



CODE OF ETHICAL BUSINESS CONDUCT



The CODE Contents

A LETTER FROM THE CEO	1	Our Business Partners	10	Our Information Security and Electronic Communications	26
My Ethics and Compliance	2	Fair Dealings with our Business Partners	10	Safeguarding Your Credentials and Passwords	26
Who must follow the Code?	2	Anticompetitive Behavior	10	Storing and Accessing Company Information	26
Our shared responsibility for ethics and compliance	2	Bribes and Kickbacks	10	Data Security Incident Response	27
How do I know if my actions comply with the Code?	2	Settlement Services	11	You have No Expectation of Privacy	28
Manager Responsibilities	2	Gifts and Gratuities	12	Our Communication Systems	29
Who should I ask if I have an ethical dilemma or other Code/policy concern? What about reporting?	2	Conflicts of Interest	13	Email, Blog and other Social Media Communications	29
If I report suspected misconduct anonymously, is it really anonymous?	3	Employees Using Company Vendors, Suppliers or Trade Contractors for Personal Use	15	Our Communications with the Public	33
What if I am worried about retaliation?	3	Employees Using Company-Owned Suppliers for Personal Use	15	Conflicts Committee	35
What happens if I violate the Code?	3	Employee Purchases of Our Homes or Our Supplies	16	Ethics Committee	36
Does the Company make exceptions for compliance with certain Code sections?	3	Our Company Records and Reporting	18	Additional Resources	37
Our Employees	4	Financial Accounting Records	18		
Employee Privacy	4	Records Management	18		
Harassment	5	Expenditures	19		
Non-retaliation	6	Finance and Operations Policies and Procedures ("Finance Manual")	19		
Health and Safety	6	Loans	20		
Environmental Compliance	6	Political Contributions	20		
Drugs and Alcohol	6	Our Securities and Property	21		
Our Customers	8	Material Information	21		
Non-Discrimination	8	Blackout Periods for Covered Employees	21		
Customer Privacy	8	Trading PulteGroup Stock	22		
Sales and Marketing	8	10b5-1 Trading Plans	23		
		Protect Company Assets; Safeguard Confidential and Proprietary Info	23		

A LETTER FROM THE CEO

Dear Colleague:

For over 70 years, PulteGroup has operated on a foundation of ethics, quality and integrity. We recognize the importance of a diverse and inclusive culture where each employee is valued, respected and empowered to create business value and innovation. As our company continues to grow, one thing that will never change is our absolute commitment to conduct business according to the highest ethical standards.

Our Code of Ethical Business Conduct sets forth the standards by which we conduct business and it applies to everyone, from the construction site to the boardroom. Following the Code gives homeowners and shareholders the utmost confidence in our homes and gives us extreme pride in our work. We will enforce the Code fairly and consistently -- our reputation and success depend on it.

Our Code does not cover every situation you may encounter at work. It provides standards to show you how to conduct business and lists contact information to help you obtain advice from a company expert. If you ever have a question regarding Code compliance, ask your manager, People & Culture, the Law Department or contact the SpeakUp Helpline to make an anonymous report. Each of us must do our part to prevent or correct policy violations. And you have my word that you will never be retaliated against for reporting a policy violation in good faith.

Please read the Code thoroughly as we continue to update it to reflect our growing company and the current business environment. This Code applies even if you are working remotely. You will be asked to annually certify that you read and understand the Code. I challenge you to continue our tradition of operating with the highest ethical standards and be a leader in upholding our core values. Be proud to brand yourself as PulteGroup member who always does the right thing. Let's continue to earn the reputation of "The Most Respected Homebuilder in America".



RYAN MARSHALL
President and CEO



My Ethics and Compliance

This Code provides the standards we must follow to uphold our Company's ethical standards. Throughout this Code, "Company" or "Pulte" includes all wholly owned entities and affiliates of PulteGroup, Inc.

Who must follow the Code?

All employees, officers and directors must follow this code. We also expect everyone working on Pulte business, including consultants and vendors to comply with our ethical standards.

Our shared responsibility for ethics and compliance

As members of PulteGroup, we are required to:

- ✓ Fully understand and follow the standards in this Code so as to conduct our business according to the highest ethical standards
- ✓ Fully understand and follow all laws and policies that apply to our positions
- ✓ Promptly report any concerns and/or known or suspected Code or policy violations, including any misconduct by a third party such as a trade contractor or vendor

How do I know if my actions comply with the Code?

Our Code does not cover every situation you may encounter at work. If you encounter a difficult decision, ask yourself these questions:

- Am I confident that my action complies with the law?

- Am I confident that my action complies with all Company policies?
- Would I feel ok if others knew about it?
- Does it feel like I am doing the right thing?

If you answer "no" to any of these questions, you must seek advice and guidance from your manager or other Company expert (see Company contact info following each Code section).

Manager Responsibilities

Managers shall proudly serve as ethical role models for all employees and are required to:

- ✓ Communicate the Code's importance and confirm that employees understand the behaviors expected of them
- ✓ Create a positive work environment where employees feel comfortable to ask for help and raise questions
- ✓ Be alert to any situations or issues that may violate the Code or damage the Company's reputation; and promptly notify People & Culture or the Law Department about any potential misconduct

A manager that attempts to handle and investigate a Code or policy violation on his/her own without promptly reporting it will be disciplined.

Who should I ask if I have an ethical dilemma or other Code/policy concern? What about reporting?

You have a duty to promptly report any suspected unethical or illegal conduct. First consider speaking to your manager. Because

we realize that reporting misconduct to your manager is not always possible or comfortable, you may also contact any of these resources to seek guidance or report issues:

- » [Area VP or Director of People & Culture](#)
- » [Area VP of Finance](#)
- » [Chief People Officer](#)
- » [Internal Audit](#)
- » [Any member of the Conflicts Committee](#)
 - » [VP Compliance](#)
 - » [SVP Finance](#)
 - » [Deputy General Counsel](#)
- » [General Counsel, Chair of the Ethics Committee](#)
- » [Chair of the Audit Committee of the Company's Board of Directors](#)
- » [Law Department](#)
- » [Call our SpeakUp Helpline or make an online report \(anonymously if you choose\)](#)

We will promptly and thoroughly investigate all reports of misconduct. We will treat all complaints confidentially to the extent allowed by law. If you are involved in an investigation, you must fully cooperate and keep any information related to the investigation confidential. Your obligation to keep information confidential continues after your employment ends. You must be honest and forthright throughout a Company investigation, and your failure to tell the truth at all times will result in disciplinary action up to and including termination.

If I report suspected misconduct anonymously, is it really anonymous?

Yes. Our SpeakUp Helpline is operated by a completely independent third party – Convercent. All calls are answered by trained professionals and callers are provided with a call-back date so they can obtain a response to his/her concern. The hotline is

available 24 hours a day, 7 days a week. Please note, however, that remaining anonymous may limit our ability to fully investigate your concerns.

What if I am worried about retaliation?

We prohibit retaliation against anyone who reports misconduct in good faith. We also do not tolerate retaliation against anyone who cooperates in a company investigation in good faith. “Good faith” means you reported all the information you have and you believe it to be true.

What happens if I violate the Code?

A code violation can expose you and the Company to serious risks, including:

- ✗ Criminal prosecution and fines
- ✗ Loss of business and damage to the Company's reputation
- ✗ A legal judgment and/or other penalties against you and the company
- ✗ Decreased shareholder value

If you violate company policies and/or act unethically, you will be disciplined, up to and including termination.

Does the Company make exceptions for compliance with certain Code sections?

In rare circumstances, the Company may permit an exception to the Code (“waiver”). Waivers for executive officers (including Covered Senior Officers as defined in the [Code of Ethics](#) or Company directors) may only be granted by the Board of Directors.

Any waivers for executive officers (including Covered Senior Officers) or Company directors will be promptly disclosed as required by law, by the Securities and Exchange Commission or the New York Stock Exchange.

Our Employees

PulteGroup is an equal opportunity employer. We maintain a diverse workplace free from discrimination and harassment. We treat each other fairly and with respect, and will not make any decisions on the basis of gender, race, color, religion, national origin, ancestry, age, medical condition, marital status, familial status, veteran status, physical or mental disability, sexual orientation, transgender, gender identity or expression, genetic information or any other basis prohibited by applicable federal or state law. Our equal opportunity policy covers all aspects of employment, including hiring, pay, benefits, promotions and termination. We make every effort to reasonably accommodate employees or applicants with disabilities as defined by the Americans with Disabilities Act. PulteGroup strives to promote a diverse and inclusive culture where each employee is valued,

respected and empowered to create business value and innovation. We believe that embracing diversity and inclusion fosters an environment that attracts, develops, engages, and retains the best talent, and results in performance-driven culture of excellence to make lives better for our employees, customers and communities.

