IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT IN AND FOR PALM BEACH COUNTY, FLORIDA

CASE NO.:

WILLIAM J. PULTE, an individual,

Plaintiff,

VS.

BRANDON JONES, an individual,

Defendant.

COMPLAINT

Plaintiff, WILLIAM J. PULTE, an individual, by and through his undersigned counsel, hereby sues BRANDON JONES, an individual, and alleges as follows:

JURISDICTION AND VENUE

- 1. This is a Complaint for equitable relief and damages in excess of \$30,000, exclusive of attorney's fees and costs, but in no event greater than \$74,999.00, and which is within the jurisdictional limits of this Court.
- 2. Venue for this action lies in Palm Beach County, Florida, as the tortious acts occurred or were published in Palm Beach County, Florida, and are causing damage to Plaintiff who is situated in Palm Beach County. Thus, the causes of action accrued in Palm Beach County.
- 3. Florida's long-arm statute, Fla. Stat. 48.193, sets forth the acts subjecting a non-Florida resident to the jurisdiction of Florida courts. Specifically, this Court has jurisdiction over the claims as they are premised upon libelous statements made by Defendant against Plaintiff. This Court has jurisdiction over Jones as he committed a tortious act in this State under Section 48.193(1)(a)2, Florida Statutes.

4. This matter involves Plaintiff's defamatory statements made on the World Wide Web and published in Florida. Defamatory material published on the World Wide Web and available in Florida is "published" in Florida, for the purpose of satisfying Florida's long-arm statute, when the material is accessed by a third party in Florida. *See Internet Solutions Corp. v. Marshall*, 39 So. 3d 1201 (Fla. 2010):

When the posting is then accessed by a third party in Florida, the material has been "published" in Florida and the poster has communicated the material "into" Florida, thereby committing the tortious act of defamation within Florida.

Id. at 1214-1215.

5. The statements by Defendant, published by him on Twitter, as alleged herein, have been accessed by third parties in Florida.

PARTIES

- 6. Plaintiff, WILLIAM J. PULTE ("Pulte"), is an individual residing in Palm Beach County, Florida.
- 7. Defendant, BRANDON JONES ("Jones") is, upon information and belief, a resident of Georgia.
 - 8. All conditions precedent have been met, waived, or excused.

FACTUAL ALLEGATIONS

- A. Pulte's Involvement with Pulte Homes and its parent, PulteGroup Inc.
- 9. Pulte, who was born and raised in South Florida, has his family roots in Detroit, Michigan. Pulte is the namesake and grandson of William J. Pulte, who was the founder of Pulte Homes, now PulteGroup Inc., a national home builder which is a publicly traded company that was started in Michigan. It trades under the stock symbol PHM on the NYSE.

- 10. Pulte's grandfather built his first subdivision in Bloomfield Hills, Michigan in 1959 and went on to grow the company to the 1st place homebuilder in the country with annual sales of \$14.6 billion. After his retirement as Chairman, PulteGroup declined to 4th place.
- 11. Pulte had a close relationship with his grandfather and was the only family member, of his grandfather's 14 children and 25 grandchildren, recruited by his grandfather to work in Pulte Homes. Pulte's relationship with his grandfather was so good that he was the only descendant to receive an inheritance from his grandfather.
- 12. Pulte's grandfather recruited Pulte to turn around PulteGroup Inc. in 2016 after then-CEO Richard Dugas implemented an ineffective value creation strategy by an outside consultant, Boston Consulting Group ("BCG"). Also, at that time, an independent board member called into question financial representations and practices by the accounting executives and the Dugas Team at about PulteGroup Inc.'s profitability.
- 13. The Pulte Family's public feud with the company earned the endorsement of prominent Wall Street analysts and even the famed hedge fund Elliott Management (a \$35 billion fund at the time) who subsequently purchased a significant stake in PulteGroup Inc. to indirectly support the Pulte's desire for change. In order to bring PulteGroup Inc. out of this state of distress, Pulte agreed to join the board of directors, after being independently vetted by the board in 2016, where Pulte served as a director in good standing for 4 consecutive terms. Pulte later wrote a book with quote excerpts by his grandfather in a book called, *The Home That Bill Pulte Built*. A copy of the book is attached hereto as Exhibit "O".
- 14. In private Board meetings, for which Defendant Brandon Jones was not present, PulteGroup's Current CEO, Ryan Marshall, proposed that Jones be promoted directly from Michigan Division President to the position of COO, the second in command at the company, in a

move that was bizarre. Jones, who was a supporter of the failed former CEO Dugas and the BCG strategy, was Ryan Marshall's confidante, but not qualified for the position proposed. Pulte, an independent director, opposed the bizarre proposal by Marshall. Ultimately, the board unanimously agreed with their colleague Pulte, and unanimously rejected Ryan Marshall's proposal to fast track and promote Jones. After the promotion was rejected, Jones was still given preferential treatment (above a more diverse pool of managers in the dozens of offices across the country) in an expedited manner by the management team.

15. It has not yet been determined how Jones received access to private deliberations of the Board of Directors of PulteGroup Inc., which appear to be the source of Jones's false allegations and half-truths. The independence of the board is not just a matter of fiduciary duty and good ethics, but required by federal law and security regulations.

B. <u>Pulte's Business and Charitable Efforts</u>

- 16. Pulte founded Pulte Capital, a company he founded in 2011, which invests and operates companies in the housing industry. Pulte's grandfather worked for years inside his grandson's Pulte Capital companies and was a valued member of his grandson's Pulte Capital team. Pulte Capital has been very successful in its business ventures.
- 17. Along with Pulte Capital, Pulte spends a significant part of his time on one of his other great passions charitable giving and raising money for those in need. Pulte's charitable efforts and intentions were complimented by the board and management team even whilst there was disagreement over Pulte using his own last name, for fear that it would overshadow the corporation's non-profit efforts which received little media attention.
- 18. Pulte has developed a large Twitter presence with 3.2 million followers in the State of Florida and elsewhere. Pulte regularly posts to his account identifying worthy causes and people

he donates to and to which his followers can donate if they so choose. Many of those recipients have been and remain in Florida.

- 19. One such recent project was the tragic shooting of four high school students killed and seven others wounded in a high school shooting on November 30, 2021.
- 20. After seeing the GoFundMe.com posting from the grandmother of one of the students who was killed, Pulte urged his Twitter followers to donate alongside his donation. Many of his followers donated as shown by their comments in the GoFundMe page which credit Pulte.
- 21. Another effort by Pulte was raising money for funeral costs for an 18 month old who was tragically killed by the child's mother's boyfriend. Pulte published a tweet to his followers on December 18, 2021, that the family needed \$8,000 for funeral costs. Pulte's tweet helped to raise over \$10,000 in two days as donations from his Twitter followers poured in.
- 22. Another recent effort was related to the Uvalde, Texas elementary school shooting, whereby Pulte and his Twitter audience helped raise over \$2.5 million for the family of the teacher who was killed in that shooting.
- 23. Through his charitable giving, Pulte often donates to people in need of money for food and rent and to teachers in need of supplies for their classrooms. In 2019, Pulte gave a Chevrolet SUV to an Air Force veteran.
- 24. Pulte also uses his social media presence to fight greed and corruption in Fortune 500 companies. He has also worked to combat urban blight, a project he started with his grandfather.
 - C. <u>Brandon Jones Bot Network and Spam Accounts</u>
- 25. Jones was recently promoted by CEO Ryan Marshall, in name, to Chief Operating Officer of PulteGroup Inc., making him the second in command. Jones is currently a Senior

Executive of PulteGroup Inc. Previously, Jones served as PulteGroup's Southeast Area President, including and principally Florida, and as a Division President under former CEO Dugas.

- 26. As Marshall's confidante, Jones manages the company's only manufacturing facility based and operating in Jacksonville Florida. Jones manages the Florida team for PulteGroup Inc. Additionally, Jones manages the entire country's operations in his roles.
- 27. As the *potential* Chief Operating Officer, Jones would be the Second in Command of the Fortune 500 Company. While Brandon Jones was promoted by, and is a personal and professional confidante of CEO Ryan Marshall, there is not a reason to believe, at this time, that Ryan Marshall is involved with the operating of the bot network.
- 28. Upon information and belief, PulteGroup Inc. resources were used in the commission of this tort. Marshall is Jones' direct report.
- 29. Upon information and belief, Jones has created a sophisticated network of fictitious accounts ("bots", the "botnet", or "bot network") to target, publish and artificially amplify incessant, targeted, coordinated and malicious harassment attacks on Pulte, his grandfather and The Pulte Family. On the Twitter network, botnets can be used to promote and republish ("retweet") specific tweets or hashtags in order for them to gain larger audiences.
- 30. To conceal his identity and actions, Jones uses and frequently changes fake names for his bots. In at least one case, Jones appears to have stolen the identity or photograph of a deceased man to conceal Jones's own identity. It appears that Jones is using PulteGroup-paid-time and PulteGroup-paid property to operate his botnet. It is likely that Jones is using PulteGroup-controlled IT-issued devices to operate the botnet.
- 31. PulteGroup's employee handbook, its Code of Ethical Business Conduct, specifically forbids the use of social media engaged in by Jones. Everyone from PulteGroup's

Founder, new CEO's, accountants, and other members are subject to PulteGroup's employee handbook, without favor or prejudice.

