

NEWMARK PARTNERS, INC. GLOBAL ANTI-BRIBERY AND CORRUPTION POLICY STATEMENT

Newmark Group, Inc. (“Newmark”) has approved the following global policy with respect to Newmark and its subsidiaries.

The following policy reflects Newmark’s commitment to Anti-Bribery and Corruption and forms part of its governance standards. It is adapted from its Global Anti-Bribery and Corruption Policy.

Introduction

Newmark is committed on a global basis to Anti-Bribery and Corruption (“ABC”).

- Newmark advocates the development of regulations and internal procedures for ABC.
- Newmark has developed a set of policies outlining its general ABC standards and is committed to complying with all applicable ABC laws and regulations.
- Newmark has implemented and maintains a program to provide regular ABC education and training to its employees.

Compliance & Financial Crime Program

Newmark examines its ABC strategies, goals and objectives on an ongoing basis and strives to maintain an effective program that focuses on prevention and detection. The program includes:

- A clear set of policies and procedures outlining ABC standards and principles, including a zero-tolerance policy for bribery and facilitation payments of any kind;
- Establishing a clear policy with respect to the state and nature of any gifts or hospitality;
- Communication of regulatory changes and requirements to the relevant stakeholders alongside the appropriate training;
- Implementing changes to systems and/or processes as required, as well as updates to policies and/or procedures;
- Identification and management of potential and actual conflicts of interest;
- Relevant risk assessments and controls around donations, entertainment, charitable contributions, gifts and employee trading;
- Regularly reviewing the effectiveness of sanctions related policies, procedures, systems and controls;
- Establishing whistleblower and reporting requirements in the event of suspected bribery, including a policy of non-retaliation; and
- Identifying specific “Red Flag” risk scenarios with respect to reputational risk, compensation, unusual circumstances or government relationships.

Governance, Oversight and Consultation

Newmark’s ABC program is managed by its group Compliance department, which has wide discretionary authority over ABC matters including concerns over potential or suspected breaches of the policy and has access to all information and data necessary to fulfill this governance and oversight function. Periodic reports are made to senior management and the Company’s Board of Directors.

Definitions

Newmark's ABC policy contains specific definitions of prohibited crimes, violations and actions based on law in applicable jurisdictions, which may be amended from time to time as regional laws are revised. The Compliance department reviews and monitors changes in applicable law and revises the policies and provides notices to employees and management as warranted.

Specifically, the ABC policy defines bribery and corruption as follows:

"Bribery" refers to the act of offering, giving, promising, or authorizing, or extorting, soliciting, accepting, or receiving "anything of value" to improperly influence the actions of a person to obtain or retain business, secure an improper advantage, or otherwise induce or reward improper conduct which is unlawful or a breach of trust.

"Corruption" can be regarded to be any abuse of position of entrusted power to gain an undue personal advantage. The UN Guide for Anti-Corruption Policies notes that definitions applied to corruption vary from country to country in accordance with cultural, legal or other factors and the nature of the problem as it appears in each country. Transparency International defines corruption as an abuse of entrusted power for private gain.

Corrupt behavior is very broad in its practical manifestations and is not always related specifically to bribery, but bribery can be regarded as a subset of the overall crime of corruption.

Version: September 2021