
Newmark U.S. Equal Employment Opportunity Policy



U.S. Equal Employment Opportunity Policy Summary

Newmark Group, Inc. and its affiliated entities, subsidiaries, and strategic partners (collectively, the “**Company**”) is an Equal Employment Opportunity (EEO) employer. This means that the Company aims to provide equal opportunity in all aspects of the employer-employee relationship, including recruiting, hiring, promotion, conditions and privileges of employment, training, compensation, benefits, transfers, discipline, and termination of employment, and seeks to prevent any prohibited discrimination or harassment based upon any classification or status protected by applicable law (which can include race, color, gender, age, sexual orientation, gender identification, religion, national origin or ancestry, citizenship, veteran status, marital status, physical or mental disability, pregnancy, genetic information and other factors protected by law).

The Company expects that all relationships among persons in the workplace and in other settings in which employees or contractors may find themselves in connection with their employment or services will be professional and free of bias and prejudice.

The Company’s equal employment policies (including the non-discrimination policy and the anti-harassment and anti-retaliation policies contained herein and in the Company’s Employee Handbook) apply to all incidents of unlawful discrimination, harassment and retaliation, including those that occur at work, in a work or work-related setting off-premises or during off- hours – for example, business trips, Company holiday parties, work-related client entertainment activities (even if the activities are at the request of and/or paid for by a client), and other work-related social or recreational events. These policies may apply to events outside of work if the inappropriate conduct has a connection to or adversely affects the employment relationship.

All Company employees and applicants are protected by the policies prohibiting unlawful discrimination, harassment and retaliation, whether related to conduct engaged in by fellow employees, supervisors, managers, contractors or someone with whom the employee is involved, directly or indirectly, because of his or her employment with the Company (e.g., an outside vendor, consultant, client, potential client or customer).

To the extent that the equal employment policies contained herein directly conflict with the terms or policies contained in the Company’s Employee Handbook, then the Company’s Employee Handbook shall control and supersede the policies contained herein.

101 GENERAL PRINCIPLES AND APPLICATION OF POLICY

Non-Discrimination

The Company is an Equal Employment Opportunity (EEO) employer. This means that the Company aims to provide equal opportunity in all aspects of the employer-employee relationship, including recruiting, hiring, promotion, conditions and privileges of employment, training, compensation, benefits, transfers, discipline, and termination of employment, and seeks to prevent any prohibited discrimination or harassment based upon any classification or status protected by applicable law (which can include actual or perceived race, color, gender, age, sexual orientation, gender identification, religion, national origin or ancestry, citizenship, veteran status, marital status, physical or mental disability, pregnancy, genetic information, and other factors protected by law). The Company expects that all relationships among persons in the workplace and in other settings in which employees or contractors may find themselves in connection with their employment or services will be professional and free of bias and prejudice.

Application of Equal Employment Opportunity Policies

The Company's equal employment policies (including the non-discrimination policy and the anti-harassment and anti-retaliation policies that follow) apply to all incidents of unlawful discrimination, harassment and retaliation, including those that occur at work, in a work or work-related setting off-premises or during off-hours – for example, business trips, Company holiday parties, work-related client entertainment activities (even if the activities are at the request of and/or paid for by a client), and other work-related social or recreational events. This policy may apply to events outside of work, if the inappropriate conduct has a connection to or adversely affects the employment relationship. All Company employees and applicants are protected by the policies prohibiting unlawful discrimination, harassment and retaliation, whether related to conduct engaged in by fellow employees, supervisors, managers, contractors or someone with whom the employee is involved, directly or indirectly, because of his or her employment with the Company (e.g., an outside vendor, consultant, client, potential client or customer). In no event will participation in, sponsorship of, or attendance at a strip club or similar sexually-themed establishment as a work-related social or client-entertainment activity be permitted.

102 REASONABLE ACCOMMODATION

Accommodation of Disabilities

The Company prohibits discrimination or harassment on the basis of physical or mental disability. Pursuant to applicable laws and government regulations, the Company provides reasonable accommodation of known physical and mental disabilities of job applicants and employees. Disabilities for which accommodations may be requested include conditions that are caused by or contributed to by pregnancy.

