
Newmark | Whistleblower Complaint and Investigation Policy

It is the policy of Newmark Group, Inc. (the “Company”) and its Board of Directors to treat complaints about accounting, internal controls, employment and labor practices, auditing matters, questionable financial practices, or other legal or business misconduct (“Complaints”) seriously and to handle their review expeditiously. Complaints that are accounting or financial in nature (“Accounting Complaints”) will be handled by the Company’s Audit Committee (the Audit Committee) as set forth below.

This policy applies to each officer, director, employee (including, without limitation, a leased employee), broker, (including independent contractor), and consultant of the Company (each, a “Covered Person”). The Company expects Covered Persons to report any actual or suspected misconduct. Company employees are obligated to cooperate in any investigation. This policy is designed to ensure each Covered Person is responsible for conducting the Company’s business in a manner that demonstrates a commitment to the highest standards of legal compliance and business and professional ethics and integrity.

If requested by any Covered Person, the Company will protect the confidentiality and anonymity of the Covered Person to the fullest extent possible, consistent with its need to conduct an adequate review of and, if necessary, address the Complaint or take further action. Vendors, suppliers, customers, business partners and other parties external to the Company will also be given the opportunity to submit Complaints; however, the Company is not obligated to keep Complaints from non-Covered Persons confidential or to maintain the anonymity of any such persons.

Managers are responsible for appropriately reporting any concerns raised to them directly and escalating any reports under the procedures described in this policy rather than investigating issues themselves.

Procedures Receipt of Complaints; Confidentiality; Anonymity; Anti- Retaliation

Any person may submit a Complaint to the independent outside law firm of Davis Polk & Wardell LLP (1) by writing to Davis Polk & Wardwell LLP, c/o Derek J. Dostal, Esq., 450 Lexington Avenue, New York, NY 10017, ATTN: Newmark Group Whistleblower; (2) by calling 1-877-312-4501; or (3) by sending an email to newmarkgroupwhistleblower@davispolk.com. These methods are available 24/7 and monitored frequently.

Covered Persons submitting an Accounting Complaint need not provide their name or other personal information and reasonable efforts will be used to conduct the investigation that follows from such Complaint from a person in a manner that protects the confidentiality and anonymity of the person submitting the Complaint. Other Complaints may require more detailed information to receive a complete review.

Persons submitting Complaints or persons who cooperate in investigations in good faith will not be subject to retaliation and nothing in this policy is intended to or shall restrict any person from filing a charge with a government agency (such as the U.S. Equal Employment Opportunity Commission, the National Labor Relations Board, or the U.S. Securities and Exchange Commission), testifying, assisting, communicating with or otherwise participating in an investigation with any such government agency or entity, or reporting possible violations of federal, state, or local law or regulation to any governmental agency, or taking any other actions, in each case that are protected under the whistleblower provisions of federal, state, or local law or regulation or other laws.

Treatment of Complaints, Investigation Procedures and Review Structures

An Accounting Complaint made under these procedures shall be directed by Davis Polk & Wardwell LLP to the Chief Legal Officer and/or Corporate Secretary and/or his or her designated Company legal counsel (in either case, “Company Counsel”) and/or the

Chairman of the Audit Committee. Complaints received by Davis Polk & Wardwell LLP that do not constitute Accounting Complaints shall be directed by Davis Polk & Wardwell LLP only to the Company's Chief Legal Officer and/or Corporate Secretary and/or designated Company legal counsel.

Company Counsel and the Chairman of the Audit Committee shall review the Accounting Complaint and may jointly investigate it or may agree to assign another employee, outside counsel, advisor, expert or third-party service provider to investigate, or assist in investigating, the Accounting Complaint. Company Counsel and the Chairman of the Audit Committee may direct that any individual assigned to investigate an Accounting Complaint work at the direction of or in conjunction with Company Counsel, the Chairman of the Audit Committee, or any attorney in the course of the investigation. Other Complaints shall be reviewed and investigated by appropriate persons, including Company Counsel, as appropriate. The Company takes allegations seriously, will investigate promptly and will take appropriate and corrective action if necessary.

Access to Reports and Records and Disclosure of Investigation Results

All reports and records associated with Complaints are considered confidential and access will be restricted to members of the Audit Committee (if applicable), the Company's legal department, employees of the Company or outside counsel involved in investigating a Complaint as contemplated by these procedures. Access to reports and records may be granted to other parties at the discretion of the Audit Committee or Company Counsel (if applicable).

Frequency of Reminders, Annual Training and Local Languages

Reminders are provided to employees on an annual basis and this Whistleblower Policy is translated into multiple local languages and included in the Company's annual Code of Ethics training presentation.