

MERITAGE HOMES CORPORATION

HUMAN RIGHTS POLICY

At Meritage Homes, respect for human rights is fundamental to how we manage our business and how we interact with our employees, directors, business partners, customers and all other stakeholders. We are committed to supporting the principles outlined in the [United Nation's Universal Declaration of Human Rights](#).

Our respect for human rights is embodied in our Core Values, specifically Start With Heart, Develop To Empower and Integrity Above All Else. These Core Values reflect our recognition and appreciation of each stakeholder as we set out to treat everyone fairly and earn their trust as well as assume positive intent. Acting with honesty, character, integrity and empathy are key. And equally important is treating employees like our most precious resource.

OUR CORE VALUES



This Human Rights Policy applies to all employees (full time or part time) and directors, as well as contractors, subcontractors, vendors, suppliers and partners. Oversight for this policy resides with our Board of Directors while the executive management is responsible for its implementation. Similar to our [Code of Ethics](#) policy, annual certification of our Human Rights Policy and follow up to any reported alleged violation to our hotline is monitored by our internal audit department.

OUR RESPONSIBILITIES

EQUAL OPPORTUNITY, NON-DISCRIMINATION AND PREVENTING HARASSMENT

Meritage Homes is committed to providing equal opportunities in employment, protecting the rights of all employees and promoting a work environment free from harassment, violence and intimidation, which is described in the “Equal Opportunity Relations With Employees” section in our Code of Ethics and in the “Anti-Discrimination and Anti-Harassment Policy” in our Employee Handbook. Our Anti-Discrimination and Anti-Harassment Policy prohibits discrimination on any basis including, without limitation, race, gender, color, religion, age, national origin, marital and familial status, gender identity, sexual orientation or any other legally protected status. Any form of harassment or discrimination by and of employees, supervisors, vendors, contractors, subcontractors, customers or any other person is not tolerated. Our robust provisions for the reporting and investigation of any incidents of discrimination or harassment as well as demanding discipline if it is determined the policy has been violated, including but not limited to violation of the no retaliation principles are captured in the Code of Ethics under the section, Equal Opportunity Relations With Employees. In addition to having policies and a culture that will not tolerate discrimination and harassment, we regularly train employees to recognize the existence of and how to operate under this policy, and to reinforce these values and help them better recognize unacceptable behavior.

DIVERSITY, EQUITY AND INCLUSION (“DEI”) IN THE WORKPLACE

Meritage Homes is committed to enhancing a diverse workplace and building on our inclusive culture to ensure all employees are welcomed and treated with respect, fairness and a sense of belonging.

CHILD LABOR, FORCED LABOR AND HUMAN TRAFFICKING

Meritage Homes condemns the use of child labor, forced labor and human trafficking, and prohibits the use of forced, bonded, indentured or involuntary prison labor. We comply with applicable laws prohibiting such exploitation and employ people who meet minimum age requirements in accordance with [Fair Labor Standards Act](#) and other state and local requirements.

WAGE, HOUR AND COMPENSATION POLICIES

Meritage Homes believes every employee has a right to a fair wage. Our work hours comply with local wage laws, regulations and relevant collective bargaining agreements, if applicable, including those relating to minimum wages, overtime hours and legally mandated benefits.

HEALTH AND SAFETY

Meritage Homes is committed to providing and maintaining a safe and healthy workplace. We manage jobsites in compliance with all applicable health and safety regulations including [Occupational Safety and Health Administration](#) (“OSHA”) regulations and certification, all applicable laws, as well as internal policies related to our own quality and construction standards which may exceed certain regulatory requirements. We obtain all necessary permits and approvals for our work.

Meritage Homes maintains an extensive Safety Manual for our construction personnel. In addition to providing extensive continuous training regarding job site safety, our safety program and processes are designed to systematically identify, evaluate, and prevent or control workplace hazards, specific task hazards and hazards which could arise from our operations. Applicable policies in our Safety Manual apply to our contractors and subcontractors as well. Please see our Employee Handbook for Meritage Homes’ safety policies.

To be OSHA certified, our construction personnel attend related training that is tracked through a third-party website. Operations employees are assigned monthly classes in our library of third-party safety courses. Construction managers conduct weekly safety inspections on jobsites and host Toolbox Safety Talks or Toolbox Meetings on a monthly basis for our contractors and subcontractors.

Beyond workplace safety, we are committed to the health of our employees and have implemented the Meritage Wellness Incentive Program, which is designed to promote good physical, mental, nutritional and social health for our employees and their families.

CIVIL LIBERTIES AND FREEDOM OF SPEECH

Meritage Homes is committed to upholding civil liberties, including but not limited to the right to life, liberty and security of person, as well as freedom of speech, opinion and expression.

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

Meritage Homes respects the principles of freedom of association and collective bargaining, in accordance with applicable laws.

DATA PRIVACY

Meritage Homes respects employees' rights to privacy of their personal information. This personal information, which is properly secured in our human capital management infrastructure, is not shared with anyone who does not have a legitimate business need to know it.

Meritage Homes is committed to protecting customer's personal information and data by complying with applicable privacy laws and regulations. This includes digital information concerns that are covered in the [California Consumer Privacy Act](#).

CONFLICT MINERALS

Meritage Homes' corporate responsibility and respect for human rights extend beyond its operations to a global platform, as the materials used by our construction contractors and subcontractors originate from sources both in the United States and throughout the world. We believe in and support the principles contained in the Organization for Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk-Areas.

Meritage Homes is committed to identifying, reducing and ultimately eliminating the use of conflict minerals that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo and surrounding countries.

TRAINING AND EDUCATION

Employees participate in training courses that are compliance-based and professional development-based. All employees must upon employment and annually thereafter certify their understanding of Meritage Homes' principles and guidelines in this Human Rights Policy, our Code of Ethics and our other policies. Such compliance certification includes but is not limited to online training on safety, ethical standards, anti-discrimination and anti-harassment, information security, antibribery and diversity, equity and inclusion.

Meritage Homes also makes available to all employees a robust training portal with a wide variety of third-party information for job fulfillment as well as information and tips to promote professional and personal growth. Our sales personnel are provided extensive sales training. To maximize personal growth and leadership potential, our management-level personnel are provided leadership training. We regularly monitor our employees' satisfaction, set clear performance expectations, conduct regular performance reviews, and solicit feedback to better understand how we can improve at all levels.

THE ROLE OF OUR BUSINESS PARTNERS

Similar to our employees and directors, Meritage Homes expects and requires our vendors, suppliers, contractors and subcontractors to comply with all of the above Human Rights and Code of Ethics standards and policies, as well as federal, state and local laws, regulations and requirements.

CODE OF ETHICS

As part of our overall program for supporting employee and human rights, Meritage Homes is committed to the highest ethical business and legal standards, which is detailed in our Code of Ethics. It reinforces our commitment to these standards and provides each employee and director with guidance and perspective in understanding business ethics at Meritage Homes. Compliance with our Code of Ethics is monitored by the highest levels of our senior management, including our internal audit department, and ultimate compliance authority is vested in our board of directors. Matters covered by our Code of Ethics include but are not limited to conflicts of interest, anti-bribery, antitrust, insider trading, financial integrity, equal opportunity, workplace health and safety, and environmental protection compliance.