

Code of Ethics for Principal Executive Officer, Principal Financial Officer, Principal Accounting Officer (Controller), or Persons Performing Similar Functions

This Code of Ethics is adopted by PulteGroup, Inc. (the “Company”) pursuant to Section 406 of the Sarbanes-Oxley Act and the final rules and regulations promulgated by the Securities and Exchange Commission thereunder.

This Code provides principles to which the principal executive officer, principal financial officer, principal accounting officer (and controller, if different) and other persons performing similar functions (collectively, “Covered Senior Officers”) are expected to adhere and advocate. This Code embodies rules regarding individual and peer responsibilities, as well as responsibilities to the Company and its shareholders.

Covered Senior Officers should always strive to:

1. Act with honesty and integrity, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships.
2. Provide constituents with information and, as required, maintain records that are accurate, complete, objective, relevant, timely and understandable.
3. Assure that financial statements, reports and documents filed with the Securities and Exchange Commission or contained in other public disclosure are accurate, complete, objective, timely and understandable.
4. Comply with rules and regulations of federal, state, provincial and local governments, and other appropriate private and public regulatory agencies.
5. Act in good faith, responsibly, with due care, competence and diligence, without misrepresenting material facts or allowing their independent judgment to be subordinated.
6. Respect the confidentiality of information acquired in the course of their work except when authorized or otherwise legally obligated to disclose. Confidential information acquired in the course of a Covered Senior Officer's work should not be used for personal advantage.
7. Share knowledge and maintain skills important and relevant to their constituents' needs.
8. Proactively promote ethical behavior as a responsible partner among peers in their work environment.
9. Achieve responsible use of and control over all assets and resources employed or entrusted to them.
10. Report to an appropriate Senior Officer or member of the Company's Audit Committee or Board of Directors, on a timely basis, violations of this Code of Ethics or any other matters that would reasonably be expected to compromise the integrity of the Company's financial statements.

11. Not coerce, manipulate, mislead, or unduly influence any authorized audit or interfere with any auditor engaged in the performance of an internal or independent audit of the Company's system of internal controls, financial statements or accounting books and records.

Covered Senior Officers will be asked to certify, to their best knowledge, their compliance with this Code of Ethics periodically, but not less than annually. This Code of Ethics is intended to supplement, and not substitute for, the Code of Ethical Business Conduct which the Company has adopted for its employees and directors generally ("Company Policy"), and the Covered Senior Officers will be responsible for complying with this Code of Ethics and all other Company policies and practices, including the Company Policy.