WALKER & DUNLOP

2022 ENVIRONMENTAL, SOCIAL, & GOVERNANCE REPORT

Photo by Garrett Rowland

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, as well as 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). This report is also 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, 2022, through December 31, 2022, unless otherwise noted.

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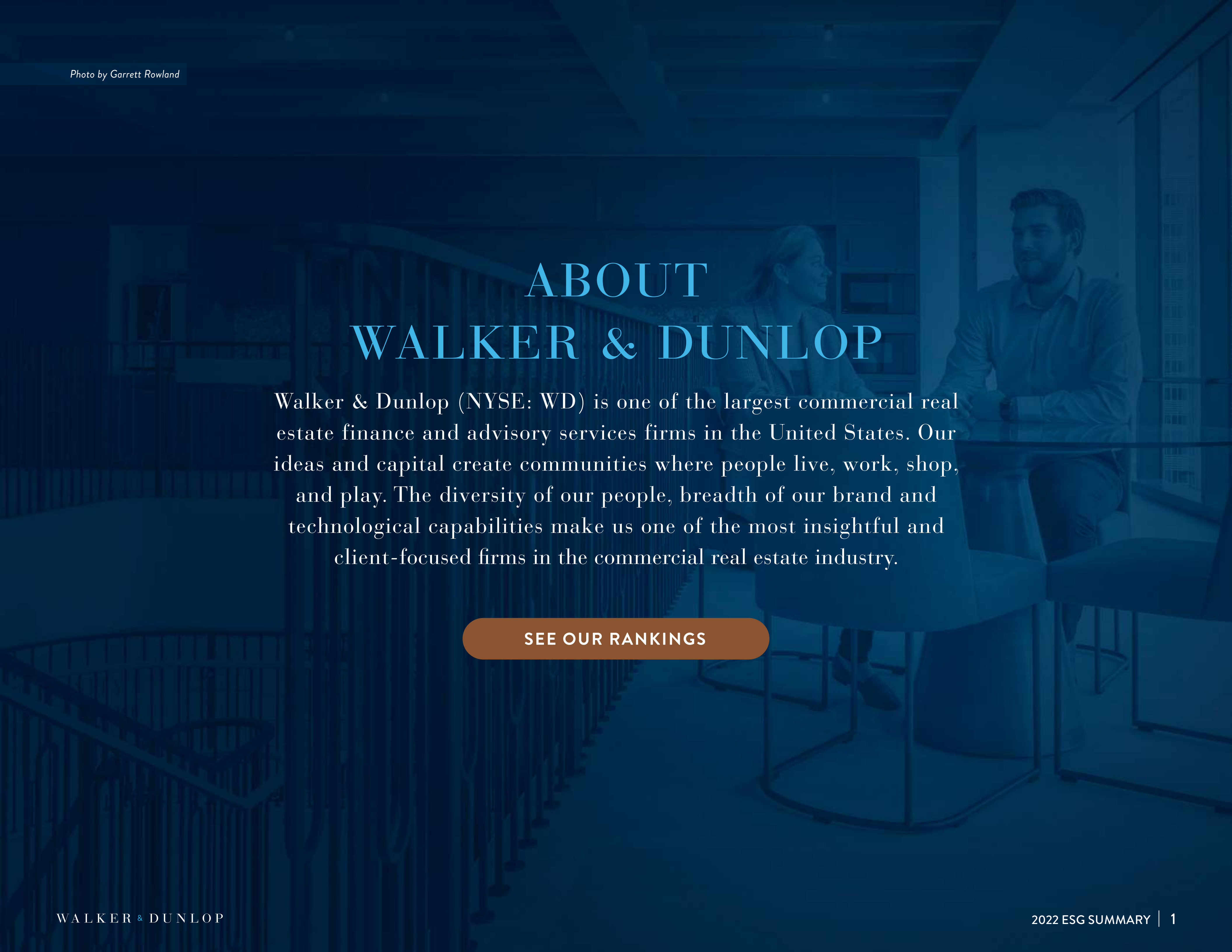


Photo by Garrett Rowland

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.

SEE OUR RANKINGS

ACTIVITY METRICS

	2022	2021	2020
Transaction Volume ($M)	63,339	68,166	41,084
Total Revenue ($M)	1,259	1,259	1,084
Net Income ($M)	214	266	246
(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) 1,876; $43.6B	(b) 2,084; $49.0B	(b) 1,626; $35.0B
[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)	1,451	1,305	988

[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.

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).

- During the summer of 2023, we initiated the process of seeking carbon offsets related to our 2022 emissions

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

- Between 2019 and 2022, we achieved a 40% reduction in emissions per employee from a 2019 base year

See p.7 for more information

Increase the proportion of women and traditionally underrepresented racial/ethnic groups in management positions to 35% and 25%, respectively.

- As of December 31, 2022, women held 28% of management positions and members of traditionally underrepresented racial/ethnic groups held 13% of management positions

Increase the proportion of women and traditionally underrepresented racial/ethnic groups among top company earners to 15% each

- As of December 31, 2022, women represented 10% of top company earners and members of traditionally underrepresented racial/ethnic groups represented 7% of top company earners

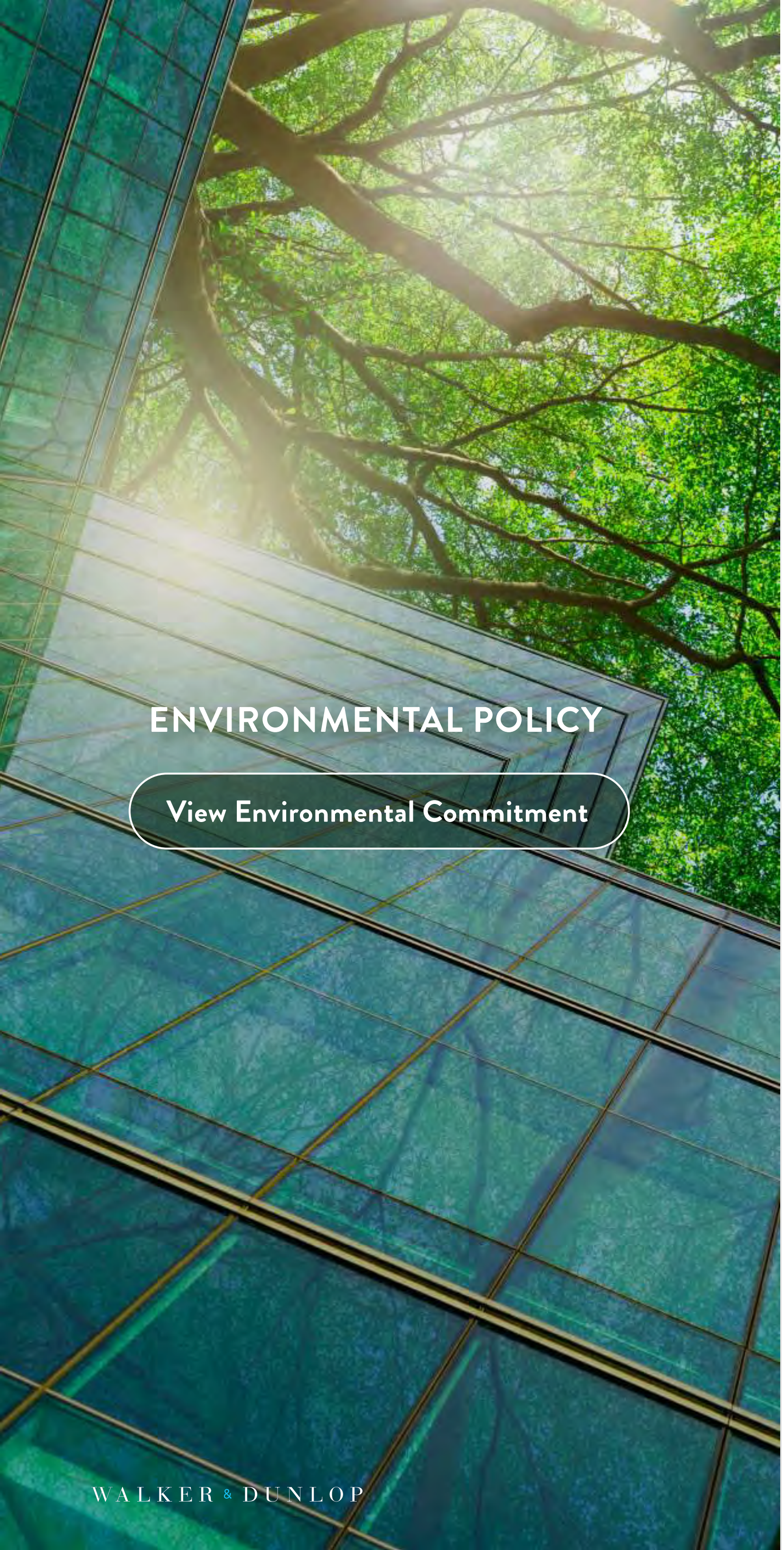
Donate 1% of annual income from operations to charitable organizations

