



## VENDOR CODE OF ETHICAL BUSINESS CONDUCT

PulteGroup has been a company branded by core values for more than 70 years. Our founder, Bill Pulte, built this company on a foundation of ethics, quality and integrity. 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, including engaging with vendors, suppliers and trade contractors (collectively, "Vendors") that are committed to the same ethical standards. We require Vendors to comply with our Vendor Code of Ethical Business Conduct ("Vendor Code"), which is detailed below. To ensure these ethical standards are cascaded throughout the homebuilding process, PulteGroup also expects our Vendors to hold their vendors, suppliers and trade contractors to the standards and practices covered by our Vendor Code.

Our homes and communities must be built in a manner that meet or exceed the expectations of PulteGroup and our customers as reflected in our Vendor Code. Vendors must act with integrity and are expected to demonstrate a commitment to legal, ethical, safe, fair and environmentally responsible business practices.

PulteGroup maintains the right to audit Vendors to ensure our standards are being met. In addition, we conduct regular announced and unannounced on-site audits of our communities to ensure Vendors are compliant with health and safety, and environmental standards. PulteGroup may terminate its relationships with any Vendor that does not comply with our Vendor Code or any other PulteGroup requirements. In the event of any conflict or ambiguity between any provision of this Vendor Code and the provisions of any relevant contract with any Vendor, the provisions of that contract will prevail.

**Labor and Human Rights.** PulteGroup recognizes its responsibility to protect human rights. We expect our Vendors to have similar policies and practices that apply to all workers to address:

- **Health and Safety on Job Sites.** Our Vendors must provide workers with a safe and healthy work environment, and Vendors are expected to provide appropriate training, comply with all applicable federal, state and local laws regarding working conditions and occupational safety standards, and PulteGroup's own standards. Consumption of or impairment by alcohol or drugs, even if legal in the state, are prohibited on all jobsites. Vendors must also prohibit their workers from bringing firearms and weapons to any PulteGroup jobsite (even if a worker is properly licensed to do so by state law) and promptly report to authorities any threats or acts of violence.
- **Wages and Benefits.** Our Vendors must pay their workers timely and in compliance with all applicable laws. These include all federal, state and local minimum wage and overtime regulations.
- **Freely Chosen Employment.** Vendors shall only use voluntary labor; any form of forced, human trafficked, bonded, or indentured labor is prohibited.
- **Child Labor.** PulteGroup will not tolerate any form of child

labor. Vendors are expected to prevent child labor as defined by International Labor Organization (ILO) Conventions 138 & 182, in addition to all federal, state, and local labor age laws.

- **Nondiscrimination.** Workers shall be treated with dignity and respect at all times. We require Vendors to comply with all applicable laws regarding nondiscrimination in hiring and employment practices. We expect our Vendors to maintain a workplace free of discrimination or harassment of any kind including but not limited to race, age, color, religion, gender, sexual orientation, national origin, disability, veteran status, or other legally protected status. This extends to how Vendors treat PulteGroup employees, customers, and trade partners as well.
- **Immigration.** Our Vendors may only hire workers who are legally eligible to work in the country where the labor is being provided.

**Ethical Behavior.** PulteGroup expects Vendors to conduct business in accordance with the highest ethical standards, including but not limited to:

- **No Bribery.** Our Vendors may not engage in bribery with anyone for any reason, whether dealing with government officials or the private sector. This includes offering, promising, giving, or accepting anything of value to obtain or provide undue or improper advantages to anyone for any reason.
- **Anti-Corruption.** Vendors must comply with applicable anti-corruption laws, including the United States Foreign Corrupt Practices Act, and never bribe a government official on PulteGroup's behalf. Vendors may not offer, give, or promise anything of value, either directly or indirectly, to government officials to encourage them to act improperly or to reward them for doing so.
- **Non-Retaliation.** Vendors must prohibit retaliation against workers who report Vendor Code violations and create a mechanism for workers to complain anonymously.
- **Data Protection.** Vendors must create, store, retain, and dispose of business records and PulteGroup data in compliance with all applicable laws, including those relating to the confidentiality, integrity and availability of such data and the privacy rights of any related data subjects. Vendors shall report in writing any suspected cyber incident or data breach that may impact PulteGroup employees, customers, homeowners or shareholders immediately following detection to Vendor's PulteGroup contact and to [compliance@pultegroup.com](mailto:compliance@pultegroup.com)

**The Environment.** Our Vendors must comply with all applicable environmental laws and immediately notify PulteGroup if Vendor observes, discovers and/or becomes aware of any spill of any hazardous or toxic substance or material or other pollutants on any PulteGroup jobsite. PulteGroup encourages our Vendors to implement processes to identify and manage risks and opportunities related to the environment, including but not limited to:

- **Water.** Vendors must comply with the Clean Water Act, including, but not limited to, the National Pollutant Discharge Eliminate System, and avoid the discharge of any hazardous

or toxic substance or material or other pollutants into or on the jobsite which leaves the jobsite or is capable of being washed from the jobsite during a rain event.

- **Permits and Recordkeeping.** Vendors must obtain and keep current all required environmental permits, approvals, and registrations and follow applicable operational and reporting requirements.
- **Effective Management and Disposal of Hazardous Substances.** Vendors must effectively identify and manage the safe handling, movement, storage, and disposal of chemicals and other substances that pose a threat to the environment, including providing workers with appropriate training on the safe-handling and disposal of hazardous substances. Vendors must also monitor and control wastewater or solid waste generated from operations before disposing in accordance with applicable laws. In addition, Vendors must characterize, monitor, control, and treat regulated air emissions before discharging in accordance with applicable laws.
- **Continuous Improvement.** PulteGroup encourages our Vendors to continuously improve and reduce waste. We also encourage our Vendors to suggest improvements to our own operations and processes if identified.

### Questions and Reporting Concerns

PulteGroup encourages Vendors to reach out to [compliance@pultegroup.com](mailto:compliance@pultegroup.com) with any questions or concerns regarding compliance with this Vendor Code of Ethical Business Conduct.

Any facts or circumstances which are likely to lead to your inability to meet the requirements of this Vendor Code must be reported immediately to your PulteGroup contact or to [compliance@pultegroup.com](mailto:compliance@pultegroup.com).

Anonymous reports of policy violations can be made to the PulteGroup third-party hotline [online](#) or by calling 1-800-498-5629. Retaliation of any kind against an individual who reports concerns in good faith will not be tolerated.