

NEWMARK GROUP, INC. COMPLIANCE & ANTI-FINANCIAL CRIME PROGRAM POLICY STATEMENT

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

The following policy reflects Newmark’s commitment to Compliance and Anti-Financial Crime and forms part of its governance standards. It is adapted from its Global Sanctions Policy and Know Your Customer (“KYC”) Standards Policy.

Introduction

Newmark is committed on a global basis to Anti-Money Laundering (“AML”) and Anti-Financial Crime (“AFC”) including Anti-Bribery and Corruption (“ABC”), Counter Terrorism Financing (“CTF”) and Anti-Fraud.

- Newmark advocates the development of regulations and internal procedures for AFC.
- Newmark has developed a set of policies outlining its general AML standards and principles to combat money laundering and terrorism financing.
- Newmark has developed a set of policies outlining its general ABC standards and is committed to complying with all applicable ABC laws and regulations.
- Newmark has identified prohibited and special risk countries as part of its compliance with sanctions rules.
- Newmark has implemented and maintains a program to provide regular AML and ABC education and training to its employees.

Compliance & Financial Crime Program

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

- A clear set of policies and procedures outlining AML standards and principles, including acceptable behavior guidelines;
- An established operating guideline for reporting suspicious transactions to relevant authorities;
- Communication of regulatory changes and requirements to the relevant stakeholders alongside the appropriate training;
- Customer and vendor screening for adequate identification and regular reviews;
- Implementing changes to systems and/or processes as required, as well as updates to policies and/or procedures;
- Identification and management of potential and actual conflicts of interest; and
- Regularly reviewing the effectiveness of sanctions-related policies, procedures, systems and controls.

Governance and Oversight

Newmark’s AML and AFC program is managed by its group Compliance department, which has wide discretionary authority over AML and AFC matters and has access to all information and data necessary to fulfil this governance and oversight function. Periodic reports are made to senior management and the Company’s Board of Directors.

Definitions

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