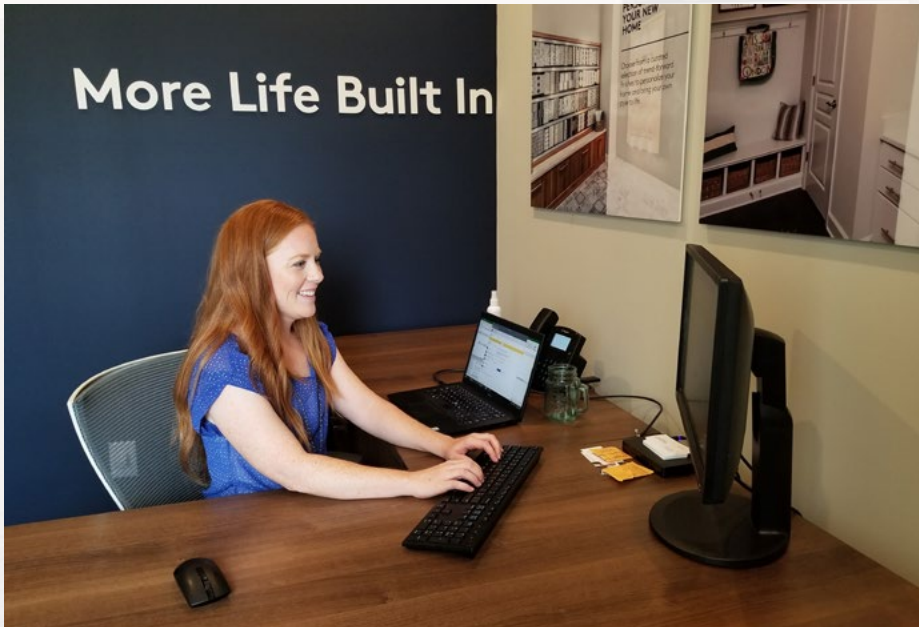


I decided to promote Kevin instead of Al. They are both strong performers, but Kevin appears to have more energy and I heard a rumor that Al may retire next year. Can I be accused of discrimination?

Yes. By stating that Kevin has “more energy” and assuming that Al will soon retire, you could be accused of age discrimination. You are prohibited from making decisions based on assumptions and may only make promotion decisions based on legitimate business reasons, such as performance and job skills.

Employee Privacy

Throughout our employment, we provide sensitive information to the Company. Such data may include performance reviews, compensation, leaves of absence, disabilities/medical issues and government-issued ID numbers. We pledge to safeguard this information and provide employees with privacy and confidentiality. We will only use this information for appropriate business purposes, and may not share it with anyone (inside or outside the company) who does not have a business need/authorization to know it.



Employees are prohibited from using, disclosing or disseminating to anyone any confidential information regarding our employees and/or their families. Unauthorized use, disclosure, copying and/or misuse of confidential information is a serious policy violation. If you receive an email with a link to a website or document that you were not expecting, use the Report Phish button on the Outlook ribbon to report it to the TSC Help Desk. If you mistakenly click on a suspicious link, under no circumstances should you enter your PulteGroup network credentials or provide any information about employees, customers or vendors. You must also promptly report such suspicious links to your manager and the TSC Help Desk at 1-877-733-3728. Your obligation to keep information confidential continues after your employment relationship ends.

Harassment

We are committed to providing a workplace free of sexual harassment as well as harassment based on gender, race, color, religion, national origin, ancestry, age, medical condition, marital status, familial status, veteran status, physical or mental disability, sexual orientation, transgender, gender identity or expression, genetic information or any other basis prohibited by applicable federal or state law. We will not tolerate harassment of employees.

Harassment includes verbal, physical or visual conduct that creates an intimidating, offensive or hostile work environment for another person. Conduct may be deemed harassment regardless of whether it is done verbally or physically, in person or by email/text, and whether it is sexual or otherwise inappropriate. Potentially offensive behavior includes sexual remarks or advances as well as inappropriate jokes or disparaging remarks about religion, race, ethnicity or disabilities.

Employees who witness, suspect or have knowledge of any harassment by an employee or any other person (including a vendor, trade contractor or homeowner) shall promptly report the

incident to the employee's manager or to People & Culture. The Company will investigate every complaint thoroughly, promptly, professionally and confidentially.



Nancy mentions to her co-worker Beth that their manager Charlie asks Nancy to lunch most days during the week. Nancy further shares that she feels unable to say no to Charlie's lunch invites, and Nancy feels uncomfortable and embarrassed about the conversation topics Charlie asks for her advice on at lunch (e.g. his pending divorce, how to get back in the dating scene, what women look for in a romantic partner). Nancy says she can handle the situation herself and asks Beth to "not tell anyone" for fear that Charlie will retaliate against her and refuse to promote Nancy at year-end. What should Beth do?

Beth should urge Nancy to promptly report the situation to People & Culture. Regardless of whether Nancy reports the issue, Beth also has a duty to report the situation -- Beth has knowledge of possible Code-violating conduct, as Charlie's actions create an intimidating and offensive environment for Nancy and possibly other employees.

There is a homeowner that has gone from unhappy to angry. Yesterday he yelled and screamed at me. I feel uncomfortable and intimidated. What should I do?

Workplace safety is of utmost priority for the Company. You must promptly report this issue to your manager, People & Culture and/or the Law Department. The Company will not tolerate inappropriate behavior or threats, even if the homeowner could be joking. If you or someone you know is in immediate danger, call the police before you report it to the Company.

You are prohibited from bringing firearms and weapons to any Company site, even if you are properly licensed to do so by state law. This prohibition extends to your vehicle if it is parked on Company property, or any Company-owned vehicle wherever it is located.

We will not tolerate threats or acts of violence. You must immediately report any threatening behavior, even if it could be a joke. If you or someone you know is in immediate danger, call the police before reporting it to the Company. See also Workplace Threats and Violence policy.

Non-retaliation

PulteGroup will not tolerate retaliation against anyone who reports in good faith a person or activity believed to violate this Code. The Company will also not tolerate any form of retaliation against any employee cooperating in a Company investigation.

Health and Safety

You are responsible for maintaining a safe work environment, and we expect you to perform your duties in accordance with all health and safety laws, regulations and Company policies. This



includes any all policies and procedures implemented as a result of a pandemic or other public health emergency. You shall also immediately notify your supervisor regarding any harassment, injury, occupational illness or hazardous conditions in the workplace.

See also [Wireless Communication while Driving policy](#) and [Construction Safety and Health Manual](#).

Environmental Compliance

The Company is subject to numerous environmental requirements. These statutes and regulations govern air emissions, discharges of water to surface and groundwater, handling and disposal of waste, including hazardous substances, and workplace practices. They also focus on the release of pollutants to the air or water, or onto or under the ground. The Company may need to report such a release, even if accidental, to the government.”

We are committed to complying with all applicable environmental laws and regulations. Each employee must be sensitive to regulatory requirements and must exercise good judgment regarding the environmental effect of the Company’s operations.

Employees are encouraged to identify ways to improve our environmental performance, including conservation and recycling. If you suspect or become aware of any environmental law violation or any action that may appear to conceal such a violation, you must immediately report the matter to your manager or to the Law Department.

Drugs and Alcohol

The Company maintains a drug-free and alcohol-free workplace. This policy applies when employees work at remote locations. Employees must report to work free of alcohol or illegal drugs in their bodies or in their possession. We strictly prohibit the use,

sale, purchase, transfer, distribution, possession or manufacture of illegal drugs and narcotics or alcoholic beverages (except as discussed in the next paragraph) on Company property and work sites or during any working time outside the workplace while representing the Company.



Upon approval from your Division President, an exception exists to possess alcohol on Company property for the limited purpose of providing gifts to customers or employees, and not for consumption on Company property, provided that the use or possession complies with all applicable laws. In addition, a manager at or higher than the Division President level or its equivalent (e.g. Corporate Vice President) may approve alcohol use by employees in appropriate Company business or social situations provided that the employee's use or possession complies with all applicable laws. In situations where the Company or its vendors sponsor social events at which alcohol is present, you should do nothing to compromise the Company's reputation, and you alone are responsible for your actions. Employees should never consider the use of alcohol a business obligation at any time.

You are expected to act lawfully and appropriately for the business context, including during Company-sponsored meetings and training sessions. You are expected to get adequate rest and refrain from staying out late in order to be fully engaged in the meeting or training session.

You are required to conduct yourself in compliance with the law and with the highest professional standards with other Pulte employees and others outside the company; this requirement continues for off-duty conduct which includes travel time, hotel stays, and any other off-duty activities you may attend. Employees acting unprofessionally or engaging in unacceptable behavior during Company sponsored events and thereafter, may be subject to disciplinary action up to and including termination. If you witness, suspect or have knowledge that an employee has engaged in inappropriate off-duty conduct during a Company sponsored activity or thereafter, you are expected to report the incident to your manager, People & Culture, or the training facilitator immediately. This policy applies to all employees, consultants and anyone on property owned or leased by the Company, including parking lots, Company-owned vehicles and any location being used to conduct Company business or social events, including remote work locations.

The Company may test employees or applicants without notice to determine the presence of drugs or alcohol. If you test positive for illegal drugs or alcohol, or refuse to take a test when requested, you violated this policy and will be disciplined up to and including termination.

Who should I contact if I have a question or report regarding equal opportunity, employee privacy, harassment, environmental compliance, or drugs/ alcohol?

- » [Your manager](#)
- » [Your Area VP or Director of People & Culture](#)
- » [Chief People Officer](#)
- » [Law Department](#)
- » [Call our SpeakUp Helpline or make an online report \(anonymously if you choose\)](#)

Our Customers

Our customers are valuable assets. You should always be fair, honest, and respectful whenever you deal with customers.

Non-Discrimination

It violates Company policy and the law to discriminate in any aspect of a home sale, marketing and advertising, or the provision of a mortgage, title policy or settlement service due to a person's gender, race, color, religion, national origin, ancestry, age, medical condition, marital status, familial status, veteran status, physical or mental disability, sexual orientation, transgender, gender identity or expression, genetic information or other status protected by the Fair Housing Act, Fair Lending laws, the Americans with Disabilities Act, the Equal Credit Opportunity Act and other applicable laws. The Company also prohibits harassment and we pledge to treat all customers with dignity and respect. We will also make reasonable accommodations and home modifications for disabled customers as provided by law. Disparate treatment of any type, regardless of motive, based on protected status violates our policy. As a homebuilder and lender, this principle is of fundamental importance. For more information, please see [link to the Fair Housing Act / Do the Right Thing training powerpoint slide deck](#).

