

MERITAGE HOMES CORPORATION

VENDOR CODE OF CONDUCT

PURPOSE

Meritage is committed to conducting our business consistent with the highest ethical and legal standards and in full compliance with all applicable laws and regulations. The provisions of our Code of Ethics, Human Rights Policy, and Environmental Responsibility Policy that apply to our contractors, subcontractors, vendors, and partners (collectively, “vendors”) are found within this Vendor Code of Conduct. We expect our vendors to comply with this policy, be aware of its ability to be updated, and review it annually.

Our homes and communities must be built in a manner that meets or exceeds both our expectations and those of our homebuyers. We seek to partner with vendors that act with integrity and conduct business with a commitment to legal, ethical, safe, fair and environmentally sound business practices. Each vendors’ continuing relationship with Meritage is subject to compliance with this Vendor Code of Conduct.

Oversight for this policy resides with our Board of Directors while the executive management is responsible for its implementation. Meritage may amend this Vendor Code of Conduct from time to time, as this policy is reviewed and updated annually at a minimum.

YOUR RESPONSIBILITIES

COMPLIANCE WITH LAWS AND THIS VENDOR CODE OF CONDUCT

- Comply with all applicable federal, state and local laws, regulations and requirements while conducting business with and/or on behalf of Meritage, wherever conducted or performed
- Understand and follow Meritage policies and procedures that apply to your business and the specifications we establish for your particular products, materials and/or services
- Communicate your responsibilities under this Vendor Code of Conduct to all your employees and subcontractors employed by you involved directly or indirectly in providing products, materials or services to Meritage
- Inform Meritage promptly of any nonconformance by you to this Vendor Code of Conduct. We engage with vendors who fall out of compliance to assess corrective measures as necessary
- Obtain and maintain all required legal permits, licenses, approvals and registrations

HEALTH AND SAFETY

- Commit to providing and maintaining a safe and healthy workplace
- Manage activities and services on 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 Meritage’s Safety Manual for construction personnel
- Obtain all necessary permits and approvals to conduct activities and provide services for Meritage
- Attend Toolbox Safety Talks or Toolbox Meetings hosted by Meritage to support ongoing jobsite safety training

- Limit jobsite access to your employees who are conducting business for or on behalf of Meritage. Prohibit unauthorized people from gaining access to jobsites
- Prohibit your employees and vendors from using, possessing, distributing or being under the influence of illegal drugs, marijuana or alcohol at any time while on Meritage or vendor company premises or while performing business for Meritage at any location

EQUAL OPPORTUNITY RELATIONS WITH EMPLOYEES

- Commit to the development and fair treatment of all of your employees
- Commit to providing equal opportunity for employment and advancement at every level of employment on the basis of ability and aptitude, without regard to race, gender, color, religion, age, national origin, marital and familial status, gender identity, sexual orientation, or any other legally protected status
- Commit to maintaining a workplace that is free from harassment and discrimination

CHILD LABOR, FORCED LABOR AND HUMAN TRAFFICKING

- Comply with all laws regarding the use of child labor, forced labor and human trafficking, and prohibit the use of forced, bonded, indentured or involuntary prison labor
- 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

- Comply with local wage and work hour laws, regulations and relevant collective bargaining agreements, if applicable, including those relating to minimum wages, overtime hours and legally mandated benefits

THREATS AND INTIMIDATION

- Prohibit physical abuse and any other forms of intimidation

CIVIL LIBERTIES AND FREEDOM OF SPEECH

- Commit 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

CONFLICT MINERALS

- 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
- Comply with any contractual obligations that restrict the use of conflict minerals

ENVIRONMENT

- Obtain and maintain all required environmental permits, approvals and registrations
- Comply with all applicable environmental regulations and environmental protection laws
- Support Meritage's commitment to sustainability initiatives and goals
- Commit to operating in an efficient and environmentally responsible manner
- Dispose of hazardous and nonhazardous waste properly and according to regulations
- Acknowledge and support Meritage's Environmental Responsibility Policy

ANTI-BRIBERY AND ANTI-CORRUPTION

- Do not accept or request any form of kickback or bribe. A bribe or a kickback includes any item or favor provided for the purpose of improperly obtaining favorable treatment or seeking a competitive advantage. Such efforts should never be used to accomplish indirectly what Meritage could not properly or legally do directly. In certain situations or on certain occasions, you may present small gifts of nominal value of less than \$500 to Meritage employees, such as specialty advertising items bearing the corporate logo, and tickets or gift cards to local sports, civic or cultural events and/or restaurant meals or refreshments
- Comply with all applicable anti-bribery and anti-corruption laws including but not limited to U.S. Foreign Corrupt Practices Act

DATA PRIVACY & CYBERSECURITY

- Create, retain and dispose of business records in compliance with all applicable laws including confidentiality and data privacy
- Report in writing in a timely manner to Meritage any actual or suspected data breach that may impact or involve Meritage's data
- Abide by all federal and state regulations and requirements around cybersecurity to ensure the protection of consumer data, including the California Consumer Privacy Act. Do not disclose confidential information unless required by law

ENFORCEMENT

- Failure to comply with this Vendor Code of Conduct may result in the termination of your relationship with Meritage

DATA AND AUDITING

- Provide reasonable data necessary to assist Meritage in reporting on its sustainability and diversity objectives and commitments, if requested
- Allow Meritage or a third-party auditor selected by Meritage to audit your compliance with this Vendor Code of Conduct, if requested

REPORTING CONCERNS

- Contact Meritage's Chief Financial Officer, General Counsel or VP of Internal Audit / Compliance with any questions or concerns regarding compliance with this policy and to report violations
- Anyone may report any actual or suspected violations under this policy promptly to Meritage's anonymous ethics phone line at (800) 793-7719 or by Internet (www.meritagehomes.ethicspoint.com). This hotline provides a transcript of your anonymous call to Meritage's Chair of the Audit Committee through a third-party provider. Accordingly, the hotline is completely confidential and protects the identity of any individual reporting a potential issue
- Prohibit retaliation of any kind against an individual who reports concerns in good faith