- 32. Consequences dictate termination according to the Code of Ethical Business Conduct and standard operating procedures currently in place at PulteGroup Inc. This is why Jones sought to conceal his identity as he evaded PulteGroup's legal compliance, Human Resources oversight, and the Investor Relations Department. Jones violates the employee handbook and code of conduct while enforcing it against his subordinates and colleagues.
- 33. PulteGroup's Code of Ethical Business Conduct prohibits the behavior Jones exhibited in dozens of replies and malicious tweets directed at Pulte and his family. Shockingly, he violated nearly every point envisioned by PulteGroup:
 - 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.

See pp. 26-28 of PulteGroup's Code of Ethical Business Conduct a copy of which is attached hereto as Exhibit "N".

- 34. In further violation of PulteGroup policy, Jones misappropriated copyrighted images from the Detroit Lions' logo to the personal photograph of a deceased man, Raymond "Ray" Porter. The Code of Conduct states that: "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." *See* pp. 26-28 of Exhibit "N". Jones knowingly concealed his identity during his targeted campaign of defamation against Pulte to avoid the prohibitions of PulteGroup.
- 35. Upon information and belief, Jones maintains several Twitter accounts under various aliases. One such account, @GoDetroitWin, which initially was under the profile name of "Pistons Fan", changed its profile name to "Raymond Hutchinson" with a photo taken from a deceased man from Kentucky. Jones then changed its name to a "Douglas A. Baldwin" with a profile photo of a young man who is not Jones who is 20 to 30 years of age. Recently Jones changed it again, this time to @EverythingTaket under the name "Catalina Chen". In his recent updated profile photo, Jones has changed the image of "Catalina Chen" to what appears to be an AI generated fake face of a fake woman.
- 36. Jones is targeting Pulte with his false, defamatory and harassing Twitter posts. In his efforts, Jones is using at least two Twitter accounts @GoDetroitWin, which is now account @EverythingTaket, and @stephen_matthe under at least five different names including stealing the identity or photo of a deceased man.
- 37. His bot network's behavior includes constant and repetitive attacks on the Pulte family, accusing members of the Pulte family of crimes, specifically arson, elder abuse and securities laws violations that they did not commit, following illicit pornography, and personally insulting Pulte's Twitter followers. As stated above, PulteGroup's Code of Ethic Business Conduct

prohibits regular engagement Jones exhibited with "pornography, sexually suggestive content." See p. 27 of Exhibit "N".

- 38. Often, Jones's insults are made with non-public, confidential information from PulteGroup Inc.
- 39. Jones uses his fake identities to evade disclosures required by both PulteGroup Inc.'s Employee Handbook and the Securities and Exchange Commission ("SEC").
- 40. Jones's activities function as a pseudo Investor Relations Department for PulteGroup Inc., which is another violation of PulteGroup's Code of Conduct, assuming Jones' bots were not authorized to make such statements on behalf of the company.
- 41. Jones's bots wait for posts from Pulte and then the bots jump into the public comments to plant falsehoods, make statements that either are not true or rely on confidential, nonpublic information and/or disparage Plaintiff's reputation. To avoid detection, and after hurling insults at Pulte and his fans, Jones will often delete his bot's public tweets. Jones's tactics are calculated, malicious, defamatory and unlawful.
- 42. Upon information and belief, Jones has been internet stalking, defaming, and harassing Pulte on Twitter, and possibly several other websites, since at least 2021.
- 43. The history of Jones's Twitter accounts from which he runs his social media campaign against Pulte and his grandfather dates back to at least November 2021 when, upon information and belief, Jones had a publicly available account on Twitter.com under the username "@GoDetroitWin". In 2021, the display name for that account changed to "Pistons Fan" using the Detroit Lions logo as the profile picture. The primary reason for repurposing of this Twitter account became targeting, internet harassment and interfering with ongoing social conversations of Pulte.

- 44. On or about February 12, 2022, the display name of the "@GoDetroitWin" Twitter account was again changed, this time to a fake name "Raymond Hutchinson" with a profile picture stolen from an elderly man. According to an online obituary, this elderly man's real identity is "Raymond Porter" of Olive Hill, Kentucky who passed away on October 28, 2018. The account has been improperly appropriated to misrepresent who is the owner of the account. "Raymond Porter" (1933-2018) has been deceased for over three (3) years and therefore cannot be operating this Twitter account. *See* Raymond Porter's obituary attached hereto as Exhibit "A". It is likely that this identity was unlawfully taken by Jones without permission of Mr. Raymond Porter's family.
- 45. On or about May 12, 2022, Jones changed "Raymond Hutchinson" on the "@GoDetroitWin" Twitter account to a new fake identity, "Douglas A. Baldwin", with a profile picture of a young adult male who is not Jones in his late 20's to 30's. It is unclear if this person is a sophisticated "deep fake" image or if this is another case of identity theft by Jones.
- 46. On or about June 7, 2022, the display name of the "@GoDetroitWin" Twitter account was again changed to "Douglas Balldum", this time maintaining the same profile picture.
- 47. On or about June 24, 2022, the display name of the "@GoDetroitWin" Twitter account was changed to "Catalina Chen" with a display picture of a young adult woman of Asian descent who looks to be in her late 20's to early 30's. It is unclear if this person is a sophisticated "deep fake" image or if this is another case of identity theft by Jones. The Twitter handle was also changed from "@GoDetroitWin" to "@EverythingTaket".
- 48. Upon information and belief, in April 2008, Jones created his other publicly available account on Twitter.com, it appears originally under username @BrandonPHX and is now under the username "@stephen matthe". In what is believed to be a completely fabricated profile

biography, Jones, posing as a fictitious business journalist named Stephen Matthews writes: "Business writer and father of 2 girls. Born in Oklahoma City, but Seattle is my adopted home." A gentleman who is not Jones is pictured in the profile's picture to deliberately mislead Pulte's followers and the investment community into thinking this person is a serious business journalist. This is, of course, a fake business journalist discussing PulteGroup Inc., created by Jones. It is unclear if the person in the profile photo is a sophisticated "deep fake" image or if this is another case of identity theft.

- 49. Jones appears to be using at least two accounts, often in tandem, to give the illusion of a conversation amongst at least two people, but really it is just Jones talking to himself. For example, he will socially engineer an incident of harassment against Pulte, and a short time later will amplify it from his other account(s). Often, he will use his bot accounts to engage with other Twitter accounts to disrupt Pulte's follower base.
- 50. Jones's use of multiple personal accounts violates several of Twitter's Terms of Service parameters, including but not limited to "abuse/harassment," "hateful content," manufactured conversations, and posting from multiple accounts.
- 51. Specifically, Twitter prohibits the practice Jones has and continues to use to defame and harass Pulte, namely "creating multiple accounts to post duplicative content or create fake engagement, including: posting identical or substantially similar tweets or hashtags from multiple accounts you operate." *See* Twitter's Terms of Service attached hereto as Exhibit "B".
 - D. Jones's Bot Network Publishes and Re-Amplifies Tweets Which Defame Pulte
- 52. Jones's Twitter accounts frequently comment on Pulte's Twitter posts and have embarked on a vindictive campaign of falsehoods as a means to sully Pulte's good name and the charitable work in which he engages. Jones's bots have published during business hours when

Jones should be focused on the work of Pulte Homes – not disparaging a former Board member, and indirectly, Pulte Homes for whom Jones works.

53. On or about December 16, 2021, Jones attacked Pulte and his grandfather, writing: "This Bill Pulte has nothing to do with Pulte Homes. He trades in his grandfather's legacy as if he had something to do with it." This statement is false, malicious, and defamatory because Pulte came to the aid of his grandfather and his legacy, and served in a vital capacity to his grandfather. Jones, of course, knows that his statement is false because Jones worked at Pulte Homes when Pulte was at the company. Additionally, Jones overlapped with his grandfather at Pulte Homes from 2004-2009. Jones's statement was simply in retribution for a fan of Pulte's making a positive comment: "I rode past the @PulteHomes sign today, thinking to myself this has to be the same Pulte and sure enough it is!!" *See* copy of tweet attached hereto as Exhibit "C".

54. In response to a February 19, 2022, tweet as to the turnaround of Pulte Homes which Pulte and his grandfather were involved in that started in 2016, Jones wrote:

"My friend was laid off because of you. The employees blame you."

"Employees hated him. That's why he constantly panders to them."

"They lost their jobs because of him."

A copy of the February 19, 2022 tweet and responses are attached hereto as Exhibit "D".

55. These responses are false, malicious, and defamatory in that no single board member is responsible for laying off an individual employee or causing employees to lose their jobs, and employees did not express hatred for Pulte. As a former board member, Pulte believes Jones received private board information that was then used to publish false and partial misinformation.

56. As to a tweet from February 19, 2022, showing a screenshot of the Bill Pulte Foundation Statement, Pulte wrote:

"Our Statement on the Fire at our beloved Oakland Hills CC, a special place for charity events and where my dad, Mark Pulte, and his wife Julie Pulte, are members in Good Standing. Praying for everyone there."

57. In response, Jones wrote:

"are you insinuating your father had something to do with the fire? Was Mark Pulte involved in the fire? Mark Pulte recently bought a competitor course. Is that a coincidence?"

- 58. It is important to note that Jones "tagged" nine others in this false, malicious, and defamatory post, including the Detroit News and the Detroit Free Press, among other news organizations and reporters, in an effort to broaden the reach of his false and defamatory remarks that Pulte's father had committed arson, which is a crime.
- 59. Jones followed up with several other comments that day to this post with similar statements alleging that Pulte was accusing his father of being involved with or causing the fire at the Oakland Hills Country club. Copies of the February 19, 2022 tweets are attached hereto as Exhibit "E".
 - 60. In a tweet from March 10, 2022, Pulte wrote:

"Fortunately, My Grandpa (also Bill Pulte) 100% trusted me with Wall Street Investors. This included FINDING AND LOCATING \$35 Billion Elliott Management, who endorsed our case for CHANGE! The 2016 Turnaround of PulteGroup Inc will be studied for decades, and maybe, centuries."