Customer Privacy

We protect the privacy, security and confidentiality of customer information entrusted to PulteGroup. We must never share customer information (including names and contact information) with a colleague or third party who doesn't have a business need to know it. We must also act to prevent disclosing customer information by accident – if you know or suspect that confidential customer information has been improperly disclosed, you must

promptly contact the Law Department. If you receive an email with a link to a website or document that you were not expecting, use the Report Phish button on the Outlook ribbon to report it to the TSC Help Desk. If you mistakenly click on a suspicious link, under no circumstances should you enter your PulteGroup network credentials or provide any information about employees,

In some cases, laws will prevent us from sharing customer information with affiliates. You should understand the laws, regulations and policies that govern sharing customer information.



Sales and Marketing

If your job involves sales and marketing we expect you to be familiar with the laws, regulations and policies applicable to your job. We truthfully market, promote and advertise our brands and products. We must never make false or misleading statements about our homes or our competitor's products.

[Click here for construction and sales licensing requirements and FAQs.](#)



I am a sales consultant. I just posted an outstanding review about living in a Del Webb community. My posting suggests I am a customer and not a Pulte employee. As long as I am generating sales, is this ok?

No. We do not misrepresent facts to achieve sales goals. Also, the law requires you to identify yourself as a Company employee when making any statement about our homes that could be read by the public.

Who should I contact if I have a question/ report regarding a law or regulation that applies to selling, marketing or advertising to our customers?

- » [Your manager](#)
- » [Chief Marketing Officer](#)
- » [Law Department](#)
- » [Call our SpeakUp Helpline or make an online report \(anonymously if you choose\)](#)



Our Business Partners

Fair Dealings with our Business Partners

We commit to fair dealing with our vendors, trade contractors, suppliers and other business partners. If you deal with our business partners, you must choose vendors, trade contractors, suppliers and other business partners on the basis of quality, service, price and similar competitive factors. As outlined below, it violates Company policy to make business decisions on any other basis, or to solicit or accept favors in exchange for business decisions. Pulte requires all of its trade contractors, vendors and suppliers to abide by our [Vendor Code of Conduct](#).

Anticompetitive Behavior

Antitrust laws are designed to maintain an open, competitive marketplace. These laws prohibit a wide range of practices that could restrain trade or limit competition. You shall not participate in any agreements or understandings of any kind with our competitors or suppliers to fix, stabilize or control prices, nor shall you enter into any agreement or understanding with competitors to boycott customers or suppliers in an effort to affect market prices. You also may not enter into any agreement with another company to “not hire” their employees – this is called an anti-poach agreement and it is strictly prohibited.

Bribes and Kickbacks

The Company is committed to conducting business with integrity, and in an ethical, legal, and responsible manner. Company employees shall not engage in bribery – directly or indirectly – in any amount, with any person. A bribe is anything of value given to a person to improperly influence their decision-making or to secure an unfair advantage. The term “anything of value” is



construed broadly to include not only money, but also gifts, travel and entertainment, promises of future employment, charitable/campaign contributions, forgiveness of debt, and discounts. A bribe may be funded by the Company, an employee, or a third party. A kickback is a bribe that is paid from the proceeds of an award, such as a contract.

A bribe or kickback can arise when dealing with vendors, trade contractors, suppliers, customers, bankers, employees, government officials or others. Bribes and kickbacks are prohibited by this Policy, as well as state and federal laws. If you are uncertain about any transaction or payment, you should consult the Law Department before proceeding.

Employees must also be familiar with the Gifts and Gratuities policy to ensure that good business judgment is not compromised.



The city inspector just notified Leo (VP Construction) that the City plans to delay issuing certificates of occupancy (COI) due to staffing issues. Leo decides to take the city inspector out for lunch at an expensive restaurant to discuss timely closing homes for our customers (and in turn try to convince the inspector to not delay the COIs). Is this a policy violation?

Yes. A bribe is anything of value given to a person to improperly influence their decision-making or to secure an unfair advantage. Leo's purchase of lunch for the city inspector could be deemed a bribe – lunch as an inducement for the inspector to move up the dates for issuing the COIs. Remember that a bribe can be ANYTHING of value, even an inexpensive bottle of wine, if it is done for the corrupt purpose of improperly influencing an official act! The better solution would be for Leo to discuss the issue with the city inspector in a meeting without lunch.

A county official just called Leo (VP Construction) to tell him that the Company needs to build an HOV lane adjacent to the parcel marked for a new Del Webb community. Leo thinks this request will add substantial costs to the project and impact his year-end bonus. Leo subsequently calls his engineering vendor to request that the vendor reach out to the vendor's friend at the county to "make this request go away." Leo promises the vendor that if the vendor convinces the county to drop the request, Leo will add a success bonus to the vendor's next invoice. Leo is unaware that the vendor plans to split the success bonus with his friend at the county. Is this a policy violation?

Yes. Bribes are anything of value given to a person to get them to do something they would not otherwise do. By offering a success bonus to the vendor in exchange for the vendor to call his friend to "make the road improvement requirement go away", Leo (and his friend) could be offering a bribe. Success bonuses or any other payments to "expedite" an official action are dangerous and should be utilized only in limited circumstances with objectively defined criteria,

including clear direction that improper means may not be used to achieve the goal. Leo should have reached out to the Law Department or compliance@pultegroup.com for review prior to offering a success bonus.

Leo (VP Construction) has heard that a difficult township building inspector hosts an annual golf outing for a local charity. The event is well attended by a number of vendors and public officials, as well as competitors in the residential building business. Leo does not golf but he makes a contribution so that he can attend the dinner after the golf outing. Is this a policy violation?

No. As long as Leo makes a reasonable contribution to network at the function and not for the purpose of getting the township building inspector to take official action that he would not otherwise take, it is not a bribe. A bribe occurs when an exchange is made to improperly influence another person. Here, Leo is attending the dinner at the golf outing to socialize with other people important to our Company business. Our business can be enhanced by building relationships. Nonetheless, because such contributions could be viewed as a bribe in some circumstances – including the amount, frequency, and impetus of the contribution – employees should seek advice from the Law Department or compliance@pultegroup.com before making contributions involving people associated with our business.

Settlement Services

The Real Estate Settlement Procedures Act (RESPA) governs our relationship with mortgage companies, title agencies, and other settlement service providers, whether or not these companies are part of the Company:

- You are prohibited from splitting the fee that a settlement service provider receives for its settlement services unless you perform appropriate services for which your fee is fair value
- You are prohibited from receiving a kickback or a referral fee from a settlement service provider for merely referring the business

- If your job involves the provision of settlement services (for example, mortgage or title services), you are prohibited from giving any other person or company a kickback or referral fee for merely referring the business to the Company
- You must require every customer that both purchases a Company home and uses a Company settlement service to sign an Affiliated Business Arrangement Disclosure form

Gifts and Gratuities

Business judgment regarding vendors, suppliers, customers or trade contractors can be compromised by gifts and gratuities that are excessive. At the same time, we recognize that modest gifts and sponsored social events build goodwill and are part of doing business.

You should use these guidelines if you are offered a gift or an opportunity to attend a sponsored social event:

- You should not accept gifts that appear to have significant value. Gifts such as goods, services or event tickets for your personal use, including gifts from homeowners, should be of reasonable value
- Third-party sponsored social events, such as golf outings, meals and sporting or other events, should also not be excessive and should not compromise good business judgment or the Company's reputation
- No tickets or gifts should influence any business decision and no company property or asset may be traded or exchanged for any ticket or gift

You should only accept personal gifts and sponsored social events periodically. When deciding whether value is reasonable and not excessive, you should consider the cumulative annual value received from a single vendor.

Employees seeking to hold a Company-supplier sponsored event or gift must comply with the [Company-supplier Events policy](#).

If you are offered a gift that may violate this policy, you must seek guidance from your manager or your finance officer. Approvals can only be made by your Division President or your Area VP of Finance. If you are the Division President or Area VP of Finance, you must obtain approval from the SVP Finance.

If you use Company assets to give a gift or for entertainment expenses, whether for a third party or a Company employee, the gift must be of reasonable value, must not be excessive and must be properly booked on the Company's financial and payroll records. Any gift that could be considered excessive may not be given without permission of your Area VP of Finance or your Division President.





The ICG VP Sales decides to host the entire procurement team of ICG customer Big Spender Builder, Inc. at a baseball game, including food, drinks and ICG mugs.

Prior to scheduling, the VP Sales must obtain approval from the ICG VP Finance due to the costs of the event. Click [here](#) for the policy.

I purchased a Super Bowl ticket from our trade contractor. Since I paid face value for the ticket, did I violate Company policy?

Probably. It is extremely likely that the vendor paid significantly more than face value for the ticket. This means you received an excessive gift that far exceeds reasonable value and you are violating company policy—even though you paid for the tickets.

Conflicts of Interest

Employees and their immediate family members must avoid doing anything that creates a conflict of interest, or the appearance of a conflict of interest, with their responsibilities to the Company. A conflict of interest arises when an employee's personal interests are inconsistent with the Company's interests, or when an employee's judgment may be compromised because of the potential for personal gain.

No policy can cover all possible scenarios. If you have a question whether an existing or contemplated business situation could be a conflict of interest, you should promptly and fully disclose the facts to a member of the Conflicts Committee.