- In 2022, we contributed $1.4 million to charitable organizations, which is 0.53% of our 2022 income from operations

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

- Over the past two years, we financed $20.4 billion of affordable housing properties

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



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. Our employee-led Green Task Force focuses on engaging employees in the reduction of resource and electricity usage, waste, employee commuting via single occupancy vehicles, and the company's overall carbon footprint. We are also actively involved in the Fannie Mae Green Rewards and Freddie Mac Green Advantage programs, which help property owners reduce their energy and water consumption in multifamily properties. In 2022, 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 organized by our Green Task Force.

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

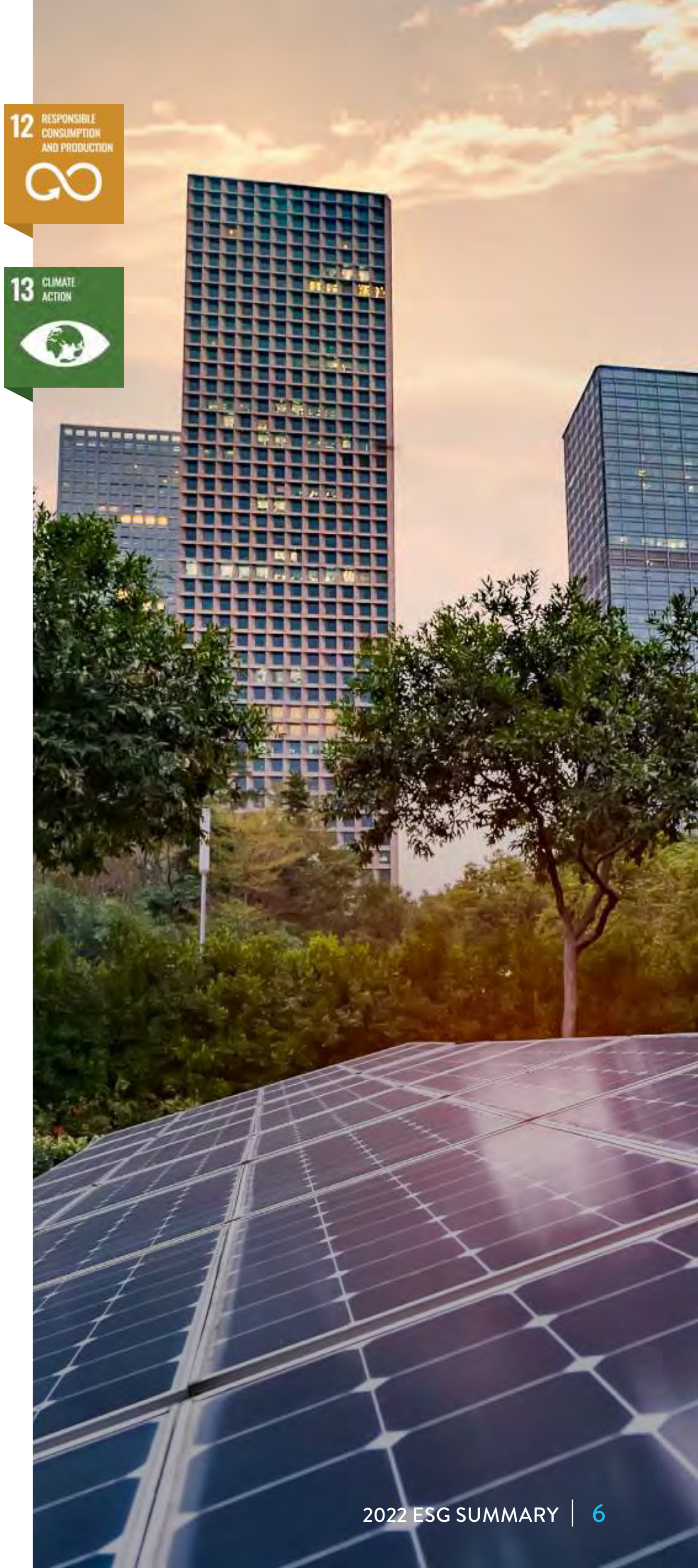
Green Buildings (Leased)

We do not own or operate any buildings that our employees occupy, but of the 66 Buildings in which we leased space in 2022, 31% of our total occupied square footage (136,798 square feet of 446,399 square feet) was in a green-certified building [2].

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, we relocated our corporate headquarters in Bethesda, Maryland in January 2022, and when considering options for the new lease, we prioritized relocating to a LEED-certified building. We selected a LEED Gold property, and when designing our own office, we made additional improvements throughout the space that helped us achieve a LEED Gold Certification. Based on 2022 reported data, compared to the old Bethesda headquarters, our new office reduced both energy emissions and use by 50%, despite office square footage increasing by 43%.

Investment in Renewable Energy

During 2021, we made the decision to invest in renewable energy farms with the financial benefit of receiving the tax credits associated with these farms. We invested $5.6 million in a 10-megawatt solar energy portfolio comprised of two newly constructed solar energy plants, located in Glenfield and Lowville, New York, respectively. Each megawatt of solar generated energy can power approximately 160 homes each year. The investment was made through a joint venture with 1st Source Bank, a regional bank based in South Bend, Indiana that specializes in solar projects less than 20 megawatts and prioritizes long term relationships with developers and investors. Walker & Dunlop has not made any additional renewable energy investments, but we will continue to navigate future ventures in the renewable energy space and fortify our commitment to reducing our environmental footprint.



[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 66 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.*

Carbon Footprint

In 2021, we purchased RECs for 100% of our electricity use and verified carbon offsets for all remaining Scope 1 and 3 emissions. In 2021 we offset 61% of our total emissions with RECs and 39% with carbon offsets. We purchased a combination of 1) carbon offsets from Illinois where landfill-gas was captured and repurposed to generate renewable electricity; and 2) RECs from multiple hydroelectricity facilities in Manitoba, Canada to cover all of our Scope 2 emissions. During the summer of 2023, we initiated the process of seeking carbon offsets related to our 2022 emissions. We plan to purchase high-quality emissions that best mirror our U.S.-based operational emissions to the extent possible.