- 61. In response Jones wrote: "Is this a securities violation?" This response is a false accusation of a criminal act by Pulte, intended to deceive Pulte's followers by suggesting that Pulte has committed a crime, when no such violation occurred. *See* copy of tweet attached hereto as Exhibit "F".
- 62. Continuing his incessant campaign of harassment, on or about February 19, 2022, Jones wrote in a public posting: "Honest question... since you never worked for Pulte, why do you

feel entitlement?" This is factually false, malicious and defamatory. Not only did Pulte work for Pulte Homes to successfully turnaround the company in 2016, he was a party to the agreement between the parties that same year and joined the board where he was compensated with an annual salary for his four terms where he ferociously defended the shareholders and tried to stop corruption and greed. *See* copy of tweet attached hereto as Exhibit "G".

- 63. On or about February 16, 2022, Jones disparaged the extended Pulte family (in particular Bill Pulte, Mark Pulte, Nancy Pulte-Rickard, and former PulteGroup executive assistant Karen Koppal-Pulte) writing: "Pulte Family is kind of a mess. Money does that." *See* copy of tweet attached hereto as Exhibit "H".
- 64. On or about February 19, 2022, when Pulte was shocked by the national news that his father, Mark Pulte's, longtime club had burnt to the ground, Plaintiff put out a statement expressing his sadness for the loss of jobs, the buildings and his father's community. In a sick and twisted response to one of Pulte's fans, an unsolicited Jones wrote: "@pulte mentioned his father Mark Pulte and an investigation into the fire. Sounds like he may suspect his father". This was a clear attempt to disparage the Pulte family, cause confusion and sow division maliciously to as many people as possible. *See* Exhibit "E".
- 65. Jones went on with his harmful conspiracy theory writing: "Was Mark Pulte involved in the fire? Mark Pulte recently bought a competitor course. Is that a coincidence?" This accusation requires a level of obsession and premeditated research that cannot be overstated as Jones sought to inflict as much damage or revenge as possible on Pulte and the broader Pulte family. Several Michigan-based media outlets and a journalist were included in the alert of Jones' public posting. *See* Exhibit "E".

- 66. When a confused fan of Pulte's questioned the absurdity of Jones's claim that Mark Pulte committed arson, Jones wrote: "His dad just bought a competitor course the St. Johns Inn. Google it." He continued, "Link to DBusiness article- Pulte Family Management Acquires Inn at St. John's from Archdiocese". *See* Exhibit "E".
- 67. Writing further in a campaign to disparage Pulte, Mark Pulte, and the Pulte family Jones wrote: "Also look at this article. Coincidence?" Article Fox2 Detroit- 7,000 sq ft home destroyed by fire in Bloomfield Township. *See* Exhibit "E".
- 68. Jones then taunted Pulte to engulf the family in controversy and specifically accuse Pulte of saying his father may be involved in the felony of arson writing: "Are you trying to tell us that your father may be involved in the fire at Oakland Hills???", and "@pulte are you trying to tell us your dad burned down the Oakland Hills Golf course?" *See* Exhibit "E".
- 69. On or about March 10, 2022, Jones falsely suggested that Pulte is lying about a story in another one of his tweets. *See* copy of tweet attached hereto as Exhibit "I".
- 70. On or about March 10, 2022, Jones falsely suggested that Pulte violated securities laws in a tweet wherein Pulte discusses his grandfather's trust in his abilities to speak to investors. *See* copy of tweet attached hereto as Exhibit "J".
- 71. On or about May 15, 2022, Jones published an unsolicited response to a question from a fan of Pulte's inquiring of why Pulte thought PulteGroup was currently named 4th in the country for homebuilders. Instead of taking this time to disclose his role in the company and offer fact driven information on the status of the company, Jones turned the blame of the current ranking of the company on Pulte, who has not been with the company in years, by publishing a tweet stating, "You and the Pulte board spend BILLIONS on stock buy backs. You also did layoffs. Grandpa Pulte would have invested in land, homes and People." In an effort to artificially inflate

the conversation and cause division, Jones responded to himself using a separate moniker in a false, malicious and defamatory manner accusing Pulte of lying, stating: "Wow. Why isn't @pulte honest about this????" *See* copy of tweets attached hereto as Exhibit "K". These accusations and statements attributing current actions at Pulte Homes to Pulte are false because Pulte has not been on the board in years, of which Jones is intimately aware.

- 72. On or about October 9, 2022, Jones wrote in reference to Pulte Homes founder and grandfather of Pulte: "@pulte Nah, you just took advantage when his faculties were diminished. You manipulated an elderly man and are trying to hijack his legacy. He didn't 'wait' a generation. He got old and you were opportunistic." See copy of tweet attached hereto as Exhibit "L". This is false, malicious and defamatory as it alleges Pulte engaged in felony elder abuse, a criminal act, against his grandfather.
- 73. Jones, bizarrely commenting as if he were a former employee of Pulte Homes, wrote on November 2, 2022: "@pulte, I was laid off when you were on the board. You claim you were in the weeds to fix it so you were culpable. You had a massive compensation as a board member and a private jet. You are a hypocrite!!!" This is false, malicious and defamatory on several grounds, not the least of which is Jones pretending to be a laid off employee of Pulte Homes for the purpose of blaming Pulte for the pretend loss of a job. See copy of tweet attached hereto as Exhibit "M".
- 74. These published statements defamed Pulte and resulted in injury to him, including but not limited to, financial losses, loss to his reputation and good name in the community and lost business opportunities.
- 75. Jones's false, malicious and defamatory statements allege behavior on the part of Pulte that is incompatible with the proper conduct of his business, trade or profession.

76. Plaintiff has hired the Law Offices of Jason Gordon, P.A. and has agreed to pay it a reasonable fee for its services in this matter.

COUNT I – DEFAMATION, LIBEL AND SLANDER

- 77. Plaintiff, WILLIAM J. PULTE, realleges the allegations set forth in paragraphs 1 through 76 as though fully set forth herein.
- 78. Jones made one or more false statements regarding Pulte as set forth in paragraphs 43 through 73 above.
- 79. These statements wrongly accuse Pulte of having acted in a manner that would subject him to hatred, distrust, contempt, aversion, ridicule and disgrace in the minds of companies with whom he does business through Pulte Capital, those he connects with through his charitable efforts, as well as with those whom Pulte potentially would do business.
- 80. The false statements, individually and jointly, tend to harm Pulte's reputation in the business and charitable communities and deter others from associating or dealing with Pulte.
- 81. Further, the statements, even if true, are conveyed in such a manner as to give false impressions.
- 82. The statements made by Jones were false and no applicable privilege or authorization protecting the statements can attach to those statements.
- 83. Jones published these false statements to third parties by posting the statements on Twitter.
- 84. In publishing these false statements, Jones either knew the statements were false, had serious doubts as to their truth, or published them with reckless disregard for, and in purposeful avoidance of the truth.

- 85. Jones made a deliberate decision not to investigate facts that would have confirmed the falsity of the accusations against Pulte, or published those falsities with knowledge that they were false.
- 86. As a direct and proximate result of the publication of the false and defamatory statements, Pulte has suffered general and special economic injury, damage, loss and harm to his reputation, in an amount to be proven at trial, which damages are continuing in nature and will be suffered in the future.
- 87. Jones's defamatory statements include statements that Pulte engaged in illegal and/or criminal activity constitute defamation *per se*. Damages for such statements are presumed.
- 88. Jones's defamatory statements alleging behavior on the part of Pulte that is incompatible with the proper conduct of his business, trade or profession constitute defamation *per se.* Damages for such statements are presumed.

WHEREFORE, Plaintiff, WILLIAM J. PULTE, demands entry of a judgment against Defendant, BRANDON JONES:

- a) awarding general and special damages;
- b) prejudgment interest;
- c) costs; and
- d) all such other relief as this Court deems just and proper.

<u>COUNT II – TORTIOUS INTERFERENCE WITH BUSINESS RELATIONSHIPS</u>

- 89. Plaintiff, WILLIAM J. PULTE, realleges the allegations set forth in paragraph nos. 1 through 76 as though fully set forth herein.
- 90. Pulte has a business relationship with persons and companies with whom he does business through Pulte Capital, familial and through his charitable efforts.

- 91. Jones had knowledge of Pulte's business relationships as he follows Pulte's Twitter account and knows of Pulte based on Jones's employment with Pulte Homes.
- 92. Jones targeted and engaged in intentional and unjustified interference with the relationship between Pulte and his existing business relationships, as well as potential business relationships.
 - 93. Due to this interference, Pulte has incurred damages.

WHEREFORE, Plaintiff, WILLIAM J. PULTE, demands entry of a judgment against Defendant, BRANDON JONES:

- a) in an amount of his damages;
- b) prejudgment interest;
- c) costs; and
- d) all such other relief as this Court deems just and proper.

COUNT III - TEMPORARY AND PERMANENT INJUNCTION

- 94. Pulte re-alleges the allegations contained in paragraphs 1 through 76 as if fully set forth herein.
- 95. This Court has the power to issue temporary and permanent injunctions based on Jones's written statements regarding Pulte and his tortious interference with Pulte's business relationships and prospective business relationships.
- 96. Unless a temporary injunction is granted to require Jones to remove the tweets in which he makes false and libelous statements regarding Pulte, Pulte is subject to immediate and irreparable harm as his reputation is being impaired.
 - 97. Pulte has a clear legal right to injunctive relief.

