

## **EMPLOYEE COMPLAINT PROCEDURES FOR ACCOUNTING AND AUDITING MATTERS**

Any employee of PulteGroup, Inc. or its affiliates (“the Company”) may submit a good faith complaint regarding accounting or auditing matters to the management of the Company without fear of dismissal or retaliation of any kind. The Company is committed to achieving compliance with all applicable securities laws and regulations, accounting standards, accounting controls, and audit practices. The Company’s Audit Committee will oversee treatment of employee concerns in this area.

In order to facilitate the reporting of employee complaints, the Company’s Audit Committee has established the following procedures for (1) the receipt, retention, and treatment of complaints regarding accounting, internal accounting controls, or auditing matters (“Accounting Matters”) and (2) the confidential, anonymous submission by employees of concerns regarding questionable accounting or auditing matters.

### **Receipt of Employee Complaints**

- Employees with concerns regarding Accounting Matters may report their concerns to the General Counsel of the Company.
- If employees desire to forward complaints on a confidential or anonymous basis, they should direct them via regular mail to the Company’s Chairman of the Audit Committee:

Chairman of the Audit Committee  
PulteGroup, Inc.  
P.O. Box 19357  
Atlanta, Georgia, 31126

### **Scope of Matters Covered by These Procedures**

These procedures relate to employee complaints relating to any questionable accounting or auditing matters, including, without limitation, the following:

- Fraud or deliberate error in the preparation, evaluation, review, or audit of any financial statement of the Company.
- Fraud or deliberate error in the recording and maintaining of financial records of the Company.
- Deficiencies in or noncompliance with the Company’s internal accounting controls.