
Newmark Vendor Code of Conduct

NEWMARK



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Introduction

This Vendor Code of Conduct (this “**Code**”) sets forth the standards, business practices and regulatory compliance expected by Newmark Group, Inc. and its subsidiaries (collectively, “**Newmark**” or the “**Company**”) of each supplier, vendor, contractor, consultant, agent and other provider of goods and services who does business with or on behalf of Newmark (each, a “**Vendor**”) and their respective agents, employees, and subcontractors. This Code applies to interactions between Vendors and Newmark or its clients, and between a Vendor and any third party with which a Vendor may deal in providing goods or services on behalf of Newmark or its clients.

Vendors should have systems in place to help (i) ensure compliance with this Code and applicable laws and regulations, identify and mitigate related operational risks and facilitate continuous improvement and (ii) correct any deficiencies identified by an internal or external audit, assessment, inspection, investigation, or review in a timely manner.

Legal and Ethical Standards

Newmark is committed to upholding the highest ethical standards and complying with all applicable laws, rules, and regulations. Vendors are expected to (i) act in a manner intended to uphold all applicable standards of honesty, good faith and fair dealing, (ii) comply with all federal, state, local and foreign laws and regulations (including antitrust and fair competition laws) applicable to its business and maintain records and reports in compliance with any and all such laws and regulations, and (iii) not knowingly participate in any financing of terrorism or any scheme to launder money, under-report the size of a cash transaction, or wrongfully avoid tax liability.

Diversity and Inclusion and Human Rights

Diversity and Inclusion

Newmark is committed to fostering a culture of respect, diversity and inclusion in the workplace. Our [Diversity and Inclusion Policy](#) sets forth our commitment, including with respect to recruiting and hiring practices.

Human Rights

Newmark is committed to maintaining the highest ethical standards, protecting the rights and enhancing the welfare of our employees and contractors, clients and wider communities in which we operate. Our [Human Rights Policy](#) sets forth our commitment, including in respect of freedom from discrimination and harassment, fair wages and working hours, safe and healthy working environment, freedom of association, child labor and slavery, forced labor and human trafficking.

Environment

Newmark operates responsibly in our operations, treating natural resources with respect. Our [Environmental Policy](#) sets forth our commitment and focus. Building operations impact 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. As one of the largest real estate service providers, we continuously explore ways to improve energy and water efficiency and reduce energy, GHG and waste consumption to protect the environment. Sustainable buildings increase building efficiency and help reduce the environmental impact of building operations.

Data Protection, Information Security, and Disclosure of Information

Protection of Personal Data

Newmark is committed to protecting confidential client information and personal data. The definitions of personal data, and the legal requirements for safeguarding it, vary by country, and generally include (but are not limited to), employee or client names, personal healthcare information, photographs, and legal identity records. Newmark has put in place policies to ensure that personal data is processed and secured in accordance with applicable local personal data protection laws. Vendors must also ensure that all uses of personal data – such as collection, registration, comparison, storage, processing, transfers and deletion, or a combination of these – take place in accordance with applicable laws and regulations.

Intellectual Property

Vendors must respect intellectual property rights and safeguard Newmark's and its clients' information. Any transfer of technology and know-how must be done in a manner that protects intellectual property rights.

Further, Vendors may not use the Newmark brand or Newmark's trademarks without express written permission or as otherwise expressly permitted under any Vendor agreement.

Cyber Security

It is essential that Vendors safeguard the integrity and security of their systems and complies with the relevant legal or regulatory standards and guidance. Vendors must immediately inform Newmark upon becoming aware of any cyber security incident that affects or has the potential to affect any of Newmark's or its clients' data or systems.

Bribery and Corruption

Newmark has implemented a [Global Anti-Bribery and Corruption Policy](#) to combat bribery and corruption through a clear set of policies and procedures outlining anti-bribery and corruption standards, procedures and annual employee training.

Gifts and Gratuities

Vendors shall not give or receive any excessive or lavish gifts or other favors of material value with the intent or effect of unfairly or improperly influencing a business decision or of obtaining an unwarranted advantage. Vendors shall use good judgment, discretion, and moderation with business meals and/or entertaining any employees of Newmark or its clients.

Trade Regulation

Vendors shall comply with all applicable trade restrictions, export controls, sanctions, and customs laws and regulations. Vendors shall not knowingly become involved with anyone suspected of criminal or terrorist activities or of being on any sanction lists.

Conflicts of Interest

Vendors shall promptly disclose to Newmark any situation involving an actual or potential conflict of interest between a Vendor and Newmark or its client, and any situation under which a Vendor's judgment or objectivity, or its duties to Newmark or its clients, may be impaired.

Business Continuity and Crisis Plan

Vendors shall have a business continuity plan in place to prevent or minimize any disruption of its business operations due to, without limitation, natural disasters, equipment malfunction, power failure, terrorism, supply chain disruptions, communicable disease outbreaks, epidemics or pandemics, information security issues, cyber-attacks, etc.

Compliance

Newmark expects its Vendors to self-monitor and demonstrate compliance with this Code. Newmark and its clients reserve the right to conduct inspections or audits to confirm compliance. Vendors must cooperate with Newmark by being available, and by providing any information and systems requests in a timely manner and at no cost to Newmark. Vendors shall promptly present a corrective action plan to Newmark and shall cure any ongoing breach. In the event of a serious or persistent non-compliance in Newmark's determination, Newmark reserves the right to terminate its relationship with a Vendor.

Vendors may also be required to affirm their acceptance and compliance with the Code. Vendors may be asked to re-affirm compliance with the Code periodically. Upon request, Vendors may be required to provide written information on its policies and practices related to compliance with the Code.

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