

# OUR PURPOSE

TO CREATE DURABLE AND GROWING VALUE FOR OUR CUSTOMERS, EMPLOYEES, PARTNERS AND SHAREHOLDERS



# **TABLE OF CONTENTS**

	About Our Code Our Core Principles, Attitude and Beliefs Ethics Matters Application of Our Code Using Our Code Reporting a Concern Compliance with Laws, Rules and Regulations Duty to Disclose and Report No Retaliation Penalties for Violations Approval, Amendment and Waivers	5 
	We are Committed to Each Other  Health and Safety Drugs and Alcohol Workplace Violence Human Rights and Labor Practices Fair Treatment / No Discrimination No Harassment Data Privacy Conflicts of Interest Anti-Corruption and Bribery Company Assets Computer Use	10 11 11 12 12 12 13 16 16
	We are Committed to our Customers and Partners Non-Discrimination in Housing Sales, Marketing and Advertising Customer Privacy Sales Concessions Environment Anti-Boycott Intellectual Property and Confidential Information Antitrust	17 18 18 18 19 19 19 20 21
	We are Committed to our Shareholders Accounting and Financial Reporting Insider Trading Fair Dealing Public Disclosure Anti-Money Laundering and Anti-Terrorist Funding Document Retention and Information Management Political Activities and Contributions Social Media	22 24 24 25 25 25 25
S	Conclusion	26

# MESSAGE FROM OUR CEO



Hello,

I'm Allan Merrill, CEO of Beazer Homes. I would like to introduce you to our Code of Conduct and explain why it is so important to us and to me.

Our Code is the set of guidelines we use to help ensure that our actions, as individuals and as a Company, conform to our corporate culture. In turn, our culture is defined by our Purpose (what we're trying to achieve), our Principles (our non-negotiable values, including Integrity), our Attitudes (how we hope to act) and our Beliefs (lessons we've learned along the way).

While the Code cannot anticipate every difficult situation that will arise, it has been developed to give us practical advice about how to align our actions with our culture. Said another way, our culture describes who we are trying to be and how we hope to get there and the Code gives us a map to navigate along the way.

Each year we ask employees to confirm both their awareness of the Code and their compliance with it. We ask all new employees to do the same thing. It is a shared experience that ensures our Code continues to inform and influence the choices we make.

Finally, I want to remind you that you've got access to many different resources to report any concerns or help you resolve difficult or ethics-related matters. These include: www.ethics.beazer.com, our senior leadership team, our compliance officer, human resources, the internal audit group and our Board of Directors.

Thank you for your attention.

Allan Manill

Sincerely,

Allan Merrill

Chairman and CEO, Beazer Homes

# ABOUT OUR CODE

OUR CORE PRINCIPLES, ATTITUDE AND BELIEFS • ETHICS MATTERS

APPLICATION OF OUR CODE • USING OUR CODE

REPORTING A CONCERN • COMPLIANCE WITH LAWS, RULES AND REGULATIONS

DUTY TO DISCLOSE AND REPORT • NO RETALIATION

PENALTIES FOR VIOLATIONS • APPROVAL, AMENDMENT AND WAIVERS



# **ABOUT OUR CODE**



The Company's purpose is to create durable and growing value for our customers, employees, partners and shareholders.

# **HOW WE CREATE VALUE**

## For Customers

Well-built homes in attractive neighborhoods; offering extraordinary value at an affordable price compared to other new homes

# For Employees

An environment that encourages learning, engagement, corporate and community impact, opportunities for advancement, and aligning compensation with performance

# For Partners

Relationships built on transparency and agreement of operational and financial objectives

# For Shareholders

Returns measured over an entire housing cycle that are achieved without excessive risk-taking



# **CORE PRINCIPLES**

# Safety

We do not take or tolerate risks that endanger others

# Integrity

We insist on honest, ethical, and legal behavior

# Respect

We treat others with civility and humility

### Fun

We make the Beazer experience enjoyable



# THE RIGHT ATTITUDE

## **Focus**

Prioritizing activities consistently aligned with our Purpose and Principles

# Grit

Effort multiplies talent into skill, and with additional effort, into achievement

# Accountability

Planning, communication, and engagement with others leads to success



# **CORE BELIEFS**

# Choice

Strengthens employee and customer satisfaction

# **Teamwork**

Allows us to achieve extraordinary results efficiently

# Improvement

Sustains our value creation and leads to opportunities for advancement

# **Openness**

Enables operational clarity and ethical behavior

# **Urgency**

Creates a powerful competitive advantage

# **ETHICS MATTERS**

Our Code is built on the foundation of our Core Principles. Our Code outlines the standard of conduct that applies to everyone who works for or represents Beazer. Acting ethically is not only the right thing to do, it is also good business. Our continued business success depends on our customers, employees, partners, and shareholders respecting us for our integrity, as much as it does on the homes we build.