The Conflicts Committee consists of PulteGroup's Senior Vice President – Finance, Deputy General Counsel, and Vice President – Compliance. No Conflicts Committee member may pass judgment on a possible conflict of interest or appearance of conflict

involving that member.

Here are some examples that we consider a conflict of interest:

- You may not work for, or invest in, another business that competes with the Company, such as a homebuilder or mortgage or title company, do work that interferes with your ability to perform your job duties, or engage in activities closely related to the Company's business such that



your involvement with the ancillary business could cause confusion with your role at Pulte. This investment prohibition does not apply to a non-controlling investment in a public company that competes with the Company

- Neither you nor someone in your immediate family may provide goods or services to the Company. If you wish to engage in business with the Company, you must obtain the approval of the Conflicts Committee. Please click [here](#) to learn the Company's position on employees related to outside realtors and click [here](#) for the policy on adding realtors to sales deals.
- You should not invest in, or having any financial interest in, any vendor, supplier or trade contractor if you have

any control over the Company's decision to work with that company (other than through a mutual fund or a non-controlling investment in a public company). If you or anyone in your immediate family has an ownership interest in a Company vendor, supplier or trade contractor, you shall immediately disclose that fact to a member of the Conflicts Committee.

- If you learn of a business opportunity in the course of your work with the Company, you may not take advantage of that opportunity, even if you believe the Company would decline it. Before you take advantage of such a business opportunity, you must disclose your plans and confirm with a member of the Conflicts Committee that the business opportunity was, in fact, declined by the Company.



I am a Construction Manager. A homeowner asked me if I could do a "side job" on my day off and re-grout some tile in her bathroom. She said she would pay me for my time. Can I say yes to her request?

No. Working "side jobs" for homeowners will violate Pulte's conflicts of interest policy due to the potential interference with your Pulte job duties, potential confusion by the customer regarding whether Pulte is responsible for the work product, and the possibility of employee judgment being compromised due to the potential of personal gain. Please contact your manager or People & Culture regarding any questions you may have as to whether a particular situation would be a conflict of interest.

When building your own home or performing renovations you may not use Company building materials or require Company employees to assist or perform such renovations. This provision does not prohibit customary construction or warranty work on a Company-built home. This provision also does not apply to a

Company-owned Supplier (such as Innovative Construction Group (ICG)); refer to ["Employees Using Company-Owned Suppliers for Personal Use"](#).

Potential conflicts related to members of our Board of Directors or an Executive Officer will be reviewed by the Conflicts Committee and determined by the disinterested members of the Nominating and Governance Committee.



I work in Marketing. However, I also have my broker's license. On the weekends, can I sell homes in my spare time?

Most likely, no. You may not work on business that competes with the Company – this creates a conflict of interest. Additionally, it is likely that this other work interferes with your job duties to Pulte due to the fact that you email prospective weekend customers during the work week using your Pulte computer. Before you go any further, you must raise this issue with your manager, and your manager will discuss it with the Ethics Committee.

I am a sales consultant. I refer my husband, who is a realtor, to Pulte homebuyers under my market's preferred realtor program. As long as I am driving sales, this is ok, right?

Most likely, no. Generally, someone in your immediate family may not provide services to the Company -- this creates a conflict of interest. Before you go any further, you must raise this issue with your manager, and your manager will discuss it with the Ethics Committee.

I am a Sales Consultant and I own a rental home. My customer needs a place to live while she waits for Pulte to build her home. Can I rent my home to the customer so long as I charge a reasonable rent?

No. This is a conflict of interest. By using Pulte customers to further your rental business, your personal interests are inconsistent with the Company's interests (the longer she pays rent, the more you make) and your judgment may be compromised because of the potential for personal gain -- a clear policy violation. This situation will also likely result in customer confusion (e.g. the customer will complain to Pulte) if the customer has a problem with your rental. Even if you do not rent to Pulte customers, always check with your manager or People & Culture to determine whether your "side business" may violate the Conflicts of Interest policy.

Employees Using Company Vendors, Suppliers or Trade Contractors for Personal Use

You may not use a Company vendor, supplier or trade contractor unless you comply with the following:

- You may not receive any discount from the vendor, supplier or trade contractor unless the discount is available to all Company employees in your operation.
- You must pay reasonable commercial rates for such goods and/or services and in all instances (no matter the dollar level) document your payments and retain invoices and receipts.
- For a project where the total amount of goods or services to be performed/ received from the vendor, supplier or trade contractor will exceed \$1000, you and the Contractor must also complete the ["Employee Using Vendor, Supplier or Trade Contractor For Personal Use Consent Form"](#) prior to beginning your personal project.
- However, if you are a Vice President-level employee or above or you work in the Procurement Department, and you have a project where the total amount of goods or services to be performed/received from the vendor, supplier or trade contractor will exceed \$5000, you are prohibited from using

a Company vendor, supplier or trade contractor for your personal project. The SVP Finance may grant you a written exception to this Policy only if there are no other reasonable alternatives in your market.

If you hire a general contractor to manage your personal project, you must still comply with all of the above provisions of ["Employee Using Vendor, Supplier or Trade Contractor For Personal Use Consent Form"](#) as your general contractor may use a Company vendor, supplier or trade contractor.

If you are unsure as to whether to accept a discount, or whether your project requires the ["Employee Using Vendor, Supplier or Trade Contractor For Personal Use Consent Form"](#), or whether you are permitted to use a Company contractor, promptly check with your Area Vice President of Finance or the SVP Finance.

This Policy does not apply to the employee purchase programs listed on the "Employee Discounts" section of the Company intranet, or other similar discount programs which are available to all employees.

Employees Using Company-Owned Suppliers for Personal Use

You may use a Company-owned supplier so long as:

- For any project, you and Management of the Company-owned supplier must complete the ["Employee Using Company-owned Supplier for Personal Use Consent Form"](#) prior to beginning your personal project.
- Any discount provided by the Company-owned Supplier is available to all Company employees.
- You pay reasonable commercial rates for such goods and/or services and in all instances (no matter the dollar level) you document your payments and retain all invoices and receipts.

- If you hire a general contractor to manage your personal project, you must still comply with the provisions of [“Employees Using Company Vendors, Suppliers or Trade Contractors for Personal Use”](#) as your general contractor may use another Company vendor, supplier or trade contractor in addition to the Company-owned Supplier.
- The terms and pricing of all services and/or materials provided by the Company-owned Supplier must be pre-approved in writing by the SVP Finance.



I am adding an addition to my home and using a general contractor who I have confirmed is not a Company vendor, supplier or trade contractor. Can my general contractor use ICG for framing (materials and labor)?

Yes, so long as you: 1) Obtain review and written approval from the SVP Finance for all ICG discounted pricing prior to beginning your personal project; and 2) confirm that all other trades, vendors or suppliers hired by your general contractor do not perform work for and/or sell materials to the Company (or comply with the [Employee Using Vendor, Supplier or Trade Contractor For Personal Use Consent Form](#)); and 3) you and your manager have signed the [Employee Using Company-owned Supplier for Personal Use Consent Form](#).

I am adding an addition to my home and using a general contractor who I have confirmed is not a Company vendor, supplier or trade contractor. Do I need to separately confirm that any trades, vendors or suppliers hired by my general contractor also do not do work for and/or sell materials to the Company?

Yes. Even if you hire a general contractor for a personal project, you must still ensure that the use of any trades and suppliers by your general contractor comply with this Policy. If you are unsure whether a vendor, supplier or trade contractor currently does work for the Company, you should reach out to your Division Finance or Procurement team for assistance.

Employee Purchases of Our Homes or Our Supplies

We hope that you become a customer. To avoid the appearance of impropriety, the following policy applies to the purchase of a PulteGroup residence or services and/or materials (“Supplies”) by a PulteGroup-owned supplier such as Innovative Construction Group (ICG):

- You may purchase any available home from the Company only if you occupy the home as your primary or secondary residence, or if a member of your immediate family will occupy it as his or her primary or secondary residence. In no instance can an employee or immediate family member purchase a PulteGroup home for investment purposes (e.g. purchasing with the intent to collect rental income is prohibited).
- The term immediate family includes your or your spouse’s parents, grandparents, children, siblings or grandchildren.
- The terms and pricing of any employee or immediate family member home purchase must be preapproved in writing by the SVP Finance. You must be employed at the time of the home closing to receive any type of employee or immediate family member discount on the home purchase.



- Only employees are eligible to purchase ICG materials/supplies. The cost to the employee will include an 18.75% mark-up above ICG's cost of the materials/supplies. The terms and pricing for any ICG materials/supplies being purchased by any employee must be preapproved in writing by the ICG VP Finance if the value of such materials/supplies is \$1000 or less. The Company SVP Finance must preapprove in writing any material/supply purchases where the value exceeds \$1000 (and for all purchases made by Director-level-and-above employees regardless of the value). You must be employed at the time the materials/supplies are delivered to receive any employee discount on the purchase. [Click here for the entire Policy Regarding Home Purchases By Employees, Immediate Family Members and Trade Partners.](#)



No. House plans are Pulte's proprietary materials and the Company does not consent to the employee's use of those plans.

You are responsible for understanding and adhering to this policy, whether you are the purchaser or are otherwise involved in the employee purchase transaction due to your position.

Who should I contact if I have a question or report regarding fair dealings, gifts, conflicts of interest or purchasing a Pulte home?

