

NEWMARK

2022

CORPORATE
RESPONSIBILITY
REPORT



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CEO Letter

We strongly believe that our ESG commitment is foundational to Newmark’s promising future and a more dynamic commercial real estate industry.



Barry M. Gosin
Chief Executive Officer

Since 1929, Newmark has become a world leader in commercial real estate, which brings with it many environmental, social and governance (“ESG”) responsibilities and opportunities. As we look to the future, we are focused on advancing our business by creating sustainable, long-term value for Newmark, our stakeholders and our clients.

To that end, we are proud to share this inaugural Corporate Responsibility Report, which demonstrates the legacy of our actions and the evidence of our commitment in the results noted within. Below are just a few highlights that illustrate how Newmark has furthered our corporate responsibility impact in 2022:

- We established an ESG Executive Committee consisting of our executive and senior leadership to provide direction for Newmark’s ESG progress and initiatives.
- Newmark Global Corporate Services was awarded a Silver Sustainability Rating for our sustainability management and performance by EcoVadis, one of the world’s largest and most trusted providers of business sustainability ratings.
- We partnered with the National Minority Supplier Diversity Council to incorporate their 15,000 certified minority suppliers into our supplier bid process.
- Newmark was ranked #1 on LinkedIn’s 2022 “Top Companies in Real Estate” list, which ranks the top 25 companies at which to grow a career in the industry.

As an organization built on strong values, we are excited to further develop our ESG policies and practices and embed them into our operating standards, everyday course of business and corporate strategy. This inaugural report should serve as a framework and roadmap for our company. Because the nature of our business is to serve our clients, there will always be some things we control and some things we do not. Wherever decisions are under our control, we aim to have a positive impact on the sustainability of the workplace and the environment.

We strongly believe that our ESG commitment is foundational to Newmark’s promising future and a more dynamic commercial real estate industry.

Thank you for your continued support.

Barry M. Gosin
Chief Executive Officer

About This Report

This report is provided by Newmark Group, Inc. and its subsidiaries (together, “Newmark,” “the Company,” “our,” or “we”) based on activities in fiscal year 2022 (January 1, 2022 to December 31, 2022), unless otherwise noted. Data included in this report is provided on a metric-by-metric basis. This report reflects both client services and select environmental, social and governance (ESG) metrics relevant to Newmark’s business. While Newmark has reported ESG data in other disclosures for years, this is the Company’s inaugural ESG Report.



About Newmark Section 01

Who We Are

Newmark (Nasdaq: NMRK) is a world leader in commercial real estate, seamlessly powering every phase of the property lifecycle. Newmark’s comprehensive suite of services and products is uniquely tailored to each client, from owners to occupiers, investors to founders and startups to blue-chip companies. Combining the platform’s global reach with market intelligence in both established and emerging property markets, Newmark provides superior service to clients across the industry spectrum. For the year ending December 31, 2022, Newmark generated revenues of approximately \$2.7 billion and had nearly 6,300 employees in over 150 offices in more than 110 cities. To learn more, visit nmrk.com or follow @newmark.

Our Fundamental Values

Newmark is an organization built on strong values, employee engagement and ownership. At our core, we are committed to our employees by providing them with an opportunity to participate in our success. We believe that by cultivating a dynamic mix of people and ideas, we enrich the performance of our businesses, the experiences of our increasingly diverse employee base and the level of engagement in the communities in which we operate. We value hard work, innovation, superior client service, strong ethics and governance and equal opportunities. Further, philanthropy is woven into our corporate culture. We believe these values foster sustainable, profitable growth. We strive to be exemplary corporate citizens and honor high ethical principles in our interactions with other businesses, our employees and the communities in which we live and work. We take corporate social responsibility and sustainability seriously; we want to contribute to the common good.

Adapting to the Future of Real Estate

Newmark has been one of the fastest-growing commercial real estate services companies for the past decade, and we expect to continue our outperformance as we work towards achieving our long-term goals. Our culture of collaboration and use of data and technology elevates our services, which has led to superior client experiences and enhanced our ability to attract and retain the industry’s best talent.

As Newmark continues to expand globally, our robust set of offerings, including our sustainable business solutions, ensures that we can add value to our clients and positively impact the communities in which our clients and we operate.

ESG at Newmark

We believe that our ESG policies and practices will create sustainable long-term value for Newmark, our stockholders and other stakeholders, our clients and our employees, while also helping us mitigate risks, reduce costs, protect brand value and identify market opportunities.

Board-Level ESG Committee

In November 2020, we established a Board-level ESG Committee to provide oversight with respect to our ESG policies and practices. The [ESG Committee Charter](#) may be found on our website under the heading “ESG Governance.” With the Board’s and the ESG Committee’s oversight, we are embedding social and human capital, employment, environmental, sustainability, charitable and corporate governance policies and practices into our corporate strategy, compensation, disclosure and other goals to maintain and advance long-term value for our investors.

ESG Executive Committee, Roadmap and Champions Council

Newmark supports sustainable business practices and is focused on taking the steps necessary to continually advance our sustainability program, both internally and for our clients.

- In 2022, we retained a nationally certified, women-owned firm to assist our leadership in this endeavor. We also established an Executive ESG Committee, comprised of key Company executives, to provide direction for Newmark’s ESG progress and initiatives. Their results include:
- Prioritized industry relevant ESG topics, outlined in this report, to guide our actions, informed by management, market, employee and investor interests and ESG standards to guide ongoing ESG endeavors.
- Launched an ESG Champions Council, made up of hand-selected cross-organizational leaders, to ensure input and incorporation of all our business lines
- Routinely engaged on ESG topics to drive progress on ESG topics internally.

EcoVadis Silver Medal Sustainability Rating for GCS

As part of Newmark’s commitment to corporate social responsibility, in 2022, Newmark Holdings Limited, formerly NGFK Global Corporate Services LTD (“Newmark GCS”), submitted a sustainability assessment questionnaire to the independent business sustainability ratings firm EcoVadis, which assesses companies across four themes: environment, labor and human rights, ethics and sustainable procurement. In this first independent assessment, Newmark GCS was awarded a Silver EcoVadis Medal, placing the group in the top 10% of 90,000 companies assessed.