# APPLICATION OF OUR CODE

All directors and employees of Beazer Homes and its subsidiaries are expected to carefully read and adhere to our Code. We also expect all of our partners, contractors, subcontractors, suppliers, vendors, service providers, trade partners, consultants, representatives, agents, and others working temporarily or providing services to us, to comply with this Code in connection with any work or services performed on our behalf.

Our managers have a responsibility to lead by example. Managers must instill a culture of integrity and ethical business practices, and cannot ignore violations or potential violations of our Code.

When each of us follows our Code, we communicate our commitment to the values that have made our business admired as a good partner, place to work and investment. It is important to note, however, that violations of our Code, or other policies and guidelines applicable to our employees, can result in disciplinary action, up to and including termination of employment and/or criminal prosecution.

# **USING OUR CODE**

Our Code is designed to provide a broad overview of key policies and examples in each area. It is not all-inclusive and does not cover every potential scenario you may encounter, or provide answers to every question that may arise.

You must rely on your good sense of what is right, including a sense of when to seek guidance regarding the appropriate course of conduct. If you are unsure, you should ask yourself whether the conduct that is being contemplated would withstand public disclosure and scrutiny, and whether it would be consistent with our Core Principles.



Q: I suspect – but am not certain - that a co-worker is violating our Code. Should I keep my concerns to myself?

A: No. If you suspect a violation, say something. It is better to raise a concern than to wait and risk harm to others or Beazer. Reporting in "good faith" means you are coming forward honestly with information you believe to be true, even if after investigation, it turns out that you were mistaken.

> Remember that in most cases, your own best judgment is the best gauge when facing a potential ethical issue.

# REPORTING A CONCERN

If you have questions after reading our Code, or any other policy or guideline applicable to your job responsibilities, resources are available to assist you. We encourage all employees, partners, and others who support our business, to ask questions, seek guidance, express concerns and report any suspected violations of our Code, policies or applicable laws and regulations. Depending on your concern, it is often best to speak first with your immediate manager or supervisor since she or he may be best positioned to immediately respond to your issue. If you are not able to get an answer to a question, or resolve an issue by working with your immediate manager or supervisor, or if you feel uncomfortable talking with them for any reason, please contact one of the following resources:





- Our Head of Human
   Resources at 770.829.3759
- The anonymous hotline at 1.866.457.9346 or ethics.beazer.com

Once a report or concern is raised, a trained investigator will be assigned to review the concern. If appropriate, the investigator will determine the facts through interviews, review of documents or other means. We expect all of our employees to cooperate in investigations fully and truthfully. Deliberate withholding of information, destruction of information or documents or refusing to participate is prohibited. We will take appropriate disciplinary or corrective action (if applicable) based on the findings of the investigation, regardless of the position of the individuals involved. The identity of the the person raising the concern (if provided) will be shared only to the extent necessary for purposes of investigating or resolving a concern.



# COMPLIANCE WITH LAWS, RULES AND REGULATIONS

Beazer is committed to ensuring compliance with all applicable laws and regulations. Employees, directors and partners must strive to comply at all times with the laws and regulations in connection with their services to Beazer. If it is ever unclear whether an action being considered would violate a law or regulation, you should seek guidance from our Legal Department or Compliance Officer. Violations of applicable laws or regulations may subject you to disciplinary action, up to and including termination of employment or termination of your contract.

# **DUTY TO DISCLOSE AND REPORT**

Certain duties and obligations are established under this Code. Circumstances requiring approval under this Code, or as outlined in applicable policies, must be disclosed. Employees, directors and partners must promptly raise any concern about actual or suspected illegal or unethical conduct using the reporting opportunities in this Code. Nothing in this Code or any other policy limits the ability to communicate with or provide information to any governmental agency or commission, including the Securities and Exchange Commission, regarding possible legal violations without disclosure to the Company, as protected under whistle-blower laws.

# **NO RETALIATION**

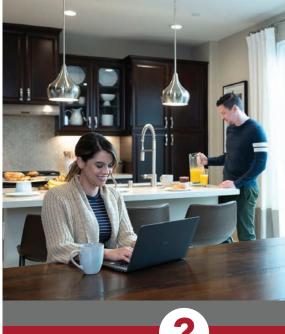
Beazer strictly prohibits retaliation against any employee, officer or director who in good faith raises a concern or participates in good faith in the handling or investigation of a concern regarding an actual or suspected violation of this Code, our policies, applicable laws and regulations or contracts (even if the concern is later unsubstantiated). No employee, officer or director should be discharged, demoted, suspended, threatened, harassed, subjected to intimidation, coerced or retaliated against in any other manner as a result of raising a complaint in good faith or assisting in the handling or investigation of a complaint. If you feel you have been, or are being, retaliated against, contact our Compliance Officer immediately.

# **PENALTIES FOR VIOLATIONS**

Employees, officers and directors or partners who violate the Code or applicable laws, regulations, policies or contracts are subject to disciplinary action up to and including termination of employment or service. Misconduct that may result in discipline includes such actions as: directly or indirectly violating the Code or other policy; directing or assisting others to violate the Code or other policy; failing to promptly raise a known or suspected violation of the Code or company policy; failing to cooperate in company investigations of alleged violations of the Code or other policy; retaliating against another employee for reporting a potential concern about illegal or unethical conduct or assisting in an investigation; or failing to supervise to the extent the circumstances of a violation reflect such supervisor's disregard for the Code or other policy.

