

WALKER & DUNLOP

2023 ENVIRONMENTAL, SOCIAL,
& GOVERNANCE REPORT





The following report contains disclosure of environmental, social, and governance (ESG) metrics relevant to Walker & Dunlop, Inc.'s business, as well as select, relevant metrics in the Sustainability Accounting Standards Board (SASB) standards for the Financials, Mortgage Finance industry classification, and SASB metrics from other SASB industries, in particular those related to human capital management. As a commercial real estate services firm, many of the SASB standards for the Mortgage Finance industry do not directly apply to our operations. We have provided disclosure where applicable and supplemented the narrative with our efforts that we believe are most relevant to our business. Throughout this report, we also indicate where we believe our practices support efforts to meet the United Nations' Sustainable Development Goals (UN SDGs) and the Ten Principles of the UN Global Compact (UNGC). This report is supplemented by a summary of our disclosures within the framework of the Taskforce on Climate-related Financial Disclosures, which can be found in the "Environment" section of the report. This report covers ESG disclosures for Walker & Dunlop, Inc., and its subsidiaries (together, "Walker & Dunlop," "W&D," "our," or "we") from January 1, 2023, through December 31, 2023, unless otherwise noted.

Photo by Garrett Rowland

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ABOUT WALKER & DUNLOP

Walker & Dunlop (NYSE: WD) is one of the largest commercial real estate finance and advisory services firms in the United States. Our ideas and capital create communities where people live, work, shop, and play. The diversity of our people, breadth of our brand and technological capabilities make us one of the most insightful and client-focused firms in the commercial real estate industry.

[MORE ABOUT US](#)

ACTIVITY METRICS

	2023	2022	2021
Transaction Volume (\$M)	32,987	63,339	68,166
Total Revenue (\$M)	1,054	1,259	1,259
Net Income (\$M)	107	214	266
(1) Number and (2) value of mortgages originated by category ¹ :			
(a) residential	(a) 0; \$0	(a) 0; \$0	(a) 0; \$0
(b) commercial	(b) 1,159; \$24,203	(b) 1,876; \$43.6B	(b) 2,084; \$49.0B
[SASB: FN-MF-000.A]			
(1) Number and (2) value of mortgages purchased by category ² :			
(a) residential	(a) 0; \$0	(a) 0; \$0	(a) 0; \$0
(b) commercial	(b) 0; \$0	(b) 0; \$0	(b) 0; \$0
[SASB: FN-MF-000.B]			
Full-time Employees (as of December 31)	1,326	1,451	1,305

¹ Walker & Dunlop does not originate residential mortgages, only commercial loans, including for multifamily, office, industrial, retail, hospitality, and healthcare properties. Accordingly, we believe that the SASB Mortgage Finance's Discriminatory Lending topic [FN-MF-270] regarding residential mortgages and remuneration structure of originators is not applicable to the Company.

² Walker & Dunlop does not purchase commercial real estate or residential real estate loans. Accordingly, we believe that the SASB Mortgage Finance's Activity Metric [FN-MF-000.B] is not an accurate reflection of the operations of the Company.



Photo by Garrett Rowland



OUR ESG PROGRAM OBJECTIVES

We believe that a healthy environment, properly managed resources, and vibrant communities are keys to a secure and prosperous future. At Walker & Dunlop, our mission is to create communities--with ideas and capital—where people live, work, shop, and play. We view our ESG program as an integral part of carrying out that mission statement, and it is a process of continuous improvement. We are committed to measuring and monitoring our carbon footprint, looking for ways to reduce emissions, and facilitating eco-friendly, green financing for our clients. We seek to attract, hire, include, develop and retain diverse talent across our organization, finance affordable housing, and contribute to the communities in which we live and operate.

In addition, effective corporate governance is critical to executing on our long-term strategy, fulfilling our responsibilities, and delivering value to all our stakeholders. Our governance of ESG-related matters reflects our commitment to strong leadership and oversight at the highest levels of senior management up to the Board of Directors.

In 2024, Walker & Dunlop became a UN Global Compact (UNGC) signatory. The UNGC is a voluntary, initiative-based commitment to adopt sustainable and socially responsible policies and report on their implementation. As a participant in the UNGC, we support the Ten Principles of the UNGC on human rights, labor, environment, and anti-corruption. With this communication, we express our commitment to making the UNGC and its principles part of the strategy, culture, and day-to-day operations of our company, and to engaging in collaborative projects which advance the broader development goals of the UN, particularly the SDGs. As a UNGC, WD will continue to make a clear statement of this commitment to our stakeholders and the general public through our ESG reporting.

AT THE END OF 2020, WE SET SPECIFIC ESG-RELATED GOALS AS A SUBSET OF OUR FIVE-YEAR STRATEGIC GROWTH PLAN, THE *DRIVE TO '25*. BY 2025, WE AIM TO:



Continue to manage our Greenhouse gas (GHG) emissions each year through the purchase of offsets and Renewable Energy Credits (RECs).

- › In 2023, we purchased carbon offsets and Renewable Energy Credits (RECs) related to our 2022 emissions



Reduce emissions by 50% from 2019 levels on a per employee basis.

- › Between 2019 and 2022, we achieved a 51% reduction in emissions per employee from a 2019 base year

**See p. 7 for more information*



Donate 1% of annual income from operations to charitable organizations.

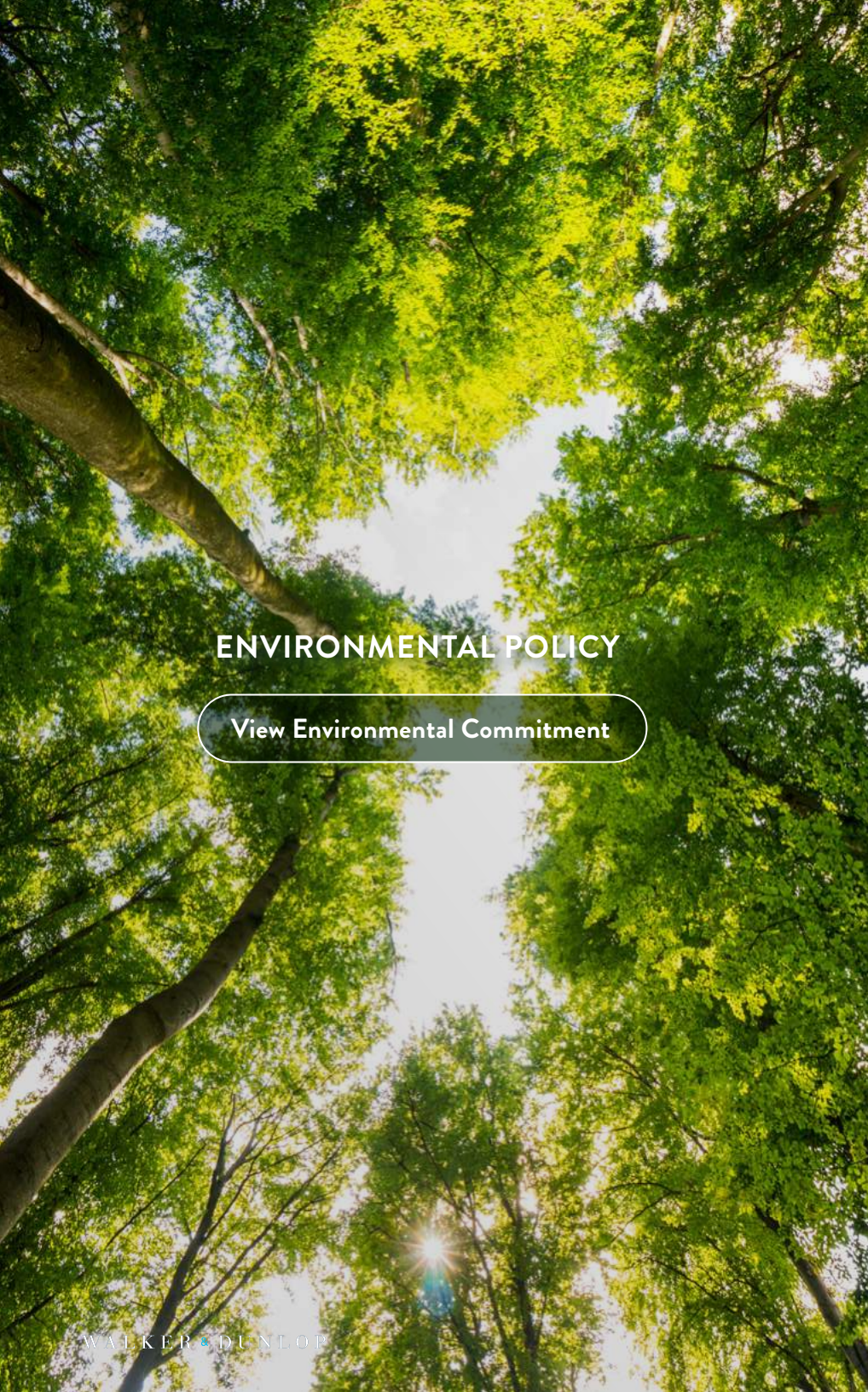
- › In 2023, we contributed \$1.6 million to charitable organizations, which is 1% of our 2023 annual income from operations



Originate \$60 billion of affordable lending (cumulative from 2021- 2025)

- › Over the past three years, we financed \$27 billion of affordable housing properties

Each of these goals and our progress is discussed later in this report.



ENVIRONMENTAL POLICY

[View Environmental Commitment](#)

ENVIRONMENT

As a leader in the commercial real estate finance industry, and in our effort to build stronger and more resilient communities, we recognize our responsibility to reduce our environmental impact through both our operations and our lending practices. We actively participate in the Fannie Mae Green Rewards, Freddie Mac Green Advantage, and HUD's Green Mortgage Insurance Premium (MIP) programs, which provide financing to multifamily properties to implement energy and water efficiency improvements. In 2023, we were ranked the #1 Fannie Mae Green lender in the United States, having financed \$1.9 billion of loans on buildings with Green certifications and loans that qualified for Green Rewards.

We engage in environmentally friendly office practices, such as “paperless” kitchens, while working to minimize our Scope 3 emissions from employee commuting through a flexible telecommuting policy, a pre-tax public transit program, and other initiatives.