	2022	2021	2020	2019
Scope 1 emissions (metric tons CO_2e)	425	710	297	431
Market-Based Scope 2 emissions (metric tons CO_2e)	0[2]	0[2]	889	N/A
Location-Based Scope 2 emissions	1,696	1,186	979	996
Emissions Intensity (Scope 1 and 2 metric tons CO_2e per $M Total Revenues)	1.8	1.7	1.3	1.8
Scope 3 emissions (metric tons CO_2e) [3]	15,314	2,529	1,622	3,643
Total Emissions with ASI Portfolio (Scope 1, 2 and 3)	17,435	4,426	2,898	5,070
Total Emissions without ASI Portfolio (Scope 1, 2, and 3)	6,027	2,529	1,622	5,256
Emissions on a per-employee basis	11.94	3.38	2.92	6.15

EMISSIONS INTENSITY METRICS[4]	2022	2021	2020	2019
Square footage (SF)	441,602	251,224	247,505	234,701
Emissions per 1,000 SF	13.65	17.67	11.71	22.40
Revenue ($B)	$1.259	$1.259	$1.084	$0.817
Emissions per million USD in revenue	4.79	3.51	2.67	6.43
Number of Sites	66	51	47	44

[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 ASI's multifamily portfolio.*

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

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 17,435 MTCO2e in 2022. This is a 326% increase from 2021, during which our total carbon footprint reached 4,426 MTCO2e.

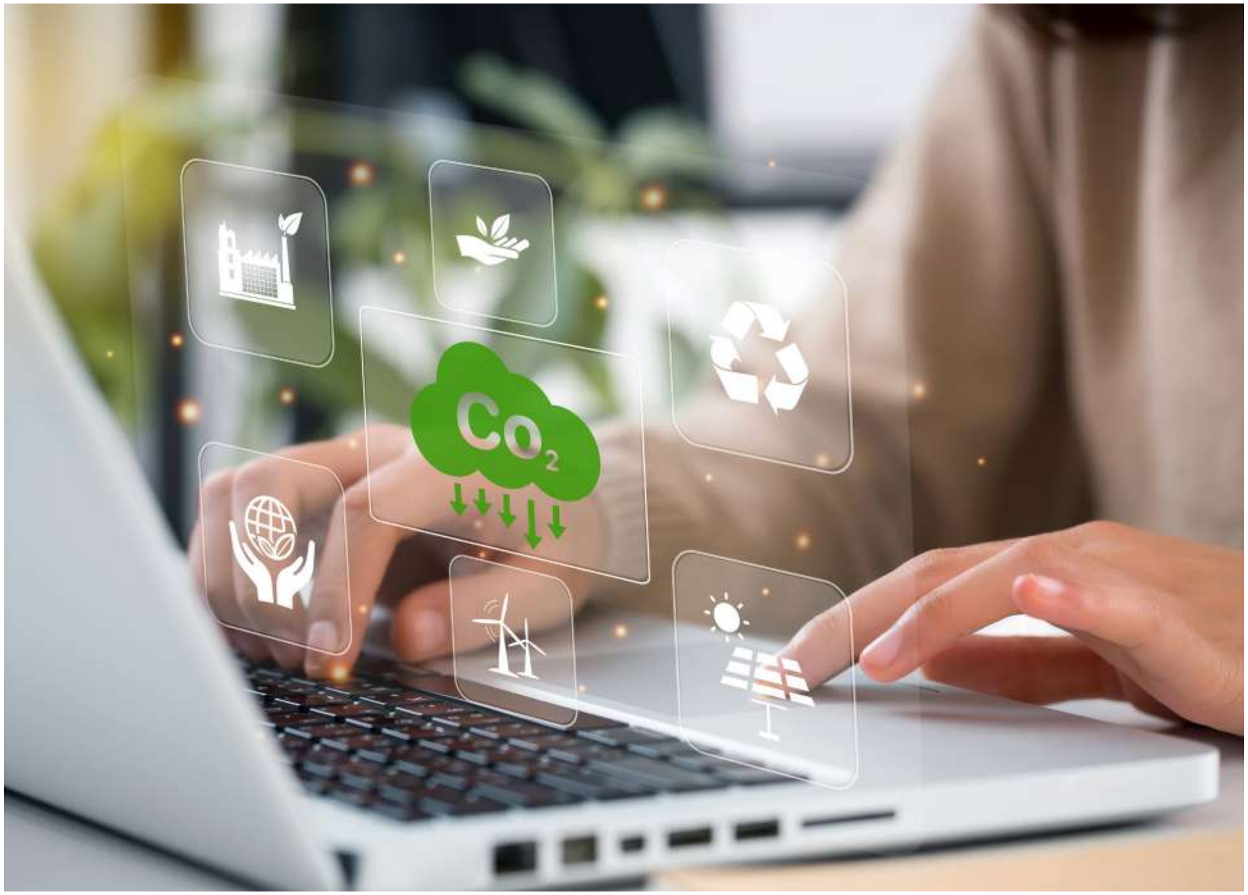
At the end of 2021, Walker & Dunlop acquired Alliant Capital, which develops and finances affordable housing communities. Its subsidiary, Alliant Strategic Investments (ASI), invests in preserving historic affordable and workforce housing. As of January 1, 2022, its portfolio consisted of 12 multifamily residential properties across the country, and we now include the emissions from ASI's portfolio under Category 15: Investments of our scope 3 emissions.

A majority of this change is due to our expanded scope to include ASI's portfolio, which added 11,408 MTCO2e. Without ASI's portfolio, Total emissions were 6,027 MTCO2e, a 47% increase from 2021.

Additionally, our total emissions increased due to our business travel and commuting emissions approaching or exceeding pre-COVID levels. Similarly, our total carbon footprint per employee in 2022, 11.03 MT CO2e/Employee, increased by 270% from 2.98 MT CO2e/ Employee in 2021.

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.

In 2021, we offset 100% of our operational emissions through the purchase of RECs for 100% of our electricity use, and purchase verified carbon offsets to offset all remaining emissions. In addition, 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 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 (MTCO2e), or 5.01 MTCO2e per employee. In 2022, Walker & Dunlop's emissions totaled 2.98 MTCO2e per employee, not accounting for emissions from ASI's portfolio. Thus, accounting for REC purchases, between 2019 and 2022, Walker & Dunlop achieved a 40% 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 have an ongoing positive impact on our Scope 3 emissions from corporate operations. Besides emissions from the ASI 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 ASI portfolio to supplement its previously established 2025 emissions goal.

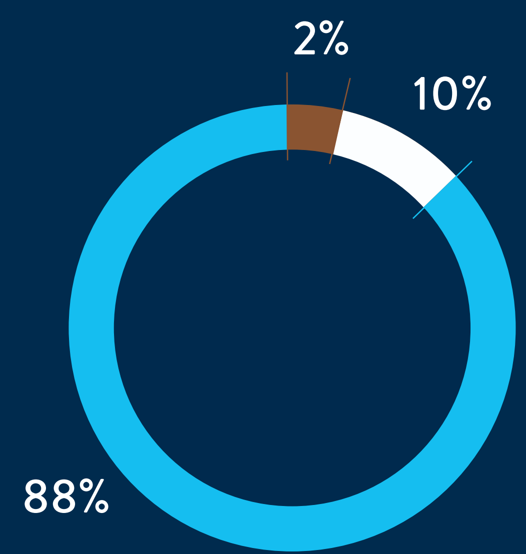
Also, as many of our large leases expire in the next few years, we will prioritize transitioning our leases to LEED, Energy Star or other Green-certified buildings. During 2022, we signed new leases in LEED-certified buildings in Dallas, Houston, Fort Lauderdale, Kansas City, Tampa, and San Francisco.