# APPROVAL, AMENDMENT AND WAIVERS

Our Code has been approved by our Board of Directors. Any substantive amendments to our Code must be approved by the Board of Directors or an appropriate committee of the Board of Directors. In certain rare circumstances, you may request a waiver of a provision of our Code by contacting our Compliance Officer. A waiver request submitted by an officer or director must be approved by our Board of Directors. No waiver or exception will be effective unless granted in writing. Approval of waivers will be disclosed to shareholders and the public, as required by law.



Q&A ?

Q: What can I do if I believe someone is retaliating against me for reporting a matter to my Human Resources Representative?

A: Report it to our Compliance Officer immediately! Retaliation is a violation of our Code, and appropriate action will be taken to stop any retaliation and prevent future occurrences.

> If you feel that you have been retaliated against, speak up and report it immediately.

# WE ARE COMMITTED TO EACH OTHER

HEALTH AND SAFETY • DRUGS AND ALCOHOL
WORKPLACE VIOLENCE • HUMAN RIGHTS AND LABOR PRACTICES

FAIR TREATMENT / NO DISCRIMINATION • NO HARASSMENT • DATA PRIVACY
CONFLICTS OF INTEREST • ANTI-CORRUPTION AND BRIBERY
COMPANY ASSETS • COMPUTER USE



# WE ARE COMMITTED TO EACH OTHER



We want employees to have the opportunity to reach their fullest potential. This section of our Code outlines what is expected from each of us in our personal conduct and treatment of others to ensure a safe, inclusive, and supportive work environment.

# **HEALTH AND SAFETY**

Our highest priority is to protect the health, safety and well-being of our employees, partners and those who visit our communities or offices. Your health and safety are important to us, and also to your family, colleagues and community.



The work we perform, and the environment in which we work, may present health and safety risks. You play an important role in our commitment to health and safety by maintaining a safe work environment. Please ensure that everyone uses personal protective equipment (PPE) as required, and adheres to all health and safety rules and regulations.

You should immediately report any known or suspected unsafe conditions, hazard or workplace injuries to your local Environment, Health and Safety Representative or our Compliance Officer. (See our Incident Notification Policy and Employee Handbook Safety and Security Policy for more information.)

# **DRUGS AND ALCOHOL**

Substance abuse is incompatible with the health and safety of our employees and partners. Never engage in work if you are under the influence of or impaired by any substance.

We prohibit the consumption, use, possession, distribution, purchase or sale of alcohol or controlled substances on our premises while conducting business or performing your job, or while operating equipment. Controlled substances include illegal drugs and narcotics, prescription drugs obtained or used without a legal prescription, and any other unlawful substances or materials. Consumption of alcohol may be permitted in connection with certain authorized company events when consumed in moderation.

The use of any substance, including prescription medications, that causes or contributes to unacceptable job performance or conduct in the workplace is also prohibited. Where permitted by law, Beazer may conduct searches and test for drug and alcohol use. (See our Employee Handbook Drug-Free Workplace and Alcohol Policy for more information.)

# WORKPLACE VIOLENCE

We are also committed to a violence-free work environment. We will not tolerate any level of violence or threat of violence in the workplace. (See our Employee Handbook Weapons and Violence Policy for more information.)

Q&A .?

Q: One of our trade contractors often forgets to wear PPE. He claims the building site is safe enough and that the PPE is overkill. I feel this poses a safety risk. What should I do?

A: Report the matter to your immediate supervisor, your Environment, Health and Safety Representative or the Compliance Officer. Never compromise your safety or the safety of others on the site.

Q: I suspect a co-worker has a drinking problem. What should I do?

A: Never compromise when it comes to safety – yours or others. Report your concerns to your immediate supervisor, a manager, your Human Resources Representative or the Compliance Officer to give Beazer the opportunity to address the issue.

# **HUMAN RIGHTS AND LABOR PRACTICES**

We are committed to upholding fundamental human rights and believe that all human beings globally should be treated with dignity, fairness and respect. We strive to promote diversity in the workplace, protect all personnel and assets and provide appropriate workplace security. We further strive to engage with communities to build upon our understanding of potential human rights issues, and encourage our partners and suppliers to treat their employees – and to interact with communities - in a manner that respects human rights. We condemn human rights abuses and do not condone the use of slave or forced labor, human trafficking, child labor, the degrading treatment of individuals, physical punishment or unsafe working conditions. All employees are required to understand and obey local human rights and labor laws, to report any suspected violations and to act in accordance with our values and Code.

Q: My co-worker sent an email that was offensive to me. What should I do?

A: First, ask the co-worker to stop sending you these types of emails. If you are not comfortable speaking directly with your coworker, or your co-worker continues to send these types of emails, you should contact your immediate supervisor, a manager, a Human Resources Representative or our Compliance Officer.