Our carbon footprint is measured through a third-party consultant adhering to the Greenhouse Gas Protocol. We have targeted our emissions and energy reduction efforts by measuring and setting goals to reduce all our emissions, both direct and indirect.

Oversight and management of ongoing sustainability commitments have a clear governance and accountability structure as a result of a company-wide culture that encourages ideas, questions, feedback, engagement, and training related to the environmental impact of our business practices.

ENERGY & GHG EMISSIONS

Green Buildings (Leased)

We do not own or operate any buildings that our employees occupy, but of the 61 Buildings in which we leased space in 2023, 31% of our total occupied square footage (136,798 square feet of 458,477 square feet) was in a green-certified building².

As tenants, in most cases, we are not able to retrofit or improve these leased spaces to align with green certification requirements; however, we are focused on improving our leased spaces to increase energy efficiency and decrease water usage in cases that our leases permit us to make such improvements. We will continue to pursue green building certifications when considering lease renewals and new office locations. For example, when we relocated our Denver, Colorado office in the spring of 2024, we prioritized relocating to a LEED-Gold property.

Carbon Footprint

The measurement of our carbon footprint involves an assessment of direct and

indirect emissions resulting from our annual operations. Our total carbon footprint, which includes direct (energy consumption at offices) and indirect emissions (business travel, commuting, and waste) was 18,956 MTCO₂e in 2023. This is a 17% increase from 2022, during which our total carbon footprint reached 16,174 MTCO₂e.

At the end of 2021, Walker & Dunlop acquired Walker & Dunlop Affordable Equity (formerly known as Alliant Capital), which develops and finances affordable housing communities. Its subsidiary, Walker & Dunlop Affordable Preservation (WDAP, formerly known as Alliant Strategic Investments), invests in preserving historic affordable and workforce housing. As of December 31, 2023, its portfolio consisted of 16 multifamily residential properties across the country, and we now include the emissions from ASI's portfolio under Category 15: Investments of our scope 3 emissions.

¹ Green Loans are defined as loans for properties with Green Building Certifications or loans targeting a 30 percent reduction or more in energy and water consumption, inclusive of at least 15 percent energy reduction consumption.

² Of the 61 property managers, only 13 reported their buildings having a green certification, such as LEED and Energy Star. Many of the property managers either declined to respond or were non-responsive to our questions. It is likely that additional office buildings are green certified, but we do not have complete information at this time.



A majority of our increased emissions is due to our expanded scope to include WDAP's portfolio, which added 15,125 MTCO₂e. Without WDAP's portfolio, total emissions were 3,831 MTCO₂e, a 20% decrease from 2022.

Without accounting for WDAP's emissions, our total emissions decreased mainly due to decreased business travel and commuting emissions, which declined 27% and 19%, respectively, from 2022. All together, in 2023, WD more than halved its air travel and jet emissions from 2022. And while our office square footage increased by 4% (excluding WDAP properties), WD's employee count decreased slightly by 1% from year-end 2022 to year-end 2023. Thus, our 2023 total carbon footprint per employee, 2.6 MT CO₂e/Employee, also decreased by 19% from 3.3 MT CO₂e/Employee in 2022.

Our carbon emissions sources can be subdivided into three categories: Scope 1 which is composed of direct emissions from owned or controlled sources (i.e., stationary combustion and refrigerants); Scope 2 which covers indirect emissions from the generation of purchased electricity, steam, heating, and cooling consumed; and Scope 3 which includes all other indirect emissions that occur in our value chain.

By 2025, we have set a goal to reduce emissions (Scope 1, 2, and 3) by 50% from 2019 levels on a per employee basis. We engaged a third-party consultant, ICF, to help measure our emissions and determine a viable emissions reduction goal adhering to the Greenhouse Gas Protocol. For target tracking purposes, Walker & Dunlop uses totals and intensity metrics that incorporate the market-based electricity

CARBON EMISSIONS ¹	2023	2022	2021	2020
Scope 1 emissions (metric tons CO ₂ e)	339	425	710	297
Market-Based Scope 2 emissions (metric tons CO ₂ e)	0 ²	0 ²	0 ²	889
Location-Based Scope 2 emissions	1,366	1,696	1,186	979
Emissions Intensity (Scope 1 and 2 metric tons CO ₂ e per \$M Total Revenues)	1.6	1.8	1.7	1.3
Scope 3 emissions (metric tons CO ₂ e) ³	18,595	15,314	2,529	1,622
Total Emissions with WDAP Portfolio (Scope 1, 2 and 3)	18,956	17,435	4,426	2,898
Total Emissions without WDAP Portfolio (Scope 1, 2, and 3)	3,831	6,027	2,529	1,622
Emissions on a per-employee basis	13.06	11.94	3.38	2.92

EMISSIONS INTENSITY METRICS ⁴	2023	2022	2021	2020
Square footage (SF)	458,477	441,602	251,224	247,505
Emissions per 1,000 SF	8.4	13.65	17.67	11.71
Revenue (\$B)	\$1.054	\$1.259	\$1.259	\$1.084
Emissions per million USD in revenue	3.6	4.79	3.51	2.67
Number of Sites	61	66	51	47

2025 Goal:

Reduce total (Scope 1, 2, and 3) emissions by 50% from 2019 levels on a per employee basis.

¹ GHG emissions methodology is based on the GHG Protocol Corporate Accounting and Reporting Standard. We emphasize collecting actual activity data (e.g., utility bills) for the year and then scale data gaps using reported data from previously reported years. We also apply facility-specific emission factors whenever possible (e.g., based on local electricity grid factors for electricity). 2023 employee commuting emissions were calculated by conducting a survey of employee commute habits in 2023 to determine number of commuting days, commute distances, and commute modes. We extrapolated commuting data for employees that did not respond to the survey. Location-based electricity emissions are included in totals and intensity metrics and are calculated based on regional grid emission factors, where utility emission rates are not available. Market-based electricity emissions are based on utility-specific emission rates where available and residual mix emission factors. Market-based emissions account for renewable energy contractual instruments (i.e., direct contracts, certificates, or supplier-specific information).

² Market-based emissions account for renewable energy contractual instruments (i.e., direct contracts, certificates, or supplier specific information). Market-based emissions are zero due to Walker & Dunlop's purchase of RECs.

³ Scope 3 includes employee travel (air, rental cars, employee-owned vehicles, taxi/car service, rail, and hotel stays), employee commuting, and waste. In 2022, Scope 3 included emissions from WDAP's multifamily portfolio.

⁴ Calculated using Total Emissions (Scope 1, 2 and 3).

approach. The market-based electricity approach accounts for reductions in electricity emissions as a result of Renewable Energy Credit (REC) purchases. At the time of setting our goal, we had most recently completed our 2019 GHG inventory and subsequently selected 2019 as the baseline year, which aligns with guidance from the Science-Based Targets Initiative (SBTi). Because 2019 is Walker & Dunlop's base year for its target and Walker & Dunlop purchased RECs for the 2019 inventory, this approach reflects the REC purchases in reporting and target tracking.

This reduction goal is derived from a base level of 2019 emissions, which totaled 4,140 of metric tons CO₂e- equivalent (MT CO₂e), or 5.0 MT

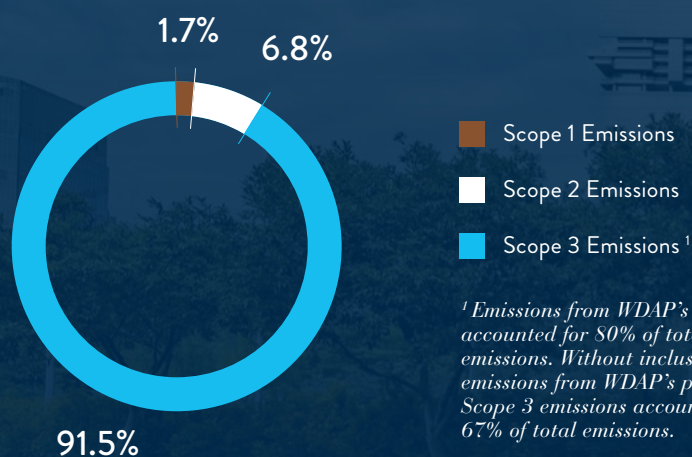
CO₂e/Employee. In 2023, Walker & Dunlop's emissions totaled 2.6 MT CO₂e/Employee, not accounting for emissions from WDAP's portfolio. Thus, accounting for REC purchases, between 2019 and 2023, Walker & Dunlop achieved a 51% reduction in emissions per employee from a 2019 base year. This data and its related claims have not been validated by an independent third-party.

Our flexible work policy includes two or more remote days per week, which we expect to continue to have an ongoing positive impact on our Scope 3 emissions from corporate operations. In addition, the number of fully remote employees has gone from 6% of our total employee base in 2019 to 28% in 2023. Besides

emissions from the WDAP portfolio, employee commuting and travel are the largest components of our Scope 3 emissions, so we expect increased teleworking to significantly reduce these emissions. Walker & Dunlop is evaluating opportunities for emissions reduction across the WDAP portfolio to supplement its previously established 2025 emissions goal.

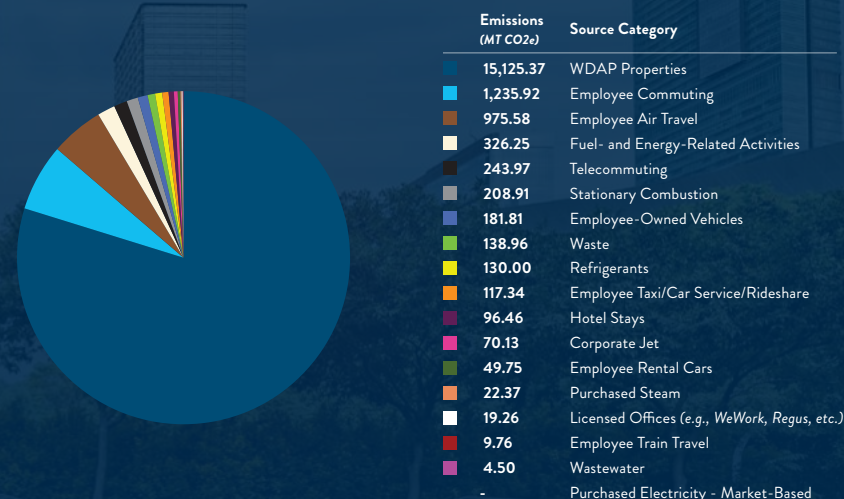
Also, as many of our large leases expire in the next few years, we will prioritize transitioning our leases to LEED, Energy Star or other Green-certified buildings. As of 2023, we had 13 offices in LEED-certified buildings.