As part of Newmark’s commitment to corporate social responsibility, in 2022, Newmark Holdings Limited, formerly NGFK Global Corporate Services LTD (“Newmark GCS”), submitted a sustainability assessment questionnaire to the independent business sustainability ratings firm EcoVadis, which assesses companies across four themes: environment, labor and human rights, ethics and sustainable procurement. In this first independent assessment, Newmark GCS was awarded a Silver EcoVadis Medal, placing the group in the top 10% of 90,000 companies assessed.

We are pleased by the EcoVadis external validation and are committed to continue enhancing our sustainable management practices.

Michael Hall
Managing Director, ESG and EHS, Global Corporate Services



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*At the time of the award, Newmark Global Corporate Services was registered with Ecovadis as NGKF Global Corporate Services LTD, a subsidiary of Newmark at the time, however the documents submitted for assessment reflect Newmark’s corporate practices.



Environmental Section 02

Our Approach

We are focused on the environment and recognize the importance of treating our natural resources with the greatest respect, so that they are available to future generations. Building operations have a significant impact on the environment, and as technology continues to place greater demands on building systems for power and cooling, energy consumption is expected to continue to rise at an unsustainable rate. As one of the largest real estate service providers, we believe it is our responsibility to improve energy efficiency and reduce energy consumption to protect the environment through continuous improvement of building practices. We understand that sustainable buildings provide a better work environment, increase building efficiency and reduce the environmental impact of building operations. We continue to work on these initiatives.

As a responsible business, we are acutely aware of climate change and other major issues affecting the environment. We also understand the impact commercial real estate can have on the health of the environment. That is why we encourage sustainable building practices and, in our Global Corporate Services business and property management assignments, recommend strategies to clients to maximize energy efficiency, recycle materials and limit waste. These goals apply to Newmark’s offices, as well as to the work we do for our clients, whether in selecting a location, building out space or managing an asset.

Our Own Operations

In our workplaces, we are studying how to make our own contribution to state, national and global environmental initiatives and expect the same from our vendors and suppliers when doing business with us. As part of this, we are considering how to minimize our future carbon footprint while planning office renovations and intend to focus our attention in the near term on methods for reducing our greenhouse gas emissions, increasing use of renewable energy, conserving water and reducing waste generation. Newmark is working with the landlords and property management teams that oversee the buildings we occupy to collect accurate and actionable energy data. As this data becomes more available, Newmark plans to implement energy efficiency initiatives where possible that will help lower our overall carbon footprint. We are also investigating the purchase of renewable energy supply where possible in deregulated energy markets. For all newly leased space for Newmark, we generally consider green lease options and strive to build and operate a sustainable workplace.

Newmark occupies over a dozen buildings that are Leadership in Energy and Environmental Design Certified (LEED) Certified and over 30 that are ENERGY STAR Certified. For example, our New York City Headquarters at 125 Park Ave. is in a building that has received U.S. Green Building Council LEED Gold certification and is also ENERGY STAR Certified.



Environmental Policy

We have a **policy** with respect to the responsible environmental management of our operations. We are creating a baseline to understand and minimize the impact that our business has on the environment and have begun to actively search for ways to reduce our footprint. We are pursuing traditional, as well as new and innovative, methods to achieve our goals. We are seeking to create a culture where environmental focus is a way of being, rather than a secondary consideration.

Environmentally Focused Solutions and Offerings

Newmark’s property, facilities and energy/sustainability management teams work internally and with clients to reduce energy demand and carbon emissions. Newmark is increasingly collecting and measuring environmental data, and this data is used to build client strategies around energy efficiency and renewable energy supply initiatives.

Energy and Sustainability Services

Since 2017, Newmark’s Energy and Sustainability Services team has led energy management initiatives for Newmark clients. The team partners with clients to help identify, develop and manage green building investments, pursue Energy Star certifications, manage their greenhouse gas emissions inventory, and establish long-term energy conservation measures to help meet their corporate decarbonization and net zero emissions goals. The team utilizes a cloud-based Energy Intelligence Platform that empowers clients with access to their utility data, offers facility utility bill payment services and manages third-party procurement contracts, which it integrates with ENERGY STAR reporting.

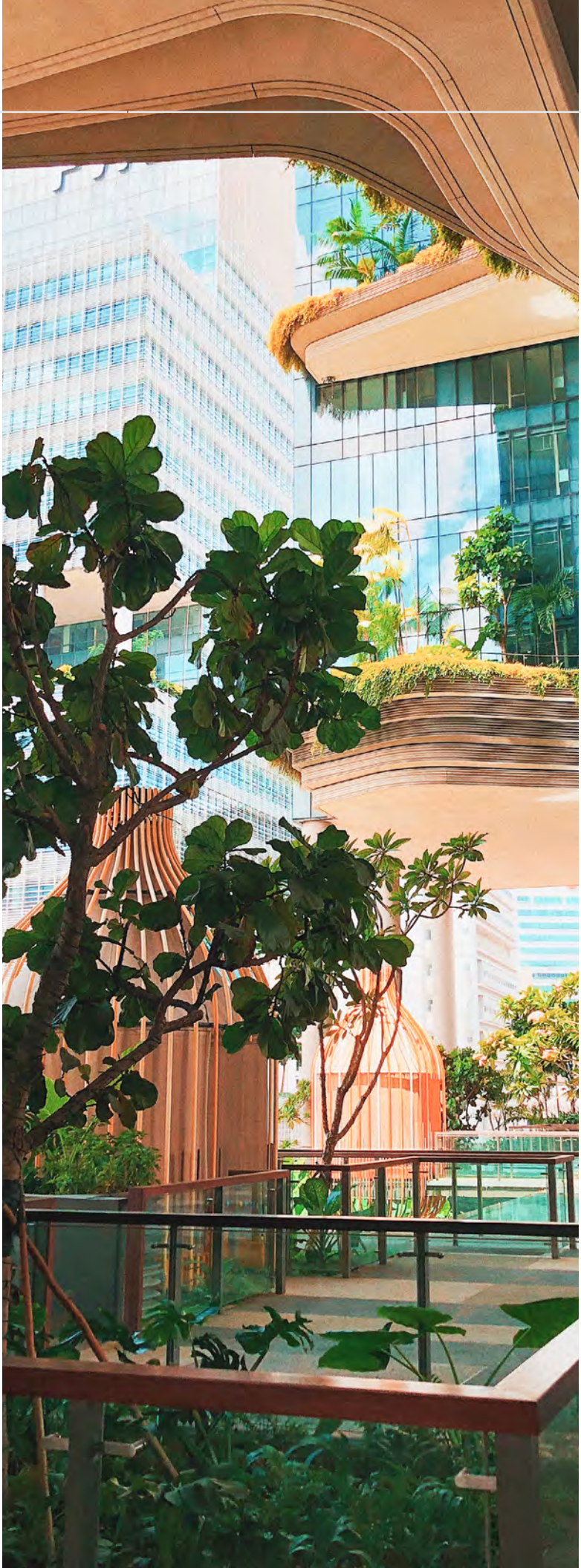
Energy and Sustainability Services Reference Guide

To support our services, Newmark has also developed an **Energy and Sustainability Services Reference Guide**, which assists clients and property teams in reducing the environmental impact of property operations, maintenance and construction associated with real estate assets.