- 98. Pulte does not have an adequate remedy at law since he will not know whether any persons or companies with which he does business terminate or limit their involvement with him, or do not become involved with Pulte, as a result of the false and libelous statements made by Jones.
- 99. Finally, the public interest will not be disserved by requiring Jones to remove the tweets in which he has made false and libelous statements, and to prevent him from continuing with such actions, as he has no privilege to publish false statements.
- 100. Accordingly, Pulte seeks temporary and permanent injunctive relief to require Jones to remove the tweets at issue and to preclude him from publishing further libelous statements.

WHEREFORE, Plaintiff, WILLIAM J. PULTE, respectfully requests that the Court issue temporary and permanent injunctions against Defendant, BRANDON JONES:

- a) requiring Jones to remove the tweets;
- b) precluding Jones from publishing future statements on Twitter and any other medium regarding Pulte which contain libelous or false statements;
- c) costs; and
- d) all such other relief as this Court deems just and proper.

DEMAND FOR JURY TRIAL

Plaintiff hereby demands a jury trial on all issues so triable.

RESERVATION OF RIGHT TO SEEK PUNITIVE DAMAGES

Plaintiff reserves the right to bring a claim for punitive damages as to all claims for which punitive damages are an available remedy.

Signed on this 14th day of December, 2022.

Respectfully submitted,

Law Offices of Jason Gordon, P.A. 3440 Hollywood Blvd., Suite 415 Hollywood, Florida 33021 Telephone: (954) 241-4207 Facsimile: (954) 241-4236 FOR SERVICE OF COURT FILINGS: jg@jgordonlegal.com service@jgordonlegal.com

By: /s/ Jason Gordon Jason Gordon, Esq. Fla. Bar No. 0012973

Exhibit "A"



Raymond "Ray" Porter May 21, 1933 - October 28, 2018

Mr. Raymond "Ray" Porter, age 85, of Mocabee Creek Road, Olive Hill, Kentucky, passed away Sunday morning, October 28, 2018, at his residence.

He was born May 21, 1933, in Carter County, Kentucky, a son of the late Paul and Arlie Goodan Porter.

Ray was a member of the Soldier Church of God and was a lifelong farmer, logger, and dozer operator. He enjoyed taking care of his cattle, loafing at Globe Feed Store, the stockyards and spending time on the farm and especially with his daughter.

In addition to his parents, he was preceded in death by his wife of 55 years, Janet Caudill Porter, whom he married on September 21, 1957; two brother, Junior Porter and Curt Porter; and three sisters, Wanda Manning, Martha Thomas and Patricia Stamper.

Ray is survived by one daughter and son-in-law, Tina Marie Porter Parsons and Roger of Globe, Kentucky; one brother and two sisters-in-law, John Paul Porter and Sue of Lawton, Kentucky, and Phyllis Porter of Olive Hill, Kentucky; three sisters and two brothers-in-law, Sue Dean and Terry, Ella Thompson, Bonnie Thompson and Homer Stamper, all of Olive Hill, Kentucky; and special caregivers, Debra Burchett, Kathleen Purnell, Judy Brewer, Norma Barnett, and Kathy Fraley. He also leaves many other family members and friends who will sadly miss him.

Funeral services will be held at 11 a.m. Wednesday, October 31, 2018, at Globe Funeral Chapel in Olive Hill, Kentucky, with Brother J.C. Bond and Brother Bobby Day officiating. Burial will follow in the Olive Hill Memorial Park in Olive Hill, Kentucky.

Friends may visit from 6 p.m. to 9 p.m. Tuesday, October 30, 2018, and after 9 a.m. on Wednesday at Globe Funeral Chapel, 17277 West Highway US 60, Olive Hill, Kentucky 41164.

Benny Caudill, Rob Puckett, Mark Orcutt, Homer Stamper, Roy D. Porter, Josh Thompson, Jobe Thompson, Joe Castle, and Greg Kiser will serve as pallbearers.

Twitter's platform manipulation and spam policy | Twitter Help

Platform manipulation and spam policy

Overview

April 2022

You may not use Twitter's services in a manner intended to artificially amplify or suppress information or engage in behavior that manipulates or disrupts people's experience on Twitter.

We want Twitter to be a place where people can make human connections, find reliable information, and express themselves freely and safely. To make that possible, we do not allow spam or other types of platform manipulation. We define platform manipulation as using Twitter to engage in bulk, aggressive, or deceptive activity that misleads others and/or disrupts their experience.

Platform manipulation can take many forms and our rules are intended to a ess a wide range of prohibited behavior, including:

- commercially-motivated spam, that typically aims to drive traffic or attention from a conversation on Twitter to accounts, websites, products, services, or initiatives;
- inauthentic engagements, that attempt to make accounts or content appear more popular or active than they are;
- coordinated activity, that attempts to artificially influence conversations through the use of multiple accounts, fake accounts, automation and/or scripting; and
- coordinated harmful activity that encourages or promotes behavior which violates the <u>Twitter Rules</u>.

What is in violation of this policy?

Under this policy we prohibit a range of behaviors in the following areas:

Multiple accounts and coordination

You can't mass-register Twitter accounts or use automation to create Twitter accounts.

You can't artificially amplify or disrupt conversations through the use of multiple accounts or by coordinating with others to violate the Twitter Rules. This includes:

https://help.twitter.com/en/rules-and-policies/platform-manipulation

- overlapping accounts operating multiple accounts with overlapping use cases, such as identical
 or similar personas or substantially similar content;
- mutually interacting accounts operating multiple accounts that interact with one another in order to inflate or manipulate the prominence of specific Tweets or accounts; and
- coordination creating multiple accounts to post duplicative content or create fake engagement, including:
 - posting identical or substantially similar Tweets or hashtags from multiple accounts you operate:
 - engaging (Retweets, Likes, mentions, Twitter Poll votes) repeatedly with the same Tweets or accounts from multiple accounts that you operate;
 - coordinating with or compensating others to engage in artificial engagement or amplification, even if the people involved use only one account; and
 - coordinating with others to engage in or promote violations of the Twitter Rules, including violations of our <u>abusive behavior policy</u>.

Engagement and metrics

You can't artificially inflate your own or others' followers or engagement. This includes:

- selling/purchasing Tweet or account metric inflation selling or purchasing followers or engagements (Retweets, Likes, mentions, Twitter Poll votes);
- apps using or promoting third-party services or apps that claim to add followers or add engagements to Tweets;
- reciprocal inflation trading or coordinating to exchange follows or Tweet engagements (including but not limited to participation in "follow trains," "decks," and "Retweet for Retweet" behavior); and
- account transfers or sales selling, purchasing, trading, or offering the sale, purchase, or trade of Twitter accounts, usernames, or temporary access to Twitter accounts.

Misuse of Twitter product features

You can't misuse Twitter product features to disrupt others' experience. This includes:

Tweets and Direct Messages

- · sending bulk, aggressive, high-volume unsolicited replies, mentions, or Direct Messages;
- · posting and deleting the same content repeatedly;
- repeatedly posting identical or nearly identical Tweets, or repeatedly sending identical Direct Messages;
- repeatedly posting Tweets or sending Direct Messages consisting of links shared without commentary, so that this comprises the bulk of your Tweet/Direct Message activity; and
- Tweeting an existing phrase or content in a duplicative manner, whether individually or in concert
 with other accounts. Learn more in our copypasta and duplicate content policy.

https://help.twitter.com/en/rules-and-policies/platform-manipulation

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Following

- "follow churn" following and then unfollowing large numbers of accounts in an effort to inflate one's own follower count;
- indiscriminate following following and/or unfollowing a large number of unrelated accounts in a short time period, particularly by automated means; and
- · duplicating another account's followers, particularly using automation.

Engagement

- aggressively or automatically engaging with Tweets to drive traffic or attention to accounts, websites, products, services, or initiatives.
- · aggressively adding users to Lists or Moments.

Hashtags

- using a trending or popular hashtag with an intent to subvert or manipulate a conversation or to drive traffic or attention to accounts, websites, products, services, or initiatives; and
- · Tweeting with excessive, unrelated hashtags in a single Tweet or across multiple Tweets.

URLs

- publishing or linking to malicious content intended to damage or disrupt another person's browser (malware) or computer or to compromise a person's privacy (phishing); and
- · posting misleading or deceptive links; e.g., affiliate links and clickjacking links.

What is not a violation of this policy?

The following are not in violation of this policy:

- · posting links without commentary occasionally;
- coordinating with others to express ideas, viewpoints, support, or opposition towards a cause, provided such behavior does not result in violations of the Twitter Rules; and
- operating multiple accounts with distinct identities, purposes, or use cases. These accounts may
 interact with one another, provided they don't violate other rules. Some examples include:
 - organizations with related but separate chapters or branches, such as a business with multiple locations;
 - operating a personal account in addition to pseudonymous accounts or accounts associated with your hobbies or initiatives; and
 - hobby/artistic bots.

https://help.twitter.com/en/rules-and-policies/platform-manipulation

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Exhibit "C"

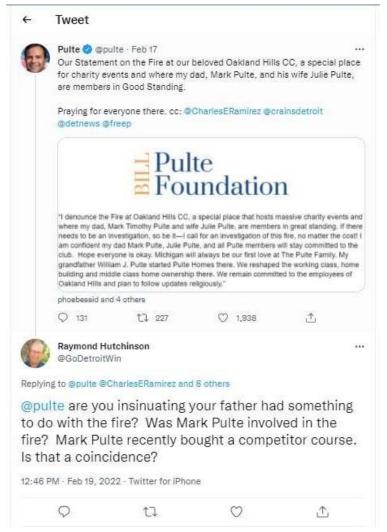


Exhibit "D"

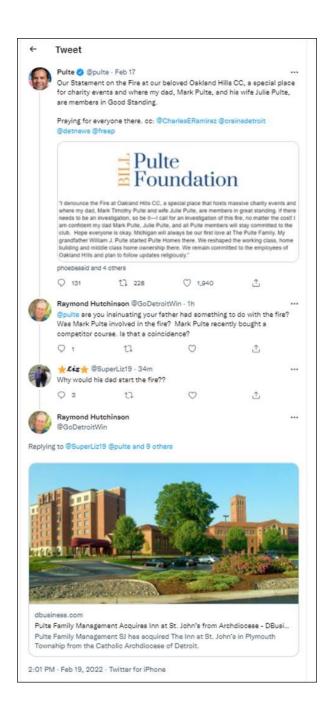




Exhibit "E"











@pulte are you trying to tell us your dad burned down the Oakland Hills Golf course?

