

# PulteGroup Human Rights Policy

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## Policy Statement

PulteGroup adopts this Human Rights Policy to reinforce its commitment to sustainable and socially responsible business practices. We recognize the importance of respecting and promoting internationally recognized human rights - specifically those rights which are inherent to all people, regardless of race, gender, nationality, ethnicity, language, religion, or other status - and have adopted this policy to guide our company, our employees, and our business partners.

In developing this Human Rights Policy, we have referred to governing U.S. law, best practices published by authoritative professional and industry organizations, policy statements of our peer companies and employers in other industries, international conventions, and third-party international organizations. While informed by these sources, our policy remains our own and reflects our culture, principles, and standards. It is the responsibility of our leadership to determine how best to interpret and apply these principles to our business and the places in which we operate.

PulteGroup maintains a robust employee and stakeholder grievance process - Any persons aware of or suspecting violations of PulteGroup’s Human Rights Policy should report such concerns to the SpeakUp Helpline at [SpeakUp.Pultegroup.com](https://SpeakUp.Pultegroup.com) or 800-498-5629.

## Human Rights

Our approach to human rights is rooted in a commitment to the United Nation’s Universal Declaration of Human Rights and its recognition of the aspirations of all persons to be treated with dignity. We look to guidance from various international conventions, including the International Convention on Civil and Political Rights and the UN Guiding Principles for Business and Human Rights.

We strive to anchor respect for human rights in our day-to-day business activities as reflected in our existing policies and such policies which we may adopt in the future.

The advancement of human rights is not without challenge. Governments are the primary duty-bearers under international human rights law, and collectively they are the trustees of the international human rights regime. Governments can take appropriate steps to prevent, investigate, punish, and redress such abuse through effective policies, legislation, regulations, and adjudication. Consequently, our first duty is to comply with the law of the land where we operate.

While we recognize that Governments have the ultimate duty to protect human rights, we also have a role to play in advancing human rights. In fulfilling our role, we focus on general areas where the risk of adverse human rights impacts is most significant, whether due to certain suppliers' or clients' operating context; the particular operations, products or services involved; or other relevant considerations. We believe that we can, and do, influence others through leading by example.

## PulteGroup Policies

This Human Rights Policy should be read as a whole with the existing policies and practices that PulteGroup has adopted. Our commitment starts with the principles outlined in our [Code of Ethical Business Conduct](#) along with the policies and the responsibilities such Code imposes. Our Code also sets forth a process for managing compliance with those policies. Collectively, our policies have the objective of enhancing PulteGroup's standards and practices so as to achieve tangible results for the communities in which we operate.

Below we summarize some of our key policies and practices.

- *Our Environment.* PulteGroup is committed to operating in an environmentally responsible manner to benefit all our stakeholders, which includes our employees, customers, trade partners, communities, and shareholders. Our commitment to quality encompasses doing the right thing by our environment throughout the entire design, development, and build process as more fully detailed in our [Environmental Policy](#). The right to water and a healthy environment are essential human rights and it is PulteGroup's policy to work to minimize our environmental impact and commit to the environmental integrity of our building processes and manufacturing facilities at all times. We follow US Securities and Exchange Commission guidelines when disclosing any use of conflict minerals.
- *Child Labor and Human Trafficking.* PulteGroup is committed to working to ensure that its operations and supply chain are free of the use of child labor, forced labor (including slave labor, prison labor, indentured servitude, or bonded labor), or human trafficking. We mandate that our service providers will not engage in such activities, as well as not engage in unlawful discrimination or fail to comply with applicable wage and hour obligations to which they are subject with respect to their workforces.
- *Nondiscrimination.* 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, gender identity or expression, genetic information, or any other basis prohibited by applicable federal or state law.

- *Non-Harassment and Retaliation.* PulteGroup will not tolerate conduct by any person or organization that seeks to intimidate, harass, or coerce employees. This includes the prohibition of retaliation against employees who report misconduct.
- *Freedom of Association.* PulteGroup is committed to protecting the right to freedom of association, including the principle that no one may be compelled to belong to an association. Everyone has the right to freedom of opinion and expression; this right includes freedom to hold opinions without interference and to seek, receive and impart information and ideas. Recognizing that the workplace is for work and the particular safety and regulatory demands of the industry in which we operate, these rights must be exercised in a manner that does not interfere with the safe and efficient performance of work by those persons on working time and be in compliance with all applicable laws.
- *Workplace Safety.* We are committed to providing a safe and healthy workplace with appropriate rules and practices for reporting and preventing accidents, injuries, and unsafe conditions. This means that we manage our jobsites in compliance with all applicable occupational health and safety regulations and laws, plus our own quality and construction standards which may exceed those which are lawfully required.
- *Our Vendors and Trade Partners.* Our [Vendor Code of Ethical Business Conduct](#) seeks to ensure that our ethical standards applies throughout the homebuilding process. Our vendors, suppliers, and trade contractors are required to adhere to our Vendor Code. PulteGroup also expects our business partners to hold their vendors, suppliers, and trade contractors to the standards and practices covered by our Vendor Code.
- *Our Communities.* Our purpose is to build incredible places where people can live their dreams. PulteGroup is committed to continuing to serve the communities we help to create. We do this through involvement with community organizations and foundations as well as engaging in meaningful dialogue with our local stakeholders. We encourage employees to participate in company-sponsored volunteer events and to take advantage of PulteGroup Charitable Foundation programs to provide funding to local charities.

## Stakeholder Engagement

The exercise of the rights provided for in this Policy carries with it special duties and responsibilities by those claiming such rights for themselves or on behalf of others. Members of a community which advances the free and full development of human potential, and the exercise of rights and freedoms, share a responsibility to recognize and respect the rights and freedoms of others.

PulteGroup welcomes engagement from all of our relevant stakeholders - employees, communities, trade partners, shareholders and others - under our Human Rights Policy. We regularly discuss our human rights practices and policies with our stakeholders and have taken their input into account with respect to this policy.

## Policy Governance

This policy has been approved by the Nominating and Governance Committee (the "Committee") of the PulteGroup Board of Directors. Members of senior management may amend or update the policy as appropriate, with such amendments reviewed and approved by the Committee on an annual basis. The review and approval of this policy are to be

considered part of the Committee's periodic oversight of social responsibility, ethics and culture.

## Related Documents

- [Code of Ethical Business Conduct](#)
  - Non-Retaliation
  - Health and Safety
  - Environmental Compliance
  - Customer Nondiscrimination
- [Employee Handbook](#)
  - Equal Opportunity, Diversity, and Inclusion
  - Open Door Policy
  - Reporting Obligations/Non-Retaliation
  - Safety
  - Harassment
  - Workplace Threats and Violence
- [Vendor Code of Ethical Business Conduct](#)
- [Environmental Policy](#)

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## Additional Contacts

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