Greenhouse Gas Risk Management

Newmark partners with our clients to help identify and manage their greenhouse gas (“GHG”) emissions inventory. Examples of these services include:

- **GHG Inventory Management:** Newmark has a cloud-based utility data management and GHG inventory tool that tracks GHG for both customer sites and Newmark’s occupied sites that utilize this service.
- **Decarbonization and Master Planning for NetZero:** Newmark assists clients in meeting their corporate carbon reduction goals by helping to establish long-term energy conservation and decarbonization measures.



Physical Climate Risk Management

Newmark supports our clients by helping to identify and mitigate climate risks by leveraging:

- **Water Risk Assessments:** Newmark utilizes the World Resources Institute Aqueduct Tool to identify site water risks, including quantity and quality-based physical threats (such as water stress, water depletion and flood risks) and regulatory and reputational risks. Additionally, we have worked with several clients to develop water conservation initiatives and measures designed to minimize the impact of the site on the local environment.
- **Property Due Diligence:** Newmark facilitates property due diligence, which includes an analysis of several climate risk factors, including Phase I environmental site assessments, property condition assessments, seismic analysis and water risks.

Green Building Investments

Newmark collaborates with our clients to help identify, develop and implement green building investments, including:

- **Retro/Continuous Commissioning and Building Management System Optimization:** Newmark is implementing a building commissioning and management system optimization program that has realized sizeable energy savings.
- **Energy Efficiency and Decarbonization Upgrades:** Newmark partners with clients to conceptualize, develop and implement energy efficiency and decarbonization measures that assist with utility expense management and meeting corporate carbon reduction goals.
- **Integration of Renewable Energy:** Newmark educates clients on reducing their carbon footprint by integrating renewable energy into the existing site electric supply. This integration has been accomplished by physically delivering green power from a retail energy supplier, purchasing renewable energy credits and installing onsite renewable solar energy systems.



Examples of Client Projects the Energy and Sustainability Team Completed in 2022:

Renewable Energy

- Converted three Newmark-occupied facilities to new renewable energy contracts and renegotiated three renewable energy contract extensions for a client’s RE100 goal, leading to 5,875,964 KWh or 8,292,308 lbs. of CO2 to be offset with renewable energy
- Developed a 2.1MW distributed solar project in Valencia, California, which will include rooftop and carport Solar PV and will generate 4,025,336 kWh of renewable electricity per year

LED Lighting Retrofits

- Performed LED retrofits for clients in New Jersey, New York and Georgia, resulting in an annual reduction of 676,327 KWh and +/- 374,583 lbs. of CO2
- Installed a high-performance LED lighting system at a client parking facility in West Orange, New Jersey, leading to an estimated annual saving of 272,119 KWh

Energy Management Solutions

- Continued to install SPECTRUM, Newmark’s cloud-based Energy Intelligence Platform, to manage and benchmark the energy spend of clients, adding 78 properties across North America
- Completed Energy Benchmarking Compliance reports for assets located in New York City, Philadelphia and California
- Completed 15 Energy Star Certificates for Newmark-managed buildings
- Completed a Roadmap to Net Zero for Newmark’s largest client



Craig W. Flinn
*Executive Managing Director,
Energy and Sustainability Solutions,
LEED AP*



Matt Wells
*Senior Managing Director,
Energy and Sustainability Solutions,
PE, CEM, LEED AP*

We’re proud to be able to deliver meaningful energy reductions and cost savings to our clients.

Green Building Certifications

LEED: Newmark assists clients with achieving and maintaining LEED Certification.

ENERGY STAR: Newmark assists clients with maintaining their ENERGY STAR Portfolio Manager data and, in some cases, achieving a building-level ENERGY STAR Certification. As of year-end 2022, Newmark had hundreds of client properties enrolled in the online ENERGY STAR Portfolio Manager program and has achieved Premier Status in the Environmental Protection Agency’s ENERGY STAR Certification Nation.

Green Building Memberships and Expertise

Newmark collaborates with our clients to help identify, develop and implement green building investments, including:

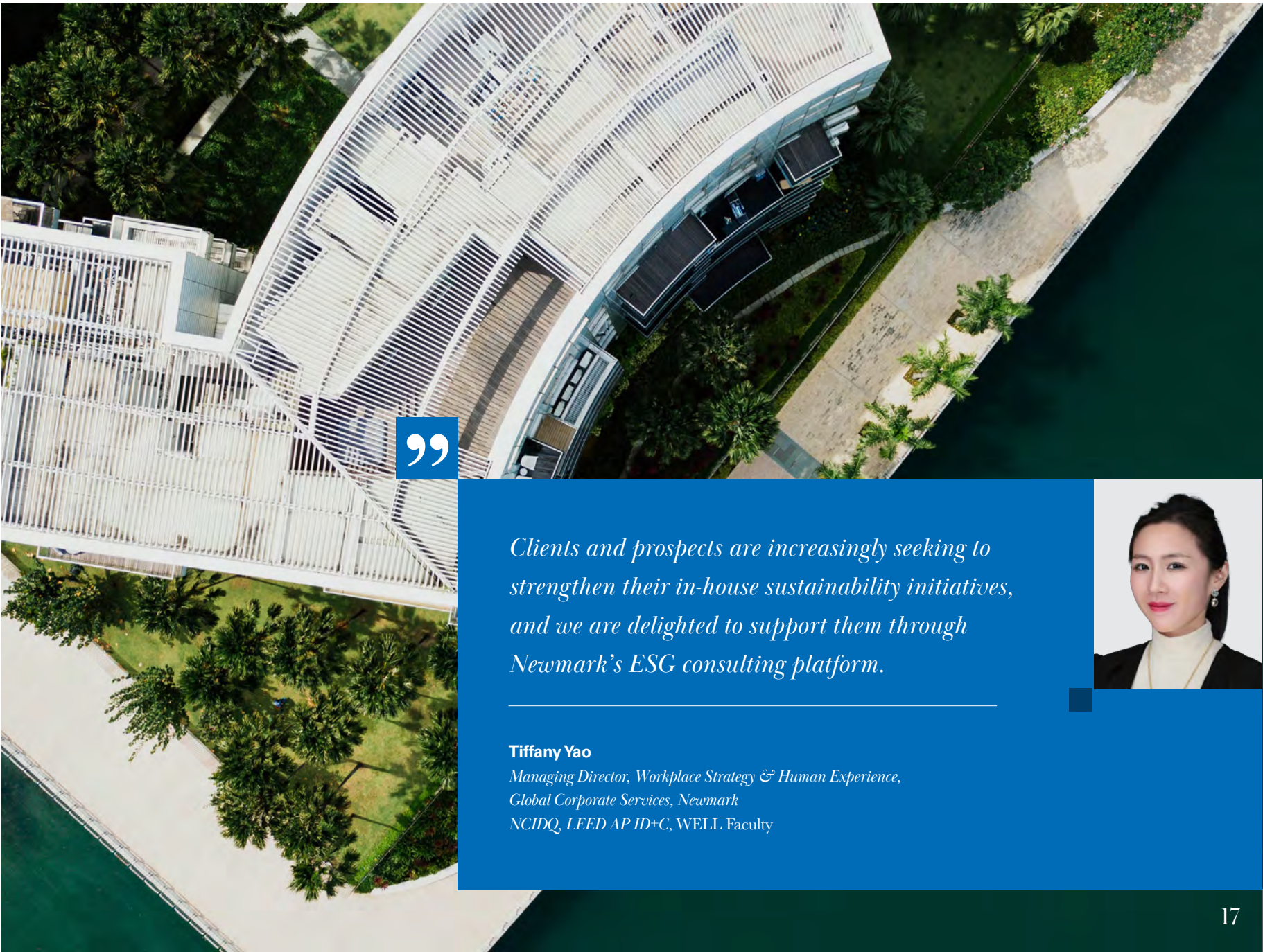
- U.S. Green Building Council (USGBC)
- International Facility Management Association (IFMA)
- Building Owners and Managers Association (BOMA) International
- Site Selectors Guild

Newmark has professionals with the following green and sustainable building accreditations and helps clients with related certifications and expertise:

- GRESB data collection and reporting
- USGBC Leadership in Energy and Environmental Design (LEED) certifications
- WELL accredited professionals
- Fitwel certifications
- International Facility Management Association Certified Facility Managers (CFM)
- Institute of Real Estate Management Certified Property Managers (CPM)
- Association of Energy Engineers Certified Energy Managers (CEM)

Workplace Strategies and Sustainable Business Practices

The GCS Workplace Strategy & Human Experience team works with clients to help them achieve their sustainability goals. For example, in 2022, the team was hired to build an ecosystem of purpose, people, process and productivity for a global pharmaceutical company. The project involved a series of interviews and workshops, which led to actionable insights on how to incorporate sustainability into the overall workplace strategy to accelerate achieving the company’s ESG goals.



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Clients and prospects are increasingly seeking to strengthen their in-house sustainability initiatives, and we are delighted to support them through Newmark’s ESG consulting platform.

Tiffany Yao
Managing Director, Workplace Strategy & Human Experience,
Global Corporate Services, Newmark
NCIDQ, LEED AP ID+C, WELL Faculty





Social Section 03

Our People

A real focus on sustainable transformation will yield tangible benefits for any business. The intersection of different cultures and ideas will contribute to future growth and success. We are committed to increasing opportunities and equality and adding diversity across our Company.

Barry M. Gosin
Chief Executive Officer, Newmark



Human Capital

We are committed to our people, our stockholders and the community as a whole. We have a variety of programs to incentivize and support our employees, from employee ownership to comprehensive benefits and training. We are also committed to equal opportunity, diversity and other policies and practices we expect will fulfill our commitment to social and human capital development.

Attracting and Retaining the Best Talent

Our success depends on our ability to attract and retain talented, productive and skilled employees to transact with our clients in a challenging and regulated environment that is experiencing ever-increasing competition for talent. We are investing in creating a diverse, inclusive and incentivized work environment where our people can deliver their best work every day. In 2021, we were named by GlobeSt.com as one of commercial real estate’s “Best Places to Work.” Newmark was ranked #1 on LinkedIn’s 2022 “Top Companies in Real Estate” list, which ranks the top 25 companies at which to grow a career in the industry.

Employee Diversity, Inclusion and Equal Opportunity

We believe that by cultivating a dynamic mix of people and ideas, we enrich our businesses’ performance and communities’ engagement which we expect will yield an increasingly diverse employee base. We are committed to equal opportunity, training, diversity and other policies and practices that we expect will result in the development of a diverse and inclusive workplace. We consider all qualified applicants for job openings and promotions without regard to race, color, religion, gender, sexual orientation, gender identity, national origin or ancestry, age, disability, service in the armed forces or any other characteristic that has no bearing on the ability of employees to do their jobs well. We continue to develop initiatives to support these values and include qualified, diverse candidates in the interview process for leadership roles.

We are dedicated to our efforts to achieve pay equity. Our promotion and compensation processes are designed to enable us to treat employees fairly, and our compensation decisions are differentiated based on performance.

Newmark participates in the Corporate Equality Index, a national benchmarking tool measuring policy, practices and benefits pertinent to lesbian, gay, bisexual, transgender and queer (LGBTQ+) employees and was named to Globe St.’s 2021 Women of Influence ‘Diversity Champion’ list.

Talent remains at the core of who we are as a Company, and we remain committed to having a culture built around inclusion and equality which we expect will increase the diversity of our workforce.



Network of Women

The Network of Women (“NOW”) supports the recruitment, development and retention of women across our organization. NOW strives to offer a variety of opportunities and tools to help our members make new professional contacts, find mentors and develop their careers, with the goal of advancing our businesses and reputation. These events and activities also provide opportunities for our members to support one another through a valuable exchange of experiences, advice and best practices for career success.