GHG Emissions by Scope



¹ Emissions from WDAP's portfolio accounted for 80% of total emissions. Without inclusion of emissions from WDAP's portfolio, Scope 3 emissions accounted for 67% of total emissions.

GHG Emissions by Source

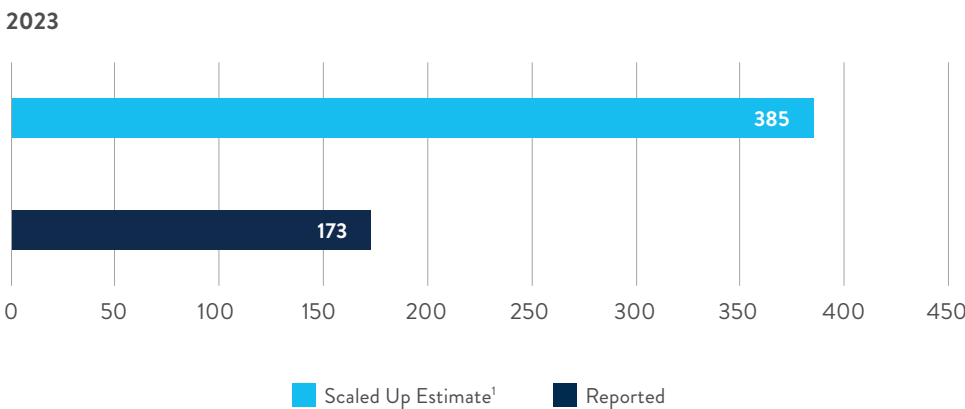


WASTE & RECYCLING

Recycling

In 2023, our landfill/waste-to-energy diversion rate was 21% based on reported data. Some sites only reported recycling data, which likely skews the diversion rate upward. We actively engage with employees on waste generation and recycling practices and seek to implement waste reduction policies, such as our transition to paperless kitchens across all of our offices.

Solid Waste (Short Tons)



¹ Scaled-up estimate calculates the data gaps from unreported facility data by using reported data from previous years



Key Climate-Related Risks

	Time Horizon	Description
PHYSICAL		
Acute	Short-term (0-1 years) Medium-term (1-5 years) Long-term (5-10>10 years)	Risk of severe weather events (e.g., natural disasters such as flooding, hurricanes, tornados) impacting offices that we lease and occupy, commercial real estate properties that we finance and our clients who own these properties, and key vendors with whom we work.
Chronic	Short-term (0-1 years) Medium-term (1-5 years) Long-term (5-10>10 years)	Risk of extreme variability in weather patterns, rising mean temperatures, and rising sea levels impacting offices that we lease and occupy, commercial real estate properties that we finance and our clients who own these properties, and our key vendors with operations located in these high-risk areas. Risk of extreme variability in weather patterns, rising mean temperatures, and rising sea levels causing increased insurance premiums and potential for reduced availability of insurance on commercial real estate properties we finance in high-risk areas. Risk of extreme variability in weather patterns, rising mean temperatures, and rising sea levels impacting company borrower bases that are located in susceptible high-risk areas.
TRANSITIONAL		
Policy & Legal	Short-term (0-1 years) Medium-term (1-5 years)	Risk of regulatory change as it relates to emissions-related obligations as a corporation, or any federal/regional regulatory changes that impact the properties we finance.
Market	Medium-term (1-5 years) Long-term (5-10>10 years)	Risk of climate driven migration shifting current markets that we serve and in which we operate.
Reputation	Short-term (0-1 years) Medium-term (1-5 years) Long-term (5-10>10 years)	Risk to reputation (with all stakeholders, including clients, workforce, general marketplace) based on our response, or lack thereof, to mitigate climate change and address potential risks.

Key Climate-Related Opportunities

	Time Horizon	Description
Market	Short-term (0-1 years)	Opportunity through access to new and emerging markets due to climate change-related migration.
	Medium-term (1-5 years)	
	Long-term (5-10>10 years)	Opportunity for new business offering to provide sustainability services and advice to clients to help them achieve sustainable building improvements.
Technology	Short-term (0-1 years)	
	Medium-term (1-5 years)	Opportunity from technological advances (such as office building automations and renewable technologies) that would positively impact our operations, services, and related costs and revenues.
	Long-term (5-10>10 years)	
Reputation		Opportunity for improved reputation by offering sustainability consulting advice via our partnerships with the Fannie Mae Green Rewards and Freddie Mac Green Advantage programs, ultimately maximizing value to clients.
	Medium-term (1-5 years)	
	Long-term (5-10>10 years)	Opportunity for improved reputation with all stakeholders (including clients, our own workforce, and in the marketplace) based on our response to climate change-related advice (adopting improved technologies, providing advisory services to clients, etc.).

Task Force on Climate-related Financial Disclosures

We are taking actionable steps to improve our sustainability solutions by addressing the implications of climate change in our operations, products, and partnerships. We recognize the vital responsibility of lessening corporate impacts on climate change and are committed to playing a role in its mitigation. We also recognize the need for our stakeholders to understand the ways that climate change may impact our business. This led us to formally adopt the Task Force on Climate-related Financial Disclosure (TCFD), whose framework provides clear and effective risk evaluations associated with climate change.

The evaluation of our business through the TCFD lens has improved our sustainability reporting and operations by increasing transparency and helping us recognize and address climate-related risks and opportunities. Our TCFD-aligned report is the result of the input and expertise of an internal, cross-functional working group in partnership with a third party. We view our TCFD journey as ongoing and will continue to evaluate and redefine the impacts that climate change may have on our business.

Our full TCFD report, which will be published in the summer of 2024, not only provides transparency on our climate-related risks and opportunities, but also outlines our strategic approach to managing these identified risks and pursuing these climate-related opportunities. This report describes how we are working to integrate relevant climate change considerations into governance, strategy, risk management, and metrics and targets that we believe will provide long-term benefits to our business, our clients, and all of our stakeholders.

Following TCFD guidance, we outlined our key climate-related risks and opportunities as in the corresponding tables.

ENVIRONMENTAL RISK TO MORTGAGED PROPERTIES

Description of How Climate Change and Other Environmental Risks are Incorporated into Mortgage Origination and Underwriting

[SASB FN-MF-450a.3]

As the largest Fannie Mae Delegated Underwriting and Servicing (“DUS[®]”) Lender and the third- largest Freddie Mac Multifamily Optigo[®] Seller/ Servicer in the country, we are actively involved in the Fannie Mae Green Rewards and Freddie Mac Green Advantage programs, both of which provide financing to multifamily properties to finance energy and water efficiency improvements. Through our lending activities with other capital providers across the country, in multifamily, office, industrial, retail, and beyond, we are active in financing LEED and other green-certified properties. In 2023, we were ranked the #1 Fannie Mae DUS[®] Producer for Green Financing, closing \$1.7 billion of Green Building Certification volume and \$281 million of Green Rewards volume. All together, we closed \$2.0 billion of Green Financing with Fannie Mae, Freddie Mac, and HUD, totaling 12% of our total Agency lending.

We also actively monitor the ways in which climate change and environmental risks, particularly related to physical climate events, could impact our business. Severe weather events could have permanent impacts on the commercial real estate markets in which we operate, transact, and invest in. Markets at high risk of severe weather events may make properties in those areas more expensive to maintain, potentially weakening the performance of those properties and adversely impacting the performance of our at risk portfolio. We manage this risk by maintaining a geographically diverse portfolio. Additionally, we take physical climate risk into account when underwriting transactions, evaluating our investments, and with the management of our at-risk servicing portfolio.

¹ DUS[®] program grants approved lenders the ability to underwrite, close, and sell loans on multifamily properties to Fannie Mae without prior Fannie Mae review.



Physical Climate-Related Risk by Area:

1) Total expected loss and (2) Loss Given Default (LGD) attributable to mortgage loan default and delinquency due to weather-related natural catastrophes, by geographic region

[SASB FN-MF-450a.1]

[SASB FN-MF-450a.2]¹

When assessing climate change-related risks, we consider current and emerging regulations, legal affairs and potential for litigation, technological advances, market influences, and more generally, the potential physical impacts from climate change. The risk committee, a management committee that reports directly to our Board of Directors, utilizes an Enterprise Risk Management (ERM) process to both assess and manage these risks which is ultimately overseen by the Board of Directors. Through identifying these risks, we are also able to identify related opportunities to improve our operations and business model. We regularly reassess and update risk management policies and programs to align with best practices and seek to anticipate emerging risks and opportunities.

We disclose climate risks in two categories: physical risks and transition risks. Physical risks include both acute risks – natural disasters, etc. – that are projected to worsen as a result of climate change, and chronic risks – permanent increases in temperature, sea levels, etc. – that impact buildings and infrastructure. Transition risks comprise the transitions companies will have to make as we move to a lower-carbon economy as a result of climate change impacts.

We actively monitor the climate-related risks that could impact our at-risk servicing portfolio, and in

2024 conducted a formal Climate Risk Assessment and scenario analysis assessing the potential impact of weather-related climate events on the properties in our at-risk portfolio. This climate risk assessment focused on 1,500 properties selected based on both financial materiality and geographical coverage throughout the portfolio. Climate-related risks and opportunities were assessed under two extreme climate scenarios (+2 °C “middle-of-the-road” and +4 °C high impact scenario) and two time horizons (2030 and 2050). Full details of the analysis are available in our TCFD report.

If these at-risk loans were to default due to destruction caused by severe weather events, we would retain a portion of the risk of loss because of our risk-sharing obligations. However, together, with Fannie Mae, we ensure that borrowers with properties in these high-risk areas carry appropriate levels of flood and/or windstorm insurance. As a lender, our risks include the borrower maintaining inadequate coverage limits or not having the necessary funds to meet insurance deductibles. Insurance coverage is reviewed both prior to loan closing and annually throughout the term of the loan to maintain adequate protection.