GHG Emissions by Scope

From 2021 to 2022, emissions have increased at a higher rate than employees and revenue. The increase in emissions is in due to a scope expansion to include emissions from ASI's portfolio, as well as the resumption of business travel and commuting emissions to pre-COVID levels.

- Scope 1 Emissions
- Scope 2 Emissions
- Scope 3 Emissions [1]

[1] *Without inclusion of emissions from ASI's portfolio, Scope 3 accounted for 65% of total emissions*

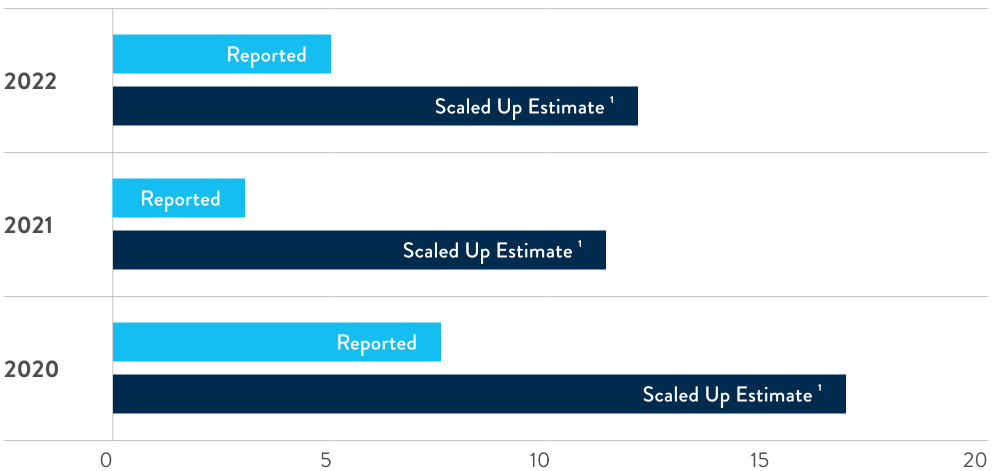


WASTE & RECYCLING

Recycling

In 2022, 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) Medium-term (1-5 years) Long-term (5-10>10 years)	Opportunity through access to new and emerging markets due to climate change-related migration. 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) Long-term (5-10>10 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.
Reputation	Medium-term (1-5 years) Long-term (5-10>10 years)	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. 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. This responsibility 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 was published in the summer of 2022, 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 reflected to the left.

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 2022, 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 volumed. 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 and transact. 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 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 the 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 have identified the following short-, medium-, and long-term risks with a potential to have a substantive impact (whether financial or strategic) on our business.

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. Of our $55 billion at-risk servicing portfolio , comprised of over 4,787 loans, 201 of these loans, representing an unpaid principal balance (UPB) of $5.2 billion, are located in a Special Flood Hazard Area (SFHA). These affected loans represent 4.2% of our at-risk servicing portfolio on a loan count basis and 9.5% on a UPB basis. 355 of these loans, representing a UPB of approximately $9.0 billion, are located in either High or Very-High Hurricane Risk Areas. These affected loans represent 7.5% of our at-risk servicing portfolio on a loan count basis and 16.4% on a UPB basis. Both SHFA and Hurricane Risk Areas are identified via FEMA's National Risk Index, which displays which of the U.S. communities are most at risk to natural hazards.

If these 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, we require that borrowers with properties in these high risk areas carry appropriate levels of flood and/or windstorm insurance. As a lender, our primary risk is if the borrower does not have the necessary funds to meet their insurance deductible. Because of our insurance coverage requirements, the primary risk of having assets exposed to severe weather events falls to those property owners/operators. The insurance coverage is reviewed both prior to loan closing and annually throughout the term of the loan.

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

[1] *The (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 are not disclosed. The Company is reviewing the feasibility of capturing and reporting such data for future disclosure.*

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 a safe and supportive work environment across all our offices and to actively expand the range of perspectives and experiences that contribute to our shared success.

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 2022, the proportion of women and underrepresented groups in management positions totaled 28% and 11%, 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, especially as we grow. During 2021 and 2022, we made three significant acquisitions: Alliant Capital, Zelman & Associates, and GeoPhy. While this growth is needed to support our business strategy, it also means that we need to consider how our community, culture, and employee experience are evolving. We are mindful that while some employees find that their experience at Walker & Dunlop is supportive and rewarding, others may feel that they need more to make their time here more meaningful. 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 2022, 88% 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. It is important to highlight that these scores

2021 DEI Goals and Achievements

2022 Goal	2022 Achievements
Maintain 2021 level or achieve year-over-year (YOY) growth in the number of women in our top 20% compensated employees.	YOY decline of **3.5%** Ended 2022 at **10% (target was 14% or above)**
Achieve YOY growth in the number of racially/ ethnically diverse persons in our top 20% compensated employees.	Achieved YOY growth of **0.4%** Ended 2022 at **7% (target was 8.5%)**
Achieve YOY growth in the number of women in management positions (AVP/Associate Director +).	Achieved YOY growth of **1%** Ended 2022 at **28% (target was 29%)** › **Hiring: 27% of AVP/AD+ hires were women** › **Promotions[1]: 44% of AVP/AD+ promotions were women**
Achieve YOY growth in the number of racially/ ethnically diverse persons in management positions (AVP/Associate Director +).	Achieved YOY growth of **1%** Ended 2022 at **13% (target was 16%)** › **Hiring: 18% of AVP/AD+ hires were racially/ ethnically diverse** › **Promotions[1]: 28% of AVP/AD+ promotions were racially/ethnically diverse**

1) Promotions made in February 2023 reflect 2022 employee performance.

typically decrease as companies grow in size; yet a number of our scores have increased as we have grown our employee base and expanded our business lines, suggesting a 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.

2025 goal:

Increase the proportion of women in management positions to 35%.

2025 goal:

Increase the proportion of underrepresented groups in management positions to 25%.

Building on the annual engagement survey, to determine what and where we needed to improve, we continued our partnership with several external vendors to conduct benchmarking and surveys. As a result, we continued to implement new training and development programs and endeavored to further improve our existing policies and procedures to make them more inclusive and reflective of our company values.

We leveraged two equity audits through Management Leadership for Tomorrow's (MLT) Black Equity at Work Certification and were one of few companies to achieve a Bronze Certification status after the first year of participating in the certification program. In 2022, our partnership with MLT expanded with our participation in their inaugural Hispanic Equity at Work Certification program. Participation in this program requires us to develop a plan that will allow us to make measurable progress toward achieving Hispanic equity. We also participated in the Bloomberg Gender-Equality Index in 2022 and achieved inclusion in the index for the second year in a row. The index tracks the performance of public companies committed to disclosing their efforts to support gender equality. Similar to last year, the process of participating in the index involved collecting data across the following five key pillars that allowed us to assess and measure our current gender equality (all data captured was for the 2021 fiscal year): female leadership & talent pipeline; equal pay & gender pay parity; inclusive culture; anti-sexual harassment policies; and developing a pro-women brand. We will continue to aim for improvement across all pillars in the index in the future.

