



**BLUEROCK
RESIDENTIAL
GROWTH REIT™**

BLUEROCK RESIDENTIAL GROWTH REIT, INC.

Occupational Safety and Health Policy and Procedures Manual

AS OF JULY 1, 2019

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Forward

Bluerock Residential Growth REIT, Inc., and its subsidiaries (collectively, “we,” “our,” “us,” or the “Company”) are committed to the health and safety of all our employees. The purpose of this Occupational Safety and Health Policies and Procedures Manual (the “Policy”) is to guide and direct all employees to work safely and prevent injury to themselves and others.

All employees are encouraged to participate in developing, implementing, and enforcing this Policy. All employees must take all reasonable steps to prevent accidents and never sacrifice safety for expedience. Our goal is to eliminate or minimize hazards that can cause accidents. It is our policy that all employees be given a copy of this Policy and be familiar with its contents.

This Policy will be reviewed annually. Together we can achieve a safe and happy work environment.

Health and Safety Policy

We are committed to following the Occupational Safety and Health Act (the “Act”). Our goal is to provide and maintain a healthy and safe working environment, with a view to continuous improvement. This goal is only achievable by striving to exceed all obligations under applicable legislations and by fostering an enthusiastic commitment to health, safety and the environment within our employees, vendors, contractors and visitors.

IN PARTICULAR:

- Management will strive to take all reasonable steps to minimize workplace hazards to the extent reasonably practicable.
- Supervisors and managers will be held accountable for the health and safety of all employees under their supervision. This includes responsibility for applicable training and instruction, appropriate follow-up on reported health and safety concerns, and implementation of recommended corrective action. This accountability is integrated into the performance appraisal system.
- Supervisors, workers and visitors are expected to perform their duties and responsibilities in a safe and healthful manner and are accountable for the health and safety of themselves and others.
- We are committed to providing all necessary training and instruction to ensure that appropriate work practices are followed on the job and to promoting appropriate practices off the job.
- If necessary, we will take disciplinary action if individuals fail to follow healthy and safe work practices or do not comply with this Policy, the Act or other applicable corporate policies and procedures.

Health and safety are everyone’s responsibility. We expect that everyone will join in our efforts to provide a healthy and safe working environment on a continuous day-to day-basis. Only through the dedication and efforts of all individuals can we succeed in providing a healthy, safe working environment.

Occupational Health and Safety in the Workplace

WHAT THE LAW REQUIRES

Our workplace is governed by the Act. The Act places duties on us and our employees, workers, suppliers, and contractors to establish and maintain safe and healthy working conditions.

EMPLOYER RESPONSIBILITIES

We are responsible for providing you with safe and healthy working conditions. This includes a duty to protect you from violence, discrimination and harassment. However, you must cooperate with us in making your workplace safe and healthy.

YOUR RESPONSIBILITIES

One of your most important responsibilities is to protect your health and safety as well as that of your co-workers. You have the responsibility to comply with the provisions of the Act and the policies and procedures of the Company, which include the following:

- protecting your own health and safety and that of your co-workers;
- not initiating or participating in the harassment of another worker; and
- co-operating with your supervisor and all others with duties under the Act.

SAFETY OFFICER

The Safety Officer is accountable to the Company's Corporate Responsibility Committee and is responsible for the occupational health and safety of all its Company employees. The Safety Officer will provide leadership in all aspects of health and safety activities at work or elsewhere. The Safety Officer will take an active role in all aspects of health and safety within its office.

THE DUTIES OF THE SAFETY OFFICER INCLUDE THE FOLLOWING:

- ensuring that all reasonable steps are taken to prevent accidents;
- maintaining familiarity with the Company's policies and all provisions under the Act pertaining to health or safety;
- ensuring all policies of the Company and the Act are followed by all employees;
- ensuring safety meetings are held and minutes are recorded, posted and filed in accordance with occupational health and safety regulations;
- ensuring all accidents and "near misses" (as defined herein) are reported and investigated;
- ensuring Safety Document Sheets (SDS) are provided for all hazardous materials delivered to the workplace and are readily available for employees to review;
- ensuring employees are instructed in the procedures and requirements under the Company's policies and the Act pertaining to occupational health and safety; and
- reviewing all accidents and "near misses" (as defined herein) to determine root and basic causes, with suggestions for implementation of changes to prevent re-occurrence.

Occupational Health and Safety in the Workplace (Cont'd)

OCCUPATIONAL HEALTH AND SAFETY COMMITTEE

THE DUTIES OF THE OCCUPATIONAL HEALTH AND SAFETY COMMITTEE INCLUDE THE FOLLOWING:

- regularly inspecting the workplace;
- assisting with accident and “near miss” (as defined herein) investigations;
- responding to the health and safety concerns of employees; and
- investigating refusals to work.