Mark Pulte's house that was on the course burned down!!



2:05 PM · 2/19/22 · Twitter for iPhone







Exhibit "F"



Exhibit "G"



Exhibit "H"



Exhibit "I"



Exhibit "J"



Exhibit "K"





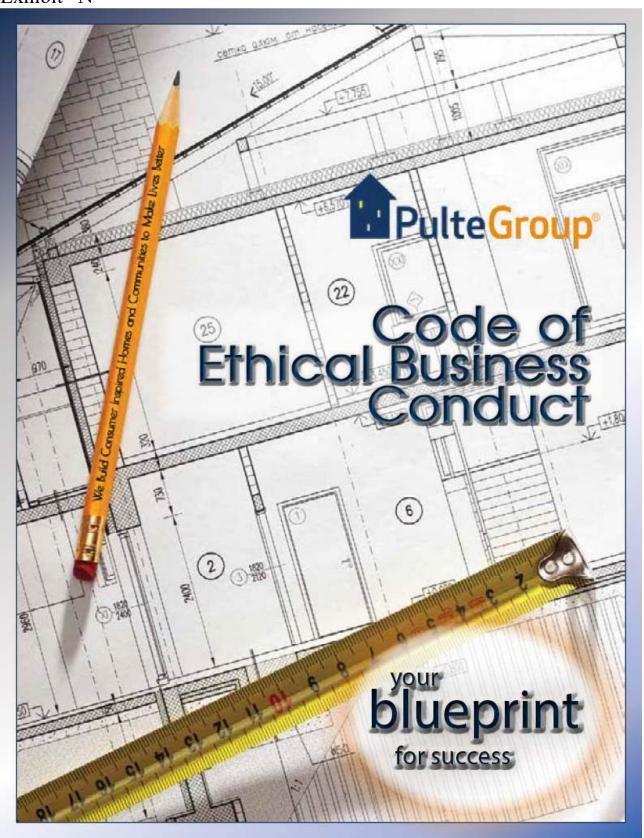
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Law Offices of Jason Gordon, P.A.

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LETTER FROM RYAN MARSHALL PRESIDENT AND CHIEF EXECUTIVE OFFICER

Dear Colleague:

For over 70 years, PulleGroup has been a company branded by core values. Our founder, Bill Pulle, built this company 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.

Welcome to our Code of Ethical Business Conduct. Our Code 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.

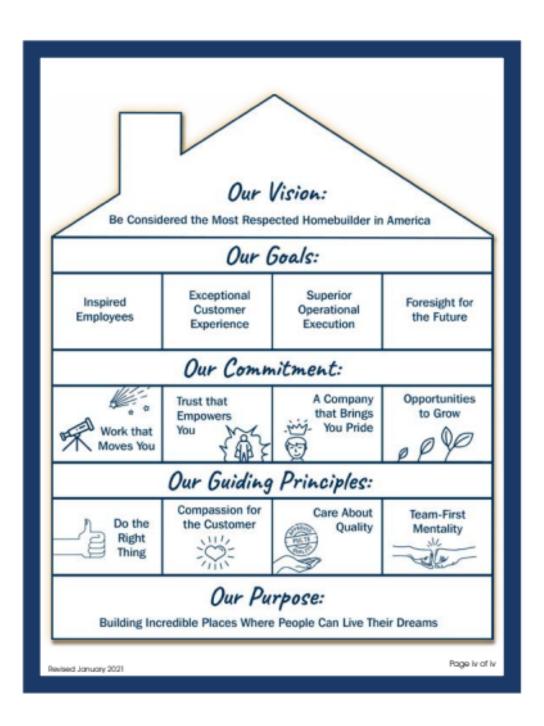
Our Code does not cover every situation you may encounter at work. It provides standards to show you how to conduct business and lists contact information to help you obtain advice from a company expert. If you ever have a question regarding Code compliance, ask your manager, HR, the Law Department or contact the Ethics and Compliance Hotline to make an ananymous 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 confinue 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 confinue our tradition of operating with the highest ethical standards and be a leader in upholding our core values. Be proud to brand yourself as a PutleGroup member who always does the right thing. Let's continue to earn the reputation of "The Most Respected Homebuilder in America".





Reymed January 2021



My Ethics and Compliance

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

Who must follow the Code?

All employees, officers and directors must follow this code. We also expect everyone working on Putle business, including consultants and vendors to comply with our efficial 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 contident 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 into 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 behavior expected of them
- Create a positive work environment where employees teel 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 notity HR or the Law Department about any potential misconduct



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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?

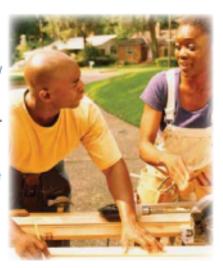
You have a duty to promptly report any suspected unethical or lilegal conduct. First consider speaking to your manager. Because we realize that reporting misconduct to your manager is not always possible or comfortable, you may also contact any of these resources to seek guidance or report issues:

- Area VP or Director of HR
- Area VP of Finance
- ➤ SVP Human Resources
- ➤ SVP Finance
- Internal Audit
- General Counsel. Chair of the Ethics. Committee
- Chair of the Audit Committee of the Company's Board of Directors
- Law Department
- Call our Ethics and Compilance.
 Hoting or make an on-line report (anonymously if you choose)

We will promptly and thoroughly investigate all reports of misconduct. We will theat all complaints confidentially to the extent allowed by law. If you are involved in an investigation, you must cooperate and keep any information related to the investigation confidential. Your obligation to keep information confidential continues after your employment ends.

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

Yes. Our Ethics and Compliance Hotline is operated by a completely independent third party – Navex Global. 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 retailation against anyone who reports misconduct in good faith. We also do not tolerate retailation 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.

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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 <u>Code of Ethics</u> 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 Secutifies and Exchange Commission or the New York Stock Exchange.

Our Employees

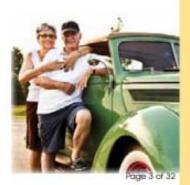
PulteGroup is an equal opportunity employer. We maintain a diverse workplace free from discrimination and harassment. We treat each other fairly and with respect, and will not make any decisions on the basis of gender, race, color, religion, national origin, ancestry, age, medical condition, marital 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 tosters an environment that attracts, develops, engages, and retains the best talent, and results in a performance-driven culture of excellence to make lives better for our employees, customers and communities.

QUESTION:

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?

ANSWER:

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.



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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, you must delete it immediately. 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 link 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.

<u>Harassment</u>

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, tamilial 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 infimidating, 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 Human Resources. The Company will investigate every complaint thoroughly, promptly, professionally and confidentially.

QUESTION:

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?

ANSWER:

Beth should urge Nancy to promptly report the situation to HR. 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.

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Non-retaliation

PutteGroup 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 duffes 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.

QUESTION:

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?

ANSWER:

Workplace safety is of utmost priority for the company. You must promptly report this issue to your manager, HR 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 <u>Workplace Threats and</u> <u>Violence policy</u>.

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. Such a release, even if accidental, must often be reported 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

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good judgment regarding the environmental effect of the Company's operations.

Employees shall also 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 narcofics 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 retrain from staying out late in order to be fully engaged in the meeting or training session. In order to receive full credit for your training, you are required to aftend the entire training session, unless you have an approved absence from your training facilitatoris. Employees are expected to arrive on time and retrain from using electronic devices while training is in 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. It 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, Human Resources, 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

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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.

CONTACT INFO

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

- > Your manager
- > Your Area VP or Director of HR
- > SVP Human Resources
- Law Department
- Call our Ethics and Compliance.
 Hotine or make an on-line report (anonymously if you choose)



Michelle Hosston SVP, Human Resources Michelle Hosston-GPutte-Group.com

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, genefic information or other status protected by the Fair Housing Act, Fair Lending laws, the Equal Credit Opportunity Act and other applicable laws. We will also make reasonable accommodations and home modifications for disabled customers as provided by law.

Customer Privacy

We protect the privacy, security and confidentiality of customer information entrusted to PulteGroup. We must never

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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, you must delete it immediately. 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 link to your manager and the TSC Help Desk at 1-877-733-3728.

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.



Founder Bill Putte receiving NAHB Award of Excellence.

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 take or misleading statements about our homes or our competitor's products.

Click here for construction and sales licensing, requirements and FAQs.

QUESTION:

I am a sales associate. 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?

ANSWER:

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 Ethics and Compliance Hoting or make an on-line report (anonymously if you choose)



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Our Business Partners

Fair Dealings with our Business Partners

We commit to fair dealing with our vendors, trade contractors, suppliers and other business partners. It 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 authined below, it violates Company policy to make business decisions on any other basis, or to solicit or accept favors in exchange for business decisions.