Q: I heard a manager say he would not promote a co-worker because she is female. The manager also uses racial slurs. What should I do?

A: Immediately contact your supervisor, a manager, a Human Resources Representative or our Compliance Officer. We do not tolerate unlawful discrimination of any kind.

# **FAIR TREATMENT / NO DISCRIMINATION**

Fair employment practices are an essential part of our business and help contribute to a culture of respect. We respect your dignity and expect you to act in a fair and equitable manner toward colleagues, customers, partners and others with whom you come into contact.

It is our collective responsibility to create a work environment in which everyone is treated with dignity and respect. We are committed to fair treatment in all aspects of employment for employees and applicants. Employment with us is based solely on individual merit and qualifications directly related to how well you do your job. We prohibit unlawful discrimination of any kind, including discrimination based on race, color, religion, creed, sex, gender, gender expression, gender identity, age, national origin, ancestry, genetic information or characteristics, marital status, sexual orientation, military or veteran status, pregnancy, mental or physical disability, medical condition, or any other basis prohibited by applicable laws or regulations. (See our Employee Handbook Equal Employment Opportunity Policy and our Anti-Harassment Policy for more information.)

## **NO HARASSMENT**

You should expect a positive working environment. We prohibit intimidation and harassment in all work-related settings. Harassment can include behavior that creates an intimidating, hostile or offensive work environment. It can also include displays of written or graphic material of an inappropriate nature. Examples of harassment include making threats, offensive jokes and sexual advances. We prohibit unlawful harassment in any form, and you should make a report if you observe or experience such behavior in the workplace. (See our Employee Handbook Anti-Harassment Policy for more information.)

# **DATA PRIVACY**

All employees must exercise care and discretion in handling personal data and may not use or disclose it improperly. The way we handle this data is critical to our success, demonstrates our respect for others and promotes trust with our business partners, employees and customers.

Personal data is information in paper or electronic format that can directly or indirectly identify an individual - including employees, partners, suppliers, contractors, directors, shareholders, customers or anyone else with whom we do business. Personal data should be processed only if there is a legitimate business reason to do so. Individuals who are not authorized to handle personal data are prohibited from doing so. Employees should collect and use only the personal data needed for the business task and all such data must be kept secured. Employees are responsible for complying with all applicable privacy laws. (See our Information Security Policy for more information.)

## **CONFLICTS OF INTEREST**

You have a responsibility to make decisions based on the interests of the Company without regard to how they might personally benefit you. A conflict may occur when your private or professional interests interfere in any way – or even appear to interfere - with the interests of Beazer. Even if you did not intend for your actions to create a conflict of interest, the perceptions of a conflict by others can be just as damaging.

# If you are faced with a potential conflict of interest, ask yourself:

- Would this activity create an incentive for me, or be perceived by others to create an incentive for me to benefit personally at the expense of the Company?
- Would this activity harm my reputation, negatively impact my ability to do my job or potentially harm the Company?
- Would this activity embarrass the Company or me if it showed up on the front page of a newspaper or blog?

If the answer is "yes" to any of these questions, then the relationship or situation may be likely to create a conflict of interest and you should probably avoid it.

If you are in a situation that may create a conflict of interest, or the appearance of a conflict of interest, review it with your direct supervisor or our Compliance Officer. All actual conflicts of interest must be reported to our Compliance Officer.





Outside Employment, Business Venture and Investments. Your secondary employment, outside business ventures and other commercial or financial activities must not take away from your primary responsibility to Beazer. Outside business activities may be conducted during non-working hours only and cannot interfere with your satisfactory work performance. You may not use company equipment or resources in connection with these outside activities and you must never engage in any outside employment or other activity that competes with Beazer, violates your confidentiality or other obligations to Beazer or otherwise reflects negatively on Beazer. Likewise, you may not use information about business opportunities learned from your role at the Company for your own or anyone else's benefit. You should also avoid making personal investments in companies that compete with Beazer when the investment might cause, or appear to cause, you to act in a way that could harm the Company.

# Q&A ?

Q: I have a relative that I would like to ask to do some work for Beazer. Since it's a legitimate project that needs to be done, and my relative is trained in this kind of work is it okay to hire him?

A: Although the work may be legitimate, this situation creates the appearance of a conflict of interest. You should discuss this with our Compliance Officer.

Q: Our division has upcoming community opening. One of the community's Choice Lenders is planning to attend and have a booth. The Choice Lender also offered to pay for the food truck at the community opening. Is that permitted?

A: No, it is not permitted. Both asking for and receiving financial contributions, sponsorships, any other funds or things from lenders are strictly prohibited in connection with Company events or for any other purpose. However, the Choice Lender may attend our community opening to market their products.

