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# Newmark Human Rights Policy



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## Commitment to Human Rights

Newmark Group, Inc. and its subsidiaries (collectively referred to herein as “**Newmark**” or the “**Company**”) is committed to maintaining the highest ethical standards and protecting the rights and enhancing the welfare of our employees and contractors, clients and the wider communities in which we operate.

## Scope

This policy applies to Newmark’s employees and contractors. Newmark is committed to encouraging all business partners and clients and other stakeholders to uphold the principals of this policy within their own businesses. In addition, Newmark’s [Vendor Code of Conduct](#) outlines expectations for all suppliers.

## Provisions

We believe it is our duty to act as a responsible business and employer with particular attention to the following provisions which we believe are the most relevant to our business:

### ***Freedom from Discrimination and Harassment***

We are an equal opportunity employer. By cultivating a dynamic mix of people and ideas, we believe we enrich our businesses’ performance and communities’ engagement, which we expect will yield an increasingly diverse employee base. We are committed to equal opportunity, ethical recruiting, training, diversity and other policies and practices that we expect will result in the development of a diverse and inclusive workplace.

In all aspects of the workplace, including our hiring and promotion practices, we do not tolerate any form of discrimination or harassment, including based upon any classification or status protected by applicable law. These principles are further outlined in Newmark’s [U.S. Equal Employment Opportunity Policy](#) and its [Diversity and Inclusion Policy](#).

### ***Fair Wages and Working Hours***

Compensation is intended to be performance-driven, fair and competitive, regardless of characteristics protected by the [U.S. Equal Opportunity Employment Policy](#). We comply with all applicable local laws and regulations regarding wages paid to employees and the hours they work.

### ***Safe and Healthy Working Environment***

We comply with all applicable health, safety and security laws and regulations designed to maintain a safe work environment. We also seek to maintain strict health and safety standards and implement a health and safety program with the objective of providing safe and healthy working conditions to all employees.

### ***Freedom of Association***

We respect the rights of our workforce and we comply with all applicable local laws and regulations concerning freedom of association and collective bargaining.

## **Child Labor**

The use of child labor is strictly prohibited. We will not participate in, condone or tolerate any violation of the minimum working age laws and requirements in any jurisdiction where we operate.

## **Slavery, Forced Labor and Human Trafficking**

All labor must be voluntary. We oppose slavery, forced labor and human trafficking. The use of force, fear, coercion, punishment, confinement, threats of violence, harassment, abuse, mental and/or physical discipline, as well as any forms of human trafficking, are strictly prohibited. We do not and will not knowingly support or conduct business with any organization involved in such activities.

## **Implementation and Enforcement**

We are committed to assessing our practices and policies with respect to the provisions above to ensure we are complying with applicable laws and regularly self-assessing for improvement. We implement our commitment to human rights by 1) circulating and posting this Human Rights Policy, and 2) providing access to remedy through the process outlined in the section below.

## **Reporting Violations**

Newmark supports a culture of investigation, confidentiality and non-retaliation. Our [Whistleblower Policy](#) describes the procedure for reporting complaints concerning labor and employment practices. Any person may anonymously submit a complaint, including any concern that the Human Rights Policy is being violated, to our independent outside law firm to a dedicated hotline and email account available 24 hours a day, 7 days a week.

Our [U.S. Equal Employment Opportunity Policy](#), which includes the non-discrimination policy and the anti-harassment and anti-retaliation policies, sets forth the procedure for reporting and investigating reported incidents. In addition, our policies include alternative forums for reporting concerns to the New York State Division of Human Rights and/or the United States Equal Employment Opportunity Commission.

Our U.S. Employee Handbook outlines Workplace Safety and reporting requirements for injuries or accidents, as well as reporting health or safety hazards. Our employees are protected from retaliation for reporting safety concerns.

## **Retaliation**

We do not tolerate threats or acts of retaliation for reporting conduct reasonably believed to violate this Policy, or in good faith provide information in connection with a report or investigation of any such conduct.

## **Compliance**

The Company reserves the right to take appropriate disciplinary action, up to and including termination of employment or services, for any failure to comply with this Policy.

## **Termination or Amendment**

We reserve the right to modify, suspend, change or terminate this Policy at any time, in accordance with local law. This Policy does not create any contractual rights or obligations, whether expressed or implied.

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