Anticompetitive Behavior

Antitiust 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.

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. A bribe is often described as an exchange for a corrupt purpose, to cause someone to do something in his or her official capacity that they would not otherwise do. The term "anything of value" is construed broadly to include not only money, but also giffs, 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 can arise when dealing with vendors, trade contractors, suppliers, customers, bankers, employees, government afficials or others. Bribes 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.

QUESTION

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 a 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?

ANSWER

Yes. Bribes are defined as anything of value given to a person to get them to do something they would not otherwise do. 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 a cheap 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.

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QUESTION

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 borus. 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 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?

ANSWER

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 bornus 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 bornuses or any other payments to "expedite" an official action are dangerous and should be utilized only in limited circumstrances 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.

OUESTION

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?

ANSWER

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 is based on 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 tee 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

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- for merely referring the business to the Company
- You must require every customer that both puichases a Company home and uses a Company settlement service to sign an Affiliated Business Arrangement Disclosure form

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.

Gifts and Gratuities

Business judgment regarding vendors, suppliers or trade contractors can be compromised by gifts and gratulities 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 gitts that appear to have significant value.
 Gitts such as goods, services or event tickets for your personal use, including gitts from homeowners, should be of reasonable value
- Third-party sponsored social events, such as golf outlings, 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 sporsored social events periodically. When deciding whether value is reasonable and not excessive, you should consider the cumulative annual value received from a single vendor.

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

OUESTION:

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

ANSWER:

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 pain.

No policy can cover all possible scenarios, it 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 your manager or the appropriate Company contact.

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 lob duties, or engage

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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 your supervisor and your Area Vice President of Finance or the SVP Finance. Please click here to learn the Company's position on employees related to outside reattors and click here for the policy on adding reattors 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 your supervisor and your Area Vice President of Finance or the SVP Finance.
- 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 the SVP Finance or General Coursel that the business opportunity was, in fact, declined by the Company.

OUESTION:

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?

ANSWER:

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 HR 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.

QUESTION:

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

ANSWER:

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.

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OUESTION:

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?

ANSWER:

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.

OUESTION:

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?

ANSWER:

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 HR 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 receiots.
- 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 witten 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 "Employees Using Company Vendors, Suppliers or Trade Contractors for Personal Use" 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.

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OUESTION

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?

ANSWER

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.

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 Companyowned 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.

QUESTION

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)?

ANSWER:

Yes, so long as you: 1) Obtain review and written approval from the SVP Finance for all IGG 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 Companyowned Supplier for Personal Use Consent

Your Purchase of One of Our Homes or of Our Supplies

We hope that you become a customer. To avoid the appearance of impropriety, the following policy applies to the purchase of a PulleGroup 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 if as his or her primary or secondary residence. In no instance can an employee or immediate family member purchase a PutteGroup home for investment purposes (e.g.

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- 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 arandchildren.
- The terms and pricing of any employee or immediate family member purchase must be preapproved in writing by the SVP Finance. You must be employed at the time of the home closing or at the time the materials are delivered (in the case of ICG materials/supplies) to receive any type of employee or immediate family member discount on the purchase.

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

QUESTION:

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

ANSWER:

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

CONTACT INFO

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

- > Your manager
- Area VP of Finance
- > SVP Finance
- Law DepartmentCall our Ethics and Compliance Hotine or make an on-line report (anonymously if you choose)



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

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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

OUESTION:

I work in the Sales Department. Yesterday a customer emailed me a notice canceling her sales contract. We are in the middle of an iPad 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?

ANSWER:

No. You must follow the 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. 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 to reseeable 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.

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OUESTION:

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

ANSWER:

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.

CONTACT INFO

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 HR
- > Area VP of Finance
- > VP Controller
- Chief Financial Officer
- ➤ Director of Corporate Audit
- Records Management
- Law Department
- Call our Ethics and Compliance.
 Hotline or make an on-line report (anonymously if you choose)



Bob O'Shaughnessy Executive Vice President and Chief Financial Officer

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. Informations 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 PutteGroup's <u>Finance Manual</u> 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.

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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 <u>here</u> for the Political Contributions Authorization Form.

CONTACT INFO

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 <u>Ethics and Compliance</u>.
 <u>Hotline</u> or make an <u>on-line report</u> (anonymously if you choose)

Our Securities

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 PutteGroup 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

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 Significant transactions with other companies, such as joint ventures or licensing agreements

These are examples – this list is not exhaustive.

- 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 1065-1 trading plan (see "1065-1 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 <u>Disclosure Policy</u> 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 Directorlevel 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, 2021. The Blackout period begins on March 8th, 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 momina.

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)

OUESTION:

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?

ANSWER:

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 Compilance@pultegroup.com if you need to confirm whether you are a Covered Employee.

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Trading PulteGroup Stock

You may never engage in trading, short sales, trading in options or other speculative investment transactions regarding PutteGroup securities. "Irading" means a combination or pattern of substantial or continuous buying and selling of PutteGroup 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

OUESTION:

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

ANSWER:

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 securifies 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.



founder Bill Pulle at bat

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CONTACT INFO

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 Ethics and Compliance.
 Hotline or make an on-line report (anonymously if you choose)



Todid Sheldon Executive Vice Resident, General Coursel and Corporate Secretary

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.

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.

Confidential Information

During your employment, you may learn confidential information that belongs to PulteGioup. 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-Putte location, such as at an employee's home or on his or her private computer.

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.

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QUESTION:

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

ANSWER:

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 Pulle considers a trade secret during your employment, that trade secret will always remain the exclusive property of the Company.

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.

QUESTION:

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?

ANSWER:

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.



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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 PutteGroup 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.

QUESTION:

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?

ANSWER:

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 filled against Leo individually and the Company.

CONTACT INFO

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

- ➤ General Counsel
- > Law Department
- Call our Ethics and Compliance Hotling or make an on-line 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

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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.

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 job specific computer applications and information. Access to the Company's systems is a privilege, and not a right, and the Company is the exclusive owner of the systems as well as the data and information contained therein. Keep your passwords confidential, do not write them down, and do not share your credentials with anyone, even if they are authorized users; contact the TSC to secure authorization and access to company systems and applications. You are responsible for any activity that occurs under your credentials. Passwords should be a randomly generated combination of upper and lower case letters, numbers, and special characters.

QUESTION:

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

ANSWER:

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.

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 or store the Company's proprietary, confidential or otherwise sensitive information in a non-Putte location, such as your home, on your private computer, or in a personal or cloud file storage system such as DropBox, Apple iCloud, Google Drive, etc. Click here for a reminder about storing and accessing Company information. 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.

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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 unaffended. You should avoid leaving or storing devices in a vehicle or hotel room; take them with you. 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"), software and/or peripheral equipment/ hardware 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 are prohibited from intentionally or unintentionally attering 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 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. The Company 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.

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 Putte systems, applications, emails, etc. Company and employee-owned personal devices are 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

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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 HR 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.

OUESTION:

I clicked on a link in an email from ADP which told me that I had a bonus check deposited into my bank account, but when I checked my ADP 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?

ANSWER:

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 incum millions of dollars of legal fees and expenses, suffer irreparable brand damage, and employees lose jobs as a result of data security breaches. Reminder – protect and safeguard any devices that access company data/information, and do not to share your credentials or passwords with anyone as it is believed that credential abuse is observed in all targeted attacks.

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

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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 defarmatory, obscene, abusive, harassing, discriminatory or in violation of any other applicable law. Please undestand that the Company may investigate any complaints about your posts or use of social media, and take appropriate disciplinary action, even it such use is personal and outside of work time.

This Social Media Policy covers all Internetbased communication platforms, including Facebook, Twitter, Instagram, LinkedIn, YouTube, Yammer, Snapchat, Parler, message boards, as well as other websites, blogs, and chaf rooms. Our core values apply whether you are Tweeting, posting, texting with customers, or chafting 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 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 HR. 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. Follow the Company's Code of Ethical Business Conduct. 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

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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/falk 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.

 Ownership of Social Media Accounts and Content; Pictures of Employees
 If you use social media as part of your job

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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 passward 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 ("Imited license"). If the Company trademarks or 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 flist).

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, you must take down 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 after policies located in the Code and/or employee handbook that you should keep in mind whenever you are communicating about or on behalf of PuteGroup 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 Campaians

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 linespective 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.

OUESTION

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?

ANSWER

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.

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You are legally responsible for your own postings. Therefore, you may be subject to liability for 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. 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.

CONTACT INFO

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

- > Your manager
- Area VP or Director of HR
- > ISC Help Desk or 1-877-733-3728.
- Chief Information Officer
- > Chief Information Security Officer
- Law Department or Compliance@ PulteGroup.com
- Call our Ethics and Compliance.
 Hotline or make an on-line 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 talse 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. Current contact names and numbers are listed on MyPutte.com. If the issue is urgent, you may also contact the PutteGroup Corporate Communications Department.

If you are contacted by the media directly, please respond that you are not an authorized spokesperson for PutteGroup (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,

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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 the Company 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 <u>Corporate</u>. <u>Communications</u> <u>Department</u>.

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.

QUESTION:

I am a Field 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?

ANSWER:

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.