For more detail on the climate related-risks we deem to be material to our business, please view our full TCFD report.





HUMAN CAPITAL & DEVELOPMENT

DIVERSITY, EQUITY, AND INCLUSION

DE&I Efforts

At Walker & Dunlop, we treat all individuals with empathy and respect and create a community where our employees can thrive and feel a sense of belonging. Through a growing range of initiatives, we work to ensure an inclusive and supportive work environment across all our offices and to actively expand the range of perspectives and experiences that contribute to our shared success. We are committed to equity throughout the recruitment and employment experience. We believe in equal access opportunities in the workplace. We strive to be a safe place to ask questions, build professional relationships, and develop careers.

As outlined in our Drive to '25 ESG goals, by 2025 we plan to increase the proportion of women in management positions to 35% and the proportion of underrepresented groups in management positions to 25%. In 2023, the proportion of women and underrepresented groups in management positions totaled 28% and 14%, respectively. Beginning in 2021, we assigned DE&I goals to all employees across the organization,

which are directly linked to annual incentives. This aligns with the concrete, compensation-related DE&I annual goals we set for senior management. As a company, we recognize that we must continuously improve and change as we progress as a company. As a result, we are always working to better understand how our employees view their experience in order to best meet the needs of our growing community.

During the year, we participated in an annual employee engagement survey to assess our inclusiveness as a company, in addition to several other experiences, from the perspective of our employees. In 2023, 90% of respondents felt they can be themselves at work. 95% of our employees believe that people at Walker & Dunlop are treated fairly regardless of their age. 94% believe that people are treated fairly regardless of their gender. 95% believe that people are treated fairly regardless of their race. 98% believe that people are treated fairly regardless of their sexual orientation. It is important to highlight that these scores



typically decrease as companies grow in size; yet all of our scores have increased as we have grown our employee base and expanded our business lines, suggesting a positive experience and promising trend for our workplace inclusiveness.

We compete for the best-qualified candidates for each position. As U.S. demographic statistics trend toward a more racially, ethnically, and gender-diverse employee and client population, we will continue to lead as a best-in-class employer by ensuring our personnel efforts are applying best practices to recruit, support, engage, and retain a diverse employee base. For us, diversity is ensuring that we have employees with different backgrounds, perspectives, and experiences coupled with an inclusive culture in order to bring diversity of thought, which is vital at every level of the business. We embrace a culture of growth, learning, and acceptance.

ERGs, Training & Partnerships

Building on the annual engagement survey, over the past three years, Walker & Dunlop has partnered with a number of consultants including Management Leadership for Tomorrow (MLT) and Great Place to Work® to conduct audits, surveys and assessments to continue to evaluate employee experience. Based on results, we continue to work with MLT and W&D senior leadership to operationalize our DE&I action plan.

Notably, we received the Mortgage Banders Association's Commercial/Multifamily DEI Leadership Award for Market & Community Outreach strategies based on our efforts in 2023 to expand access to capital, our capacity to build partnerships, and our financial commitment to the communities we serve. We submitted our initiative, CREUnited, an alliance among industry heavyweights and minority-owned businesses dedicated to increasing minority representation and Assets Under Management (AUM). Since the inception of the program, CREUnited has 26 owner partners, two vendor partners, and 12 corporate sponsors. We have seen over \$938 million of deal flow through CREUnited and

continue to market the program to women and diverse sponsors. By the end of 2024, our goal is to exceed over \$1 billion of business closed.

We have partnerships with several organizations to support education and diversity initiatives. We expanded our collaboration with The Cristo Rey Network, integrating rigorous academics with professional work experience for high school students. We continued our official corporate sponsorship of The Rutgers University Center for Real Estate and have established a new partnership with Roosevelt University. These partnerships support education in commercial real estate and fund scholarships to attract diverse talent to our industry. Additionally, we have a longstanding partnership with Project Destined, a social impact platform that provides training and mentoring in finance, entrepreneurship, and real estate to diverse students. We also support charitable causes such as The Hispanic Scholarship Fund.

In 2023, we established a new partnership with the Black Commercial Real Estate Network,

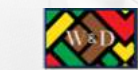
an advocacy group with the goal of amplifying the voices of Black members in our industry. As a result of these new and ongoing efforts, we achieved MLT Black Equity at Work Bronze Certification for the second consecutive year and maintained MLT Hispanic Equity at Work plan approved status. These efforts reinforce our commitment to cultivating inclusive environments and making positive impacts in our communities.

W&D currently sponsors eight employee resource groups (ERGs) to support and empower our employees. 325 employees (25%) participate in one or more ERGs. Our ERGs are W&D+ (LGBTQIA+ group), W&D Black Empowered Network, Unidos (Hispanic and Latino/a/X resource group), Military and Veteran Resource Group, WoWD (Women of Walker & Dunlop), AsiaPac (Asian American & Pacific Islander resource group), Caregivers Resource Group, and Minds of All Kinds (Neurodiversity resource group). Each strives to support our employees personally and professionally by ensuring they find a place of belonging and shared experience in the workplace.

OUR ERGS



WOMEN
OF WALKER & DUNLOP



BLACK
EMPOWERED NETWORK



ASIAPAC
ALLIANCE



UNIDOS
AT WALKER & DUNLOP



**MILITARY &
VETERAN**



CAREGIVERS
RESOURCE GROUP



MINDS
OF ALL KINDS

Based on the feedback from third-party audits, surveys, and our employees, we hosted several training programs in 2023 focused on inclusion, recognizing bias, and creating a safe space for our employees.

In 2023, we launched our Professional Development Experiences (PDE) program which now includes our established mentorship and sponsorship programs. The PDE is designed to empower our employees throughout their career no matter where they are in their journey. In addition to mentoring and sponsorship, the program includes shadowing and new hire experiences, enabling pathways to personal and professional development for both the advisor and advisee. By participating, our employees have been able to gain new skills, broaden their network, and advance their career goals. The active participation of our employees continues to make a meaningful difference in shaping the development landscape of our company.

In 2023, Walker & Dunlop continued our partnership with NOTA Inclusion to host our third annual DE&I summit. The summit spanned a total of four days over a month and featured sessions for our people managers and a session dedicated to all employees. Topics covered included rethinking workplace privileges, having courageous conversations across differences, cultivating a foundation of wellbeing, and creating an inclusive workplace for our people. Our conversations throughout the sessions focused on building connections and sharing actionable takeaways centered on integration, implementation and intentionality.

In 2023, we also introduced listening sessions with senior leaders as an open forum for employees to provide feedback, discuss areas of improvement or change, and connections with members of our senior leadership. We continue to host listening sessions with our senior leadership and HR team in the hopes of gathering feedback and developing actionable ideas to help further our collective goal of creating a culture of acceptance and belonging.



Event Spotlight: WoWD's Women's Event in NYC

To commemorate Women's History Month this year, WoWD hosted a Women's Event in NYC for WoWD members, industry peers and WD clients. During the event, Willy interviewed legendary feminist activist Gloria Steinem, the keynote speaker. A writer, lecturer, political activist, and feminist organizer, Gloria was a pioneer of the women's rights movement in the 1970s and has dedicated her life to promoting gender equality and social justice.

It was an honor to host Gloria at our event and among all the exceptional content organized by WoWD. The interview was recorded for the Walker Webcast, which can be viewed here: [Trailblazing for an Equitable Future with Gloria Steinem](#).





Gender Pay Gap

All Walker & Dunlop Employees: 61%¹

The gender pay gap is determined by comparing the mean total compensation between men and women at the company. This gap reflects our current organizational structure that has men over-represented in areas of the business that are commission-based. By 2025, we aim to increase the proportion of women and underrepresented groups among top company earners to 15%, up from 2020 levels of 9% and 6%, respectively. This will be a key driver in our efforts to decrease this pay gap over time.

¹ Calculated using Bloomberg's GEI Index methodology (average male earnings minus average female earnings, divided by the average earnings of the higher paid gender). Includes all employees at Walker & Dunlop as of 12/31/23 and their income for the year-ended regardless of when an employee started working at the Company during the fiscal year.

Equitable Compensation and Pay Transparency

Human Resources conducts a pay equity analysis to compare base salary and total compensation across genders and ethnicity. The analysis controls for the variables of age, performance rating, job code, and functional department to determine if there is a pay gap based on gender or ethnicity within those controls. We implemented a new tool in 2020 to support more real-time and deeper analysis of compensation and roles by gender and ethnicity compared to the market.

We utilize third party compensation surveys for purposes of external benchmarking of compensation. This enables us to better control for equitable pay in our hiring practices by providing guidance around managing salary ranges, while considering an individual's experience as appropriate.