- » [Any member of the Conflicts Committee](#)
- » [VP of Compliance](#)
- » [SVP – Finance](#)
- » [Law Department](#)
- » [Deputy General Counsel](#)
- » [Call our SpeakUp Helpline or make an online report \(anonymously if you choose\)](#)



I am building a home on land that I already own. Can I use one of Pulte's house plans to build my house?

Our Company Records and Reporting

Our Company's financial and accounting records must meet the highest standards of completeness and accuracy. There are many laws and rules that govern our obligations to accurately track, record and report our financial and other data. These include state and federal securities laws, regulations of the Securities and Exchange Commission, the Foreign Corrupt Practices Act, the Internal Revenue Code, the rules of the New York Stock Exchange and the Sarbanes-Oxley Act. Certain employees must personally certify that our financial records are complete and accurate, and that we have gathered and retained all required documentation. Everyone is responsible for proper recordkeeping and reporting.

Financial Accounting Records

You must observe and comply with generally accepted accounting principles and follow the system of internal accounting controls established by the Company requiring that company books and records accurately and fairly reflect, in reasonable detail, the transactions and disposition of Company assets.

- You may not make false, misleading or artificial entries on any books, or in any records or reports for any reason
- You must disclose all information regarding company funds or company assets, regardless of their purpose
- You may not make or approve payments from company funds or other assets with the intention or understanding that any part of such payment is to be used for any purpose other than that described by the documents supporting the payment
- You must support all payments with appropriately approved invoices or receipts, expense reports or other customary documents, all in accordance with established policy



I work in the Sales Department. Yesterday a customer emailed me a notice canceling her sales contract. We are in the middle of a sales contest and my GSM told me to delay reporting the cancellation until next quarter. I can probably sell another home to make up for this cancellation - is this minor "delay in reporting cancellation" ok?

No. You must follow our Sales Cancellation Policy. Entering accurate cancellation information is critical to ensuring accurate financial statements at both quarter and year-end. Each of us has a duty to ensure that financial records are timely and to provide an honest picture of our operations and financials.

Records Management

A variety of laws that govern our accounting, tax and business operations require us to follow proper records retention practices. All documents and records that you receive or generate in the course of your work are Company property. These records, which include both physical and electronic documents, are subject to the [Records Management Policy](#) that details the period of time for which you are required to retain records. You are required to comply with this [Records Management Policy](#), including Legal Holds (defined below), with respect to all business records in your possession regardless of their format or storage location.

Legal Hold

A Legal Hold is the process used to suspend the routine destruction of official and transient records because of ongoing or reasonably foreseeable claims or litigation. Regardless of the retention period specified in the records management schedules, you are prohibited from destroying documents and records that may be subject to a Legal Hold. Destruction of records subject to a Legal Hold can result in fines and criminal sanctions for persons who destroy or who direct destruction of such records.



I deleted some emails which may be subject to a legal hold. What can happen to me and the Company?

You may have exposed yourself and the Company to significant financial penalties, adverse legal rulings and bad publicity. If you believe you may have deleted records subject to a legal hold, or records that should have been maintained according to the records retention policy, you must contact the Law Department immediately. Also, if you are a manager and your employee departs, it is your duty to collect any records of the outgoing employee that are subject to a legal hold.

Who should I contact if I have a question or report regarding financial records, reporting or records management?

- » [Your manager](#)
- » [Area VP or Director of People & Culture](#)
- » [Area VP of Finance](#)
- » [VP Controller](#)
- » [Chief Financial Officer](#)
- » [Director of Corporate Audit](#)
- » [Records Management](#)
- » [Law Department](#)
- » [Call our SpeakUp Helpline or make an online report \(anonymously if you choose\)](#)

Expenditures

All items you expense to the Company, such as travel or meals, must be legitimate business expenses. You should review and comply with the [Reimbursable Business Expense Policies and Procedures \(Homebuilding Operations and Home Office\)](#), and any additional policies in your operation.

Finance and Operations Policies and Procedures (“Finance Manual”)

If you negotiate financing arrangements or leases, you are expected to know and adhere to the policies and procedures set forth in PulteGroup’s [Finance Manual](#) which will govern whether a financing arrangement or lease must be pre-approved by your Area Vice President of Finance, the Company Treasurer, the SVP Finance, and/or the Chief Financial Officer.

Among other requirements, the Finance Manual also provides that:

- A guaranty by PulteGroup or another Company entity of an affiliate’s financial commitment or contractual performance requires pre-approval by the Company Treasurer or the Chief Financial Officer

- In all circumstances, the acquisition or formation of an entity, or the formation of a joint venture, regardless of the purpose, must be approved by the General Counsel

Loans

Unless pre-approved by the SVP Finance or the General Counsel, you may not make or accept any personal loan from the Company, other than home loans from the Company's mortgage affiliate.

In addition, neither the members of the Company's Board of Directors, nor the Company officers who are deemed "executive officers" by the SEC may accept a loan from the Company, including any loan from the Company's mortgage affiliate.

Political Contributions

Any political contributions made directly on behalf of the Company must be approved in advance by the Law Department. You may not seek reimbursement for political contributions made with personal funds. This ensures that the Company's contributions are

lawful under the various governing state and local laws, regulations and reporting requirements.

The Company defines political contributions as money, services or other items of value given to candidates for office, government officials, political parties, political action committees, and referenda or political education funds. Please click here for the [Political Contributions Authorization Form](#).

Who should I contact if I have a question or report regarding company assets, the Finance Manual, or political contributions?

- » [Your manager](#)
- » [Your VP of Finance](#)
- » [VP Controller](#)
- » [Chief Financial Officer](#)
- » [Law Department](#)
- » [Call our SpeakUp Helpline or make an online report \(anonymously if you choose\)](#)



Our Securities and Property

As an employee of a publicly traded company, you must observe certain rules regarding buying, selling and trading PulteGroup Securities. PulteGroup Securities include:

- Company stock
- Employee, director, and publicly traded stock options
- PulteGroup's publicly traded debt
- Company Stock Fund in the 401(k) Plan

If you violate the following policy, you may be subject to personal civil and criminal liability.

Material Information

You may never purchase, sell or trade PulteGroup Securities if you possess Material Information that has not been previously disclosed to the investing public. Material Information is defined as any information that a reasonable investor would consider important in an investment decision regarding PulteGroup Securities.

Examples of Material Information include, but are not limited to:

- Significant internal financial information that departs in any way from what the market would expect
- Significant changes in sales, earnings, or dividends
- Significant non-ordinary course financing transactions
- Stock splits or other transactions relating to PulteGroup stock
- Significant mergers, tender offers or acquisitions of other companies, or major purchases or sales of assets
- Significant changes in management

- Significant sales or purchases by PulteGroup of its own securities
- Significant litigation
- Significant transactions with other companies, such as joint ventures or licensing agreements

These are examples – this list is not exhaustive. Also:

- All Company employees and Board of Directors are subject to this restriction
- This restriction includes elections made through your 401(k) while you are in possession of Material Information not previously disclosed to the public
- This restriction does not apply to trades made pursuant to a pre-approved 10b5-1 trading plan (see “10b5-1 Trading Plans” below)

Unless specifically authorized, you may never share such nonpublic Material Information (“tipping”) with anyone outside the Company, including family members.

Employees should be familiar with the Company's Disclosure Policy which requires that disclosures comply with applicable law and New York Stock Exchange rules and regulations.

Blackout Periods for Covered Employees

You may not purchase, sell, or trade PulteGroup Securities during the quarterly blackout period if you are a member of the Board of Directors, a President, Executive Vice President, Senior Vice President, Home Office Vice President or Home Office Director-level employee of the Company, plus any employee with access to the General Ledger cube within the OLAP reporting tool

(collectively “Covered Employees”). Family members or other persons living with Covered Employees should also adhere to the blackout periods. Employees reporting directly to any Covered Employee should discuss the applicability of this policy with their immediate supervisor. Even if you are not a Covered Employee, any employee who learns of nonpublic Material Information is subject to the blackout periods.



Blackout periods begin the second Monday of the month in which the quarter ends and end the day after the first business (trading) day following the Company’s public release of its earnings report for the preceding quarter.

Example: The quarter ends March 31st, 2024. The Blackout period begins on March 11th, which is the second Monday of the month.

Example: PulteGroup issues a press release with quarterly financial information on Tuesday, and the New York Stock Exchange is open for trading on Wednesday. The blackout period will end and the trading window will reopen when the market opens on Thursday morning.

The Company may impose additional blackout periods from time to time.

- This restriction includes elections made through your 401(k) plan with respect to the PulteGroup Stock Fund during the blackout period. The Company will regularly monitor trading in the PulteGroup Stock Fund in the 401(k) Plan
- This restriction does not apply to trades made pursuant to a pre-approved 10b5-1 trading plan. (See 10b5-1 Trading Plans below)



Our company intranet says we are in a blackout period. I just reduced my contribution amount with respect to my election of PulteGroup stock in my 401(k) plan – does this mean I violated the blackout period?

Yes, if you are a Covered Employee. Covered Employees may never trade PulteGroup securities during a blackout period. The blackout period restriction includes elections made through your 401(k) plan. Your spouse is also covered by the blackout period even though your spouse may not work for Pulte. You must contact the Law Department immediately. You can also contact Compliance@pultegroup.com if you need to confirm whether you are a Covered Employee.

Trading PulteGroup Stock

You may never engage in short sales, trading in options or other speculative investment transactions regarding PulteGroup securities. For example, you may not make a combination or pattern of substantial or continuous buying and selling of PulteGroup securities or options with the primary objective of realizing short term gains. In addition, you may not engage in hedging or monetization transactions such as zero-cost collars and forward-sale contracts.