If an employee needs accommodation, the employee should contact one of their entity's Human Resources Professionals. If an employee believes that the Human Resources Professional has not appropriately addressed a request for accommodation, the employee should report the situation using the Procedure for Reporting an Incident of Harassment, Discrimination or Retaliation.

Accommodation of Religious Observance or Belief

The Company will provide reasonable accommodations for an applicant's or employee's religious observances or beliefs, provided such accommodations are consistent with applicable law and do not impose an undue hardship. If an employee needs an accommodation for religious beliefs or observances, the employee should contact their Human Resources Professional. If an employee believes that they have been denied reasonable accommodation, the employee should report the situation using the Procedure for Reporting an Incident of Harassment, Discrimination or Retaliation.

Contractors

Contractors who experience access issues or need modifications due to disability should contact their office managers or their contracting entities' Human Resources Professional.

103 PROHIBITION OF UNLAWFUL HARASSMENT

The Company is committed to providing a work environment free from harassment based on race, color, religion, sex, pregnancy, age, sexual orientation, gender identification, national origin or ancestry, citizenship, veteran status, marital status, any physical or mental disability, or any other basis protected by federal, state or local laws. All individuals present in our workplaces, including contractors, clients, and visitors, as well as all employees and managers, are prohibited from engaging in conduct that is harassing and based upon one or more protected factors.

This policy prohibits any unlawful harassing conduct which: (i) is made a condition of employment, (ii) is used as a basis for employment decisions, (iii) has the purpose or effect of unreasonably interfering with an employee's work performance or creating an intimidating, hostile or offensive working environment, or (iv) otherwise adversely affects an individual's employment opportunities. Harassing conduct includes, but is not limited to, the following conduct where based upon a characteristic protected by law: epithets, slurs or negative stereotyping; threatening, intimidating or hostile acts; denigrating jokes; display or circulation of written or graphic material that denigrates or shows hostility or aversion toward a protected individual or group, either in the workplace (including via e-mail) or outside of work (including via social media); and threats or intimidating conduct.

The Company takes various actions in order to prevent unlawful discrimination or harassment from occurring and to promptly remedy any inappropriate conduct that occurs. These include our procedures for employees to make complaints of such conduct and for the Company's investigation of such complaints.

Please note that while this policy sets forth our goals of promoting a workplace that is free of sexual and other types of unlawful discriminatory harassment, the policy is not designed or intended to limit the Company's authority to discipline or take remedial action for workplace conduct that we deem unacceptable, regardless of whether that conduct satisfies the definition of sexual or other types of unlawful discriminatory harassment. In order to promote a professional and productive work environment, we strive to maintain an atmosphere characterized by mutual respect. The Company may take whatever action it feels is appropriate to stop or remedy conduct that does not meet the legal standard for illegal harassment, but is offensive, disruptive or, in its view, otherwise inappropriate. Also, all employees and contractors should refrain from conduct that would be considered offensive or inappropriate when engaged with the Company's clients or engaged in Company business, and should keep in mind that the Company may take action when inappropriate conduct that occurs in a non-business setting becomes known and adversely affects or has the potential to adversely affect the Company's business or reputation.

103.5 PROHIBITION OF DISCRIMINATION BASED ON REPRODUCTIVE HEALTH DECISION MAKING IN NEW YORK

The Company is committed to providing a work environment free from discrimination and retaliation on the basis of an employee's or a dependent of the employee's reproductive health decision making, including the use of particular drugs, devices or medical services, and the Company prohibits all individuals present in our workplaces from engaging in conduct that discriminates or retaliates against an employee on this basis. The Company also will not, without prior informed written consent, access personal information regarding the reproductive health decision making of any employee or his or her dependents, and will not require an employee to sign any document or waiver that purports to deny that employee the right to make his or her own reproductive health decisions.