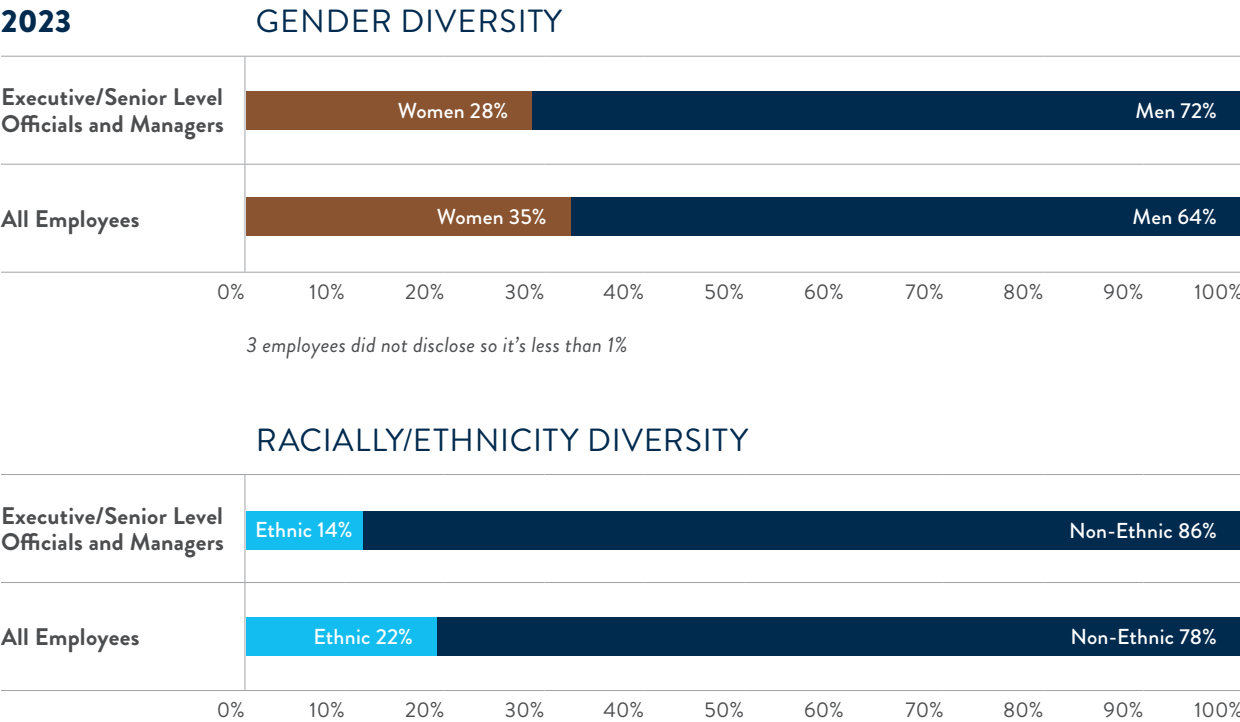
Our Recruiting, Employee Relations, and Compensation teams, with support from the Legal team, also engage in ongoing, personalized equity analyses. These analyses are typically conducted when positions open, when employees are hired, or when promotion or bonus determinations are made. Our recruiters and managers also receive dedicated training on our EEO standards, including pay equity.

Over the past several years, W&D has expanded into new verticals, including LIHTC, appraisals, research, investment banking, and technology development. In 2023, we engaged a reputable third-party compensation firm to conduct a year-long compensation study to evaluate all W&D pay practices in relation to the market. The study found that our pay programs are performing as designed and generally align with market, with opportunities for regular enhancements. Following this assessment, we contracted with a separate third-party firm to conduct an equity analysis of our pay programs to ensure equity and fairness in our pay administration. The analysis reviewed base salary, bonuses, equity,

and total compensation and compared similar jobs that have a sufficient number of employees to enable meaningful statistical evaluation. The groupings needed at least 30 employees in total and at least 5 members of a subgroup (such as men, women, diverse, or non-diverse) to conduct the analysis. There were no findings of systemic pay issues related to gender or ethnicity.

In 2023, we began a campaign to create more transparency and understanding of our pay programs, starting with the launch of Total Rewards Statements. The Total Rewards Statements provide a holistic view of an employee’s compensation and benefits package at W&D.

Percentage of Gender and Racial/Ethnic Group Representation for Management and All Other Employees¹



DE&I defines Management as any job title at the Assistant Vice President/Associate Director (AVP/AD) and above.



RECRUITMENT, ENGAGEMENT & RETENTION

Employee Engagement

We pride ourselves on having big company capabilities with a small company feel, where our employees feel that they are part of the W&D family. Our teams and departments work well together because of relationships founded in deep respect and trust. Walker & Dunlop has participated in the Great Place to Work® Institute's (GPTW®) annual employee engagement survey since 2009. The survey enables W&D to be considered for their 100 Best and Best Workplaces lists. More importantly, it allows employees to share confidential feedback about our culture and their experience at the company. The GPTW® Institute uses its Trust Model "to measure whether a company is a trust-based organization by ensuring that every single employee, no matter who they are or what they do for their company, is having a consistently positive experience at work." We have proudly made the Best Workplaces list eight times.

In 2023, 55% of our employees participated in the survey, and 93% of our survey participants agreed that "Taking everything into account, I believe this is a great place to work®", which was one of the many factors resulting in Walker & Dunlop being named a Fortune Magazine's Best Workplaces in the Financial Services & Insurance category (Large Employers).

Based on those survey responses, we learned that our employees have a sense of pride in where they work, feel welcome in our spaces, and believe Walker & Dunlop treats all employees fairly regardless of their race, age, gender, or sexual orientation. The results also show that employees feel W&D is a psychologically and emotionally healthy place to work, which is a testament to our focus on wellness and community.

We have segmented the results of the survey by demographics, tied to four key DE&I questions. These segmented results suggest specific groups that may benefit from additional support, allowing us to allocate resources more effectively. In particular, we are taking measures to support our Black male and Two or more Races population. In 2024, we will continue our commitment to making W&D a great place to work by providing greater transparency into compensation practices as noted above, providing more talent management resources for managers, and creating improved opportunities for recognition and information sharing.

Photo by Garrett Rowland

Internal Employee Engagement Survey

As part of our dedication to fostering a positive workplace environment, we began piloting Peakon, an engagement survey platform designed to gather direct insights from our employees. This pilot phase serves as the foundation for a full company rollout later this year. Utilizing Peakon will continue to bolster our workplace values that every voice is valued, fostering a culture characterized by positivity and productivity.

Client Engagement

Beyond employee engagement, customer engagement is also extremely important to us, and we leverage surveys to better understand how our clients perceive us. In 2023 we calculated our Net Promoter Score® (“NPS”), which measures customer experience and their overall perception of our brand. Out of 282 responders to our survey, 270 were “Promoters”, producing an NPS of 92.6 out of 100, a very positive score.

2023 Employee Distribution



1,322 Full Time Employees



4 Part Time Employees

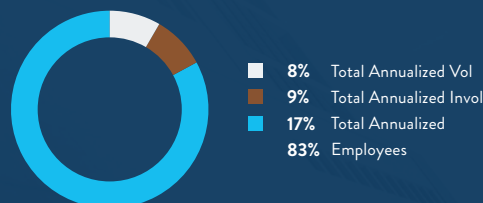


95 Organic New Hires Employees

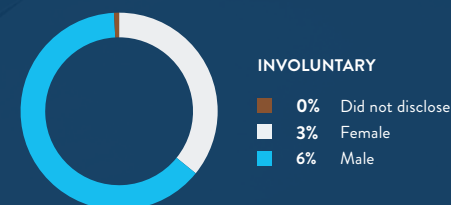
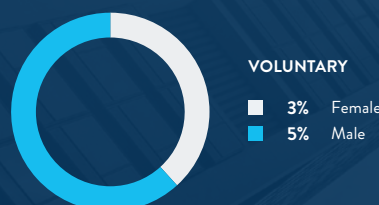


10 Internal Transfers

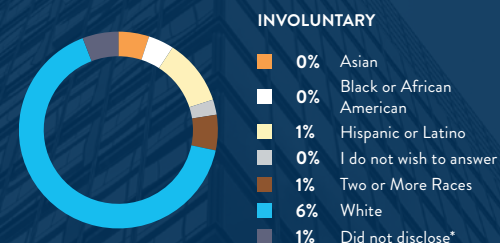
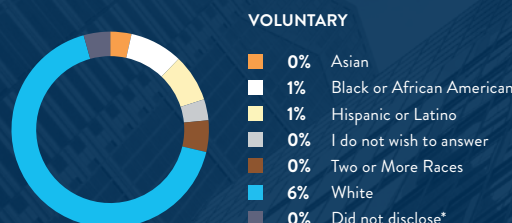
Employee Turnover Rate



Employee Turnover Rate by Gender



Employee Turnover Rate by Race/Ethnicity



Additional Employee Benefits

We believe that being in the office with colleagues and team members is a significant part of what makes Walker & Dunlop a great place to work and has contributed to our success as a company. We also recognize that many employees value the ability to work from home. To balance the importance of teamwork and collaboration in the office and our employees' desire to work from home on a part-time basis, we have a flexible work schedule that allows all employees to work remotely up to two days per week. Additional flexibility can be requested by individual employees based on health, personal, or family needs. Approximately 28% of our employees are fully remote. The remainder of our employees work from a company office one to five days a week.

In May 2024, over 1,100 Walker & Dunlop employees (approximately 83% of our employee population) joined us in Las Vegas, Nevada for three days of connection, collaboration, and community-building. The W&D culture is always strengthened when our people come together, and this year's retreat was no exception. All who attended took home a deeper understanding of our business, our collective success, and our Drive to '25 goals. But most importantly, it inspired the team to continue to embody the W&D culture and values - The Walker Way.

We provide a competitive suite of benefits offerings, including medical, dental, and vision plans, HSA, FSAs, employer-paid life and disability coverage, voluntary benefits such as supplemental life for the whole family and legal services, employee assistance programs, 401(k) with company matching, and

generous protected, paid leave programs. Of note, we offer two weeks of foster leave, four weeks of parental leave, and fourteen weeks of maternity leave once a year for all full-time employees. Also, up to twice during one's term of employment, we provide up to \$15,000 in assistance to support qualify adoption, surrogacy, or egg freezing expenses. We also offer Gender Affirming Care Leave as well as supplement gender affirming care expense reimbursements.

In addition, we believe that a fit employee - physically, financially, and emotionally - is a productive employee, so we maintain a robust health and wellness program. During the work week, we offer a variety of perks for keeping energized and healthy. We issue monthly monetary awards to employees for participating in their favorite wellness activities - earning up to \$150 per month depending on their level of activity. In 2023, we paid \$1,204,200 in wellness rewards. 66% of employees participated in the wellness portal by logging wellness activities and 55% of employees earned wellness rewards. We also provide our employees with the ability to invest in two ESG funds as company-sponsored 401k investment options. These investment options provide our employees opportunities for both US and broader market equity allocation that seeks attractive returns through both a traditional and ESG lens with positive aggregate societal impact outcomes being determined by the investment managers.

