reporting information to federal or state law enforcement agencies when an employee has reasonable cause to believe that the violation of a federal or state statute has occurred. A report to law enforcement, regulatory, or administrative agencies may be made instead of, or in addition to, a report directly to the Company through the ethics or reporting hotline or any other reporting method specified in this Whistleblower Policy.

### III. HOW DO I COMMUNICATE MY CONCERNS?

- A. **Managers:** Generally, your manager or the person you directly report to will be in the best position to quickly address a concern. In our organization we place a great deal of confidence in our managers and expect them to be responsive to your concerns. They should be your first line of communication. However, we realize that this is not always possible for a variety of reasons, so we offer you other options to consider in the event you have a concern and wish to report it.
- B. **Departments:** You can always continue to seek guidance from specific departments within your organization, depending on the type of concern you have. For example, questions or concerns relating to employment matters may be addressed to your Human Resources department or with our Chief Human Resources Officer. Similarly, questions or concerns relating to trading in the Company’s stock and other securities may be addressed to the Company’s Chief Legal Officer. And questions about the Company’s audits or financial reporting may be addressed to the appropriate finance department people within your organization or to the Company’s Chief Financial Officer.
- C. **Compliance Officer:** You may report directly to the Company’s Chief Legal Officer by sending an email to [compliance@adeia.com](mailto:compliance@adeia.com).
- D. **Audit Committee:** If you feel the concern is more appropriately addressed to the Company’s Audit Committee, you may contact the Audit Committee Chair directly by sending an email to [auditcommittee@adeia.com](mailto:auditcommittee@adeia.com).
- E. **Governance Hotline:** You may report through Notified, a secure, independent third-party service provider to the Company, which manages the Company’s Governance Hotline. In this case there are two ways to make such a report, either by telephone or by internet-enabled computer.

- i. Filing a Report by Telephone: The Governance Hotline can be accessed in the U.S. by calling 1-833-636-3069 or from a country other than the U.S. by calling 1-202-640-4731. When filing your report, you will be given a confidential report confirmation number. Log on to <https://www.whistleblowerservices.com/adeia/login?language=en> after approximately three (3) business days to follow up on your report and answer any follow-up question regarding your report. Upon first logging on, you may also be prompted to create a confidential password for access to your report status for follow-up questions.
- ii. Filing a Report on the Internet: To file a report on the Internet, access <https://www.whistleblowerservices.com/adeia> then follow the instructions to file a report. Use of the Governance Hotline is purely voluntary. No one will be subject to disciplinary action due to a failure to use the Governance Hotline. Improper or abusive use of the Governance Hotline by any person may be subject to disciplinary action.

#### **IV. REPORTING CONCERNS ANONYMOUSLY**

As a publicly traded U.S. company, Adeia is required to provide a mechanism for confidential and anonymous reports. Adeia maintains the Governance Hotline through Notified, a secure independent third-party service provider, for that purpose. Therefore, if you prefer, you may report concerns anonymously to the Governance Hotline. However, providing your name to the Governance Hotline will expedite the Company's ability to respond to your concern. It also allows the Company to contact you directly during an investigation, to obtain additional information or facts, as necessary. In all cases, Adeia will treat the information you provide as confidential to the extent reasonably possible.

If you wish to remain anonymous, the Company will not actively try to discover your identity. Due to certain requirements of data protection laws in Europe and other locations, the Company may be obligated to inform the subject of a reported violation that the report was filed, and how he or she may exercise his or her right to access and correct the information regarding the allegation. However, in most jurisdictions this right to know or access information should not entitle the subject of the allegation to information identifying the person who reported the allegation. Access to reported information from individuals in the European Union (the "EU") or concerning individuals in the EU will be limited to a small group of personnel who understand the applicable EU data protection concerns and obligations to maintain confidentiality. The Company will preserve anonymity to the extent law permits.

#### **V. WHAT HAPPENS TO THE REPORTS I MAKE THROUGH THE GOVERNANCE HOTLINE OR OTHERWISE?**

Reports made via the Governance Hotline are entered directly onto the Notified secure server, which prevents any potential breach in security. Notified makes the reports available only to specific individuals within our Company. The initial designated recipients of Notified reports are the Chair of Adeia's Audit Committee and the Chief Legal Officer unless one of them is the subject of the report. Reports to the Governance Hotline regarding accounting, auditing, or other

financial matters will be forwarded to all of the above people, as well as to the Chief Financial Officer. Reports on other subjects, or reports received outside of the Governance Hotline will be forwarded by the Chief Legal Officer to the appropriate internal Company person who is responsible for ensuring that your concern is investigated and adequately addressed. The dissemination of all reports is limited to the extent practicable to employees and third parties who have a need to know, or who are involved in any investigation or resolution of the subject matter of such report.

Adeia's Chief Legal Officer or a designee will acknowledge receipt of all submissions that are not anonymous, either orally or in writing, unless the person submitting the report or concern indicates a specific preference as to how to receive the acknowledgment. Adeia's Chief Legal Officer or a designee will maintain a record of the Company's response to each submission, including the date of acknowledgment, if applicable, and any other actions taken. All reports will be investigated promptly, regardless of how they are received. As warranted, appropriate and permitted by applicable law, corrective actions may be taken by the Company and/or disciplinary action may be taken against the subject of the report. The specific actions taken by the Company will vary with the matter at hand and the results of its investigation. In any particular instance, the Company's actions will depend on the nature and gravity of the subject matter of the report, employee conduct, or circumstances reported, as well as the quality of the information provided by the person making the report. All records related to reporting of concerns will be kept confidential in accordance with all applicable laws, including applicable data protection laws, rules, and regulations. The Company will also follow applicable provisions of its internal record retention policy or practices. In addition, the Company may handle information in such manner as the Company or the Audit Committee determines appropriate or as advised by legal counsel to the Company.

## **VI. LOCAL RULES AND LIMITED EXCEPTIONS TO THIS WHISTLEBLOWER POLICY**

Some exceptions to the policy may exist. For example, if specific conduct is permitted under this Whistleblower Policy, but is prohibited by local law, you must comply with local law. As another example, the laws of certain countries may limit the Company's ability to protect your identity or keep reports you make confidential. If you are located in our European offices, please note carefully the specific provisions contained in this Whistleblower Policy applicable to you, as a result of data privacy and other laws in the EU or the country in which you are working.

## **VII. AMENDMENTS TO THIS WHISTLEBLOWER POLICY**

The Audit Committee and Board of Directors are authorized to modify this Whistleblower Policy unilaterally at any time, without prior notice. It may be necessary to modify this Whistleblower Policy, among other reasons, to maintain compliance with U.S. local, state, and federal laws, rules and regulations and non-U.S. laws, or to accommodate organizational changes within the Company or to change the secure, independent third party service provider of the Governance Hotline. The Company will announce any material revisions to this Whistleblower Policy and will make copies of the then-current Whistleblower Policy

available to all Adeia employees by following the instructions for filing a report at <https://www.whistleblowerservices.com/adeia>.