Any employee who has been subjected to or witnessed discrimination or retaliation on the basis of an employee's or a dependent of an employee's reproductive health decision making, or any other violation of this policy, is strongly encouraged to report the incident in accordance with the Company's procedure for reporting unlawful conduct. Employees

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subjected to unlawful discrimination or retaliation on the basis of reproductive health decision making can bring an action in court and may be entitled to certain remedies, including monetary and injunctive relief.

104 PROHIBITION OF SEXUAL HARASSMENT

Sexual harassment constitutes discrimination, is illegal under federal, state and local laws, and will not be tolerated. The Company's prohibition against sexual harassment applies without regard to the gender of the offender or the recipient/target of such conduct.

It is the Company's policy that hiring, promotion or other employment decisions are not and cannot be based upon whether an employee submits to or rejects sexual advances. Direct or implied requests from a manager or supervisor for sexual favors in exchange for actual or promised job benefits such as favorable reviews, salary increases, promotions, increased benefits or continued employment are strictly prohibited.

Unwelcome sexually-oriented conduct, whether intended or not, that has the effect of creating a workplace environment that is hostile, offensive, intimidating or humiliating may also constitute sexual harassment, and is prohibited. Examples of the types of conduct that may violate this policy include, without limitation:

- unwanted sexual advances (whether they involve sexual touching or not) or requests for sexual favors, repeated requests for dates, or stalking;
- sexual jokes or innuendos, sexually suggestive comments, questions about one's sex life or sexual experiences;
- sexually-suggestive touching, grabbing, groping, or fondling;
- verbal abuse of a sexual nature, including use of sexually specific vulgar terms;
- commentary, discussion or questions about an individual's body, sexual prowess, sexual activities, or sexual deficiencies;
- leering, catcalls, staring, suggestive whistling or other sounds, or insulting or obscene gestures;
- display or circulation of obscene or sexually suggestive objects, pictures, drawings, images or cartoons (including those in electronic format).

Sometimes sexually oriented behavior occurs because of a misunderstanding regarding whether such conduct is welcome. Any employee who experiences conduct of the type above and finds it offensive is encouraged to inform the offending person that such conduct is unwelcome, offensive and should stop. If the employee does not wish to communicate directly with the offending person, or if such communication has been ineffective, the employee should report the conduct using the procedures for reporting unlawful conduct.

104.5 PROHIBITION OF SEXUAL HARASSMENT IN NEW YORK

The Company is committed to maintaining a workplace environment full of dignity and respect and free from sexual harassment. The Company's prohibition against sexual harassment applies (i) to all employees, paid or unpaid interns, and non-employees which are defined as those individuals who are (or employed by) independent contractors, subcontractors, vendors, consultants, or anyone providing services in the workplace ("non-employees") and (ii) without regard to the gender of the offender or the recipient/target of such conduct. Further, the Company prohibits retaliation against employees and non-employees who report incidents of sexual harassment, provide information, or otherwise assist in any investigation of a sexual harassment complaint. All employees who engage in sexual harassment or retaliate against anyone involved in a sexual harassment investigation will be subject to discipline, up to and including termination.

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Sexual Harassment

Sexual harassment is a form of sex discrimination, is illegal under federal, state and local laws and is a violation of Company policies. In New York, sexual harassment includes harassment on the basis of sex, sexual orientation, self-identified or perceived sex, gender expression, gender identity and the status of being transgender.

Sexual harassment includes unwelcome conduct which is either of a sexual nature, or which is directed at an individual because of that individual's sex when:

- Such conduct has the purpose or effect of subjecting an individual to inferior terms, conditions or privileges of employment or creating an intimidating, hostile or offensive work environment, even if the reporting individual is not the intended target of the sexual harassment;
- Such conduct is made either explicitly or implicitly a term or condition of employment; or
- Submission to or rejection of such conduct is used as the basis for employment decisions affecting an individual's employment.