We are helping to shape future leaders from a wide variety of backgrounds. We actively participate in various initiatives, including the following:

- The Mortgage Bankers Association Path to Diversity Scholarship Program
- Sponsorship of the Summer Enrichment and Analyst Development Programs run by Artemis Real Estate Partners, a female-owned financial firm with a strong track record in fostering diversity
- In 2021, we were a Platinum Level sponsor of the virtual internship program run by the Real Estate Board of New York (REBNY), in partnership with the City University of New York (CUNY) and Project Destined.

We further participate in job fairs and job boards that are focused on reaching a diverse applicant pool. We are also an investor in a commercial real estate services firm that operates as E Smith Advisors, which is a certified minority-owned business enterprise offering a wide variety of real estate services in the U.S.

Pace University Bridge Program

Newmark’s CEO, Barry Gosin, and his wife, Jackie Gosin, have tremendous personal commitment to supporting gender and ethnic diversity in real estate, which, as an industry, has struggled to attract diverse talent. The Barry M. and Jackie Gosin Center for Equity and Inclusion was established through the Gosins’ extraordinary personal generosity. The Center supports ongoing efforts at Pace in antiracism and equity, expands work to elevate job placement and entrepreneurship among Black, Indigenous and People of Color (BIPOC) students and enhances academic scholarship in these areas.

The Center advances Pace University’s commitment to respecting and valuing diversity, equity and inclusion by ensuring that students, faculty, staff and alumni are prepared to advocate for and create a better world.

Additionally, the Center leverages Pace’s inclusive intellectual communities to make recommendations regarding programs and practices, faculty development initiatives, supportive curriculums, interdisciplinary research, scholarship and thought leadership.

In the Fall 2022, Newmark commissioned Project Destined, a leading education platform with deep experience in training underserved youth, to administer the Pace Bridge Program by providing training in commercial real estate fundamentals and related skills through a Newmark leadership speaker series. During the six-week program, students were given the opportunity to learn from, collaborate and network with brokers, subject matter experts and Newmark executives, including Mr. Gosin. Upon completion, students received a \$1,000 tuition grant and were invited to apply for the in-person summer 2022 internship program at Newmark’s corporate headquarters in New York City. With support from Newmark, the Pace Bridge program continued in 2023.



Board Diversity

The table below provides certain highlights of the composition of our Board members as of August 16, 2023. Each of the categories listed in the below table has the meaning as it is used in Nasdaq Rule 5605(f).



Board Size				
Total Number of Directors	4			
Gender	Male	Female	Non-Binary	Gender Undisclosed
Number of directors based on gender identity	3	1	—	—
Number of directors who identify in any of the categories below				
African American or Black	1	—	—	—
Alaskan Native or American Indian	—	—	—	—
Asian	—	—	—	—
Hispanic or Latinx	—	—	—	—
Native Hawaiian or Pacific Islander	—	—	—	—
White	2	1	—	—
Two or More Races or Ethnicities	—	—	—	—
LGBTQ+	—	—	—	—
Undisclosed	—	—	—	—

Career Management, Training and Development

We are investing in our employees’ long-term development and engagement by delivering training and development programs and a culture where our people can thrive and maximize their potential. This includes “Newmark Next Generation,” a program designed to recruit and develop junior sales professionals in our brokerage business, typically comprised of diverse talent.

We require mandatory annual training in workplace respect and inclusion, anti-money laundering, anti-crime, global sanctions, ethics, cybersecurity and harassment prevention among other topics. We also provide or support periodic job-specific and other developmental training and support for our employees so they can maximize their potential, as well as tuition reimbursement programs to eligible employees.

We provide virtual and in-person leadership training to managers on topics, including management effectiveness, communication skills, interview skills, writing and delivering effective performance evaluations, managing diverse teams and other topics. This training is supplemented by a comprehensive library of online training courses that managers and employees may access. Finally, our individual business lines offer ongoing learning and development opportunities tied to deepening the subject matter expertise of their professionals.

The vast majority of our employees have completed workplace harassment training which includes modules on respect, conduct, diversity and inclusion.

Our success depends on employees understanding how their work and engagement contribute to our strategy, culture, values and regulatory environment. We use various channels to facilitate open and direct communication, including internal calls and meetings with employees, training and policy updates, our ERGs, our IDEA program and our social and family outings and events.



Performance-Based and Highly Retentive Compensation Structure

Virtually all our key executives and producers have equity or partnership stakes in the Company and its subsidiaries. Generally, they receive deferred equity, limited partnership units or restricted stock units as part of their compensation. As of June 30, 2023, our employees and independent contractors, partners, executive officers and directors owned approximately 27% of our equity on a fully diluted basis.

We issue limited partnership units and other forms of equity-based compensation, such as restricted stock units, which:

- Provide liquidity to our partners and employees over time
- Align the interests of our partners and employees and management with those of common stockholders
- Help motivate and retain key partners and employees
- Encourage a collaborative culture that drives cross-selling and growth

The nonexchangeable partnership units held by our partners are subject to forfeiture (such as if the noncompete, confidentiality or non-solicit provisions of the Newmark Holdings limited partnership agreement are violated), and unvested restricted stock units are subject to service conditions that must be met in order for them to vest into shares of Newmark common stock. In addition, any partnership amounts paid following termination of service generally are paid over a number of years, to ensure compliance with post-termination partner obligations. This compensation structure has proven to be highly retentive; since 2015, we have retained 94% of our top-performing producers

We also enter into various agreements with certain employees and partners. Many of these individuals receive loans that may be either wholly or in part repaid from the distribution earnings that the individual receives on some or all of their limited partnership units or that may be forgiven over a period of time. These loans provide incentives and promote entrepreneurship, retention, and long-term engagement.

Health and Safety

Flexible, Safe and Empowering Work Environment

To facilitate the retention of our employees, we have maintained our flexible work arrangements implemented during COVID-19 where appropriate, made compensation adjustments and provided additional benefits, including a 401(k) match.

We have taken significant measures to develop a safe work environment in our offices, subject to applicable state and local regulatory requirements.

We have implemented measures to ensure the mental health and wellbeing of our employees, particularly during the pandemic, including increased access to behavioral health and mental health telemedicine, expanding access to employee assistance program services and providing employees with access to preventative mental health solutions.

Newmark’s Health and Safety Manual sets the policies and procedures by which our management and employees operate. Its purpose is to, at a minimum, meet the requirements of required Federal OSHA Standards. The manual provides the specific type of Safety Awareness Training courses and required frequency for each position in the Company.