Friends and Relatives. You should avoid participating in a potential or existing business relationship between the company, and any of your relatives, spouse or significant other, or close friends. As a first step, you should disclose to your immediate supervisor any relationship you have with a friend or relative who is an employee or owner of a customer, supplier or competitor of the company, or a public or governmental official. You should not direct company business to, or make company decisions regarding an outside business owned or managed by a friend or relative. You should not make any employment decisions regarding a family member or close personal relationship (including hiring, promoting, or directly supervising).

Gifts and Entertainment. Accepting gifts from current or potential partners, suppliers, vendors or service providers can easily create the appearance of a conflict of interest. Examples of gifts include: meals and travel accommodations for business or personal purposes, tickets to sporting or cultural events, discounts not available to the general public, cash gifts including gift cards, vendor product samples for personal use, and wine or alcohol.

We treat the offering or acceptance of gifts from partners, suppliers, vendors or service providers in the private sector differently from those in the public sector. The legal requirements related to business gifts, meals and entertainment where a government official or representative is involved are complex and apply both to employees and representatives of the company. No gift or entertainment of any form or value may be offered to or accepted from any governmental entity, government official or representative without the prior approval of the Compliance Officer. You should contact our Compliance Officer if you have any questions.

For the private sector, we draw a distinction between "lavish" gifts, which are generally prohibited, and "token" non-cash gifts, which are generally permissible. Cash gifts, including gift cards, are never permitted.

"Lavish" gifts - and all gifts that exceed, or might be expected to exceed, \$250 in value should be reported to our Compliance Officer to determine if the gift is appropriate. In addition, certain gifts should not be accepted under any circumstances, including loans from individuals or organizations dealing with the Company, cash gratuities and private or personal discounts not approved by the Company. Gifts given with the intent to bribe, make a kickback or place undue influence are, of course, illegal.

We treat "token" non-cash gifts differently. We recognize that the occasional exchange of these sorts of lesser value gifts are a common business practice meant to provide a legitimate opportunity to interact, create goodwill and establish trust. Infrequent and moderate business meals and entertainment with clients, infrequent invitations to attend local sporting or cultural events, or gifts during the holidays may be appropriate provided that they are not "lavish" and do not create an appearance of impropriety. For example, you may be asked to attend a meal with a customer, partner or vendor - we recognize this is often an appropriate and normal way to conduct business in our industry. If you are ever unsure, you should discuss the situation with our Compliance Officer.



Dealing with Suppliers. Purchasing decisions must be made solely on the basis of quality, reputation, service, cost and similar competitive factors. We caution against engaging in social relationships with current or prospective suppliers that may interfere with your ability to perform your job objectively, or create an appearance of a conflict of interest. In dealing with suppliers, keep in mind the following best practices:

- Purchase materials and services fairly and impartially; reject the influence of bias or favoritism.
- Expenses related to attendance at a supplier sponsored event that provides a business opportunity for the Company should be paid by Beazer rather than the supplier.
- Solicitation or acceptance of a bribe, kickback or similar consideration is illegal and constitutes grounds for immediate termination of employment.

Employee Builds. If you wish to purchase any materials or services from a partner that will be used to furnish, remodel or renovate an existing home, or to build a new home for yourself, a relative or other person, you must avoid potential or direct conflicts of interest. Among other things, you must obtain from the partner written communication that the partner is charging you the same price that the partner would charge any Beazer employee. (For further information, see our Employee Builds Policy.).

Governance Opportunities. You must obtain the approval of our Compliance Officer prior to accepting any opportunity to serve as a director (or in a similar function) of a for-profit business.

Full disclosure is the key to dealing with conflicts of interest or potential conflicts of interest. If you have a conflict of interest, or you are ever in doubt as to whether a particular activity may be a conflict of interest, please contact our Compliance Officer.



# ANTI-CORRUPTION AND BRIBERY

Anti-Corruption laws generally prohibit offering, authorizing or receiving bribes, kickbacks or any other improper payment for the purpose of obtaining or retaining business. You should never accept, give or promise anything that could be interpreted as intending to improperly influence a commercial or governmental transaction.

Regardless of competitive pressures or local practices, you must avoid even the appearance of unlawful influence when dealing with government officials, as well as employees of state-owned or controlled enterprises. Given the complexity of anti-corruption laws, you should work with an attorney in the Legal Department to address any questions concerning obligations to comply with this policy.

# **COMPANY ASSETS**

Our continued success depends on the effective use of available resources. We offer you access to the tools you need to do your job effectively, including facilities, furniture, supplies, equipment and information technology resources. In return, we expect you to treat Company assets with care and respect, and to guard against waste and abuse. Other than for certain company-sponsored charitable endeavors identified by our Compliance Officer, our assets should not be used for your personal benefit or for the benefit of other, non-Company related entities or persons.

# **COMPUTER USE**

Use of our computer and business networks is both a necessity and a privilege. If you have access to our information systems and computer networks, you are responsible for using the highest standards of behavior in all of your usage and communications. When you access our networks from remote locations, you are subject to the same standards of use as are employees who access our networks while on business premises. Our networks and information systems are for legitimate Company-related business purposes. Limited personal use may be acceptable as approved in our policies and provided it does not interfere with your job responsibilities. (See our Information Security Policy and the Employee Handbook Use of Electronic Data Systems Policy for further information.)