A sexually harassing work environment includes, but is not limited to, words, signs, jokes, pranks, intimidation or physical violence which is of a sexual nature, or which is directed at an individual because of that individual's sex. Sexual harassment also consists of any unwanted verbal or physical advances, sexually explicit derogatory statements or sexually discriminatory remarks made by someone that is offensive or objectionable to the recipient, and which causes the recipient discomfort or humiliation or interferes with the recipient's job performance. Sexual harassment also occurs when a person in authority tries to trade job benefits for sexual favors, such as hiring, promotion, continued employment or any other terms, conditions or privileges of employment.

Sexual harassment can occur outside of the workplace and during non-work hours, while, for example, employees are traveling for business or at a Company sponsored event.

Examples of Sexual Harassment

Examples of the types of conduct that may constitute unlawful sexual harassment and that are strictly prohibited by this policy include:

- unwanted sexual advances (whether they involve sexual touching or not) or requests for sexual favors, repeated requests for dates, or stalking;
- sexual jokes or innuendos, sexually suggestive comments, questions about one's sex life or sexual experiences;
- sexually suggestive touching, grabbing, groping, or fondling;
- verbal abuse of a sexual nature, including use of sexually specific vulgar terms;
- commentary, discussion or questions about an individual's body, sexual prowess, sexual activities, or sexual deficiencies;
- leering, catcalls, staring, suggestive whistling or other sounds, or insulting or obscene gestures;
- display or circulation of obscene or sexually suggestive objects, pictures, drawings, images or cartoons (including those in electronic format);

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- engaging in sex stereotyping, where conduct and personality traits are considered inappropriate simply because they may not conform to other people's ideas or perceptions about how individuals of a particular sex should act or look;
- hostile behavior against an individual because of that individual's sex, sexual orientation, gender identity and status of being a transgender.

Retaliation

Unlawful retaliation can constitute any action that could discourage an employee from coming forward to make or support a sexual harassment claim. The New York State Human Rights Law prohibits retaliation against an employee for:

- reporting sexual harassment, either internally or with an anti-discrimination agency;
- testifying or assisting in a proceeding involving sexual harassment;
- opposing sexual harassment by making a complaint to management; or by informing a supervisor or manager of the harassment;
- reporting that another employee has been sexually harassed; or
- encouraging a fellow employee to report harassment.

Even if the alleged harassment does not rise to the level of a violation of the law, the employee is protected from retaliation if the person had a good faith belief that the practices were unlawful.

However, this prohibition against retaliation is not intended to protect persons making intentionally false charges of harassment.

Reporting Sexual Harassment

The Company cannot prevent or remedy sexual harassment unless it has knowledge of it. Therefore, the Company strongly urges any employee, paid or unpaid intern, or non-employee who has been subjected to or witnessed sexual harassment to promptly report the incident to his/her direct supervisor, the Director of Human Resources, or a Human Resources Professional responsible for his/her entity or business. If the supervisor or one of the other persons listed above is alleged to be involved in the complained of conduct, or the employee otherwise feels uncomfortable discussing the complaint or incident with one or more of the other persons listed above, the employee should bring the matter to the attention of the Company's ethics or compliance Hotline.

Reports of sexual harassment may be made verbally or in writing. A complaint form entitled "Complaint Form for Reporting Sexual Harassment" is attached to this Policy. All employees are encouraged to use this complaint form in connection with reporting sexual harassment on their own behalf or on behalf of another person.

Supervisory Responsibilities

The Company requires supervisors and managers to contribute to the Company's effort to maintain a dignified and respectful workplace. Supervisors and managers who receive a complaint or information about suspected sexual harassment, observe what may be sexually harassing behavior or for any reason suspect that sexual harassment is occurring, are required to report such sexual harassment or suspected sexual harassment to the Human Resources Department. Supervisors and managers who fail to report suspected sexual harassment behavior or otherwise knowingly allow such behavior to continue, or engage in any type of retaliatory conduct, will be subject to discipline, up to and

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including termination.