Our employees receive Safety Awareness Training via Newmark’s online safety training platform, providing access to over 1,000 courses across three safety catalogs. In 2022, Newmark employees completed just under 7,000 individual safety training sessions.

Total Recordable Incident Rates (TRIRs)

At Newmark, we take health and safety very seriously and are proud that our TRIRs fall well below the typical real estate averages each year. TRIR is a measure of recordable illness and injuries defined by the U.S. Occupational Safety and Health Administration (OSHA), which indicates the number of incidents per 100 fulltime employees. We work hard to minimize the risk of incidents and improve our safety record year over year. In 2021 and 2022, Newmark’s Total Recordable Incident Rates (TRIR) were:

	2021	2022
Facilities Management:	0.85 for 705,086 hours worked	0.00 for 583,599 hours worked
Property Management:	1.38 for 2,022,447 hours worked	1.2863 for 2,100,000 hours worked

Community Investment

Charitable Practices and Company Matching

Never has our commitment to our people and others been so evident as in our corporate giving and charitable work. Newmark actively encourages our producers, managers and other employees to support the communities in which we live and operate through philanthropy and volunteerism, and we proudly support our clients in their charitable efforts. In 2022, together we supported hospitals, universities, food banks and community-based organizations focused on childhood development and education and programs for the disabled, families and the financially disadvantaged. Some of the charities supported include American Cancer Society; Big Brothers, Big Sisters; Boston Children’s Hospital; Bowery Mission; Boys & Girls Clubs; Breaking Ground; Creative Art Works; Food First; Homes Fit for Heroes; Junior Achievement; National Kidney Foundation; Navy Seals Foundation; Northern Virginia Family Services; MBA Opens Doors Foundation; Pace University and United Jewish Appeal. To encourage our professionals to engage in civic and charitable efforts, we have a matching program for charities that fit within Newmark’s overall charitable mission.

Paid Time Off Volunteer Program

As part of these values in action, we offer a Volunteer Time Off program to support individual employee volunteerism in the communities in which they work and live. All full and part-time regular employees are eligible to utilize one paid workday (whole day or two half-days) each calendar year to volunteer with bona

fide charitable organizations of their choice. Participation is growing. As office life normalizes and pandemic measures recede, we will encourage broader use of this benefit and participation by employees in charitable and community service activities within all of our office communities.

The Cantor Fitzgerald Relief Fund

The **Cantor Fitzgerald Relief Fund** was founded following the events of September 11, 2001, with a \$1 million personal donation from Cantor Fitzgerald Chairman and CEO, Howard W. Lutnick. Since then, the fund continues to support families impacted by disasters and other charities. The Company currently matches 100% of individual Newmark employee donations to the Cantor Fitzgerald Relief Fund made in September of each year, up to \$5,000 per individual employee. Employees have the option of designating a bona fide charity as the beneficiary of the donation and the match. Additional charitable initiatives are in effect from time to time.

We also support victims of disasters; sometimes, our volunteers travel to those in need. In January 2019, a group of more than 200 volunteers drawn from the Cantor Fitzgerald Relief Fund, employee volunteers from Newmark and its affiliates, many friends from the New York community and clients from Banco Santander and Scotiabank traveled to Puerto Rico to aid in its recovery from Hurricanes Irma and Maria. This operation distributed \$4 million in \$1,000 prepaid cards to thousands of families still suffering from the devastation.

The Ukraine Relief Program

In 2022, Newmark announced a Ukraine Relief program with the Company matching 100% of employee, broker and client donations, up to \$1 million to the Cantor Fitzgerald Relief Fund to support direct relief efforts through charity partners in neighboring countries.

