

Newmark | Policy Statement on Hedging and Pre-Clearance of Company Equity Securities

The Board of Directors (the “Board”) of Newmark Group, Inc. (the “Company”) has adopted the following Policy Statement regarding the hedging of equity securities issued by the Company (collectively, “Company Equity Securities”) by the members of the Board and the Company’s and the Company’s subsidiaries’ employees (including, without limitation, leased employees), brokers and independent contractors, including its officers (collectively, “Covered Persons”). For avoidance of doubt, Cantor Fitzgerald, L.P. and its affiliated entities or any securities issued by such entities other than the Company are not covered under the hedging restrictions.

Hedging Transactions

Covered Persons are prohibited 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 them, except with the explicit approval of the Company’s Audit Committee or its designees. Anyone may, of course, exercise equity-based awards granted to them with respect to Company Equity Securities and, subject to the restrictions discussed in this Policy Statement and other applicable policies and any governing plans, arrangements, or agreements, sell Company Equity Securities they acquired through the exercise of such equity-based awards.

Pre-Clearance Policies

We have a pre-clearance policy and process for trades in Company Equity Securities that all 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.