Investigations of Sexual Harassment

When the Company receives a complaint or information regarding, or otherwise becomes aware of a situation that may be, sexual harassment, the Company will promptly investigate the allegations or situation in a fair and expeditious manner, ensuring due process for all parties involved. The investigation may include, but not be limited to, individual interviews with the parties involved and, where necessary, interviews of individuals who may have observed the alleged conduct or may have other relevant information as well as the collection of relevant documents, including electronic communications. All matters relating to the Company's complaint procedure and any investigation conducted will be treated in confidence to the maximum extent practicable under the circumstances. Supervisors, managers, employees and contractors are required to cooperate with Company-sponsored investigations of unlawful sexual harassment.

Alternative Forums

All employees, paid and unpaid interns, and non-employees are strongly encouraged to file all sexual harassment and retaliation complaints with the Company to allow the Company to promptly conduct an internal investigation and determine the appropriate resolution. Employees may also pursue legal claims in court or with the following governmental entities.

New York State Division of Human Rights

The New York Human Rights Law (HRL), codified as N.Y. Executive Law, art. 15 § 290 et seq., prohibits sexual harassment in the workplace. A complaint alleging sexual harassment in violation of the HRL may be filed either with the Division of Human Rights (DHR) or in New York State Supreme Court.

Complaints with the DHR may be filed any time within three years of the alleged sexual harassment. If an individual did not file a complaint with the DHR, they can sue directly in state court under the HRL, within three years of the alleged sexual harassment.

The DHR will investigate your complaint and determine whether there is probable cause to believe that sexual harassment occurred. Probable cause cases are forwarded to a public hearing before an administrative law judge. If sexual harassment is found after a hearing, the DHR has the power to award relief, which varies but may include requiring action that ensures that the harassment ends, or redress the damage caused, including paying monetary damages, attorney's fees and civil fines.

Contact the DHR at (888) 392-3644 or visit www.dhr.ny.gov/complaint for more information about filing a complaint.

United States Equal Employment Opportunity Commission

The United States Equal Employment Opportunity Commission (EEOC) enforces federal anti-discrimination laws, including Title VII of the 1964 federal Civil Rights Act (codified as 42 U.S.C. § 2000e et seq.) An individual can file a complaint with the EEOC anytime within 300 days from the alleged sexual harassment. The EEOC will investigate the complaint, and determine whether there is reasonable cause to believe that unlawful sexual harassment has occurred, at which point the EEOC will issue a Right to Sue letter permitting the individual to file a complaint in federal court.

The EEOC does not hold hearings or award relief, but may take other action including pursuing cases in federal court on behalf of complaining parties. Federal courts may award remedies if sexual harassment is found to have occurred.

Contact the EEOC (800) 669-4000 (TTY: (800) 669-6820) or visit www.eeoc.gov for more information about filing a "Charge of Discrimination."

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Local Governmental Entities

Many localities enforce laws protecting individuals from sexual harassment. An individual may contact the county, city or town in which they live to find out if such law exists. For example, employees who work in New York City may file complaints of sexual harassment with the New York City Commission on Human Rights, which can be reached by calling 311 or (212) 306-7450 or by visiting www.nyc.gov/html/cchr/html/home/home.shtml

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Sample Complaint Form for Reporting Sexual Harassment

The Company is committed to maintaining a workplace environment full of dignity and respect and free from sexual harassment. If you believe you have witnessed or been subjected to sexual harassment at the workplace or have been retaliated against for your involvement in a sexual harassment investigation, you are encouraged to complete this form and submit it to the Director of Human Resources or a Human Resources Professional responsible for your entity or business. You will not be retaliated against for filing a complaint.

If you are more comfortable making your report verbally or in another manner, a Human Resources Professional may complete this form on your behalf.

YOUR INFORMATION

Name:

Work Address:

Job Title:

Work Phone:

Email:

SUPERVISORY INFORMATION

Immediate Supervisor's Name:

Title:

Work Phone:

Work Address:

COMPLAINT INFORMATION

1. Your complaint of Sexual Harassment is made about:

Name:

Title:

Work Address:

Work Phone:

Relationship to you: Supervisor Subordinate Co-Worker Other

2. Please describe what happened and how it is affecting you and your work. Please use additional sheets of paper if necessary and attach any relevant documents or evidence that you may have.