Homeless Assistance Fund

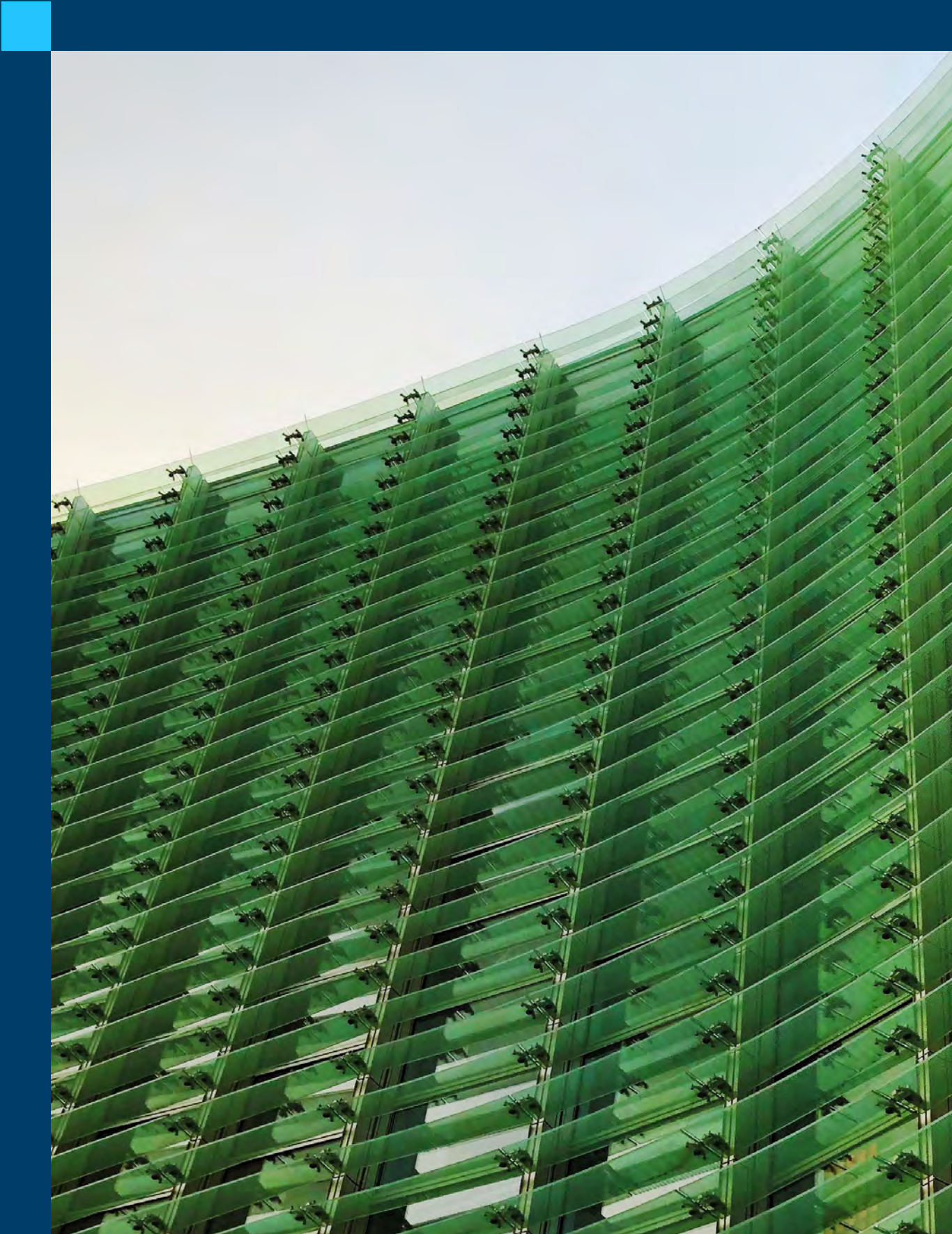


BREAKING GROUND

We are a leading sponsor of the **Homeless Assistance Fund**, a collective public-private initiative launched in 2022, led by the Partnership for New York City, to provide services and mental health resources to unsheltered New Yorkers. The Homeless Assistance Fund partners with Breaking Ground, a homeless outreach and housing nonprofit, to accelerate the connect to care process, getting individuals with mental illness into the treatment programs and housing they need. Taking our commitment a step further, Newmark provided office space 24 hours a day at its New York City headquarters for the Breaking Ground outreach teams working in the Grand Central/Midtown East area.



Additional information about all of our charitable efforts is available at www.nmrk.com/esg/social



At Newmark, strong leadership involvement is part of our ESG strategy. We established a Board-level ESG Committee, an ESG Executive Committee and an ESG Champions Council.

Leadership and Board

Our Board of Directors and management value the opportunity to engage with our investors and gain insight year-round on their views on a broad range of topics, including our strategy, financial performance, executive compensation, corporate governance, human capital management, including diversity and inclusion, and environmental and social goals. Feedback from investors informs the Board’s ongoing review of governance and compensation matters.

Corporate Governance Policies and Practices

Our commitment to good corporate governance policies and practices is demonstrated by our **Corporate Governance Guidelines**, our rigorous **Code of Business Conduct and Ethics** (the “Code of Ethics”), the charters of the **Audit, Compensation** and **ESG** Committees of our Board, our **Hedging and Pre-Clearance Policy** and our other corporate governance policies and practices.

Whistleblower Policy

We have **Whistleblower Complaint and Investigation Procedures for Accounting, Internal Controls, Auditing Matters and Employment and Labor Practices** (the “Whistleblower Policy”) regarding reporting of complaints about accounting, internal controls, employment and labor practices, auditing matters or questionable financial practices. The policy is designed to provide a channel of communication for employees and others who have concerns about our conduct or any of our directors or employees. Complaints are treated seriously and handled expeditiously. Any person may submit a complaint to our independent outside law firm to a dedicated hotline and email account available 24 hours a day, 7 days a week. Complaints that are accounting or financial in nature (“Accounting Complaints”) will be handled by the Chair of our Audit Committee and by our Chief Legal Officer, Corporate Secretary or designee.

Employees submitting an Accounting Complaint need not provide their names or other personal information and reasonable efforts will be used to conduct the investigation that follows from an Accounting Complaint from an employee in a manner that protects the confidentiality and anonymity of the employees submitting the complaint.

Employees are reminded of the Whistleblower Policy at least annually and information is provided in local languages. We honor a culture of investigation, confidentiality and nonretaliation. Persons submitting complaints in good faith will not be subject to retaliation, and the policy does not prohibit other actions protected under applicable law.

Code of Business Conduct and Ethics and Professional Integrity

Our corporate values and strong policies and procedures regarding ethics, conflicts of interests, related party transactions and similar matters are contained in our [Code of Ethics](#). This commitment applies to members of our Board, executive officers, other officers and our other covered employees globally. The Code of Ethics and its training modules are circulated in local languages and training and certifications are conducted annually for all employees. Annual written certifications are required. Potential violations and disclosures globally are reviewed annually by executive management and escalated to the Audit Committee. Director and executive officer disclosures are reviewed by the Audit Committee on an annual basis.

Compliance and Anti-Financial Crime Policy and Bribery and Corruption

We are committed globally to our [policy](#) regarding anti-money laundering and anti-financial crime, including antibribery and corruption, counterterrorism financing and antifraud. We are committed to compliance and training regarding all relevant laws, rules and regulations designed to combat bribery and corruption, including, but not limited to, the UK Bribery Act of 2010 and the U.S. Foreign Corrupt Practices Act of 1977, as amended.

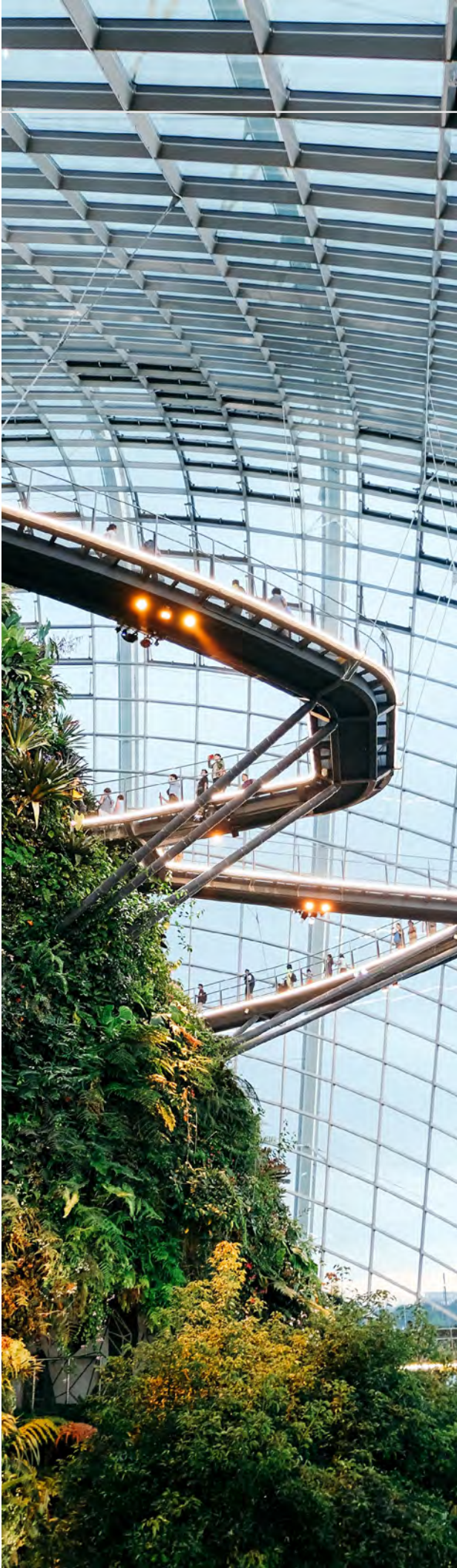
In addition, our [Code of Ethics](#) provides that we will not enter into a business relationship or engage in an activity if we know or have reasonable grounds to suspect that a business relationship or activity is connected with or facilitates bribery or corruption. It is the responsibility of each person covered under the Code of Ethics to comply with applicable antibribery and corruption laws. Persons covered under the Code of Ethics are required to report any suspicions of bribery or corruption to the Compliance Officer or, as appropriate, to the Audit Committee or the Board or in accordance with our Whistleblower Policy.