CONTACT INFO

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

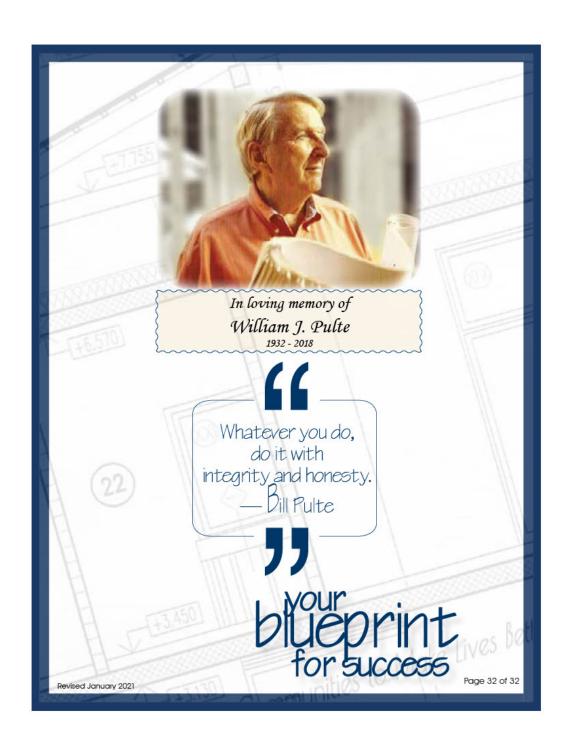
- VP of Investor Relations and Corporate Communications
- Manager of Corporate Communications in your market
- Law Department
- Call our Ethics and Compliance, Hotling or make an on-line report (anonymously if you choose)



Jim Zeumer Vice President, Prestor Relations and Corporate Communications

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GOD 1ST, FAMILY 2ND, PULTE FAMILY 3RD THE HOME WILLIAM J. PULTE & WILLIAM J. PULTE



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For my wife and two beautiful daughters who inspire me every day. Thank you for always supporting me.

For my mom. Thank you for always loving, believing in me, and supporting me. I love you with all my heart.

For my grandfather and best friend William J Pulte. Without you I wouldn't be the businessman I am today.



"I never went to work a day in my life, I just loved what I was doing"

4

Whenever you are working with my grandfather, he genuinely enjoyed what he was doing. Whether he was drawing up a plan with me to help clear out blight in inner-city Detroit, or you're working with him on floor plans. He just absolutely loved what he did. We'd be working with each other for a period of hours, and unexpectedly, it's almost like we woke up. We were in a spell of enjoying working together, and suddenly it was two o'clock in the afternoon or something like that and we would realize we hadn't even had lunch.

To me, his genuine interest in- whether it's the bulldozers in Detroit, or it's floor plans, is really what I think he meant by-- He didn't really work. He was really enjoying it. As I said, only after the fact we'd say, "Wow, I think it's time for lunch," or "Wow, I think it's time for dinner."



"Everything is changing all the time.
Look how many people have changed
history because it wasn't broke, but
they did fix it."

My Grandfather always used to say that "If it isn't broke, don't fix it" is one of the worst pieces of advice you could ever get, because he was always of the mindset that things could be continuously improved. You see this even with Elon Musk with Tesla, for example. He sees how people would say, "Oh, well, the cars aren't really broken, you don't need to invent." Elon would say, "No, I have to invent. This is how we build a great business."

My grandfather was very much of that same thought process. You can always be fixing things even if they are working. The other thought that he had around this was around technology. I remember it like was yesterday him telling me, "The building business hasn't changed in 50 years since I was a carpenter and first started out." He goes, "But if you're Google or Amazon or Apple or one of these other guys, your business changes every six months."

In many places, you don't have the luxury of thinking, "Oh, just because it's working, that it's fine." You constantly have to innovate, so it was always innovation, innovation, innovation. My grandfather was always thinking about innovation. He had many patents; I think something like 17 or 18 patents.



"So many times, over the years I've changed the rules of the sandbox. Never be afraid to make changes."

Sometimes you have to break things to fix it. My grandfather was never afraid to break things to fix it. In fact, I remember when we were working in a team environment, and he would say something that you would think, "Wow, he really hurt that person's feelings." Really what he was trying to do was to break the mold and trying to shake things up in the sandbox. That's often when the best growth happens in life is when you can shake the box and get people to think differently. You've got to change the reality sometimes if they're stuck in a groove.



"Any company that puts its shareholders first will not keep a customer very long."

I think this is why my grandfather cared so much about quality. He believed, much like modern Elon Musk of Tesla would believe, or probably even a Walt Disney, that you must have a customer experience and product that delights the customer. He would always say that there's a big difference between delighting the customer and making the customer content.

"Contentness is when they go home and they think, 'Wow, that was a good meal, I had a good meal at that restaurant,' whereas delight is when they go home, and they tell all their friends about how great their experience was. He always tried to create the Pulte homeowner for life mentality, which was, how do we delight the customer so much so that when they have a Pulte Home, they're going out and telling people about it? Therefore, you get more and more sales.



"Unless you've got your own money in, you're not an entrepreneur."

Before he passed away, my grandfather wrote me a note. In the note, he was talking about how people who don't have money in a company are not really entrepreneurs. I remember being in the car with him on our way to my facility in Illinois and we would talk about different people. He would say, "Well, that guy's not an entrepreneur." We would talk about companies that said that they had cultures of entrepreneurship. He said that that's bullshit, and that these companies don't really have cultures of entrepreneurship, because, in order to be an entrepreneur, you really have to have your own money at risk.

Until you have your own money at risk, you really won't understand how to think like a businessman, how to think like an entrepreneur, because you're always dealing with other people's money. There's certain accountability, or as he used to call it, the bitter end of the rope. You have the bitter end of the rope when you are an entrepreneur because you have your own money in the game. It just gets you to think completely differently about how to deal with the business. You don't look at the customer as a problem you look at the customer as a source of your profits or your losses. Everybody should have their own money in their own businesses because it makes you think differently about each of the problems.



"Don't be afraid to take calculated risks. You don't have to have 100% of the facts. If you get 80% that should give you enough to make a good decision. If you wait too long the decision may disappear."

This was a big one, that he taught me, and this is one that I learned with him in working at my countertop company, Carstin Brands. Everybody was so focused on making these new R&D prototypes. They were focused on making these products 100% perfect. What he showed us was that it's almost impossible to get something a 100%, but if you have 80%, you can get a lot done in life. You really want to focus on getting 80% done, considering it done, and 8 times out of 10, you are going to win.

Of course, there's always going to be those 2 times out of 10, you're not going to win. If you have 80% of the information and you have good information, you're going to come out ahead. That's what he said, "Don't wait because by the time you get to a 100%, your competitor has 100% of the information and they're going to smoke you every time."



"Spend the money now. If you buy the right tools and spend the time, you'll be able to get the money back."

One of the things that was so interesting about my grandfather was, people would often try to do things the chintzy way. He often said, "Don't do it the chintzy way." What he meant by that was that people try to get by with just a little bit of cost, and they say, "I can't afford it." What his argument always was, "You can't afford to not be able to afford the expensive stuff." When I say expensive stuff, I don't really mean expensive stuff. You must spend what you have to spend to get the right tool, to use the right tool at the right time. That's what he was big on. He wasn't into the whole game of, "Well, we got to find the lowest cost tool." He was like, "Okay, what's going to do it for the fastest time at the lowest cost, and get the job done and get the job done quickly?"



"Don't fall in love with a product. Fall in love with its profitability."

He used to talk about this a lot. He used to say, "There were all types of products that one could fall in love with, but you really need to focus on can you make money doing it." He used to give an example of a division president in Chicago and how every time he'd go visit the division in Chicago, the division president would say, "Oh I love this product, this product is so great, blah, blah, blah." He'd talk about how much money they had spent developing, and my grandpa said, "Well, how many houses did you sell with this particular product?" He'd say," I only sold two of them." My grandfather said, "Two of them? What the hell. You're not making any money on the damn thing. I don't care whether you like it or whether you think it looks good. You're not making any money. Chuck it out the window," that was a phrase he always used to say. He'd say, "Chuck that product out the window and get something that was more profitable."

He came back the next year, and boom, the profits of the division had gone up, and they had focused on the subsegment of products that were selling. The guy, I think, ended up telling him, "Man, these things are selling like hotcakes." He said, "Well, because you focused on what the market wanted, not what you or I or the people picking out the product wanted."



"There's no such word as can't, you would be surprised how often you can succeed if you really try and look at it differently."

This, I think, is one of the keys to how my grandfather made so much money. A lot of people would scoff at this and say, "Well, of course, you would say there's no such word as can't," but he really meant it in the sense that he would look at a problem completely differently. In many cases, he would look at the inverse of a problem.

For example, if somebody wanted to do something on a home that he thought looked stupid, he would do the opposite of that and say, "Okay, instead of having to go that way, let's have it go this way. How would that look?" He would try a bunch of XYZ combinations. He'd just try- in his own words, he was a tinkerer. He would just constantly try to figure out, "Okay, how do we get this to fit in here?" I think that persistence really for finding a different way is one of the ways that he became so wealthy. It's the persistence in looking at things and doing things differently and constantly trying.



"Without good people, you can't do anything. You got to give people the authority. You got to reward them financially. Don't look over their shoulders."

This is an important one because I experienced this firsthand with him in 2015 and 2016 with PulteGroup. When we were trying to get rid of bad management, which we were eventually successful in doing, he gave me at the age of whatever it was, 25 or 26 years old, full authority for negotiating and drafting of letters and going on CNBC.

He gave me full authority to be able to make decisions, and at the time, I think his equity stake was \$800 million. Here he is giving his grandson, which he hadn't entrusted anybody else in the family throughout his life to do, the keys to the expensive Ferrari that's worth \$800 million and saying, "Don't get this thing in a crash. Actually, go make the family some money." I remember shortly before he died, we were laughing about it, and I told him how much money we had made for him, for the foundation and for the family. I said, "We did it," and he said, "You did it. You did it," and to me, that wasn't him just giving credit. That was also his recognition that at the appropriate times, it makes sense to give over authority, so that was a big win.