Finally, we once again participated in the Mortgage Bankers Association (MBA) Diversity survey. The survey was established to build a baseline understanding of DE&I initiatives and priorities at member firms, and through our participation, we identified areas where we align with other member firms, where we are ahead, and areas to focus on. For example, we learned that 25% of responding firms are using some form of artificial intelligence (AI) to support DE&I in the recruitment process and many report that the tools have been useful in ensuring candidates are evaluated equitably. W&D did not employ the use of AI in this manner in 2022, but will consider its use in the future as we continue to ensure candidates are evaluated equitably throughout the hiring process.

As a result of the feedback channels we created via our annual engagement survey and various external surveys, like the MBA Diversity survey, we continued to make improvements to our DE&I offerings and policies in 2022. Some highlights include expansion of our ERGs, increased involvement and strengthened relationships with key external partnerships (e.g., North Carolina Central University, Rutgers University, Project Destined, Cristo Rey), continued DE&I training for all employees, and a senior management sponsorship program.

Our eight ERGs are W&D+ (LGBTQIA+ alliance group), W&D Black Empowered Network, Unidos (Hispanic and LatinX 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

W&D +

WOMEN OF WALKER & DUNLOP

BLACK EMPOWERED NETWORK

ASIAPAC ALLIANCE

UNIDOS AT WALKER & DUNLOP

MILITARY & VETERAN

CAREGIVERS RESOURCE GROUP

MINDS OF ALL KINDS

Through summer learning intensives, we continued our ongoing commitment to developing equity and inclusion in the workplace by training our managers and employees to develop their skills around inclusivity and building diverse teams. The goal of these sessions is to increase employee inclusion, belonging, innovation and retention, while preparing executives and managers to lead in a more complex, inclusive environment. The full training was required for all people managers and various sessions were required for all employees.

In addition, in 2022 we hosted our second annual DE&I Leadership Summit. The half-day event featured expert speakers focusing on the topic of trust and how we use it as a catalyst to create a community where allyship, equity, and inclusion are woven into the way we approach our work and how we engage with our colleagues. We are working to further systemize DE&I training across the organization, focusing on providing appropriate training, programming and manager support based on employee level and continuing to leverage our learning management system.

We are interested in cultivating a vibrant culture not only here at Walker & Dunlop but also within our surrounding communities to create a diverse pipeline of industry participants and leaders. We continued our multi-year partnership with North Carolina Central University (NCCU) School of Business. In addition to assisting with the launch of its real estate MBA program, we provided tuition assistance, internship and career opportunities and professional exposure for both MBA and undergraduate students. NCCU, a top historically black university, prioritizes the development and growth of talented minority students – a mission that aligns with our commitment to forming meaningful relationships with organizations providing innovative opportunities to diverse communities. Additionally, we announced our formal corporate sponsorship of Rutgers University's Center for Real Estate. This partnership has enabled us to support the education of Rutgers students, especially those from historically marginalized groups, in the commercial real estate field. Through our partnership we have funded scholarships and attracted diverse talent to be part of our 2023 Summer Intern program.

Beyond academic institutions, in partnership with some of the biggest names in the industry such as KKR, Freddie Mac, and Fannie Mae, we continued to expand CRE*United*. Launched by W&D in 2021, CRE*United* is an alliance among key players in the commercial real estate industry focused on developing sustainable solutions for underrepresented groups. Since the inception of the program, W&D has seen over $670 million of deal flow through CRE*United*, and we continue to market the program to diverse sponsors. By the end of 2023, the group's goals are to have at least 32 diverse sponsors in the program and $1 billion of business closed, as well as a normal component of client pitches for our sales teams.

To learn more about our diversity, equity, and inclusion efforts, ***view our DE&I Report.***

Gender Pay Gap

All Walker & Dunlop Employees: 71%[13]

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 plan to increase the proportion of women and underrepresented groups among top company earners to 15%, up from 2020 levels of 9% and 6%, respectively (when we established these targets.) This will be a key driver in our efforts to decrease this pay gap over time.

Equitable Compensation

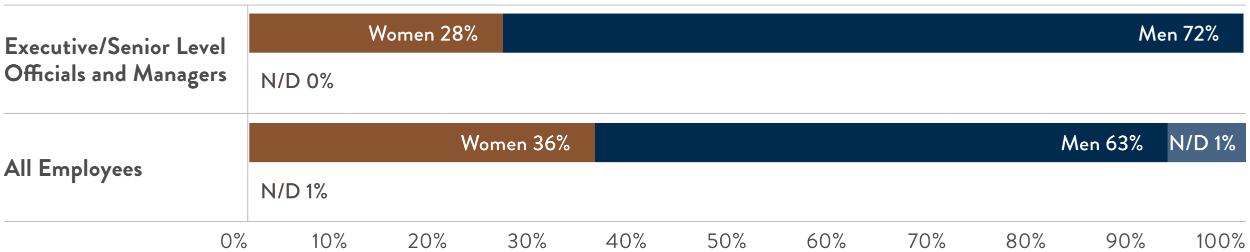
Human Resources conducts a pay equity analysis to compare base salary and total compensation across genders and ethnicity. The analysis controls for the variables of age, performance rating, job code, and functional department to determine if there is a pay gap based on gender or ethnicity within those 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 in the markets where we compete. 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. In 2022, we launched a broad compensation study across all of our business units led by a third-party consultancy to re-evaluate our compensation structure and benchmarking. As of mid-year 2023, the work is still underway but we expect it to be fundamental to our ongoing analyses.

[13] *Gender pay gap calculated using Bloomberg's Gender Equality Index methodology: Includes all employees at Walker & Dunlop as of 12/31/22 and their income for the year-ended regardless of when an employee started working at the Company during the fiscal year.*

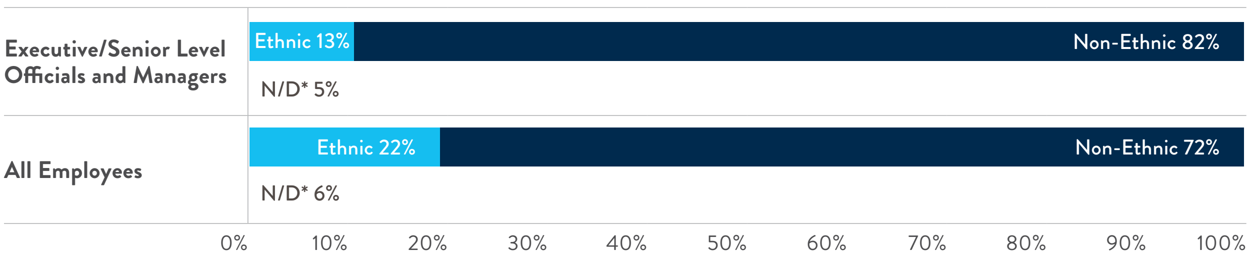
Percentage of Gender and Racial/Ethnic Group Representation for (1) Management and (2) All Other Employees[1]

2022

GENDER DIVERSITY



ETHNIC DIVERSITY



[1] Following the EEO-1 definitions of Executive/Sr. Level and First/Mid-level

** N/A = not available or not disclosed*

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. We have been recognized repeatedly as a Great Place to Work® by Fortune Magazine and The Washington Post. Annually, as noted above, we participate in a company-wide employee engagement survey facilitated by a third party, which focuses on the employee experience, corporate culture, and various metrics that make an organization a "great place to work." In 2022, 40% of our employees participated in the survey. 94% of the respondents indicated that, taking everything into account, they believe W&D is a great place to work. The results of the survey illustrated that 91% of our employees believe management has a clear view of where the organization is going and 95% believe management is honest and ethical in its business practices. The results show that people are willing to give extra to get the job done.