Global Anti-Bribery and Corruption Policy

In 2022, we implemented a [global policy](#) to combat bribery and corruption through a clear set of policies and procedures outlining antibribery and corruption standards, procedures and annual employee training. The policy specifically defines bribery and corruption and provides for management and Board oversight.

Annual Risk Evaluation and Board-Level Risk Oversight

The Board of Directors meets at least annually with our senior risk officer to review and evaluate our enterprise risk framework, risk management policies and practices, credit and risk mitigation policies and practices and other related issues.



Focus on Our Internal Control Environment

As described more fully in its charter, the primary function of the Audit Committee is to assist our Board of Directors in its general oversight of the Company’s financial reporting, internal control over financial reporting and audit process. Management is responsible for the preparation, presentation and integrity of the Company’s financial statements; accounting and financial reporting principles; internal control over financial reporting; disclosure controls; and procedures designed to ensure compliance with accounting standards, applicable laws and regulations.

Our overall control environment is a focal point for our management, the Audit Committee and the Board. With this focus and with the oversight of the Audit Committee and the Board, management regularly enhances our overall control environment.

Hedging and Pre-Clearance Policy

We have a [policy](#) with respect to hedging of equity securities issued by Newmark (collectively, “Company Equity Securities”). In this regard, we prohibit our directors, officers and employees, including our leased employees, brokers and independent contractors, from purchasing financial instruments (including prepaid variable forward contracts, equity swaps, collars and exchange funds) or otherwise engaging in transactions that are designed to or have the effect of hedging or offsetting any decrease in the market value of Company Equity Securities held by such persons, except with the explicit approval of our Audit Committee or its designees. Additionally, we have a pre-clearance policy and process for trades in Company Equity Securities that all our directors, executive officers, and other designated insiders and employees, including leased employees, brokers and independent contractors must follow. Under this policy, such persons’ trades are subject to pre-clearance through our legal and compliance department. Directors and executive officers are also required to advise management in advance of entering into any SEC Rule 10b5-1 trading plans or similar plans in accordance with applicable law. For avoidance of doubt, Cantor Fitzgerald, L.P. and its affiliated entities or any securities issued by such entities other than Newmark are not covered under this Hedging Policy.

Business Continuity and Resiliency

We are implementing additional sustainability policies and practices to protect the continuity of our business and operations to maintain and advance value for stockholders and other stakeholders. These policies and practices include disaster recovery and crisis management protocols to minimize the impact of health emergencies and natural or other disasters on our operations. We maintain concurrent data centers in the United States and internationally, providing backup of our computer systems and capacity for our employees to work remotely during crises. These policies and practices enabled our employees to maintain a high level of performance while working in offices or remotely during the pandemic, in compliance with relevant rules and regulations in applicable jurisdictions and in preservation of the health, safety and welfare of our workforce.

Data Privacy Program

We have a global **data privacy policy** applicable to all subsidiaries and business lines. We are committed to conducting our business in line with the right to privacy set forth in the Universal Declaration of Human Rights (Article 12). As such, we are committed to handling personal data responsibly and recognize the privacy rights of persons involved in our business dealings. Our policy provides a mechanism for data subjects to raise concerns about personal data and privacy, as well as a right of access to personal information, rights to correct or amend such information and the right to request deletion of such personal information.

Cybersecurity and Information Security Program

We are committed on a Company-wide basis to combating the global threat of cyberattacks and to securing our business through our information security programs to operate with confidence, through a deep understanding of cybersecurity risks, vulnerabilities, mitigations and threats. We have a global **cybersecurity policy** applicable to all subsidiaries and business lines. We conduct periodic internal and external vulnerability audits and assessments and penetration testing and provide periodic training to employees and independent contractors.

Responsible Sourcing

In 2022, for the 13th consecutive year, Newmark made the “**International Association of Outsourcing Professionals Global Outsourcing 100®**” annual listing of the world’s best outsourcing service providers.

Vendor Code of Conduct

Newmark conducts its business activities with integrity and in full compliance with the laws and regulations that govern those activities and with consideration of Newmark’s values, ethical business practices and professional expectations. Newmark expects the same from the vendors it engages, whether directly or on behalf of its clients.

Our **Vendor Code of Conduct** contains the standards of business practices and regulatory compliance that are expected of vendors and their agents, employees and subcontractors and applies to all interactions between vendors and Newmark or its clients and between vendors and any third party which may perform services on behalf of Newmark or its clients. It addresses legal and ethical standards, human rights and fair labor practices, health and safety, the environment and data protection.

Minority Supplier Diversity Program

As a part of our overall ESG strategy to support diversity, Newmark has partnered with the National Minority Supplier Diversity Council (“NMSDC”) to incorporate the organization’s 15,000 certified minority suppliers into our Supplier Bid process.

The NMSDC is the longest-operating business growth engine for communities of color in America – Asian-Indian, Asian-Pacific, Black, Hispanic and Native American – with over 50 years of experience connecting diverse suppliers with corporations. As an active member, we are engaged with the NMSDC on Newmark procurement opportunities in a strategic effort to increase our supplier diversity.

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