All employees and members of the PulteGroup Board of Directors are subject to this restriction. This restriction includes elections made through your 401(k) plan.



Our company intranet says we are in a blackout period. Before the blackout period began, I set up a standing limit order for PulteGroup stock via my e*TRADE brokerage account. Is this ok?

No, if you are a Covered Employee. You must suspend any outstanding limit orders for the duration of the blackout period. Otherwise, you or your broker could execute a prohibited trade and violate Company policy. You would also violate Company policy if you took action regarding your PulteGroup stock at a time when you possessed Material Information.

10b5-1 Trading Plans

The prohibitions on trading at a time when you possess nonpublic Material Information or during a blackout period do not apply to transactions that are made pursuant to a properly established Rule 10b5-1 trading plan. To comply with PulteGroup's insider trading policy, a 10b5-1 trading plan:

- Can only be established (or amended) at a time when the insider does not possess nonpublic Material Information
- Cannot be established (or amended) during a blackout period
- Must specify the amount, pricing, and timing of transactions in advance or delegate complete discretion on these matters to an independent third party
- Cannot be established, terminated, or amended without the advance approval of the Company's General Counsel

Once a 10b5-1 trading plan is adopted, the insider cannot exercise any influence over the amount of securities to be traded, the price at which they are to be traded, or the trade date.

Certain officers and members of the Board of Directors are also subject to the trading procedures described in the Company's Officers and Directors [Insider Trading and Confidentiality Policy](#).

Who should I contact if I have a question or report regarding company stock, Material Information, or blackout periods?

- » [General Counsel](#)
- » [VP Controller](#)
- » [Law Department](#)
- » [Call our SpeakUp Helpline or submit an online report \(anonymously if you choose\)](#)

Protect Company Assets; Safeguard Confidential and Proprietary Info

Our shareholders own our Company's assets. We must protect Company property and only use it for legitimate business purposes.

Company Assets

We must safeguard assets, such as cash, inventory, tools, equipment, records, computers and other valuable items, whether owned, leased or borrowed by the Company. You must use and maintain such assets with care and respect and guard against waste and abuse. You may not use Company facilities or assets for a purpose unrelated to Company business without your supervisor's permission. All Company assets including computers, laptops, tablets or other devices must be returned upon request or at the time an employee is separated from the organization.

You must take steps to ensure that your computer, laptop, tablet, phone or any other device that contains Company information is not stolen or lost. If any such equipment disappears, you must report it immediately to the TSC. The Company reserves the right to deduct replacement costs for the lost or stolen Company-owned electronic devices from employee paycheck(s)

when the Company finds that the loss or theft was due to the employee's negligent failure to protect Company assets. Click [here](#) for more information regarding the updated electronic device policy.



I work in marketing. Sometimes model home furniture will not be repurposed after the model is sold. Can I borrow the old model home furniture and return it to the Company later?

No. You may not borrow or take Company assets for personal use – this is theft and a violation of Company policy. You must protect Company property at all times and only use it for legitimate business purposes.

Confidential Information

During your employment, you may learn confidential information that belongs to PulteGroup. This includes information about customers, purchasing or other business methodologies, business plans (including land), pricing, marketing, sales methods, information systems, consultants, products, product development, and/or trade secrets, technological improvement plans, strategic plans, policy manuals, training manuals and financial information. All employees are prohibited from using, disclosing or disseminating to anyone any confidential information.

Confidential or otherwise sensitive Company information should not be filed or stored in a non-Pulte location, such as at an employee's home or on his or her private computer.

You have a duty to protect confidential information, especially when the data contains personally identifiable information (PII) or sensitive information concerning our customers, employees, trades, contractors, vendors, or the Company. Unauthorized

use, disclosure, copying and/or misuse of confidential information is a serious violation. Your obligation to keep information confidential continues even after your employment ends.



I use my personal email, Dropbox, and a flash drive to store company information. Is this allowed?

No. Company policy requires that employees only maintain company information in Pulte's email account, and/or on authorized network drives or OneDrive. You must immediately remove all company confidential and proprietary information from personal email, personal devices/drives and unapproved cloud storage, and transfer the information to authorized locations. [Click here for a reminder about storing and accessing Company information.](#)

Trade Secrets

If you develop anything that Pulte considers a trade secret during your employment, that trade secret will always remain the exclusive property of the Company. In general, a trade secret is any information that the Company keeps secret that has economic value because it is not known by our competitors or others.

Inventions, Works and Other Contributions

All rights pertaining to your inventions, works of authorship or other contributions related to the businesses operated by the



Company (known as intellectual property) created during the time you work for the Company will always remain the exclusive property of the Company. We can freely use that intellectual property for any purpose with no obligation to compensate you. It is within our sole discretion to seek trademark, copyright or patent protection for the intellectual property you create during your time at the Company, and the Company has exclusive ownership of those rights. You do not have any legal or equitable rights to that intellectual property.

Assignments

From time to time, we may require you to sign documents that demonstrate that intellectual property developed in the course of your work at the Company belongs to the Company. You must sign such documents promptly whenever requested. If you fail to sign these documents, you do not have rights to this intellectual property; instead, you may be disciplined.

Exclusive Rights

You may not furnish anyone except the Company an idea, invention or suggestion related to the businesses operated by PulteGroup that you develop during your employment with PulteGroup. You may not use such ideas, inventions or suggestions for your own personal benefit.



I am working on cutting-edge technology relating to home selections. Today I plan to meet with a vendor to discuss my project and my idea for the technology. What do I need to do to protect the Company?

Please contact the Law Department prior to discussing your project with a vendor. The Law Department will confirm that the Company has the appropriate non-disclosure and confidentiality agreements in place to protect our intellectual property.

Infringement

You may not use any third party's trade secrets, or their protected ideas, inventions or their original work without authorization. If you discover that PulteGroup has incorporated any third party's trade secret, idea, invention or original work into a work product, you must promptly notify your manager so we can take proper action.



Leo just started in sales with the Company. He used to work for another homebuilder. Leo plans to use Sales Training materials that he drafted for his previous employer. Is this ok?

No. This could be confidential and proprietary material that is most likely owned by Leo's previous employer. Leo should check with his manager before using any materials from another company. Failure to check with his manager could lead to a lawsuit filed against Leo individually and the Company.

Who should I contact if I have a question or report regarding confidential proprietary information?

- » [General Counsel](#)
- » [Law Department](#)
- » [Call our SpeakUp Helpline or make an online report \(anonymously if you choose\)](#)

Our Information Security and Electronic Communications

The Company owns critical information assets, including but not limited to, financial, strategic, customer, supplier or employee information, intellectual property, training, and other company records and files in document format or as data in information systems. These assets lose significant value and can cause irreparable harm if they are lost, stolen, or improperly disclosed. Unauthorized changes to the Company's information or systems (through hacking or social engineering) can seriously impact the Company's business operations. You have a duty to preserve, protect, and account for Company information and information systems, and must ensure that they are properly protected from a variety of threats including theft, improper disclosure, fraud, privacy violation, and service interruption. You are responsible for ensuring that Company information and other assets are only used for the Company's business, and are not improperly lost, stolen, disclosed, modified, endangered, and that access is only made available to authorized persons.

Safeguarding Your Credentials and Passwords

The Company provides each employee with "credentials", a user name and password, to access the Company's system, network, email systems, and role specific computer applications and information ("Systems"). Access to Company's Systems is a privilege, not a right, and the Company is the exclusive owner of the Systems as well as the data and information contained therein. You must keep your passwords confidential, do not write them down, and do not share your credentials with anyone, even with authorized Company users. If you are ever asked to input your credentials into Company Systems (using your Company device or your personal device), you must take great care to first confirm the credentials request is coming from the Company and not a cyber thief. If you believe that you may have provided your credentials to

an unauthorized user or system, you must immediately report the issue to TSC. If you fail to safeguard your credentials, and/or fail to promptly contact TSC regarding a potential compromise, you may be subject to disciplinary action up to and including termination. The Company is relying on you to be extra vigilant and help reduce the risk of cyber theft – our reputation depends on it. You are responsible for any activity that occurs under your credentials.

Storing and Accessing Company Information

Confidential company information should only be stored on the Company's network drives and authorized cloud storage; information should not be stored on your desktop, hard drive, portable media such as a memory stick or thumb drive, or an unauthorized cloud storage service. Company confidential information includes, but is not limited to proprietary or sensitive information, intellectual property, or personally identifiable information (PII). In addition, you must never file, transfer, or store the Company's proprietary, confidential or otherwise sensitive information in or to a non-Pulte location, such as your home, on your private computer, in your personal or non-Pulte email system, or in a personal or cloud file storage system such as DropBox, Apple iCloud, Google Drive, etc. While at the office, log off your desktop or laptop or use a password protected "screen saver" whenever you step away from your computer. All company laptops and desktops will automatically lock after 10 minutes of inactivity.