THE WALKER WAY



DRIVEN



CARING



COLLABORATIVE



TENACIOUS



INSIGHTFUL

Talent Recruitment

Our company is made up of highly driven and caring people. We find this talent through a thoughtful recruitment process marked by close collaboration between our experienced Talent Acquisition professionals and the hiring team every step of the way. Our approach includes leveraging our social media presence to give candidates a strong sense of our unique culture and engaging those candidates in carefully constructed recruiter-led interviews and functional interviews with members of the hiring department. We build talent pipelines through our formal college recruiting program and have several partnerships with organizations that provide us a greater reach to diverse talent, such as Project Destined, Rutgers University and Roosevelt University. Our internship program is designed to cultivate careers for the next generation of W&D employees. For the 2023 program, our diverse partnerships helped us secure an internship pool of 32 interns hired across the U.S., 33% of which were female and 47% racially/ethnically diverse. This was an improvement from the previous summer wherein 26% of 2022 interns were female and 26% diverse. In 2023, we focused on strategic hiring, welcoming 111 new employees 26% of which were female and 21% diverse. Additionally, our total applicant flow was 30% female and 51% diverse (compared to 35% female and 43% diverse in 2022). We will continue to work to improve the diversity of our new hires.

Talent Management Process

It is crucial for our employees to understand how their individual roles and contributions align with and support our company objectives, as this fosters a sense of purpose, direction, and relevance in their work. Employees work closely with their managers to define job-related goals, ensuring alignment with both their department's objectives and the organization's overarching goals. When implemented company-wide, this approach provides each individual with a clear path to collective success. Our commitment to DE&I and building W&D community equally essential alongside our job-related goals. We have carefully curated DE&I and Community Standards goals that have been distributed to all employees at every level. Both categories collectively account for 20% of employees' annual review ratings. Following goal setting, we conduct two performance check-ins each year: one mid-year to monitor progress and one year-end to evaluate overall performance. To facilitate employee development, we integrate 360-degree feedback into the mid-year review process. This enables employees to request feedback from their colleagues and allows managers to receive input from their direct reports. This comprehensive approach ensures that employees at all levels receive a well-rounded assessment of their performance. At year-end, employees complete a self-assessment, which is followed by managers' evaluations of job-related, DE&I, and Community Standards goals.



Learning and Development (L&D)

We support the ongoing development and advancement of our employees by offering a variety of learning initiatives, including in-house and external trainings, various management trainings, self-insight activities, and online business and software training. We also pay for professional licensing and industry memberships, as well as offer tuition reimbursement for undergraduate and graduate level courses or other continuing education for fulltime and certain part-time employees.

For example, in 2023 we enrolled all analyst across the organization in a course with the CRE Academy which covered topics around debt and equity. Additionally, we initiated an internal W&D Products & Services training for all employees, with 68% participation. Outside of internal trainings, employees completed 1000+ courses through various platforms or organizations on topics including but not limited to leadership, business skills, manager development, diversity, policies, and DEI.



COMMUNITIES

COMMUNITY ENGAGEMENT

Philanthropic/Charity & Communities

At Walker & Dunlop, we are committed to making a lasting and meaningful impact on the communities in which we operate. In addition to our company efforts, providing employees with opportunities to give back to the community is an integral part of W&D's culture. We have set a 2025 goal to donate 1% of our annual income from operations to charitable organizations.

Our primary unified charitable giving cause is ending homelessness and alleviating poverty in the U.S. Each year, we hold an annual fundraiser in support of our corporate charity partners who work towards eliminating the conditions that can lead to homelessness. W&D also offers a Matching Funds Program in which the Company matches employees' and directors' eligible charitable contributions of up to \$2,000 per year. This includes matching our employees' volunteer time with a contribution of \$50 per hour to their organization of choice. Between the Matching Funds Program, our annual fundraiser, and various philanthropic efforts throughout the year, W&D made \$1.6 million in charitable donations in 2023. This donation represents 1% of our annual income from operations, almost double the 0.53% donated in 2022 0.53% in 2022.

2025 Goal:

Donate 1% of annual income from operations to philanthropic efforts.





Employee Volunteerism

At Walker & Dunlop, we are a community, connected by our values, our relationships, and our drive to make an impact. We continue to build upon these principles, launching our, annual W&D Week of Service each April. The week serves as an important component of our purpose, 'Community Starts Here,' and aligns with our Drive to '25 and DE&I objective of ensuring each employee participates in at least one volunteer event, aiming for 20 hours annually. Service activities included office-sponsored food and clothing donation drives, Red Cross blood drives, volunteer opportunities with local food kitchens, beach and park clean-ups and other individual/group volunteer activities.

To fully support and encourage our employees to participate in community-enriching activities, we offer 48 hours of Volunteer Time Off per employee annually. Furthermore, employees may elect for W&D to match their donated time with a monetary donation to the approved organization. Throughout the year, we collaborate with organizations that share our commitment to ending homelessness. These include Back on My Feet, which addresses homelessness through running, community support, and vital employment and housing resources; Community Solutions, dedicated to breaking the cycle of homelessness to ensure poverty does not persist through generations; and Shelter to Shutters, focused on empowering individuals to transition from homelessness to economic self-sufficiency by connecting them with the real estate industry. In addition, we host company-sponsored volunteer events across our office locations, and employees are also encouraged to use up to four hours of paid time off per month to volunteer independently at an organization of their choice.

2025 Goal:

Every employee to participate in at least one community/volunteer event during the year; endeavoring to volunteer 20 hours a year and encouraging other colleagues to do the same.

COMMUNITY

Affordable Housing

Our business touches communities across the United States, and we are able to positively impact these communities through the financing we provide to much-needed affordable housing. In 2023, we financed over \$6 billion of affordable and workforce housing and were named Fannie Mae's #3 Affordable Housing Lender and Freddie Mac's #4 Affordable Housing Lender. We have set a goal to originate \$60 billion of cumulative affordable lending¹ between 2021 and 2025.

Walker & Dunlop is committed to becoming part of the solution to creating, maintaining, and preserving affordable housing across the nation, and we continue to invest in our platform so we can provide our clients with unparalleled solutions for all of their affordable housing needs. We have a differentiated affordable housing platform with a suite of services, providing affordable lending, sales, and low-income housing tax credit ("LIHTC") syndication capabilities.

A key step towards becoming a leader in the affordable housing sector was our acquisition of Walker & Dunlop Affordable Equity ("WDAE"), formerly known as Alliant Capital, Ltd. and its affiliates ("Alliant"). As the 6th largest LIHTC syndicator in the United States, since its inception, WDAE has participated in the financing of over 1,150 tax credit properties, totaling more than 100,000 affordable units, and serving over 400,000 families throughout the country. WDAE is one of the largest tax credit syndicators and affordable housing developers in the U.S. and provides alternative investment management services focused on the affordable housing sector through LIHTC syndication, development of affordable housing projects through joint ventures, and affordable housing preservation fund management (Walker & Dunlop Affordable Preservation).

2025 Goal:

Originate \$60 billion of affordable lending¹ (cumulative over the next five years).

¹ Following the FHFA definition of affordable housing.



CASE STUDY

MARKET TO AFFORDABLE CONVERSION OF PARK SHIRLINGTON APARTMENTS

In 2023, W&D closed a HUD loan for Park Shirlington, an existing 294-unit multifamily property in Arlington, Virginia. W&D's Federal Housing Administration (FHA) team arranged the loan through the U.S. Housing and Urban Development's (HUD) 221(d)(4) Substantial Rehabilitation Affordable LIHTC program on behalf of Standard Communities. Together with HUD, Virginia Housing, AEGON USA Realty Advisors, LLC (AEGON), Arlington County's Affordable Housing Investment Fund (AHIF), and W&D, Standard Communities was able to transform a market rate asset into new affordable housing for the long term through at least 2053.

A market-to-affordable conversion, Park Shirlington was previously financed via W&D's interim loan program as the conversion to long-term affordability process unfolded. The availability of affordable housing is an issue of national concern, and Park Shirlington is an excellent example of how the federal government, local municipalities, and private investors can collaborate to be part of the solution.

In conjunction with the FHA Financing, Park Shirlington was converted from market rate to affordable with 60% Area Median Income (AMI) rent restrictions through a LIHTC regulatory agreement that covers 100% of the units. The HUD 221(d)(4) program provided substantial rehabilitation funding of \$34 million in renovation costs which directly benefited all aspects of the property, including unit interiors, building systems, and envelope, and the expansion and renovation of amenity spaces including the construction of a new Community Center.

A partner of W&D, Standard Communities is one of the 50 largest affordable housing owners in the nation. Its principals have spearheaded innovative solutions to preserve and create sustainable and high-quality affordable, workforce, and mixed-income housing across the country.

Walker & Dunlop Affordable Preservation (WDAP)

WDAP (formerly known as Alliant Strategic Investments) is deeply committed to the mission of creating and preserving quality affordable housing. WDAP's investment in and operation of affordable and workforce properties is helping to preserve the nation's affordable housing stock and strengthen the foundation of its communities. WDAP has preserved over 5,170 units across the country, creating sustainable, healthy, and stable affordable housing communities where their residents can thrive. Their approach is to make thoughtful investments and support and enhance these investments with additional services emphasizing health and environmental impact, sustainable operations, and community engagement. WDAP examines each investment through an ESG lens and holds accountability as a core tenet. Despite recent market volatility, they have continued to use their passion for affordable housing, experience, and strong industry relationships to expand their impact and further their mission.

WDAP Impact Report

Each year, WDAP issues its own Impact Report, highlighting how WDAP's investments directly and positively impact the daily lives of its residents and communities. For more information about how WDAP incorporates ESG into its operations, as well as its plans for 2024 and beyond, please read their [2024 Impact Report](#).



CASE STUDY

MONTE VISTA APARTMENTS

Monte Vista Apartments is a 124-unit multifamily community located in Lake View Terrace, which is in the North San Fernando Valley submarket (approximately 23 miles northwest of Downtown Los Angeles). Along with our investor partner Nuveen Real Estate, we were successful in extending and expanding the Regulatory Agreement, which was initially set to expire in 2023. The Amendment expands affordability from 20 percent at 80 percent AMI under the prior agreement to 20 percent at 60 percent AMI and the remaining 80 percent at 80 percent AMI. The term was also extended for an additional 10 years. While the Amendment only requires unit affordability changes to occur at turnover, the team is currently evaluating all existing households to determine any in-place residents who may qualify and therefore benefit while maintaining residency. As of May 2024, 17 households have been qualified at 60 percent, 13 at 80 percent with another 17 in process. These households will have current rents adjusted accordingly while fulfillment of the Regulatory Agreement is expedited.