# WE ARE COMMITTED TO OUR CUSTOMERS AND PARTNERS

NON-DISCRIMINATION IN HOUSING • SALES, MARKETING AND ADVERTISING CUSTOMER PRIVACY • SALES CONCESSIONS • ENVIRONMENT • ANTI-BOYCOTT INTELLECTUAL PROPERTY AND CONFIDENTIAL INFORMATION • ANTITRUST



# WE ARE COMMITTED TO OUR CUSTOMERS **AND PARTNERS**



We are committed to fair competition. Competition drives us to continue to develop new and better ways of doing business. We will continue to earn and maintain the trust of our customers and partners, by competing fairly, honestly, legally and ethically wherever we operate. We are also committed to operating in an environmentally conscious and respectful manner. This section outlines what is expected from each of us in our dealings with our customers and partners.



**Q:** Prospective home buyers have asked for grab bars in the bathroom as a modification for a disability. Do we have to do this?

A: Yes, we do provide reasonable modifications. However, such changes come at the expense of the purchaser. Accordingly, we should prepare a change order with the cost so that the purchaser can decide if they want to pay the cost to make that modification. All such modification requests, accepted or not, should be documented and reviewed with the Legal Department.

# NON-DISCRIMINATION IN HOUSING

We prohibit all employees and others representing Beazer from discriminating against any person on the basis of race, color, religion, sex, handicap, familial status, national origin, or other protected characteristics. Upon request by a person with a disability, we will make reasonable accommodations to afford equal opportunity to use and enjoy a dwelling in accordance with the Fair Housing Act and any other applicable laws and regulations. (For further information, see our Fair Housing Law Policy.)

# SALES, MARKETING AND ADVERTISING

We truthfully market, promote and advertise our homes and brands. We will not make false or misleading statements about our homes, brands or the products we use or about those of our competitors.

## **CUSTOMER PRIVACY**

Beazer Homes respects the privacy of our customers, and protection of customer personal information is important to us. Please read our Privacy Policy at beazer.com/privacy for details.



# **SALES CONCESSIONS**

All benefits, concessions, gifts, accommodations and payments of any kind, in any form, whether paid for by the Company or by an individual Beazer employee, connected to the sale of a Beazer home must be fully disclosed to the lender and the settlement agent. The only exception to this policy is that any individual Beazer employee involved in a sale to a home buyer may, out of his or her own pocket, personally provide that home buyer with a post-closing gift worth no more than \$100 without disclosing the gift to the lender. (See our Full Disclosure of All Concessions Policy for information.)

## **ENVIRONMENT**

We strive to comply with all applicable environmental laws and regulations. We are also committed to minimizing the impact of our business on the environment with methods that are socially responsible, scientifically based and economically sound and sustainable.

Our commitment to the environment extends to helping buyers, employees and partners understand the environmental performance of our business and pursuing process modifications that prevent pollution, result in less waste and minimize the use of natural resources.

If you become aware of any situation that may negatively affect how our operations impact the environment, please discuss it with your local Environment, Health and Safety Representative.

# **ANTI-BOYCOTT**

Some countries have adopted laws prohibiting their people and businesses from participating in or cooperating with international trade embargoes or sanctions that have been imposed by other countries. We do not cooperate with foreign boycotts that are not approved by the U.S. government. If you receive a request related to any boycott, you should not respond and you must contact the Legal Department immediately.



Q: I am working with a home buyer who has told me on several occasions how much she likes the kitchen table in the model home. I just found out that we are getting new furniture in the model home, and I would like to give this buyer the old kitchen table as a gift at closing. Do I need to do anything?

A: Yes. First, you should consult with the Legal Department to ensure that the proposed gift does not violate any applicable law or policy. If it does not, you must then notify the lender and settlement agent of your intent to give the gift, and they will inform you whether the kitchen table will be considered a gift or a seller's concession for which the buyer must pay at closing. We would not want any gift to turn into an unwanted obligation for our buyers.



Q: My co-worker is really busy and travels a lot. While she was on the road recently, she asked me to log in using her password and ID so that I could send her some confidential files I would not otherwise have had access to. Should I do this?

A: No, you should not do this. It is against Company policy to share passwords. Also, access to confidential information should be limited only to those who have authorized access. Rather than putting you in this situation, your co-worker should have contacted her supervisor or the IT Department if she needed these files.

Cyber security incidents can happen in a number of ways. Immediately report any risks or incidents, including the possible loss or theft of data due to lost laptops and other computing devices.

# INTELLECTUAL PROPERTY AND CONFIDENTIAL INFORMATION

Intellectual property is among our most valuable assets. Protecting, maintaining and defending our rights, and respecting the intellectual property rights of others is crucial to the success of our company. Intellectual property includes copyrights, patents, licenses, trademarks, trade names and trade secrets. It can also include many other things, such as our brands, logos, marketing designs and confidential business ideas and information. Confidential information includes contract terms, customer lists, proposals, project plans, business plans, processes and other information that we have not released publicly, or which is not available through other public methods.