3. Date(s) sexual harassment occurred:

Is the sexual harassment continuing? Yes No

4. Please list the name and contact information of any witnesses or individuals who may have information related to your complaint:

5. Have you previously complained or provided information (verbal or written) about related incidents? If yes, when and to whom did you complain or provide information?

Signature: _____ Date: _____

105 PROCEDURE FOR REPORTING UNLAWFUL HARASSMENT, DISCRIMINATION OR RETALIATION

The Company strongly urges the prompt reporting of all incidents of unlawful discrimination, harassment or retaliation, regardless of the offender's identity or position. If an employee believes they have experienced or been subject to unlawful discrimination or harassment based on any protected characteristic, believes that they have been treated in an unlawful retaliatory manner, or has information regarding an incident of sexual or other types of unlawful harassment, discrimination or retaliation, the employee should promptly report the incident to his/her direct supervisor, the Director of Human Resources, or a Human Resources Professional responsible for his/her entity or business. If the supervisor or one of the other persons listed above is alleged to be involved in the complained of conduct, or an employee otherwise feels uncomfortable discussing the complaint or incident with one of or more of the other persons listed above, the employee should bring the matter to the attention of one of the other persons designated above or the entity's or the Company's ethics or compliance Hotline. An employee need not have been the direct victim of unlawful harassment, discrimination or retaliation to make a report under this policy.

The Company expects supervisors and managers to contribute to the Company's effort to maintain a respectful workplace. Supervisors and managers are expected to consult with the Human Resources Department to manage situations that appear to be unlawful harassment, discrimination or retaliation, but which have not generated a formal complaint. It is the responsibility of all supervisors, managers and contractors, once they become aware of these situations, to immediately bring any concerns, claims or information to the attention of the Human Resources Department. Contractors should also bring situations they perceive to be sexually or otherwise inappropriate or to be unlawfully discriminatory or retaliatory to the attention of their local managers or their retaining entity's Human Resources Professional.

Investigation of Reported Incidents

When the Company receives a complaint or information regarding, or otherwise becomes aware of a situation that may be, unlawful harassment, discrimination or retaliation, the Company will promptly investigate the allegations or situation in a fair and expeditious manner. The investigation may include, but not be limited to, individual interviews with the parties involved and, where necessary, interviews of individuals who may have observed the alleged conduct or may have other relevant knowledge. All matters relating to the Company's complaint procedure and any investigation conducted will be treated in confidence to the maximum extent practicable under the circumstances. Supervisors, managers, employees and contractors are expected to cooperate with Company-sponsored investigations of unlawful discrimination.

Prohibition of Retaliation

Applicable law prohibits retaliation against any employee for reporting unlawful discrimination, harassment or retaliation, or for filing, testifying, assisting or participating in any manner in any investigation, proceeding or hearing conducted by the Company, or a federal or state enforcement agency or court, regarding unlawful activity, including but not limited to unlawful discrimination, harassment or retaliation. Please report any unlawful retaliation immediately using the procedure set forth herein. Any report of such retaliatory conduct will be investigated in an objective and timely manner, in accordance with the Company's investigation procedure. If a report of unlawful retaliation is substantiated, appropriate disciplinary action, up to and including termination of employment, or appropriate corrective action, will be taken.

106 RESPONSIVE ACTION

If the Company determines an employee or other person has violated these policies, appropriate responsive action will be taken against the offending party. Such action may include training, referral to counseling, disciplinary action up to and including immediate termination of employment, and such other forms of responsive action as the Company deems appropriate under the circumstances. Supervisors, managers, employees and contractors are expected to comply with the Company's implementation of remedial measures and are prohibited from obstructing remedial efforts and/or retaliating against complainants or witnesses. Supervisors, managers, employees and contractors who fail to meet these expectations are subject to disciplinary or appropriate responsive action.

