

ENVIRONMENTAL POLICY

PulteGroup is committed to operating in an environmentally responsible manner to benefit all our stakeholders, which includes our employees, customers, trade partners, communities and shareholders. Our commitment to quality encompasses doing the right thing by our environment throughout the entire design, development and build process. It is PulteGroup's policy to work to minimize our environmental impact and commit to the environmental integrity of our building processes and manufacturing facilities at all times. PulteGroup's management and Board of Directors understands and fully appreciates the significance of our unwavering commitment to protect our environment for current and future generations.

PulteGroup's environmental focus includes our ongoing review, evaluation and improvement of our environmental performance. Our commitment to the environment begins even before a home is built. We employ systems and procedures designed to minimize the use of hazardous materials, energy and other natural resources; minimize the generation of waste; and enable recycling and reuse of materials. We seek opportunities to improve our environmental performance by utilizing objectives, measuring progress, and continuous improvement.

Our commitment to building environmentally responsible communities starts with our land acquisition process. As a part of this process, all land investments are required to go through an environmental review, which includes, but is not limited to:

- Inspection and evaluation by a qualified environmental engineer for each land parcel.
- ➤ Phase I environmental report, which must comply with current ASTM (American Society for Testing and Materials) standards.
- Phase II environmental report (where required), which must comply with current ASTM standards.

During each phase of the land development process PulteGroup and our trade partners implement processes to identify and manage risks and opportunities related to the environment, including but not limited to:

- ➤ Water: Strict compliance with the Clean Water Act, including, but not limited to, the National Pollutant Discharge Eliminate System, and avoiding the discharge of any hazardous or toxic substance or material or other pollutants into or on the jobsite which leaves the jobsite or is capable of being washed from the jobsite during a rain event.
- Permits and Recordkeeping: Maintaining all required environmental permits, approvals, and registrations and following applicable operational and reporting requirements.

- ➤ Effective Management and Disposal of Hazardous Substances: Effectively identifying and managing the safe handling, movement, storage, and disposal of chemicals and other substances that pose a threat to the environment, including providing workers with appropriate training on the safe-handling and disposal of hazardous substances. We monitor and control wastewater or solid waste generated from operations before disposing in accordance with applicable laws. In addition, we work to appropriately characterize, monitor, control, and treat regulated air emissions before discharging in accordance with applicable laws.
- Continuous Improvement: PulteGroup encourages our trade partners and vendors to continuously improve and reduce waste. We also encourage our trade partners and vendors to suggest improvements to our own operations and processes if identified.

Our focus on environmentally responsible building practices has led to us to develop an industry-leading National Storm Water Quality Program ("NSQP"). This program helps us to better manage the flow of rainwater through our communities, while also helping to keep materials such as dirt, paint, concrete residue, oils or other waste from leaving our construction sites.

We also require all PulteGroup trade partners and vendors to share our commitment to the environment. Our trade partners and vendors must comply with all applicable environmental laws and immediately notify PulteGroup if they observe, discover and/or become aware of any spill of any hazardous or toxic substance or material or other pollutants on any PulteGroup jobsite. Please click here for our <u>Vendor Code of Conduct</u>.

We have also implemented improvements in our operations that have resulted in greater construction efficiencies. Through our Commonly Managed Plans initiative launched in 2011, we have simplified the floorplans that we offer across our markets, which has led to more efficient use of building resources and minimized jobsite waste.

We also know that we can lessen our environmental impact by reducing the energy consumed by our homes. Our Build Quality Experience includes equipping our homes with energy efficient features to reduce waste and control energy usage – known as the Pulte Energy Advantage. We educate homebuyers on the Home Energy Rating System (HERS) score and help consumers understand that by qualifying a home's operational carbon footprint, it supplies a critical metric to help move homes toward greater sustainability. We listen carefully to consumer feedback on how to make our homes smarter and better for the environment. We also task employees to identify ways to improve our environmental performance, including conservation and recycling. Our environmental management system allows us to learn how to build better.

Through continued innovations in the homebuilding industry, homebuilders like PulteGroup have helped make new homes significantly more efficient than older homes. We are confident that the environment will continue to benefit from our actions to reduce the environmental footprint of our homes while we continue to develop smart, innovative eco-friendly homes and communities that can become guides for many generations.

Please contact <u>compliance@pultegroup.com</u> with any questions or concerns regarding PulteGroup's environmental policies or procedures. Anonymous reports of environmental policy violations can be made to the PulteGroup third-party hotline online or by calling 1-800-498-5629. Retaliation of any kind against an individual who reports concerns in good faith will not be tolerated.