A variety of Resident Services programs are being offered at Monte Vista, with participation at Monte Vista increasing 250 percent from 2023 to 2024. Donations and volunteer hours also collectively increased by 126 percent during that same period. In 2023, a new community garden was installed with programming to show the residents how to plant and teach them about the value of health and nutrition in planting and utilizing produce from their own garden.



Board of Directors¹

Independence **75%**

Gender Diversity **25%**

Ethnic Diversity **25%**

Total Diversity **50%**

Average Age (years) **58.6**

Average Tenure (years) **8.5**

Industry Expertise² **87.5%**

Independent Lead Director **Yes**

Annual Election of Directors **Yes**

¹ As of 12/31/23

² Commercial real estate, commercial lending, and investment advisory/Mergers & Acquisitions

GOVERNANCE

GOVERNANCE AND BUSINESS ETHICS



Oversight of Corporate Strategy and Risk

The Board continuously monitors risk oversight and designates one meeting each year at which the Board works with management to conduct an in-depth review of the Company's strategic plans and identify the principal issues and risks to its ongoing operations and accomplishing its strategy. While the full Board has primary responsibility for risk oversight, it utilizes its committees, as appropriate, to monitor and address the risks that may be within the scope of a particular committee's expertise or charter.

The Board believes that the composition of its committees, and the distribution of the particular expertise of each committee's members, makes this an appropriate structure to more effectively monitor the risks that relate to the committees' respective oversight authorities. In accordance with NYSE Corporate Governance Standards, the Audit and Risk Committee charter assigns to the Audit and Risk Committee the responsibility to review our policies and procedures with respect to risk assessment and risk management. The Audit

and Risk Committee receives regular reports from our General Counsel and Secretary and SVP of Internal Audit on the Company's inventory of key risks and the risk management controls and other monitoring mechanisms related to the risks and how management identifies new and emerging risks.

As it relates to specific risks, the Audit and Risk Committee oversees our financial statements, internal control over financial reporting, compliance with legal and regulatory requirements, the performance of our internal audit function and cybersecurity risk. The Audit and Risk Committee receives quarterly reports from our Chief Information Security Officer (CISO) and our Chief Information Officer (CIO) on our cybersecurity risks and meets in executive session with our CISO following such reports. Additionally, the CISO oversees our information security team, which works in partnership with our internal audit department to review information technology-related internal controls

with our external auditors as part of the overall internal controls process.

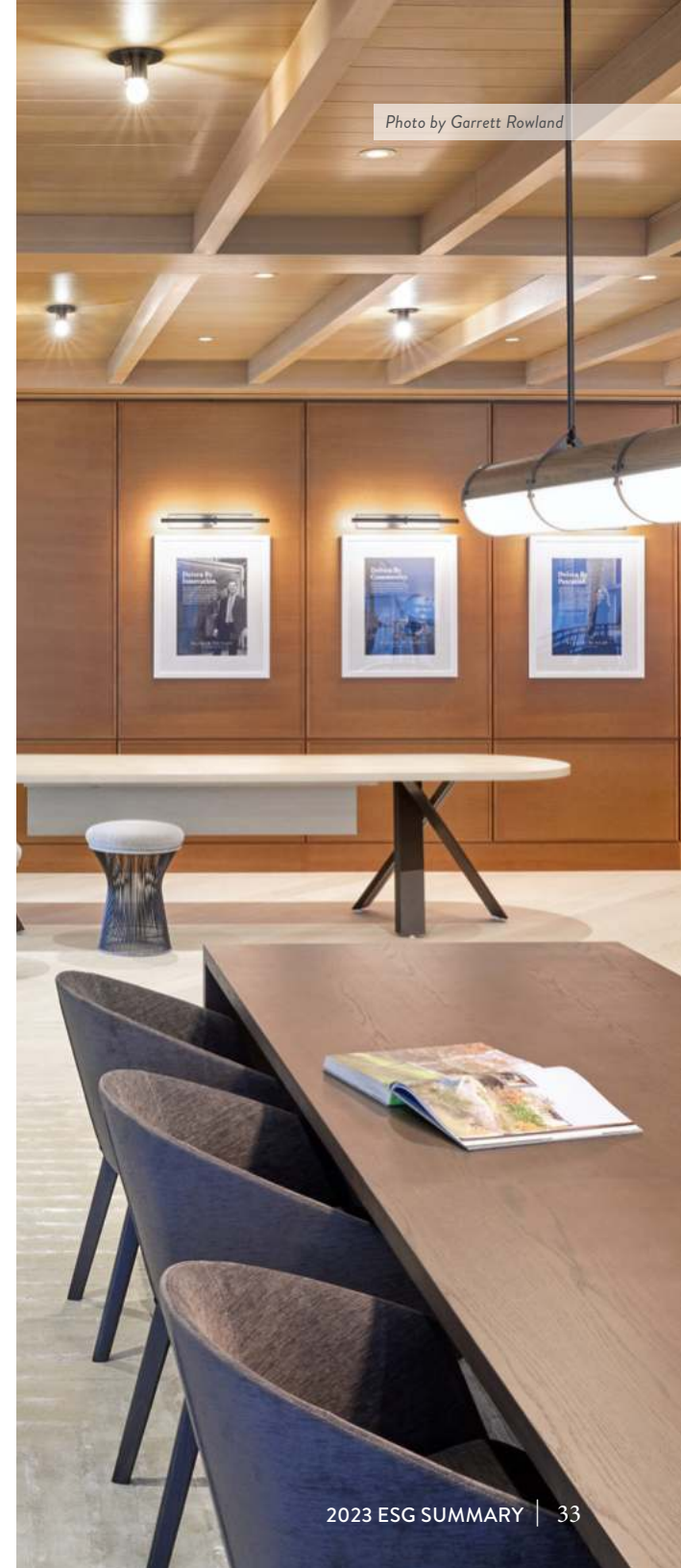
An important feature of the Board's risk oversight function is to receive regular updates beyond each quarterly Board meeting from its committees and management. For example, the Audit and Risk Committee receives the meeting minutes of all monthly Risk Committee meetings. Additionally, each year the SVP of Internal Audit, who reports directly to the Audit and Risk Committee, receives input from senior management on strategic initiatives, emerging risks, changes to business lines, etc. in order to help our internal auditors develop an audit plan designed to address key corporate governance controls, financial reporting and internal control risks, and pre-implementation reviews of significant corporate projects. This plan will subsequently be approved by the Audit and Risk Committee, and our internal auditors will report the audit results to the Audit and Risk Committee on a quarterly basis, or more frequently as needed. The SVP of Internal Audit also meets with the Audit and Risk Committee in executive session at least quarterly. In addition, our General Counsel & Secretary meets regularly with the Audit and Risk Committee and the NCG Committee and provides them with regular updates regarding material litigation and legal and regulatory compliance matters.

The Compensation Committee is responsible for overseeing compensation risk, including evaluating and assessing risks arising from our compensation policies and practices for all

employees and ensuring executive compensation is aligned with performance. The Compensation Committee is charged with monitoring our equity-based compensation plans, including employee benefit plans. The NCG Committee oversees risk related to our overall governance, including Board and committee composition, Board size and structure, director independence, ethical and business conduct and ESG risks.

The full Board is kept informed of each committee's risk oversight and related activities through standard reports to the Board by each committee chairman, frequent non-member attendance at committee meetings and committee meeting materials, minutes and resolutions which are made available to all directors. Current and emerging strategic, operational and competitive risks are presented and discussed at the Board's regular quarterly meetings. In addition to receiving direct information from its committees, the Board receives updates directly from members of management. For example, a committee of senior management comprised of representatives of our balance sheet loan origination, loan underwriting, loan servicing, accounting, legal, human resources, investment advisory, broker-dealer, information security, investor relations, internal audit, tax credit syndication and treasury groups meet monthly to discuss current and emerging risks that we face and prepare a written report to the full Board at least quarterly, describing key risks faced by us and how they are addressed. In 2023, we also established an information technology risk

Photo by Garrett Rowland



committee comprised of senior managers in our information technology, including our CISO, loan origination, loan servicing, accounting, and legal groups that meets monthly to review information security risks and the development and implementation of policies and procedures and other controls to mitigate cybersecurity and other information security risks. Our CISO provides a report to our management risk committee on the activities of the information technology risk committee, which committee, in turn, reports regularly to the full Board on its activities.

The Nominating and Corporate Governance Committee oversees our ESG efforts and receives

a report from management on our ESG activities at each quarterly meeting. Additionally, the Compensation Committee reviews and monitors (1) the development and implementation of goals established from time to time for our performance with respect to ESG initiatives, (2) the development of metrics to gauge progress toward achievement of those goals, and (3) our progress against those goals.

In order to further support the Nominating and Corporate Governance Committee's oversight of ESG, we have an ESG Working Group, comprised of department heads of Investor Relations, Human Resources, Office Services,

Internal Audit, and Marketing, as well as our VP of Diversity and Inclusion, Deputy General Counsel, Senior Vice President of Affordable Production, and Vice President of WDAP. The ESG Working Group is responsible for overseeing our short and long-term strategy related to our environmental, social, and governance efforts. The ESG Working Group reports to the Nominating and Corporate Governance Committee of the Board of Directors and is responsible for driving and tracking progress towards our 2025 ESG Goals as well as overseeing ESG reporting and increasing communication across all facets of our ESG program.

Board Committee and Management Structure



ESG in Executive Compensation

Our Compensation Committee reviews and monitors (1) the development and implementation of goals established from time to time for our performance with respect to ESG initiatives, (2) the development of metrics to gauge progress toward achievement of those goals, and (3) our progress against those goals. In 2023, our Compensation Committee approved a compensation plan for our executive officers that provides for awards based on pre-determined Company, individual and DE&I goals set by the Committee.

The individual performance goals include corporate leadership and strategic initiatives designed to support the achievement of our Drive to '25 strategy, and they are collectively weighted at 15%. The DE&I goals are designed to foster a positive and lived experience across all of our employee and advancing the achievement of the DE&I goals in our Drive to '25 strategy.