Accessing company data or information from personally owned devices is a privilege, and not a right. Employees who are provided with company issued laptops are encouraged to use those laptops for Pulte business and avoid using their personal home computers or devices. You should never leave your laptop or any device (whether company or personally owned) that accesses Company information unattended. You should



avoid leaving or storing devices in a vehicle or hotel room; take them with you. Employees are prohibited from accessing Pulte systems outside of the United States unless they are granted a temporary allowance via travel request approval due to a valid business justification. All computing and mobile devices (laptop, tablets, phones, etc.) that access Company information (even those personally owned) and external media (external hard drives, CDs, DVDs, thumb drives) must be encrypted and password protected. You should only install applications (“apps”), or software that are authorized and licensed for use by the Company’s IT Department. All Company data, information, applications and systems, must be purged from personally owned devices before disposing, recycling or transitioning the device to another, and upon termination of employment. Employees are prohibited from destroying or purging Company information from Company owned devices except to be compliant with the Company records retention, clean sweep, and/or legal hold policies and processes. Employees using personal devices to access Company data or to communicate with Company employees, vendors, trades or customers must promptly take steps to preserve any information (e.g. texts) on your personal device that may be part of a Company investigation, claim, or litigation. This includes disabling any auto-delete features on a personal device when you may be subject to a legal hold. Employees are prohibited from intentionally or unintentionally altering or damaging any Company owned asset; the TSC is responsible for managing Company owned devices,

and the employee should take no action to purge Company data or information or wiping Company owned devices.

Data Security Incident Response

You must immediately report any data security breach or password/credentials compromise, including a lost or stolen device to the TSC, including your personally owned device if you access company information with that device. Your prompt report will activate the Company’s data security incident response protocol and investigation as to the nature and scope of the data/information breach, and the Company will determine whether any notifications are required. If you fail to promptly contact TSC regarding a potential data security concern, possible compromised credentials, or a stolen device, you may be subject to disciplinary action up to and including termination. The Company also reserves the right to deduct replacement costs for lost or stolen Company-owned electronic devices from employee paycheck(s) when the Company finds that the loss or theft was due to the employee’s negligent failure to protect Company assets. By accessing Company information from your personal or Company-owned device, you authorize the Company to remotely lock or wipe the device or take other corrective action in the event of theft or loss, and you agree to cooperate fully with the investigation.



I left my Pulte laptop in my vehicle and it was stolen. What should I do?

By leaving your company device in your vehicle, you violated Company policy that requires employees to protect Company assets, data, and information. Contact the TSC at 1-877-733-3728 immediately, and inform your manager. The TSC will activate our data security incident response protocol. You are required to cooperate with the team as they investigate the nature and scope of the theft or loss and take any necessary

corrective actions. We also may require you to reimburse the Company for damages resulting from the stolen assets. Click [here](#) for more information regarding the updated electronic device policy.

You have No Expectation of Privacy

Employees have no expectation for privacy when using Pulte systems, equipment, applications, or emails; this includes employee's personal devices that access Pulte systems, applications, emails, etc. If you become part of a Company investigation, claim, or litigation your personal device is subject to a forensic examination (e.g. being imaged) by the Company and you must provide access to your personal device so the Company can take the appropriate steps to review and preserve the data. Company and employee-owned personal devices are also subject to being remotely wiped if lost or stolen and/or forensic examination in the event of an investigation. Employees are prohibited from taking and/or using the company's confidential and proprietary information, assets, and/or intellectual property or trade secrets for personal gain; this obligation extends even after termination. Employees will be required to complete the [Protection of Electronic Company Information Certification Form](#) upon separation of employment (voluntary or involuntary) at the designated time when the terminating employee returns other company property, i.e., computer, keys, ID badges, etc. The Company reserves the right to hold an employee financially responsible for costs and expenses associated with a forensic examination of a personally owned device, if that forensic examination confirms the unauthorized presence of company data or information.

All emails sent in or out of the Company's email system are Company property, and authorized Company employees may intercept or review (with or without your knowledge) your electronic communications including texts or instant messages and emails you send to your personal email account using Company property at any time. An employee may review another employee's

emails only with approval from the Law Department. The Company monitors Internet activity to determine which users are accessing which sites/blogs and for how long. Information regarding Internet activity may be shared with your supervisor, the People & Culture department and the Law Department (among others) whenever the Company suspects a violation of this Policy. You should also note that electronic communications that are erased or deleted can often still be retrieved.

For security purposes, the Company utilizes video surveillance systems in public areas including model homes, office buildings, and other work locations as necessary where there is no reasonable expectation of employee privacy. Video surveillance may be utilized for employee monitoring as appropriate.

Click [here](#) for a link to all Company Information Security policies.



I am involved in a Company investigation regarding the social media policy. I use my personal cell phone to access Company data and to communicate with my coworkers. I have text messages from other employees and trades discussing social media posts about the customer who complained. Because it is my personal device, I can refuse to provide access to my phone and the text messages, right?

Wrong. Employees have no expectation of privacy when using a personal device to access Company data or communicate with Pulte employees, customers, trades or vendors regarding Pulte business. This means that you must provide access to your personal device so the Company can take the appropriate steps to image the data that is the subject of the Company investigation. Also, you must promptly take steps to preserve any information (e.g, texts) on your personal device that may be part of the investigation. This includes disabling any auto-delete features on a personal device when you may be subject to a legal hold.

I clicked on a link in an email from Workday which told me that I had a bonus check deposited into my bank account, but when I checked my Workday account there were no additional funds.

Now, my computer is acting strange and running a company program that I didn't open. What should I do?

You must promptly report such suspicious links to your manager and the TSC Help Desk at 1-877-733-3728. By clicking on a link in a phishing email, you violated company policy that requires employees to protect company assets, data, and information. Recent security breaches involving major US retailers inappropriately disclosed millions of consumers' credit card and personal data. These data breaches were the result of human behavior failures, i.e., an employee clicking on a malware-laced phishing email and stolen credentials from a third-party vendor. Every year, companies incur millions of dollars of legal fees and expenses, suffer irreparable brand damage, and employees lose jobs as a result of data security breaches.

Our Communication Systems

We intend our electronic communication systems, including email, Internet service, instant messaging, and professional social media such as Yammer, and other tools, to be used for Company business. Similar to any other business tool, your use must be professional and appropriate. Your use of these systems for personal business should be very limited and should not interfere with job performance and must comply with all company policies.

Email, Blog and other Social Media Communications

Social media provides an opportunity to promote our brands, but there are associated responsibilities and risks. When it comes to using social media, you must comply with our same core values that serve as the foundation for all our Company's practices: ethics, quality, integrity, professionalism and confidentiality. You should assume that anything you post on social media – whether on a personal or business account – could be viewed by a coworker, manager, customer, trade, investor or competitor. Your social media activity reflects on PulteGroup and can impact our customers, reputation and the work environment. You must comply with this policy even if your posts occur on a personal account or on your personal time.



You are legally responsible for your own postings. Therefore, you may be subject to liability (or other disciplinary action including termination) if your posts are found to be defamatory, obscene, abusive, harassing, discriminatory or in violation of any other applicable law. Please understand that the Company may investigate any complaints about your posts or use of social media, and take appropriate disciplinary action, even if such use is personal and outside of work time.

This Social Media Policy covers all Internet-based communication platforms, including Facebook, Twitter, Instagram, LinkedIn, YouTube, Yammer, Snapchat, Parler, Google, TikTok, message boards, review sites, as well as other websites, blogs, and chat rooms. Our core values apply whether you are Tweeting, posting, texting with customers, or chatting with a coworker near a Ring doorbell. We encourage you to use social media for positive reasons and require you to abide by the following policies when you are online:

Protect Company Information

Safeguarding data regarding our Company, employees, customers, vendors and trades is an important part of your responsibilities. Confidential Information can include data about our homeowners, customers, purchasing/vendors, sales/financial data, business

plans (including land strategy), pricing, marketing and product development. It can also include medical and other personal information about your coworkers. Do not post or otherwise disclose Confidential Information via social media or otherwise, and if you become aware that someone else has posted Confidential Information, you must promptly report the disclosure to your manager or People & Culture. If you are not sure of whether to post something, be safe and don't post it.

Use Common Sense

Everything you post online can lead back to you, so make sure that what you post is appropriate before you post it. This is especially true with respect to business or customer related sites or posts, but we also urge you to exercise similar discretion with personal communications. Social media sites are by their nature "public." Your post might be shared with hundreds of others and archived forever even if you delete it.

Even your personal use of social media can detrimentally affect the Company's business or negatively impact the workplace. Use common sense and discretion – be professional and respectful to others. How you say something can matter as much as what you say. Do not harass, bully or threaten anyone on or outside of social media. If you end up in an online disagreement, use a respectful tone or disengage from the topic. As a reminder, we prohibit:

- ✗ Disrespectful, unprofessional, unethical comments
- ✗ Offensive material, such as pornography, sexually suggestive content, racial slurs, offensive language or jokes in the workplace, posted/shared on social media, or expressed to or about members of the Pulte community, including customers, employees, or trades
- ✗ Derogatory comments regarding another person, such as that person's age, sexual orientation, religious or political beliefs, national origin, disability or any other protected

classification in the workplace, posted/shared on social media, or expressed to or about members of the Pulte community, including customers, employees, or trades

- ✗ False, misleading, deceptive, derogatory or disparaging statements about any third parties, including competitors (there is no reason to ever discuss a competitor on social media site)
- ✗ Usage that is inconsistent with the policies in the Code of Conduct or employee handbook
- ✗ Communications prohibited by law or designed to encourage illegal or improper behavior

To prevent a copyright, trademark or publicity rights violation, do not post images or other content without the consent of those who appear in or own the media. Do not use music in your post unless you first confirm that the Company has a license to use the music. If you quote someone, remember to credit them.

This policy does not prevent you from discussing your wages and other terms and conditions of employment or otherwise engaging in protected concerted activity; however, please clearly state that your comments reflect your own opinions and not those of the Company. If your manager approves your use of social media on Company time, your use should be reasonable and align with potential business value. You have no expectation of privacy when accessing, posting or using social media during work time or through the Company's technology or property and, to the fullest extent permitted by law, the Company reserves the right to monitor such social media activities.