During your work, intellectual property or confidential information may become available to you. Always be careful to protect confidential information belonging to us, as well as confidential information belonging to our customers or business partners. Take reasonable physical and electronic precautions to safeguard the information from a variety of threats, such as error, fraud, sabotage, industrial espionage and privacy violations.

Share confidential information only with employees who have a legitimate business need-to-know, or with others who are covered by contractual nondisclosure agreements. Be very careful when talking about confidential information. Do not talk about it in public places and never share it with non-Company individuals, including family members and friends. Be sure not to share your password or log-in information, and secure all physical and electronic proprietary content when not in use.



Q&A ?

We comply with all competition laws in the markets where we do business. These laws generally prohibit competitors from restraining competition by price fixing, bid rigging, tying arrangements and dividing territories or customers. They also prohibit other anticompetitive practices, such as abusing dominant market positions.

Given the complexity of competition laws, you should consult with our Compliance Officer whenever:

- You have questions about your obligations under competition laws.
- Before entering discussions or agreements with a competitor, customer, partner or supplier about any arrangement that could have the effect of limiting competition.

You should be particularly careful when interacting with competitors. To avoid even the appearance of an agreement, you should never discuss with competitors such things as prices, terms of sale or customers. Please contact our Compliance Officer to address any questions concerning obligations to comply with this policy. (See the Antitrust Compliance Policy for more information.)



Q: A salesperson of a competitor and I are friends. Occasionally, we discuss our respective marketing plans and ideas. Should I be concerned?

A: Yes. You are revealing confidential information that Beazer has developed. You may also be violating competition laws that ban discussions of marketing and pricing (among other things) between or among competitors.

Simply having high-level conversations about business with a competitor can give the appearance of something improper and should be avoided. If you have any questions about interactions with competitors, you should contact our Compliance Officer.

Q: The Vice President of Sales at a competitor asks you what Beazer's promotion will be for the spring sales season, and suggests that it would be good for both companies if all home builders in the area agreed to offer only option discounts and no other seller contributions. Is this permissible?

A: No. While many jurisdictions have customary real estate practices about how closing costs are allocated, establishing set seller incentives between competitors could be considered price fixing. It is important to note that price fixing can be found even when exact details are not determined (i.e. the exact amount of the seller contribution is not set) or even if every market participant is not involved.

# WE ARE COMMITTED TO OUR SHAREHOLDERS

ACCOUNTING AND FINANCIAL REPORTING • INSIDER TRADING
FAIR DEALING • PUBLIC DISCLOSURE
ANTI-MONEY LAUNDERING AND ANTI-TERRORIST FUNDING
DOCUMENT RETENTION AND INFORMATION MANAGEMENT
POLITICAL ACTIVITIES AND CONTRIBUTIONS • SOCIAL MEDIA



# WE ARE COMMITTED TO OUR SHAREHOLDERS



We are committed to providing durable and growing value to our shareholders. Under no circumstances will we sacrifice integrity for profits in our day-to-day decisions. Similarly, we will not take actions to secure short-term goals at the expense of long-term shareholder value. We will comply with all applicable legal requirements and stock exchange rules relating to corporate governance and securities trading. We take responsibility for our actions as individuals and as a Company, by reporting information honestly, timely, accurately, maintaining transparent Company records and prohibiting trading on material and non-public Company information. This section of our Code outlines what is expected from each of us.

# ACCOUNTING AND FINANCIAL REPORTING

The integrity of our financial statements and other regulatory filings is of utmost importance, and is nonnegotiable. It is critical to successfully operate our business and to maintain the confidence and trust of our shareholders, customers and business partners. Our business records must be accurate, truthful and complete without restriction or qualification.

Everyone involved with our financial reporting process plays a key role in our commitment to honestly and accurately record and report financial information. We depend on you to ensure that all transactions and balances are timely and accurately recorded, classified and summarized in accordance with our financial and accounting practices. Never misrepresent our financial or operational performance, or otherwise knowingly compromise the integrity of our financial statements. Do not enter information in our books or records that intentionally hides, misleads or disguises the true nature of any financial or non-financial transaction, result or balance. Our financial disclosures must be reasonable with the understanding that what we might not disclose can be just as important as what we disclose.

If you are responsible for overseeing, operating or evaluating our internal controls over financial reporting, make sure you perform your duties in accordance with our policies, guidance and instruction. If you are asked to provide, review or certify information related to our internal controls, provide the information requested and otherwise respond in a full, accurate and timely manner.

Finally, be sure to retain, protect and dispose of our financial records in accordance with applicable legal requirements, and our document and information management policies.

# Q&A ?

Q: I do not work in finance or accounting. Is "financial integrity" my responsibility?

A: Yes. We all share responsibility for accuracy in record-keeping, from expense reports and benefit enrollment forms to commission reports and invoice approvals. All of our everyday transactions must be accurate, complete and properly recorded. We treat financial integrity broadly and it is not just the job of those in finance or accounting roles.



