

Policy:

The Company is fully committed to creating a work environment that is safe, fair, and where its directors, officers, managers, employees, associates, (collectively “Associates”) as well as our business partners, contractors, suppliers and trade partners (collectively “Vendors”) are treated with dignity and respect. In furtherance of this objective, the Company has adopted the following policies, principles and procedures:

1. The Company, its Associates, Vendors and all stakeholders have a duty to respect and protect human rights and fundamental freedoms and are responsible for continued awareness, training and compliance. This Policy is in recognition of and intended to achieve conformance with the following recognized authorities: (a) The United Nations’ Universal Declaration of Human Rights, UN (1948); (b) The United Nations’ Guiding Principles on Business and Human Rights, UN (2011); and (c) The Organization for Economic Co-operation and Development’s (OECD) Guidelines for Multinational Enterprises, OECD (2011).
2. The Company embraces diversity and inclusion and is committed to protecting and advancing the rights of minority groups and women. The Company believes that finding, employing and retaining talented people from all backgrounds, ethnicities, genders, lifestyles and belief systems will result in a workforce that is more positive, productive, and successful. The Company will strive for Company-wide diversity, and it will make decisions concerning recruitment, employment, advancement and compensation based on merit, qualifications and ability. The Company expects the same commitment from its Vendors.
3. The Company strictly forbids and prohibits any of its Associates or Vendors, from engaging in any form of forced labor, slavery, or human trafficking.
4. The Company is committed to and strictly forbids the use of child labor. The Company prohibits all forms of labor that are harmful to the health or safety of children.
5. The Company is committed to compensating all its Associates with a fair/living wage. The Company is competitive and operates in full compliance with all applicable laws and regulations concerning wages, work hours, overtime, benefits and labor standards. The Company expects that its Vendors have the same commitment.
6. The health and safety of its Associates and Vendors is of the greatest importance to the Company. The Company will strive to provide and maintain a safe work environment for its Associates and Vendors by complying with all of the Company’s safety policies and all federal, state and local laws and regulations concerning workplace safety. The Company is further committed to consistent and regular safety training for its Associates and Vendors.

7. The Company recognizes its duty to provide leadership and communication so that all Associates and Vendors have the knowledge needed to perform in the workplace in conformance with this Policy and all Company Policies and all applicable laws and regulations. If an Associate, Vendor, or other stakeholder believes that there has been a violation of this Policy or any other policy of the Company, they should report the incident to their supervisor, a Human Resources representative or call the Company's Code of Ethics hotline at 1.855.773.4657. The Company is committed to investigating all reports and taking appropriate corrective actions where necessary.

Background:

In addition to this Policy, the Company's commitment to labor rights and human rights is demonstrated and implemented through other Company Policies, including the following:

1. Equal Employment, Non-Discrimination and Promotion of Diversity. As set forth in the Company's Human Resources Policy HR012, the Company is committed to diversity and providing equal employment opportunities without regard to race, creed, religion, color, national origin, age, sex, disability, ethnicity, gender identity, genetic information, marital status, veteran status, pregnancy-related condition, sexual orientation or any other legally protected classification, characteristic or status. The Company recognizes an individual's freedom to join or not join associations, unions or other work organizations.

2. Safe, Healthy and Respectful Workplace. As set forth in several of the Companies Policies, including but not limited to the following: HR039-Prevention of Workplace Harassment, HR048-Workplace Violence, HR009-Discipline and Conduct, and Safety Policies SA001-SA018, the Company is committed to providing a safe, healthy and respectful workplace that fully complies with all applicable laws and regulations.

3. Transparency and Integrity. The Company is committed to conducting its operations in a manner that upholds the highest standards of ethics and integrity and expect our Associates and Vendors to comply with these ideals. As set forth in several of the Companies Policies and Procedures, including but not limited to the following: The Company's Vendor Code of Conduct, Enterprise Anti-Corruption and Anti-Bribery Policy, LE006-Receipt, Retention and Treatment of Complaints, HR008-Associate Complaints and Concerns, and HR009- Discipline and Conduct, the Company has established clear and concise procedures for reporting (anonymously and otherwise), investigating and handling alleged violations of applicable laws and Company Policies.

4. The Company's Code of Ethics. The Company's Code of Ethics ("Code"), which is located on the Company's internet and intranet websites, is a collection of principles regarding ethical conduct and integrity that Associates are required to comply with when interacting with each other and our Vendors, customers, shareholders, governmental agencies and competitors. Associates are required to become familiar with the Code, which includes, in relevant part, the following: (a) Associates have an affirmative obligation and responsibility to promptly report any conduct that the Associate believes in good faith, might be in violation of law, a Company policy or the Code; (b) The Company's commitment to protect whistleblowers; (c) Detailed procedures for reporting and investigating alleged violations of the Code; and (d) The Code requires Associates to: (i) Act honestly, ethically and with integrity; (ii) Comply with applicable laws, rules and

regulations; and (iii) Create a positive and safe working environment.

Purpose:

The Company recognizes that its Associates and Vendors are its greatest asset. The purpose of this Policy is to provide standards and procedures that will allow the Company and its affiliates to achieve their financial goals in a manner that reflects the Company's strong commitment to human rights and to providing a safe and fair work environment where its Associates and Vendors are treated with dignity and respect.

Scope:

This Policy applies to Hovnanian Enterprises, Inc. (the "Company"), its wholly owned subsidiaries, any entity in which the Company holds more than 50% of the voting power in such entity, and their respective officers, directors, and associates.

Procedures:

1. The Company's Board of Directors has given the Corporate Governance and Nominating Committee responsibility for reviewing and considering the Company's Environmental, Social and Governance Policies.
2. The Company's Legal Department is responsible for taking the steps necessary to ensure that appropriate provisions are included in contracts with the Company's Vendors to comply with the relevant portions of this Policy and applicable laws and regulations.
3. The procedures set forth in Company's Code of Ethics shall apply with regard to the reporting, investigating and handling of any alleged violations of this Policy.
4. Failure to comply with this Policy may result in disciplinary action, including termination.