



Political Contribution Approval Process Policy

FULL POLICY CONTENTS

<p>Policy Statement Communication Procedures Related Documents Additional Contacts</p>	<p>Effective Date: Immediately</p> <p>Last Revision Date: January 2018</p> <p>Authorization: Todd N.Sheldon, EVP, General Counsel and Corporate Secretary Law Department</p> <p>Authorization Date: January 2018</p> <p>Policy Applies To: All Employees</p>
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Policy

This policy outlines the procedure for originating a request for approval of a political contribution and obtaining the approval of a request. All requests must be submitted to and approved by the Home Office Law Department.

It is never acceptable for an employee to be reimbursed for a political contribution.

Contributions by corporations are under increased scrutiny, and even small inadvertent violations are met with substantial fines and accompanying media attention. In many cases, these penalties include criminal prosecution. Therefore, it is critical that each contribution is made in full compliance with the letter of the law. The political contribution laws of every jurisdiction are different and ever-changing. They typically include complex reporting requirements, black-out periods, contribution limits, as well as aggregate limits on contributions per election cycle, which can be up to six years long. In order to ensure that PulteGroup is in full compliance with the law, it is absolutely imperative to follow the approval process set forth below.

PulteGroup’s Nominating and Governance Committee will review a list of all political contributions made on at least an annual basis.

Communication

This policy will be available on the MyPulte Ethics and Compliance page, as well as on the Law Department’s MyPulte page.

Procedures

The following procedures must be followed when requesting authorization to make a political contribution:

- All political contributions must receive prior authorization before the contribution is made. This includes contributions to candidates, Political Action Committees (PACs), ballot initiatives, and political education campaigns. While home builder association (HBA) dues do not generally require authorization, contributions to HBA PACs do require authorization, so please be sure that part of your dues is not being allocated to a PAC. When in doubt, please submit an authorization form.
- Todd N. Sheldon, EVP, General Counsel, and Corporate Secretary, is responsible for reviewing and approving political contributions. Please submit completed Political Contribution Legal Review Authorization forms to Elizabeth A. Williams, who will work with Todd to process the approval in a timely manner. (California contributions should be reviewed by Mona Vergara prior to review by Todd.)
- All requests MUST be accompanied by supporting documentation from the campaign, i.e. the invitation or solicitation letter. If this is unavailable, please provide the website or contact information for the campaign.
- It is critical that the Law Department know which election the contribution will count toward. There are different laws and disclosure requirements for primary, general, and special elections, and all together different rules for debt retirement fundraising. Inaccurately reflecting the proper type of election will always put PulteGroup out of compliance with the law, so please be sure to find out directly from the campaign to which election the contribution will be attributed.
- Each authorization is valid for only 30 days. Please do not make a request unless you plan to mail or deliver the contribution within that time. There have been a number of circumstances where approval has been granted and the check is either never delivered or not delivered for several months. If the timing of the delivery of a check is unknown, PulteGroup cannot comply with the law and may inadvertently exceed its contribution limit for a particular period or make a contribution when it is not allowed.
- If a request is approved and you decide not to make the contribution or to delay it (or if the candidate returns the check), please contact the Law Department so that it can be removed from the Law Department's records. After doing so, if at a later date you would like to make a contribution to the same candidate, simply submit another contribution request form.
- All forms must be signed by the requestor and field approver.
- All forms must be filled out accurately. Please verify all information.
- Please provide the Law Department with sufficient lead time to review the request. The Law Department will make every effort to process requests as quickly as possible, but please remember that there are several steps that must be completed before approving a request.

Related Documents

- Political Contribution Authorization Form Checklist
- Political Contribution Legal Review Authorization Form
- California Political Contribution Approval Procedure Memorandum

Additional Contacts

	Name	Phone Number	Email Address	Position / Department
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