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These policies should not, and may not, be used as a basis for excluding or separating individuals of a particular gender or any other protected characteristic from participating in business or work-related social activities or discussions in order to avoid allegations of harassment. The law and the Company's policies prohibit disparate treatment on the basis of gender, or any other protected characteristic, with regard to terms, conditions, privileges and prerequisites of employment. Any employee who has any questions or concerns about the Company's anti-harassment, anti-discrimination or anti-retaliation policies or the related reporting and correction policies should discuss them with the Director of Human Resources.

The Company may investigate and take responsive action with respect to conduct that does not constitute unlawful behavior but is disruptive, inappropriate or otherwise inconsistent with the Company's policies or goals.

False Allegations

If, after investigating a complaint (including a complaint of harassment, discrimination or retaliation), the Company determines that the complaint is frivolous, that the person making the complaint intentionally or recklessly made false allegations or that persons involved in the investigation provided false information, the individual(s) who made the false allegations or gave the false information may be subject to appropriate discipline, up to and including termination of employment, or such other responsive action as determined by the Company.

107 NON-FRATERNIZATION POLICIES

The Company desires to avoid misunderstandings, complaints of favoritism, possible claims of sexual harassment, and the employee morale and dissension problems that can result from certain relationships in the workplace.

Company policy generally prohibits individuals who are family members (including those who marry or enter into a domestic partnership) from being employed or engaged in positions that:

1. Have the potential for creating disruption, a negative or unprofessional work environment, or an adverse impact on work performance; or
2. Create either an actual or inherent conflict of interest or the appearance of a conflict of interest.

In addition, Company policy also generally prohibits individuals who are involved in a romantic relationship from being employed or engaged in positions: (x) that may be disruptive or create actual or perceived conflicts as set forth in Sections 1 and 2 above, and/or (y) that create a supervisor/subordinate relationship (at any step in the chain of command).

Accordingly, all employees, both management and non-management, are prohibited from fraternizing or becoming romantically involved with other employees when such personal relationships may create one or more of the above situations. This policy also applies when hiring, assigning, transferring, or promoting an employee or engaging a contractor. Contractors are expected to maintain professional relationships with Company employees and with other contractors and to avoid situations that create a conflict of interest or the appearance of inappropriate conduct. In addition, the Company may require employees who are romantically involved with another employee or who are family members with another employee to acknowledge and agree in writing that such relationship will not create any of the above-mentioned conflicts and that in the event such a conflict (whether actual or perceived) arises as determined by the Company, the Company may take appropriate remedial action. Further, the Company may take any additional actions as it deems appropriate to eliminate or mitigate actual or perceived conflicts resulting from such relationships, including, for example, requiring additional approvals or oversight for actions taken with respect to such employees.

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Employees who become family members (e.g., employees who marry or enter a domestic partnership) or establish a romantic relationship may continue employment as long as, in the opinion of the Company, it does not create any of the above-mentioned conflicts. If the relationship creates, or has the potential to create, one of the conflicts outlined above, the individuals involved should report the situation to Human Resources. Options for addressing the situation might include attempts to find a suitable position within the Company to which one of the employees could transfer as soon as practicable, implementing procedures to eliminate the grounds for concern, or a decision that one of the individuals would have to resign from the Company. In the latter situation, if the employees cannot or are not willing to decide which will resign, the Company will determine who will remain employed.

ABOUT NEWMARK

We transform untapped potential
into limitless opportunity.

**At Newmark, we don't just adapt to what our partners need—
we adapt to what the future demands.**

Since 1929, we've faced forward, predicting change and pioneering ideas. Almost a century later, the same strategic sense and audacious thinking still guide our approach. Today our integrated platform delivers seamlessly connected services tailored to every type of client, from owners to occupiers, investors to founders, and growing startups to leading companies.

**Tapping into smart tech and smarter people, Newmark brings
ingenuity to every exchange and transparency to every relationship.**

We think outside of boxes, buildings and business lines, delivering a global perspective and a nimble approach. From reimagining spaces to engineering solutions, we have the vision to see what's next and the tenacity to get there first.

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