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**NEWMARK GRUBB KNIGHT FRANK EQUAL EMPLOYMENT OPPORTUNITY/AFFIRMATIVE ACTION POLICY**

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April 1, 2016

TO: EMPLOYEES AND APPLICANTS FOR EMPLOYMENT

FROM: Barry Gosin, Chief Executive Officer

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Newmark Grubb Knight Frank reaffirms its commitment to providing Equal Employment Opportunity in its personnel policies and practices. It is Newmark Grubb Knight Frank's policy to recruit, hire, train and promote into all jobs levels, employees and applicants for employment without regard to race, color, religion, age, sex, marital status, sexual preference, religious grooming practice, religious dress practice, gender identity, national origin, physical or mental disability, veteran status or any other protected classification under federal, state, or local law. All such decisions are based on (1) individual merit, qualifications, and competence as they relate to the particular position, and (2) promotion of the principle of equal employment opportunity.

All other personnel programs such as compensation, benefits, transfers, layoff, return from layoff, training, education, and social and recreational programs are administered without regard to race, color, religion, age, sex, national origin, gender identity, physical or mental disability, veteran status or any other protected classification under federal, state, or local law.

Newmark Grubb Knight Frank employees and applicants for employment have the right to inquire about, discuss, or disclose their own compensation or that of other employees or applicants through ordinary means such as conversations with co-workers. Newmark Grubb Knight Frank will not discharge or in any other manner discriminate against any employee or applicant for employment because such employee or applicant has inquired about, discussed, or disclosed the compensation of the employee or applicant or another employee or applicant. This provision shall not apply to instances in which an employee who has access to the compensation information of other employees or applicants as a part of such employee's essential job functions discloses the compensation of such other employees or applicants to individuals who do not otherwise have access to such information, unless such disclosure is in response to a formal complaint or charge, in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or is consistent with the contractor's legal duty to furnish information.

In addition, unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature constitute sexual harassment when submission to such conduct is made explicitly or implicitly a condition of an individual's employment or submission to or rejection of such conduct is used as a basis for an employment decision affecting the employee. No supervisor or manager shall threaten or insinuate, either explicitly or implicitly that an employee's submission to or rejection of sexual advances will in any way influence any personnel decision involving that employee.

Prohibited harassment includes conduct which has the purpose or effect of unreasonably interfering with the employee's work performance or creating an environment which is intimidating, hostile or offensive to the employee. Harassment based on a person's race is also prohibited. Any employee who feels that a violation of this policy has occurred should immediately report the matter to their supervisor. If that person is unavailable or the employee believes it would be inappropriate to contact his/her supervisor, the employee should contact the supervisor's supervisor, Human Resources or the department head. Each complaint will be investigated and any violations will be remedied. The complaining employee will not be affected in employment with the company as a result of bringing the harassment complaints to the attention of the company.

Newmark Grubb Knight Frank certifies its commitment to providing Equal Employment Opportunity in its personnel policies and practices and has developed and implemented an Equal Employment Opportunity Program to support its commitment.

Newmark Grubb Knight Frank is committed to complying with the regulations set forth in Executive Order 11246, as amended, Section 503 of the Rehabilitation Act of 1973, as amended, the Vietnam Era Veterans' Readjustment Act of 1974,

as amended (38 U.S.C. 4212) and their implementing regulations. As part of our Affirmative Action Program the full Affirmative Action Program for Disabled Workers and qualified veterans shall be available for inspection by any applicant or employee upon request by appointment only. To view the plan, please make an appointment with the Human Resources Manager. Newmark Grubb Knight Frank prohibits discrimination against Females, minorities, qualified individuals on the basis of disability and veteran status, and requires affirmative action by covered prime contractors and subcontractors to employ and advance in employment qualified individuals with disabilities and qualified veterans.”

Newmark Grubb Knight Frank complies with the applicable provisions of Title VII of the Civil Rights Act of 1964 as amended, and of the rules, regulations and relevant orders of the Secretary of Labor. Newmark Grubb Knight Frank complies with the applicable provisions of New York State and local regulations. Lindsey Sherman has been appointed Corporate EEO Officer. She is responsible for administering the company’s affirmative action program and will report to senior management on a continuing basis with regard to the progress being made under the Plan. Anyone having questions, comments or complaints regarding the company’s equal and affirmative action policies should contact their local HR representative.

Sincerely,

A handwritten signature in black ink that reads "Barry Gosin".

Barry Gosin, CEO