All Company Photo from our Las Vegas Retreat



CODE OF BUSINESS CONDUCT AND ETHICS

Training

Our Business Ethics Code is acknowledged by all employees and published at the same time that we publish all Employee Handbook and other policy updates, approximately annually. All new employees are trained on our core business conduct standards as part of our onboarding process. We also have a publicly available [Corporate EEO and Anti-Discrimination Policy](#) that details our commitment to equal employment, anti-discrimination, and anti-harassment. This is a part of our comprehensive EEO planning, which includes our employee EEO policy, various welcome and inclusion initiatives, and approximately annual anti-discrimination (including anti-harassment) training.

Our EEO policy and learning program included manager-tailored trainings to equip all levels of the organization with practical knowledge to recognize, prevent, and address harassment. We hold a strong stance on fostering a harassment-free workplace and will continue to reinforce anti-harassment policies through our standards of business conduct and frequent trainings.

Anti-Bribery & Corruption Policy

[View Our Code*](#)

**Please see page 9*

Whistleblower Policy

[View Our Code*](#)

**Please see page 3*



Photo by Garrett Rowland



DATA SECURITY

Description of approach to identifying and addressing data security risks

Data Security and protecting the privacy of personal information is of the utmost importance to Walker & Dunlop – we are committed to ensuring that all personal data we collect and process is handled in accordance with our established data security and privacy policies. Data security risk assessments are conducted for service engagement, including, but not limited to, third party support, vendor connectivity, and systems handling sensitive data. Continuous security monitoring is performed to identify potentially nefarious behavior in our environment and is escalated for investigation and remediation.

Operational procedures, management processes, structure of products, employee training, and use of technology are assessed, validated, and tested using industry-standard toolsets. The Cybersecurity and Technology Risk Committee, which is led by our CISO meets on a monthly basis to review the implementation and status of our information security controls and threats to our security environment. The information and feedback provided by the Committee is incorporated by our CISO into our information security programs. Our CISO reports regularly to the Audit and Risk Committee on the status of these programs.

Additionally, Internal Audit utilizes PwC to execute their risk-based audit plan. Each year, our Internal Audit department and PwC meet with IT leadership to discuss the IT cybersecurity roadmap, known and expected changes to the program, and new/emerging risks. The result is a risk-based audit plan, typically with two to four planned engagements each year.

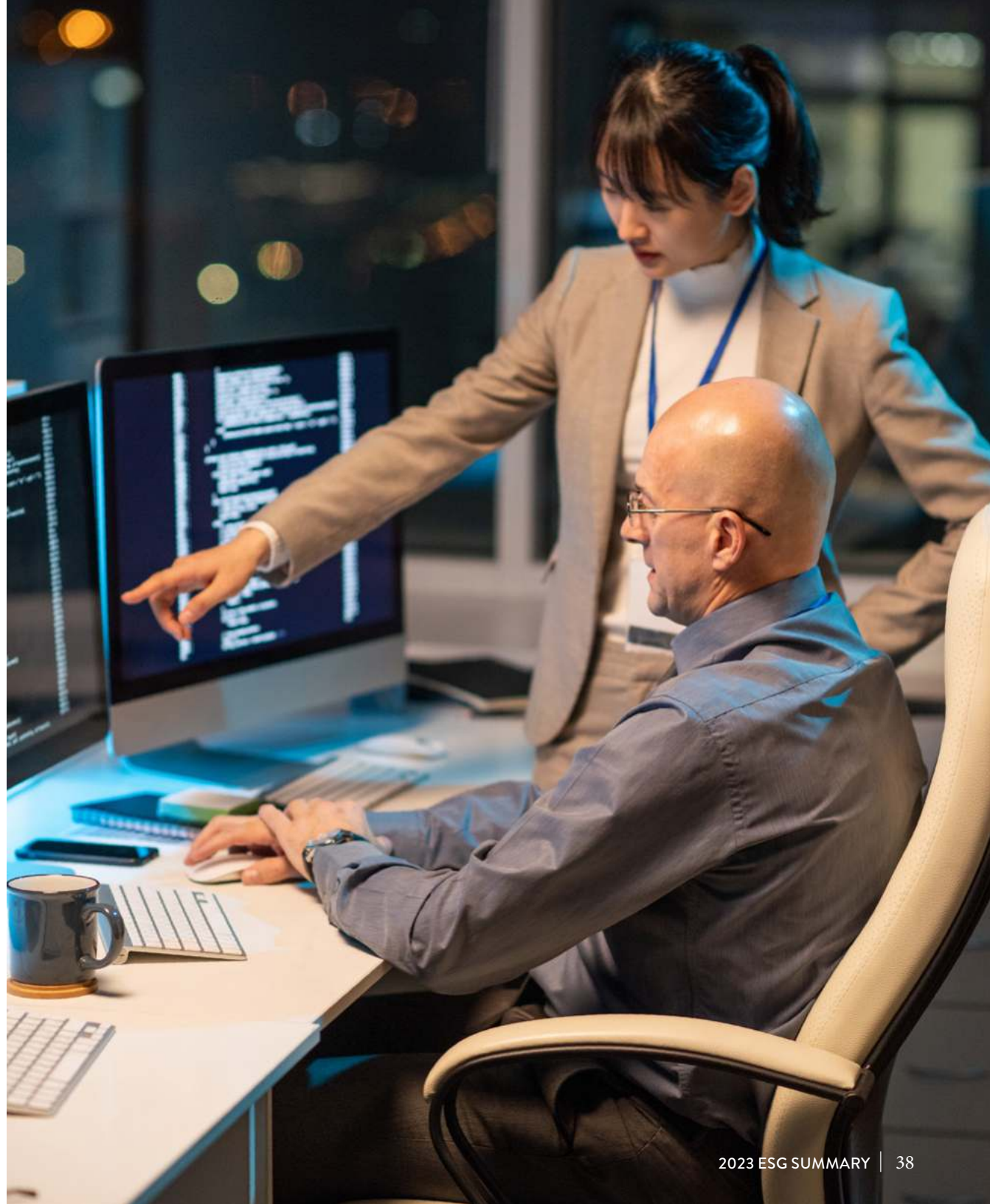
In 2023, Internal Audit performed a Data Privacy Readiness assessment and a Secure Software Development Lifecycle audit. The results of these engagements were shared with senior management and the Audit and Risk Committee.

Training

Walker & Dunlop believes in continuing education for all of its employees and routinely educates its employees through focused education, training, and simulated exercises. For example, mandatory trainings are required for any employees who fail simulated phishing exercises, leading to manager escalation for any repeat offenders. All employees are required to complete annual security training covering cybersecurity, data privacy, physical security and social engineering awareness. In addition, Walker & Dunlop includes cybersecurity and privacy information within both its employee handbook and its handbook for consultants.

Preparedness

Annually, Information Security sponsors a cybersecurity tabletop exercise. Tabletop exercises are designed to test the organization's preparedness in a cyberattack simulation and/or imminent or increased threat. Tabletop exercises alternate from red, blue, and purple, as defined by the industry, at the discretion of the CISO. Incident scripts for tabletop exercises are devised by Information Security or provided by a third party. The results of tabletop exercises are shared with the CISO along with an action plan, as needed, to address any noted deficiencies.





Privacy Policy

Walker & Dunlop's Global [Privacy Policy](#) discloses our compliance standards for how we collect, use, share, transfer and process information from our services and websites, including use of cookies and similar tracking technology. We implement physical, technical and organizational security measures designed to safeguard personal information we collect and process against loss and unauthorized alteration or disclosure. These measures include computer safeguards, secured files, and secured buildings. We also contractually require confidentiality obligations with our service providers, employees and contractors. W&D's privacy policy adheres to applicable data protection and privacy laws, including the California Consumer Privacy Act and the California Privacy Rights Act. We continue to assess new technologies and standards against our Privacy Policy, as well with the needs of our clients. If we make any material changes to our policy, we update the date of our notice and notify data subjects as required, as set forth in the Privacy Policy.

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Service Provider Oversight

The Company has established a program to assess select service providers, technology suppliers, business partners and other key vendors via a third-party risk management service. The service engages third parties to gather information and evidence to produce a risk summary based on proprietary methods and specific evaluation criteria provided by the Company. The summary includes an overall risk rating, risk rating recommendations and specific risk findings. The summary is available to the owner of the business relationship along with expert opinion from Information Security. Third parties with unsatisfactory overall risk ratings are advised on specific corrective actions or recommendations for the remediation of deficient controls.

FORWARD-LOOKING STATEMENTS

This report does not cover all information about our business, and inclusion of information therein is not an indication that the subject or information is material to Walker & Dunlop's business or operating results for purposes of U.S. securities laws and regulations. Statements other than statements of historical or current facts, including statements and images about our ESG targets, goals, aspirations, commitments and programs, and other business plans, initiatives, and objectives are forward-looking statements and are based on our management's current assumptions and expectations. These statements are typically accompanied by the words "aim," "anticipate," "believe," "can," "commit," "expect," "goal," "hope," "intend," "may," "plan," "project," "strive," "target," "will," "would," or other similar words. All such statements are intended to enjoy the protection of the safe harbor for forward-looking statements within the meaning of Section 21E of the Securities Exchange Act of 1934, as amended. Our actual future results, including the achievement of our targets, goals, or commitments, could differ materially from our projected results as the result of a variety of factors, including, but not limited to, changes in circumstances, assumptions not being realized, or other risks, uncertainties, and factors, many of which are outside of our control. Such risks, uncertainties and factors include the risk factors discussed in our most recent Form 10-K and in subsequent filings with the Securities and Exchange Commission (SEC). We urge you to consider all of the risks, uncertainties, and factors identified above or discussed in this report carefully in evaluating the forward-looking statements therein. Walker & Dunlop cannot assure you that the results reflected or implied by any forward-looking statement will be realized or, even if substantially realized, that those results will have the forecasted or expected consequences and effects. Unless expressly stated otherwise, the forward-looking statements in this report are made as of the effective date identified in the report, and we undertake no obligation to update or revise these forward-looking statements to reflect subsequent events or circumstances. Standards of measurement and performance made in reference to the goals, aspirations, and objectives referred to in this report are developing and based on protocols, processes, and assumptions that continue to evolve and are subject to change in the future, and no assurances can be given that any plan, initiative, projection, goal, commitment, expectation, or prospect set forth in this report can or will be achieved.



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