Periodically, we have supplemented this annual survey with employee engagement surveys created and facilitated internally to support the organization at the department or office level.

We have leveraged survey results to enact positive change across our organization. Compensation is one area where, partially in response to our employees' feedback received through these surveys, we acted. As mentioned above, we launched a compensation study to re-evaluate compensation.

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 2022 we calculated our Net Promoter Score® ("NPS"), which measures customer experience and their overall perception of our brand. Out of 321 responders to our survey, 296 were "Promoters", producing an NPS of 88.5, a very positive score out of a total scale of 100. As of March 31, 2023, our NPS score had increased to 95.

2022 Employee Distribution

1,451
Full Time Employees

5
Part Time Employees

331
Organic New Hires Employees

56
Acquisition New Hires Employees

Employee Turnover Rate

Voluntary: 11%
Involuntary: 3%
Total: 14%

Voluntary: 12%
Involuntary: 3%
Total: 15%

Voluntary: 7%
Involuntary: 4%
Total: 11.1%

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 25% of our employees are fully remote. The remainder of our employees work from a company office one to five days a week.

In March 2022, close to 1,000 Walker & Dunlop employees (approximately 70% of our employee population) attended our all-company retreat in Denver, Colorado to focus on connection, collaboration, and community-building. 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.***

THE WALKER WAY

DRIVEN

CARING

COLLABORATIVE

INSIGHTFUL

TENACIOUS

EMPLOYEE SPOTLIGHT

Stephanie Pratt

SVP – SBG Closing

"The most significant moment in my career thus far was being approached in 2018 to build the closing team for small balance loans at W&D. I did not know it at the time, but I was ready for a new challenge, and it encouraged me to step outside of my comfort zone. At the time, I was closing loans at a competitor firm but knew I wanted to lead my own team one day. I also knew an opportunity like this one at W&D would not come around again. I am so happy I made the move as it has truly been life changing for me.

W&D has encouraged me to put my personal wellness first to be the best I can be in my professional life. I meet with a trainer first thing in the morning several days a week to not only hold myself accountable but also to ensure that I am carving out time for my own personal wellness. This commitment has led to my position as W&D's representative in WWIRE (Wellness for Women in Real Estate in the DC Metro area. But in addition to that, I am motivated each day to show up for my amazing team and to be the best version of myself for them."

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.

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 2022, we paid $1,220,050 in wellness reimbursements. 57% of employees participated in the wellness portal by logging wellness activities and 51% of employees earned wellness reimbursements.

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.

Talent Recruitment

Our company is made up of highly driven people. We find those people through a thoughtful recruitment process, which includes leveraging our social media presence to give candidates a strong sense of our unique culture, engaging those candidates in carefully constructed phone interviews performed by experienced Talent Acquisition professionals, and functional interviews with several members of the hiring department. We build talent pipelines through our formal college recruiting program and have several partnerships with organizations that allow us a greater reach to diverse talent, including Project Destined, MBA's Commercial Real Estate Finance (CREF) Careers, Rutgers University, NCCU and Future Housing Leaders.

Our Intern Program ("Ignite") is designed to spark careers for the next generation of W&D employees. For the 2022 program, we partnered with Project Destined, MLT, Sponsors for Educational Opportunity (SEO), and MBA CREF to help us identify diverse interns. As a result, of the 36 interns we hired across the U.S., 25% were women and 25% were people of color.

In 2022, out of 436 total new hires, 34 were racially/ethnically diverse and 25% were female. Additionally, our total applicant flow was 43% racially/ethnically diverse and 35% female. We will continue to work to improve the diversity of our new hires.

Performance Review Process

It is crucial that our employees can visualize how their individual roles and contributions connect and contribute to our overarching company goals. Employees work with their managers to set job-related goals, with the idea that each employee creates goals that relate to and support their department's goals. When we execute this across the company, each person has a visible path to collective success.

Our goals and focus on DE&I and Community are equally important to our job-related goals. We thoughtfully curated DE&I and Community Standards goals that were distributed to all employees, at every level. Both categories combined are worth 20% of employees' annual review rating.

Following goal setting, we have two performance check-ins each year: one at mid-year and one at year-end. To ensure employees receive the feedback they need to succeed, we incorporate 360 feedback into the mid-year check in. This process allows all employees to request feedback from their colleagues and for managers to receive feedback from their direct reports. This allows employees of all levels to receive a well-rounded, comprehensive view of their performance through receiving feedback from a variety of sources. At year-end, employees complete a self-assessment, and managers follow with their review of job-related, DE&I, and Community Standards goals.

Learning and Development

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 full-time and certain part-time employees. In 2022, we implemented a new online learning management system designed for workforce training and development. Employees enrolled and completed over 380 courses throughout the year. In July 2022 we launched our first in-person Analyst training program which provided recent college graduates with the opportunity to gain on-the-job training and get exposure to the different areas of commercial real estate. We also relaunched W&D's Manager Training program to all people managers across the company. We compiled 22 different trainings consisting of recordings, LinkedIn Learning courses, required DEI training and talent acquisition training, and created a self-paced online resource. We will continue to build on these trainings going forward.

EMPLOYEE SPOTLIGHT

Carina Johnson

SVP – Servicing

"I am one of three siblings and the only one to finish high school and go to college. I was very driven in college and completed two majors and a minor in three and half years. I share this story, because I was laser focused to get into the working world and I have been equally focused during my career.

I started my career in commercial real estate working as an insurance analyst for Wells Fargo. One of my colleagues at Wells left to join Walker & Dunlop and convinced me to apply for a position. I got the job and continued to climb the ladder here at W&D.

I would say my career evolved because I was there for many significant events and there was always a problem to be solved, a need to be filled, or a fire to be put out. I always say, whenever there is a problem there is an opportunity. It was those opportunities that gave me the ability to shine and show my manager what I am capable of and revealed to her my potential. Once she saw this, she challenged me more and gave harder assignments for me to grow from.

Through the years, as Walker & Dunlop has grown, my professional career has grown with it. I started as an Analyst and have worked my way up to a Senior Vice President. Like Walker & Dunlop, I too challenge myself to be ready and prepared for the next opportunity of growth on the horizon."

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' 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 $1.4 million in charitable donations in 2022. This donation represents 0.53% of our annual income from operations, compared to 0.36% in 2021.

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. In 2022, we are expanded upon these efforts, launching our first annual W&D Week of Service. The week served as a crucial part of our new brand purpose campaign—Community Starts Here—and aligns with our *Drive to '25* goal of having every employee take part in at least one volunteer event, striving for 20 hours annually. Service activities included office-sponsored food donation drives, Red Cross blood drives, volunteer opportunities with, local food kitchen shifts, Beach and Park clean-ups and other individual/group volunteer activities. To ensure that our employees are fully encouraged to take part in these community- enriching activities, we provide 48 hours of Volunteer Time Off for each employee to utilize during the year.

Throughout the year, we work with organizations that align with our company's focus on ending homelessness: Back on My Feet, which combats homelessness through the power of running, community support and essential employment and housing resources, Community Solutions, which works toward a future without homelessness, in which poverty never follows families beyond a single generation, and Shelter to Shutters, which is dedicated to transitioning individuals from situational homelessness to economic self-sufficiency by engaging and connecting them to the real estate industry.