# **INSIDER TRADING**

Federal and state securities laws prohibit insider trading and so do we. Insider trading means trading securities on the basis of material, nonpublic information, or sharing this information with another person so they can trade. Information is generally considered material if a reasonable investor would consider it important to his or her decision to buy, hold or sell the security. You may have access to inside information about Beazer or other companies such as current or potential suppliers, customers or acquisition targets. You are obligated to keep this information confidential and you must never use this kind of information to trade in any company's securities. Likewise, you should never provide stock tips or share inside information with any other person who might use it to trade stock. (See the Use of Inside Information and Trading in Company Securities Policy.)

# **FAIR DEALING**

Beazer is committed to fair dealing. You must endeavor to deal fairly and in good faith with our customers, employees, partners, shareholders and others. No one should take unfair advantage of anyone through manipulation, concealment, use of privileged or confidential information, misrepresentation, fraudulent behavior or any other unfair dealing practice. Violation of fair dealing may result in termination, as well as civil or criminal liability.

# **PUBLIC DISCLOSURE**

Sharing material information with our shareholders, regulators and the public at the right time and in the right manner is an important part of doing business as a public company. It is also required by law. As a public company, we regularly disclose material information through our filings with various regulatory agencies, press releases, annual reports and earnings calls. We are committed to making all disclosures in a manner designed to provide appropriate access to material information for all shareholders, investors and the public in a timely, non-selective manner.

You play an important role in helping us to fulfill these obligations. If you are approached by, or receive a call from, the media or a member of the investment community, refer the caller to Corporate Communications or Investor Relations. We have designated only a few employees, including our CEO and CFO, to speak on our behalf. This allows us to speak with a consistent voice. (See the Communications Policy for more information.)

# ANTI-MONEY LAUNDERING AND ANTI-TERRORIST FINANCING

Beazer does not permit money laundering or any actions that facilitate the funding of criminal activities, and does not willfully transact business with suspected terrorists, or with entities or individuals that support terrorism or persons associated with such activities. You may not knowingly be involved in any such activity or ignore signs of suspicious activity.

## DOCUMENT RETENTION AND INFORMATION MANAGEMENT

Our records are important assets and must be managed appropriately. Each of us is responsible for retaining, protecting and appropriately disposing of company records in accordance with applicable law and policy. Because we incur costs to retain our records, we have a business interest in ensuring that we retain only those records that are relevant to our business or are required by law to be retained. (See our Records and Information Management Policy and the related retention schedule for information on what, how and for how long documents should be retained.)

In addition, you may receive an instruction from time to time from an attorney in the Legal Department to preserve all documents that may be relevant to a particular legal matter. You must comply with these requests.

# POLITICAL ACTIVITIES AND CONTRIBUTIONS

We encourage you to be a responsible citizen who participates in civic and political activities. However, any decision to become involved is entirely personal and voluntary. Your personal political activities must be done on your own time and with your own resources. At all times, you must make it clear that your views and actions are your own.

Corporate political contributions are permitted only with the prior written approval of our CEO and General Counsel, and only to the extent permitted by law. If you interact with government officials on Beazer's behalf, you must familiarize yourself with the laws applicable to those interactions.

# **SOCIAL MEDIA**

The way we communicate with each other continues to evolve with the rise of new media and next generation communications tools. While these changes create new opportunities for communication and collaboration, they also create new responsibilities for you.

When using social media externally, including but not limited to online platforms and applications, you must take personal responsibility for your use of social media and may not speak on behalf of the Company unless explicitly authorized to do so. We encourage you to pause and think before posting and never use social media to post about confidential Company information. (See the Social Media Policy for more information.)



Q: I need to pay for my son's college education and have an urgent need for cash. I would like to sell my Beazer stock to do this, but am nervous about doing it now because I know a big event is happening at the Company next month that is not public information. What should I do?

A: Contact our Compliance Officer for guidance.

Q: I saw a blog post that was critical of one of our communities and contained inaccurate information. I know the facts about that situation and want to set the record straight. Can I post a response online?

A: No, you should not post a response yourself. You should contact Corporate Communications or Marketing and let an authorized spokesperson address the matter.

# CONCLUSION



# CONCLUSION



Thank you for reading our Code and for making it an integral part of how we do business. We hope you find it useful in guiding your behavior and decisions as you carry out your daily activities.

# CONTACT

As a reminder, if you are not able to get an answer to a question or resolve an issue under our Code by working with your immediate manager or supervisor, or if you feel uncomfortable talking with them for any reason, please contact one of the following resources:





- A Human Resources Representative
- An Attorney in the Legal Department
- Our anonymous hotline at 1.866.457.9346 or ethics.beazer.com





Our Code is intended to provide an overview of various topics related to Business Conduct and Ethics. Many of the topics outlined in our Code, such as antitrust, harassment, insider trading, and social media are governed by a separate policy. These policies can be found on "The Beazer Way." Printed copies are also available from our Compliance Officer.