Disclose Your Relationship to the Company when Using Social Media for Work-Related Purposes

If you post/talk about work-related matters that are within your area of job responsibility you must disclose your affiliation with PulteGroup. If you comment, post, or provide a testimonial about

Company products or services, you must disclose that you are an employee. What you post must be true and not misleading, and all claims must be substantiated. When you post on social media, your integrity is broadcast for the entire world to see, so be respectful, professional, truthful and ethical. If you leave PulteGroup, please remember to update your employment on social media sites. Click [here](#) for more information about posting online reviews.



I am a sales consultant. I posted a 5-star review under my name and community on Google. Does Pulte policy permit me to do this?

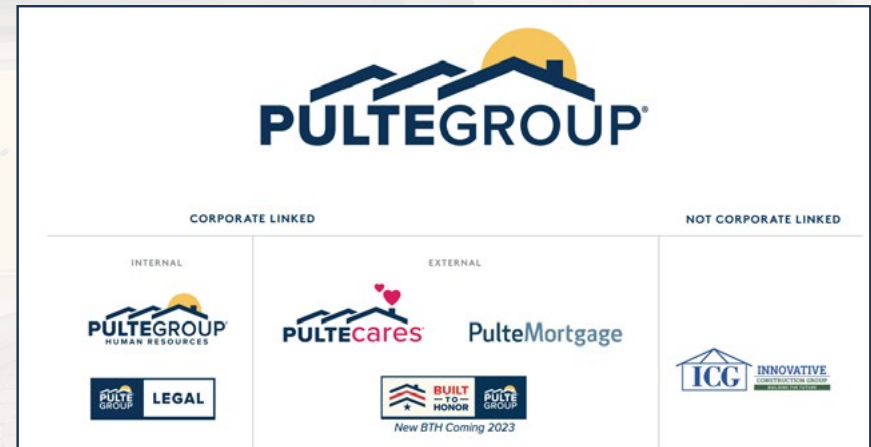
No. Our Social Media Policy states that if you post about work-related matters, you are to disclose that you are an employee with the Company (regardless of what role you serve within or external to the community). This applies to all reviews posted online to any website, app, or forum including Google reviews, community Facebook pages, NextDoor, Yelp, and all other outlets where reviews or community feedback may be provided.

Ownership of Social Media Accounts and Content; Pictures of Employees

If you use social media as part of your job duties for PulteGroup on an account created for that purpose, we consider that account PulteGroup property and it remains so if you leave the company — e.g. you will not try to change the account name or password or assert any ownership of the account or the contacts (including customer prospects) you obtained through the account. Any photos or materials you create for or post on the account will remain PulteGroup property.

You may only use the Company's trademarks and logos when authorized by your manager as part of your job duties and you

must comply with all Company trademark usage requirements ("limited license"). If the Company grants you a limited license to use Company trademarks or other Company information via social media, your limited license ends upon notice from the Company, or when your employment ends (whichever comes first).



For example, if you create a Facebook or LinkedIn page to post business content for sales promotions in your community, you must follow all company policies (including trademark usage requirements) when posting to such page. If you exit the Company, all Company content and any content or materials you created for such page must be promptly taken down and returned to the Company.

The Company reserves the right to use your picture and/or social media content relating to or arising out of your employment, on the Company's social media sites or websites for marketing and/or other business purposes, and you consent to such use via your annual certification to the Employee Handbook.

Here are some other policies located in the Code and/or Employee Handbook that you should keep in mind whenever you are communicating about or on behalf of PulteGroup on social media or otherwise:

- [Employee Privacy](#)
- [Customer Privacy](#)
- [Harassment](#)
- [Non-Retaliation](#)
- [Securities/Material Information/Blackout Periods For Covered Employees](#)
- [Confidential Information](#)
- [Information Security and Electronic Communications](#)
- [Our Communications with the Public](#)
- [Solicitation and Distribution; GoFundMe Campaigns](#)

Please contact compliance@pultegroup.com if you have any social media questions including whether it is permissible for you to post certain information. If you violate this Policy (irrespective of whether the social media activities occur on work time or during remote work, on Company technology resources, or after work hours using personal devices or resources), you may be subject to discipline, up to and including termination.



I got mad at my son's football coach and posted an obscene comment and unflattering picture of the coach. This is ok because I posted the comments on my own time, right?

No. You should assume that anything you post on social media – whether on a personal or business account – could be viewed by a coworker, manager, customer, trade, investor or competitor. Your social media activity reflects on PulteGroup and can impact our customers, reputation and the work environment. You must comply with this policy even if your posts occur on a personal account or on your personal time.



The Company may investigate any complaints about your posts or use of social media, and take appropriate disciplinary action, even if such use is personal and outside of work time. In addition, You are legally responsible for your own postings. Therefore, you may be subject to liability (or other disciplinary action including termination) if your posts are found to be defamatory, obscene, abusive, harassing, discriminatory or in violation of any other applicable law.

Who should I contact if I have a question or report regarding information security or electronic communications?

- » [Your manager](#)
- » [Area VP or Director of People & Culture](#)
- » [TSC Help Desk or 1-877-733-3728.](#)
- » [Chief Information Officer](#)
- » [Chief Information Security Officer](#)
- » [Law Department or Compliance@PulteGroup.com](#)
- » [Call our SpeakUp Helpline or make an online report \(anonymously if you choose\)](#)

Our Communications with the Public

We must be accurate and honest when communicating with employees, customers and the public about our Company. You are prohibited from knowingly making misleading or false statements to your coworkers, customers, the media, financial community, government representatives or in a public forum.

Unless you are an authorized spokesperson for the Company, it is important that you do not communicate with the media. All press inquiries should be directed to the manager of corporate communications responsible for your market. If the issue is urgent, you may also contact the PulteGroup Corporate Communications Department.



If you are contacted by the media directly, please respond that you are not an authorized spokesperson for PulteGroup (or one of our brands), but you can take the reporter's name/ number/email and a company representative will respond.

Unless you are an authorized spokesperson, you should not do the following without permission from the Company's Corporate Communications Department:

- Respond to any questions (in person, via phone or email) from a reporter, other members of the press or from Wall Street investors
- Issue press releases or arrange for publicity
- Speak on behalf of or about the Company at a public event or via any media
- Comment about the Company on the Internet, in chat rooms, blogs, on bulletin boards or on any website or social media outlet
- Respond to any comments about the Company on the Internet, in chat rooms, blogs, on bulletin boards or on any website or social media outlet

If you are confronted with a crisis or an emergency situation, refer to the Company's Crisis Communications Plan and immediately contact the Company's Corporate Communications Department.

If you are concerned about comments you see in the media or on the Internet regarding the Company, please notify the Company's Corporate Communications Department or the Law Department.



I am a Construction Manager and I was approached on the jobsite by a local reporter who asked whether the housing market was improving based on my workload. Is it ok for me to answer the reporter's question?

No. Unless you are an authorized representative, you are prohibited from responding to the reporter. Instead, you should take the reporter's name/number/email and notify the reporter that a company representative will respond.

Who should I contact if I have a question or report regarding media or investor relations?

- » [Director Corporate Communications](#)
- » [Manager of Corporate Communications in your market](#)
- » [Law Department](#)
- » [Call our SpeakUp Helpline or make an online report \(anonymously if you choose\)](#)

“
**Whatever you do,
do it with
integrity and honesty.**
— **Bill Pulte**
”

Conflicts Committee

The Conflicts Committee consists of PulteGroup's Senior Vice President – Finance, Deputy General Counsel, and Vice President – Compliance. No Conflicts Committee member may pass judgment on a possible conflict of interest or appearance of conflict involving that member.

- [VP Compliance](#)
- [SVP Finance](#)
- [Deputy General Counsel](#)

Ethics Committee

PulteGroup's Ethics Committee (EC) administers the Code of Ethical Business Conduct in an independent, objective, fair and consistent manner. The EC meets quarterly and as needed to discuss Company investigations, updates to Code of Conduct policies and procedures, conflicts of interest, risk assessments, third-party SpeakUp HelpLine management, as well as to provide oversight to training, communications and Code certification. There are six Company employees that makeup the Ethics Committee:

- [EVP and General Counsel \(Chair\)](#)
- [EVP and Chief Financial Officer](#)
- [Chief People Officer](#)
- [SVP Finance](#)
- [Designated Area President](#)
- [VP Compliance](#)

Employees seeking guidance from the EC can contact any member directly, the [SpeakUp HelpLine](#) (call, email or text), their VP Finance, People & Culture, Legal or email compliance@pultegroup.com.

Additional Resources

Subject	Contact Information
Conflicts Committee	Click here
Corporate Governance	https://www.pultegroupinc.com/investor-relations/corporate-governance/governance-documents/default.aspx
Employee Benefits	https://pultebenefits.bswift.com 800-759-3539
Ethics & Compliance	Compliance@PulteGroup.com
Ethics Committee	Click here
People & Culture	https://pulte.sharepoint.com/sites/MyHR
Investor Relations	https://www.pultegroupinc.com/investor-resources/investor-contact/default.aspx
Law Department	LegalOperations@PulteGroup.com
Privacy / Data Security	https://www.pulte.com/legal/privacy-policy
Safety	https://pulte.sharepoint.com/departments/Safety/SitePages/Home.aspx
SpeakUp Helpline	SpeakUp.PulteGroup.com call: 800-498-5629 text: 904-782-6958
TSC	https://pulte.sharepoint.com/sites/tsc 877-733-3728