In addition, Company-sponsored volunteer events are scheduled in individual offices throughout the year. Employees are compensated for their time for volunteering. Individual employees can volunteer up to 4 hours (paid) per month 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 2022, we financed over $9 billion of affordable and workforce housing and were named Fannie Mae's #3 Affordable Housing Lender. We have set a goal to originate $60 billion of cumulative affordable lending[1] 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 Alliant Capital, Ltd. ("Alliant") in 2021. As the 8th largest LIHTC syndicator in the United States, since its inception, Alliant has participated in the financing of over 1,100 tax credit properties, totaling more than 100,000 affordable units, and serving over 400,000 families throughout the country. Alliant develops and finances affordable multifamily properties through three business lines: Alliant Capital, a leading LIHTC syndicator that provides financing and equity for the development of affordable housing; ADC Communities, which utilizes joint-venture relationships to develop affordable housing properties; and Alliant Strategic Investments ("ASI"), which invests in preserving historic affordable and workforce housing throughout the country.

2025 Goal:

Originate $60 billion of affordable lending[1] (cumulative over the next five years).

[1] *Following the FHFA definition of affordable housing*

CASE STUDY

NEW YORK CITY HOUSING AUTHORITY ("NYCHA") PORTFOLIO

Pulling Off Difficult Deals in Difficult Times

Often times, W&D is faced with financing complicated transactions, requiring a significant amount of expertise, resources, and tenacity to develop the right deal structure to satisfy all parties and time constraints involved. Fortunately, we have the team to do so, and our skills were put to the test for the financing the rehabilitation of Audobon Houses, Bethune Gardens, and Thurgood Marshall Plaza ("ABM"), a 557-unit, three-building affordable housing portfolio in Harlem, New York. The buildings were built between 1982 and 1985 and were all in the need of significant upgrades. In the end, we structured $120 million of financing for the deal, which was a joint effort between WD, Dantes Partners, the NYCHA, the New York Housing Development Corp. (HDC), Freddie Mac and JP Morgan Chase.

John Gilmore and his production team at W&D arranged an execution that addressed the unique capital and ongoing operation and maintenance needs of the portfolio. W&D listened to the various stakeholders' concerns and, within a narrow set of credit-approval guidelines, limitations through HUD's Rental Assistance Demonstration (RAD) and Section 18 programs, and difficult market conditions, successfully arranged the deal to provide much needed upgrades for the low-income residents at ABM.

In order to transform the properties, Dantes Partners, the borrower, obtained a 99-year ground lease from NYCHA through their Permanent Affordability Commitment Together (PACT) program, which leverages HUD's RAD program. Additionally, 555 of the 557 total units were supported by project-based rental assistance from HUD's RAD and Section 18 programs and long-term project-based HAP contracts. The financing will enable Dantes to invest over $200,000 per unit to revitalize and renovate each of the apartment complexes, including new kitchens, bathrooms, windows, appliances, and flooring as well as upgrades to the buildings elevators and heating and cooling systems. All of this work will revitalize the affordable housing community and deliver quality, stable housing options for many New York City families.

Beyond delivering such a transformative project, WD was honored to work alongside Dantes - a 100% Black-owned team. Dantes Partners and Walker & Dunlop are members of CRE*United*, an alliance of commercial real estate industry leaders committed to improving diversity and accelerating asset management for women- and minority-owned firms. Through its strategic partnerships, CRE*United* partners have closed over a half billion dollars of transactions since its inception in 2021 and is dedicated to use its collective power to knock down diversity barriers in the CRE industry.

ASI Impact Report

ASI'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. ASI has preserved nearly 5,000 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. ASI examines each investment through an ESG lens and holds accountability as a core tenet.

Each year, ASI issues its own Impact Report, highlighting how ASI's investments directly and positively impact the daily lives of its residents and communities. For more information about how ASI incorporates ESG into its operations, as well as its plans for 2023 and beyond, please read their **2023 Impact Report.**

CASE STUDY

EAGLE'S LANDING APARTMENT

At the Intersection of Affordability and Sustainability

One example of ASI's environmental and social impact is Eagle's Landing Apartments, a multifamily property in its portfolio. Eagle's Landing is a 211-unit, affordable housing community located in Everett, Washington – 18 miles north of downtown Seattle. The property was originally constructed in 1987 and was renovated in 2007 using LIHTCs. Approximately 70% of the units are restricted to residents earning 60% or lower of the area median income (AMI), while the remaining 30% of the units are restricted to 50% AMI. Additionally, beyond traditional workforce housing, 20% of the units are set aside for residents with disabilities and 34% are occupied by residents receiving Section 8 vouchers, a government-sponsored rental housing assistance program.

The property was acquired by ASI through a partnership in 2021 and has a Land Use Restrictive Agreement (LURA) running through 2036, requiring the property to maintain its affordability for low-income tenants. The partnership has committed to developing an ancillary building onsite to accommodate resident programs, including health and wellness, financial education, and family development services. In addition, in 2022, ASI engaged Echelon Energy to perform energy audits and complete related energy and water efficiency improvement projects across various properties in their portfolio, including Eagle's Landing. Through the audits, improvements implemented included LED lighting retrofits, high-efficiency toilets, shower heads, and aerators retrofits, and smart irrigation control installations. In total, the improvements made across the portfolio are expected to result in 47% water usage reductions and 6% energy usage reductions. Eagle's Landing is a perfect case study of how ASI can develop both socially responsible and sustainable practices throughout its properties.

Board of Directors[1]

In May of 2022, an independent director retired from the board of directors, changing director independence to 75%, gender diversity to 25%, and ethnic diversity to 25%

Independence	75%
Gender Diversity	25%
Ethnic Diversity	25%
Total Diversity	50%
Average Age (years)	58.6
Average Tenure (years)	8.5
Industry Expertise [2]	87.5%
Independent Lead Director	Yes
Annual Election of Directors	Yes

[1] *As of 12/31/22*

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

GOVERNANCE

GOVERNANCE AND BUSINESS ETHICS

Oversight of Corporate Strategy and Risk

Our Board of Directors continuously monitors risk oversight and designates one meeting each year at which the Board works with management to conduct an in-depth review of our 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. The Audit Committee charter assigns to the Audit Committee the responsibility to review our policies and procedures with respect to risk assessment and risk management. During 2022 and into 2023, the Audit Committee has overseen management's project to update our inventory of key risks and the controls and other monitoring mechanisms related to the risks. As it relates to specific risks, the Audit Committee oversees our financial statements, internal control over financial reporting, compliance with legal and regulatory requirements and the performance of our internal audit function. The Audit Committee also receives reports from our Chief Technology Officer and our Chief Information Security Officer ("CISO"), at least quarterly, on information security and cyber security matters, including data privacy, protection and risk mitigation strategies ("Information Security"). Additionally, our CISO oversees our Information Security team, which works in partnership with our Internal Audit ("AI") 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 at each quarterly Board meeting from its committees and management. For example, each year our senior management will work with the SVP of IA, who reports directly to the Audit Committee, to develop a risk based 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 Committee, and our internal auditors will report the audit results to the Audit Committee on a quarterly basis, or more frequently as needed. The SVP of IA also meets with the Audit Committee in executive session at least quarterly. In addition, our EVP, General Counsel & Secretary meets regularly in executive session with the Audit Committee and the Nominating and Corporate Governance 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 Nominating and Corporate Governance 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 the leaders of our balance sheet loan origination, loan underwriting, servicing, accounting, legal, human resources, investment advisory, broker-dealer, information technology, 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. Additionally, as needed between Board meetings, Mr. Walker, our Chairman and CEO, provides reports to the Board on the critical issues we face and the recent developments in our business units, including identified risks.


