

THOMAS P. DiNAPOLI  
STATE COMPTROLLER



110 STATE STREET  
ALBANY, NEW YORK 12236

STATE OF NEW YORK  
OFFICE OF THE STATE COMPTROLLER

January 25, 2024

Glenn Sanford, Chairman and CEO  
eXp World Holdings, Inc.  
2219 Rimland Drive, Suite 301  
Bellingham, WA 98226

Dear CEO Sanford:

I write as Trustee of the New York State Common Retirement Fund (CRF), one of the largest public pension funds in the United States, which holds and invests the assets of the New York State and Local Retirement System on behalf of its 1.2 million members, retirees, and beneficiaries. As a shareholder of eXp World Holdings, Inc., I am writing to express my concern regarding the potential legal and reputational risks stemming from alleged sexual harassment and sexual assaults connected with eXp work events.

According to media reports, eXp agents have alleged predatory behavior, sexual assault, and eXp's reluctance to address these concerns. Lawsuits have been filed by five female agents against eXp Realty, a subsidiary of eXp World Holdings, Inc., over alleged sexual misconduct of male agents. According to one of the complaints, two male agents attempted to drug or assault four of the women during networking and recruitment events. The plaintiffs claimed that eXp Realty was aware of the alleged behavior of the involved male agents, contradicting public statements made by the company.

The allegations at eXp come at a time when the U.S. real estate industry — whose workforce is approximately two-thirds women — is facing heightened scrutiny regarding the treatment and safety of its agents.

Workplace abuse and harassment come with substantial costs to companies, including fines and penalties, legal costs, absenteeism, and reduced productivity. A company's public image can also be tarnished, eroding the trust of customers, endangering partnerships, and making it more difficult to recruit and retain talent. Furthermore, when companies fail to address abuse involving executives, managers, employees, or customers, they perpetuate the harm and put investors at risk.

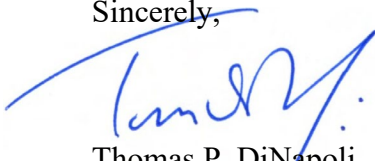
I am asking for a committee of independent board directors to investigate the allegations and report on possible gaps in policies and procedures that might allow for the occurrence of incidents alleged to have occurred, and report on concrete actions, including changes to the company's bylaws, to be taken to address them. The report should include:

- the total number and aggregate dollar amount of disputes settled by the company related to abuse, harassment, or discrimination based on race, religion, sex, national origin, age, disability, genetic information, service member status, gender identity, or sexual orientation;
- the company's progress toward reducing the average length of time it takes to resolve abuse, harassment, or discrimination complaints, either through internal processes or litigation; and
- the total number of pending abuse, harassment, or discrimination complaints the company is seeking to resolve through internal processes or litigation.

Such a report would assist company stakeholders, including shareholders, in assessing whether the company is improving its workforce management, whether its actions align with the company's public statements, and whether it is protecting long-term value.

I appreciate your prompt response to this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Tom DiNapoli", with a large flourish extending to the left.

Thomas P. DiNapoli  
State Comptroller

CC: Randall Miles, Vice Chair, eXp World Holdings, Inc.