

**MERITAGE HOMES CORPORATION
CONFLICT OF INTEREST DISCLOSURE FORM**

Name

Title

Department/Office

Date

Instructions:

This Conflict of Interest Disclosure Form is to be completed by employees of Meritage Homes Corporation, including its subsidiaries (“Meritage”) at the time of initial employment and when situations arise that create an actual, potential or apparent conflict of interest as set forth in Meritage’s Conflict of Interest Policy. In addition, as considered appropriate, and as requested periodically, employees must complete the Conflict of Interest Disclosure Form.

As an employee of Meritage, it is your responsibility to carefully review the Conflict of Interest Policy and to understand the investments, activities, transactions and relationships that Meritage considers to present a conflict of interest. The Conflict of Interest Policy sets forth the disclosure and approval processes for actual or potential conflicts of interest and must be complied with in addition to the disclosure requirements of this form.

Relationships:

Are you, and/or a person or entity “related” to you (as described in the Conflict of Interest Policy), an officer, director, trustee, partner (general or limited), member, manager, employee, beneficiary, or regularly retained agent (for example, a consultant) of any entity that:

- a. Meritage currently has or during the past year has had business dealings; or
- b. It is anticipated Meritage might have business dealings with during the next year?

Yes _____ No _____

If “Yes”, please provide the following information:

Name of Other Entity	Position at Other Entity	Nature of the Relationship Between Meritage and the Other Entity	Nature of Business of the Other Entity
1.			
2.			
3.			

Ownership Interests:

Do you and/or any person or entity “related” to you have any direct or indirect ownership investment or financial interest* in any entity, association or organization (corporation, partnership, joint venture, limited liability company, trust, etc.) that:

- a. Meritage currently has or during the past year has had business dealings; or
- b. It is anticipated that Meritage might have business dealings with during the next year?

Yes _____ No _____

If “Yes”, please provide the following information:

Name of Other Entity	Nature of Ownership or Financial Interest (type and percentage)	Nature of the Relationship Between Meritage and the Other Entity	Nature of Business of the Other Entity
1.			
2.			
3.			

** This does not apply to ownership interests in publicly traded companies where the ownership interest is less than 1% of the outstanding shares or total debt.*

Payments From Other Entities:

Do you and/or any person or entity “related” to you expect to receive in the current or a future year, payments in excess of \$500 for materials, supplies or services provided to a person or an entity, association or other organization that:

- a. Meritage currently has or during the past year has had business dealings; or
- b. It is anticipated that Meritage might have business dealings with during the next year?

Yes _____ No _____

If “Yes”, please provide the following information:

Name of Other Entity	\$ Amount	Description of Materials, Supplies or Services Received	Nature of Business of the Other Entity
1.			
2.			
3.			
4.			

Have you and/or any person or entity “related” to you received in the past year payments in excess of \$500 for materials, supplies or services provided to a person or an entity, association or other organization that:

- a. Meritage currently has or during the past year has had business dealings; or
- b. It is anticipated that Meritage might have business dealings with during the next year?

Yes _____ No _____

If “Yes”, please provide the following information:

Name of Other Entity	\$ Amount	Description of Materials, Supplies or Services Received	Nature of Business of Other Entity
1.			
2.			
3.			
4.			

Other Interests/Relationships:

Please briefly describe any other investment, activity, transaction or relationship that could create a real, apparent, or potential conflict of interest contrary to the requirements, spirit, or general principles set forth in Meritage’s Conflict of Interest Policy (a separate letter or memorandum may be attached if desired).

Employee's Certification:

I have read the Meritage Conflict of Interest Policy and Code of Ethics. I understand and accept my obligation to report and obtain proper approval of any investment, activity, transaction or relationship that is or may become, or may appear to be, an actual or potential conflict of interest and to disclose in a timely fashion any interest that I and/or persons or entities related to me might have in a proposed investment, activity, transaction or relationship with, between or involving Meritage.

The above is an accurate and current statement of all my actual and potential investments, activities, transactions and relationships relating to Meritage Homes Corporation.

Employee Signature

Date

Division President, Region/Area President, Corporate Vice President and/or Executive Vice President Review and Approval *(required for actual or potential conflicts of interest)*

Describe any proposed arrangements you have tentatively worked out with the employee to resolve or mitigate any conflict of interest (a separate letter or memorandum may be attached if desired):

Approving Officer's Signature

Date

The Company's Vice President of Internal Audit/Compliance must also review and approve any potential or actual conflict of interest. Upon completion, this Conflict of Interest Disclosure Form must be submitted to the Vice President of Internal Audit/Compliance for final review and approval.

Vice President of Internal Audit (or Other Designated Corporate Officer) Review and Approval

Describe conclusion and/or any arrangements you worked out with the employee to resolve or mitigate any conflict of interest (a separate letter or memorandum may be attached if desired):

Vice President of Internal Audit/Compliance
Signature (or other designated Corporate Officer)

Date

Document Retention of the *Conflict of Interest Disclosure Form*:

New employees are to complete this Conflict of Interest Disclosure Form upon the commencement of employment. For an employee that answered yes to any of the questions in the Conflict of Interest Disclosure Form, a signed hard copy of the Form is required to be forwarded by the employee to the People Operations Department. The People Operations Department will forward the completed form to the appropriate person(s), including the Vice President of Internal Audit/Compliance, for review and action as set forth in the Conflict of Interest Policy. Upon the completion, all originals will be filed in the employee's personnel file and copies will be maintained by the Internal Audit Department.