Photo by Garrett Rowland

In 2021, we initiated formal Board-level oversight of ESG matters by our Nominating and Corporate Governance Committee ("NCG Committee"). The NCG Committee is responsible for periodically reviewing ESG-related programs and material ESG disclosures as well as monitoring and managing how our ESG strategy impacts our various stakeholders. The NCG Committee also supports the ongoing tracking and progress towards our ESG goals, as detailed in the **Committee's charter.** The NCG Committee's oversight began with a formal presentation on our ESG framework and disclosures and a discussion on ESG priorities. The NCG Committee receives regular updates on ESG matters from various key stakeholders. During 2022, the NCG Committee received four formal updates on ESG matters during their regularly scheduled meetings.

In order to further support the NCG Committee's oversight of ESG, we formalized our 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 Alliant Strategic Investments. 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 NCG 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.

For more information see our **2023 proxy statement.**

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 2022, our Compensation Committee approved a compensation plan for our executive officers that provides for awards based on pre-determined Company, individual and diversity, equity, and inclusion (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 support the ultimate achievement of the DE&I goals included in our *Drive to '25* strategy, and they are weighted at 10%. Specifically, the 2022 DE&I goals included: achieving year-over-year growth in the number of women and underrepresented racial/ethnic groups in management positions; achieving year- over-year growth in the number of women and underrepresented racial/ethnic groups included in our top 20% compensated employees; support ERGs while fostering open dialogue and joining meetings as appropriate; actively participating in DE&I training and programming; participating in at least one external partnership (e.g.; CRE*United*, NCCU, Rutgers, Project Destined, Cristo Rey); and providing ongoing sponsorship and mentorship for multiple individuals from underrepresented racial/ethnic groups and/or female-identifying employees.

CODE OF BUSINESS CONDUCT AND ETHICS

Training

Our Business Ethics Code is acknowledged by all employees approximately annually and published at the same time as we publish all Employee Handbook policy updates. In 2022, all our new employees were trained on and acknowledged the **Business Ethics Code** when we published our 2022 Employee Handbook policy updates. We also have a publicly available **Corporate EEO and Anti-Discrimination Policy** that details our commitment to equal employment, anti-discrimination, and anti-harassment.

Additionally, as part of our commitment to being a welcoming place to work, as well as our state compliance obligations, we launched mandatory Anti-Harassment Training for all employees in 2023. This 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 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 Technology and Information Working Group, 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 Working Group is incorporated by our CISO into our information security programs. Our CISO reports regularly to the Audit Committee on the status of these programs.

Additionally, IA utilizes PwC to execute their risk-based audit plan. Each year, IA 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 2022, IA performed a Network Infrastructure Security Assessment, a Merger and Acquisition Security Assessment, and a Cloud Security Posture Management assessment. The results of these engagements are shared with senior management and the Audit Committee. In 2023, IA plans to perform a Data Privacy Readiness assessment and a Secure Software Development Lifecycle audit.

Training

Walker & Dunlop believes in continuing education for all of its employees and routinely educates its employees through focused education, training, and simulated exercises. 100% of 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.

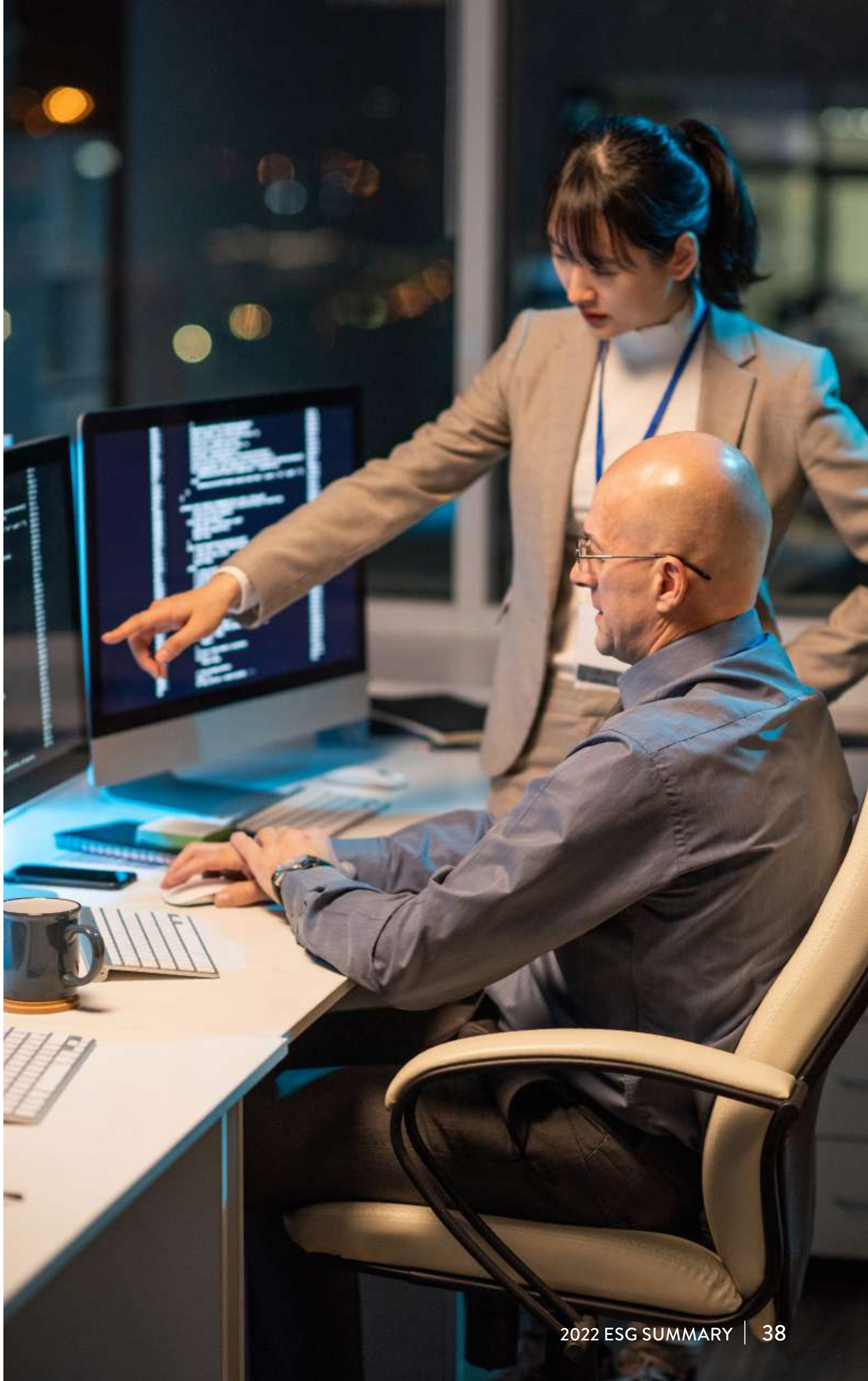
Preparedness

At least annually, external penetration tests are performed to identify and remediate potential vulnerabilities in our applications and network. Cybersecurity tabletop simulations are performed with incident responders and IT leadership to practice response activities and refine our approach to reacting to and handling trending security threats.

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. 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 set forth in the Privacy Policy.



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