"So many people are afraid they're going to lose their job if they tell the boss the truth. No that's the way to keep a job."

24

The thought process here is that you must be honest with your boss, and I say that even to my employees. You must be genuinely honest because if you are in any way trying to sugar coat it, your boss in many cases can pick up on that, and they can tell that you're insincere and that you're really being selfish by not saying what is the truth from your perspective that can help better the organization.

There's a big difference between telling the truth and knowing that you're qualified or not qualified and you must really understand whether you're qualified to give the truth, but if you're qualified to give the truth which-- My grandfather and I would take advice from anybody. If you're qualified to give the truth, then you need to say it, and even if you're not qualified, your input is still valuable. You just need to make sure that you understand really what the problem is, so you can give the best answer possible.



"The difference between a leader and a manager is a leader has vision. He's not like a Sargent in the trenches: "Take the hill fellas" No, he's willing to say " Come on fellas. Let's all take the hill." I use this in my business all the time specifically in the air conditioning space. I tell the owners all the time, you can't just tell your guys, "Oh, go sell," if you're not willing to get in the truck yourself, and that was very much my grandfather.

In fact, I remember he was interviewing builders once for a job for his own house. The one builder was stepping back from the building and looking out and giving him advice, whereas the second builder was down on his hands and knees, looking in the basement, trying to understand how the foundation was laid out. He said, "Man, I want to hire that guy, ". To me, that represents the "Come on, fellas, let's all take that hill" there's no work that's beneath them, they'll do whatever it takes to win.



"A good leader has to radiate trust, he has to demonstrate over and over again, that he is for his people." This is, I think, one of the big differences between somebody like my grandfather, who I call a founder CEO, and one of these corporate Fortune 500 CEOs that exist all throughout corporate America, is he really wanted the people to make more money than he did.

In fact, I think one of the proudest moments that he had, in terms of compensation of his executives, was when there was a division president, I think it was in Las Vegas, and a division president in Arizona, that made more money than he did, and he was the founder and CEO of the company. He really liked to make sure that his people made the most money because in an ironic way, if you get people to make a lot of money around you, you end up making a lot more money yourself.



"You never take full credit for anything because you couldn't have gotten it done by yourself."

My grandfather was just all about the team. It was never about him and he built a great culture. As a result, people worked there for 10, 20, 30 years. Now, corporations go on and corporate leaders take over, yes, that can sometimes change, but by and large, when he was running the company, and when he was in charge, it was a family. He meant it was a family. That comes from giving recognition to other people and not saying, "Oh, this is all about Bill Pulte."



"There's no such thing as a self-made man. Ego has destroyed a lot of people and companies. Ego is often a cover-up for a lack of self-confidence."

Humility is a sign of self-confidence. Humble leaders can accomplish more than egotistical leaders. I think this came really from not just his business experience, but also growing up in the great depression. He was very frugal. In fact, he would always not replace his shoes, for example, because he thought, "Oh, I could just get the soles replaced in the shoes."

I remember I think it was sometime back in like 2012, I was going to visit him in Naples, and I was driving down the road, and I saw this old guy out of his car. He had a flat tire, and it was my grandpa, so I pulled over, I said, "Grandpa, what are you doing here?". He goes, "I'm waiting for a tow truck," and he goes, "But I'm trying to figure out what the name of the tire is, what the name, and the model of the tire is." I said, "Why are you doing that?" He says, "Well, I'm going to have you take me this afternoon to a junkyard and we're going to try to find a tire that would fit on this thing because I don't want to pay retail for a new tire. There must be one on a junkyard."

This was probably about 11 AM in the morning, so we went to Five Guys for lunch, and after Five Guys, we literally went to different junkyards, and sure as hell, we went, and we found a car that had been in a car accident that had this extra wheel. He decided to have the wheel be put on his car, and in true Bill Pulte fashion. He didn't even have money on him, so I had to pay for the tire which at the time 200 to 300 bucks was a lot of money for me. I think he came from humble beginnings, and he certainly went out with humble beginnings.



"You must have self-confidence. Every individual won't find peace in their life unless they have self-confidence in themselves."

You got to have self-confidence. If you don't have self-confidence, you're constantly looking over your shoulder, you're constantly living in your own shadow, you're constantly questioning everything you do. It's okay to question yourself, but I think what he really meant was, at some point, you just say, "You know what? It is what it is, and I go forward." He always used to say, "I'm not going to worry about something if I can't control it."

That's very much of this fatalistic "It is what it is" attitude, and I think it's a great attitude that everybody should have. In fact, Elon Musk at Tesla often talks about how the best approach is to be fatalistic. When he talks about having self-confidence, you can question yourself, but at some point, you got to say, "It is what it is." You've got to move on. You've got to have self-confidence.



"People think if you ask another person for advice, that shows a lack of self-confidence. I think it shows great self-confidence." I've had tremendous success in my career, and I know he did, in asking for advice from other people. Sometimes people are going to think, "Oh, you're insecure. Oh, why are you asking me for advice?"

That's where the best ideas are generated from, when you ask other people for advice, and you get other perspectives. People can be afraid to ask for other advice because sometimes people look at it and say, "Didn't I already answer your question," or "Didn't I already do this?" It's like, "Yes, but I'm asking for your advice because I'm trying to engage in a dialogue to get good things for you and my relationship." He was very keen on saying, "Hey, what do you think about this? What do you think about that?" There was nobody who was beneath him. He would ask anybody, any Tom, Dick, and Harry or anybody, what their advice was about things.



"Never be afraid to hire people better than yourself."

I think really what he meant, and I wish he was still alive to talk to him about this, but I think really what he meant was never afraid to hire people better than yourself in their particular disciplines because he used to tell me that all the time.

My grandfather wasn't the strongest finance guy in the world. He happened to know product layout and house plans probably better than anybody in the world, but he didn't really understand finance in the way that maybe the best person in the world would. Another thing is at some point he was not the best person for operations of the company, Pulte Homes, so he hired a gentleman named Howard Johnson. Howard Johnson was the guy who really helped build the operations side of Pulte Homes throughout the 1970s and 1980s. Howard Johnson was a perfect example of somebody who was better than him at operations. He would hire the best person for these individual jobs.



"You can never succeed when you have hate on your mind. You can never succeed when you are so mad you can't think clearly."

When you're in business, you best perform if you are genuinely coming from wanting to move things forward in a good way. Money follows. It doesn't lead.

What actions can we take today that are genuine, good, whole, and abiding by God that can result in good outcomes instead of hate-filled vindictiveness? Now, I think there's something to be said, and I know he would agree, which is if somebody hit you, you got to hit him back. He was a big fan of that. He was a big fan of selfdefense, but how do we lead from a good intention? Use the past only to make better decisions in life. He hated people who focused just on the past. He used to say, his high school friends, some of them kept talking about that touchdown that they scored in 1948, and he'd say, "I'm so sick of hearing about this touchdown that occurred 50 years ago." He says, "They got to move on. You got to move on, you got to move on," and it reminds me of a comment saying, "Keep moving forward." He would say, "You got to move on, Billy. Move on."



"Always do the right thing. If you always do the right thing, you can't go wrong."

"Always do the right thing." That was what he always taught me. Always do the right thing. If you do the right thing, you can sleep good at night, you can have inner peace, you can know that you gave it your best. He also said, "Don't go to bed angry." This just came from doing the right thing. We did the right thing with our family; we did the right thing with our employees. He was big on doing the right thing with the customer. If something was going to cost the company more, he didn't give a shit. He wanted to just take care of the customer, just take care of them. He'd say, "Damn it, I don't care, just take care of them." That's how he approached life. If something was there, even if there was a boulder in the way, he would get it done.



"If you want to really find true happiness, you must have inner peace every day of your life, not just on Sundays."

I think that to him, the definition of success in life was inner peace, and that was being happy with yourself and being happy with what you had accomplished. I was fortunate to work side by side with him with PulteGroup, which was formerly known as Pulte Homes for the last 10 to 15 years of his life. One of the things that you could just tell whether you're driving in the car with him, or whether you're conversing with him, was that this was a man who didn't have so much pride about what he had done. He was just very comfortable with himself and very at peace with what he had accomplished. I think that is something that is very hard to get, but if you do the right thing all every day, my guess is you're going to end up having that as well.



"There is no greater gift than giving of yourself."

What you quickly determine, I think if you're of the right mind, is that it's better to give than to receive. My grandfather was a great example of that. He literally died as everybody does, but he intentionally left it for other people to spend it after he died. He didn't have a private jet. He didn't have a yacht. He didn't have expensive things. As I mentioned earlier, he had shoes that he would get the soles repaired on. For him it was better to save money and use it to help other people than to spend it on frivolous things. His whole mantra of "It's better to give than to receive" is really the genesis, the wellspring of Twitter philanthropy.

Grandpa,

Thanks for all the lessons and for the partnership, especially in business and the blight work. I miss you every day, and as we discussed shortly before you passed, I look forward to seeing you on the other side.

All my love, William F. "Bill" Pulte

THE HOME THAT BILL PULTE BUILT

William J Pulte was the founder of Pulte Homes, which he built into the #1 USA Homebuilder. Growing up in the Great Depression he had to work hard to succeed. He had a passion for teaching others and giving advice on how to be successful not only in business, but in life as well. Those who worked for him fondly look back on his memorable sayings that always had a lesson or two worked in. His grandson and namesake William J Pulte worked closely with his grandfather not only in Pulte Homes, but in his own companies as well. In this book he explains what each of his grandfather's most used sayings mean and shares stories to go along with them.