DISCRIMINATION, HARASSMENT AND WORKPLACE CONDUCT POLICY*

TRI Pointe Group is committed to providing a work environment free of unlawful discrimination, harassment and retaliation.

TRI Pointe Group is an Equal Opportunity Employer and strictly prohibits all forms of unlawful discrimination and harassment, including discrimination or harassment on the basis of actual or perceived race, color, national origin, ancestry, sex, gender, gender identity, gender expression, pregnancy, childbirth or related medical condition, religious creed, physical disability, mental disability, age, medical condition, marital status, military status, veteran status, sexual orientation, genetic information or any other characteristic protected by federal, state or local law. Our management team is dedicated to this policy with respect to recruitment, hiring, placement, promotion, transfer, training, compensation, benefits, employee activities and general treatment during employment.

California Employees: The California Federal Employment and Housing Act prohibits coworkers, third parties, supervisors, and managers from engaging in discriminatory, harassing, or retaliatory conduct.

This policy applies to all team members and contractors. The expectation is that all team members, suppliers, job applicants, customers and visitors will be treated with dignity and respect, free from all forms of discrimination, harassment or other inappropriate workplace conduct.

Harassment includes unwelcome verbal, visual or physical conduct creating an intimidating, offensive, or hostile environment. Examples of harassment include verbal (including slurs, jokes, insults, epithets, gestures or teasing), graphic (including offensive posters, symbols, cartoons, drawings, computer displays, or e-mails), or physical conduct (including physically threatening another, blocking someone’s way) that denigrates or shows hostility or aversion towards an individual because of any protected characteristic. Such conduct constitutes harassment when: 1) it has the purpose or effect of creating an intimidating, hostile, or offensive working environment; or 2) it has the purpose or effect of unreasonably interfering with an individual's work performance; or 3) it otherwise adversely affects an individual's employment.

With respect to sexual harassment, the Company prohibits the following conduct which includes, but is not limited to:

- Unwelcome sexual advances, requests for sexual favors, and all other verbal or physical conduct of a sexual or otherwise offensive nature, especially where:
  - Submission to such conduct is made either explicitly or implicitly a term or condition of employment;
  - Submission to or rejection of such conduct is used as the basis for decisions affecting an individual's employment; or
  - Such conduct has the purpose or effect of creating an intimidating, hostile, or offensive working environment.

- Offensive comments, jokes, innuendoes, and other sexually oriented statements.
Examples of the types of conduct expressly prohibited by this policy include, but are not limited to, the following:

- Racial or ethnic slurs, epithets, and any other offensive remarks
- Unwelcome touching, such as rubbing or massaging someone's neck or shoulders, stroking someone's hair, or brushing against another's body
- Sexually suggestive touching, grabbing, groping, kissing, or fondling
- Violating someone's "personal space"
- Whistling
- Lewd, off-color, sexually oriented or racial comments or jokes
- Foul or obscene language
- Leering, staring, or staking
- Threats, intimidation, and other menacing behavior
- Suggestive or sexually explicit posters, calendars, photographs, graffiti, or cartoons
- Unwanted or offensive letters or poems
- Sitting or gesturing sexually
- Offensive, threatening or harassing e-mail, voice-mail, or text messages
- Sexually oriented or explicit remarks, including written or oral references to sexual conduct
- Gossip regarding one's sex life, body, sexual activities, deficiencies, or prowess
- Repeated requests for dates
- Sexual favors in return for employment rewards, or threats if sexual favors are not provided
- Sexual assault or rape
- Abusive or malicious conduct that a reasonable person would find hostile, offensive, and unrelated to the Company's legitimate business interests
- Any other conduct or behavior deemed inappropriate by the Company

REPORTING DISCRIMINATION AND HARASSMENT

It is the responsibility of the Company and each team member to create an atmosphere free of discrimination and harassment. In addition, it is the responsibility of each team member to respect the rights of his or her co-workers. If a team member experiences or observes any hostile conduct or harassing behavior, or believe that he/she has been treated in an unlawful discriminatory manner, because of race, color, age, national origin, religion, sexual orientation, sex (including pregnancy, childbirth, or related medical conditions), gender identity or gender expression, military or veteran status, physical or mental disability, genetic information, or status in any group protected by applicable federal, state or local law, must immediately report the matter (orally or in writing) to their supervisor/manager or to Human Resources.

*EFFECTIVE JANUARY 1, 2016
Upon receipt of a complaint, the Company will undertake a prompt and thorough investigation of the allegations. Confidentiality will be maintained concerning the allegations and the investigation to the extent possible, and particularly when it is determined by the Company that any of the following factors are present:

- Witnesses need protection;
- Evidence is in danger of being destroyed;
- Testimony is in danger of being fabricated; or
- There is a need for confidentiality in order to prevent a cover up.

Team members who fail to cooperate with an investigation conducted pursuant to this policy, or who breach confidentiality resulting in a threat to the integrity of the investigation, may be subject to disciplinary action up to and including termination.

This policy does not limit or impede any person’s ability to communicate with any government agency or otherwise participate in any investigation or proceeding that may be conducted by any government agency, including providing documents or other information without notice to the Company, when such limitation or impediment is prohibited by applicable law or regulation.

Upon completion of the investigation, if necessary, corrective measures will be taken. These measures may include, but are not limited to: training, counseling, warning, suspension, or immediate dismissal. Anyone, regardless of position or title, found through investigation to have engaged in inappropriate harassment or bullying will be subject to discipline up to and including discharge.

Any supervisor or manager who becomes aware of possible unlawful harassment or discrimination is required to immediately report the issue to Human Resources. All allegations of harassment and discrimination will be quickly and discreetly investigated by qualified personnel, documented, and tracked. To the extent possible, your confidentiality and that of any witnesses and the alleged harasser will be protected against unnecessary disclosure. When the investigation is completed, you will be informed of the outcome of the investigation.

**PROHIBITION AGAINST RETALIATION**

The company prohibits retaliation against those reporting in good faith the incidents of harassment, discrimination and inappropriate bullying in violation of this policy, pursuing any such claim or cooperating in the investigation of such reports. Retaliation of any type will not be tolerated.

TRI Pointe Group requires all staff to receive Anti-Harassment and Discrimination training biennially. TRI Pointe Group requires supervisors of California based employees to receive a more in-depth Anti-Harassment and Discrimination training biennially.
LEADER RESPONSIBILITIES

- Know what constitutes harassment and discrimination and be vigilant to recognize it
- Role model commitment to providing a workplace free from harassment and discrimination
- Take immediate action to engage Human Resources when harassment or discrimination is witnessed or reported
- Take necessary steps to protect the complainant from retaliation
- Make every effort to resolve the issue and maintain confidentiality to the extent possible

Violation of this policy will subject an employee to disciplinary action, up to and including immediate termination. Moreover, any employee, supervisor or manager who condones or ignores potential violations of this policy will be subject to appropriate disciplinary action, up to and including termination.