SUPPLIERS

THE DUTIES OF SUPPLIERS INCLUDE THE FOLLOWING:

- providing an SDS for all hazardous material stored on our properties;
- ensuring all reasonable steps are taken to prevent an accident; and
- maintaining familiarity with health and safety requirements under the Act and the Company’s policies and procedures.

ALL STAFF

THE RESPONSIBILITIES OF ALL STAFF INCLUDE THE FOLLOWING:

- complying with all Company procedures and policies pertaining to occupational health and safety;
- being responsible for working safely and carrying out duties with skill and care as to not cause accidental injury to themselves, fellow workers or the general public;
- immediately reporting all injuries, “near misses” (as defined herein) or potential hazards to their supervisor;
- knowing the location of all fire extinguishers, fire alarms or other warning devices;
- ensuring all personal safety equipment is being used properly;
- never engaging in horseplay or tomfoolery; and
- maintaining a clean and orderly work area.

Your Rights

THE ACT GIVES YOU THREE RIGHTS:

- the right to know the hazards at work and how to control them;
- the right to participate in occupational health and safety in your workplace; and
- the right to refuse work which you believe to be unusually dangerous.

You may not be punished for utilizing these rights. We may be required to legally justify any action taken against a worker who is an active participant in the health and safety of the workplace by utilizing his or her rights under the Act.

YOUR RIGHT TO KNOW

The Act requires us to provide you with all of the information you need to control the hazards you face at work.

IF YOU ARE INEXPERIENCED, YOU WILL RECEIVE AN ORIENTATION WHICH INCLUDES:

- what to do in a fire or other emergency;
- first aid facilities;
- prohibited or restricted areas;
- workplace hazards; and
- any other information you should know.

YOUR RIGHT TO PARTICIPATE

You have the right to become involved in the implementation of occupational health and safety in your workplace. The Act encourages employers and workers to work together to maintain a healthy and safe workplace.

YOUR RIGHT TO REFUSE

You have the right to refuse to do work which you believe is unusually dangerous. The unusual danger may be to you or to anyone else.

AN UNUSUAL DANGER COULD INCLUDE SUCH SITUATIONS AS:

- a danger which is not normal for your occupation or the job;
- a danger under which you would not normally carry out your job; and/or
- a situation for which you are not properly trained, equipped or experienced.

TO EXERCISE THIS RIGHT, USE THE FOLLOWING GUIDELINES:

1. If you believe that the work you have been asked to do is unusually dangerous, promptly inform your supervisor.
2. Be sure that your supervisor understands that you are refusing to do the disputed job for health and safety reasons.
3. Attempt to resolve the problem with your supervisor.
4. If the problem cannot be resolved by your supervisor to your satisfaction, contact the Safety Officer.
5. You also have the right to contact the Human Resources Department at any time.
6. Do not leave the site without the permission of a supervisor.

Your Rights (Cont'd)

If you and your supervisor cannot mutually agree on a solution to address your health and safety concerns, your supervisor should promptly contact the Safety Officer and ask her or him to investigate and attempt to resolve the matter. If the Safety Officer cannot resolve the matter to your satisfaction, he/she will convene the Occupational Health and Safety Committee for an emergency meeting. The Committee will investigate and prepare a report on the matter at hand.

YOU HAVE THE RIGHT TO CONTINUE TO REFUSE UNTIL:

- measures have been taken to reasonably satisfy you that the job is now safe to perform; or
- the Occupational Health and Safety Committee has investigated and ruled against your refusal.

If you disagree with the decision of the Occupational Health and Safety Committee, you may appeal to Human Resources. We cannot assign another worker to do the disputed job unless the replacement worker is advised in writing:

- of the refusal and the reasons for it;
- of the reasons we believe that the replacement worker can do the disputed job safely;
- that the replacement worker also has the right to refuse; and
- of the steps to follow when exercising this right to refuse abnormally dangerous work.

Safety in the Workplace

GENERAL SAFETY RULES

YOU SHOULD BE AWARE OF THESE GENERAL SAFETY RULES AND TIPS:

1. All accidents, injuries or “near misses” (as defined herein), regardless of their nature, must be promptly reported to the Safety Officer.
2. Clothing must be appropriate with respect to the duties being performed.
3. Running is not permitted except in extreme emergencies.
4. Visitors and customers must be escorted by staff while on the Company’s property.
5. Hand tools are to be used for their intended purpose only.
6. Horseplay, fighting and tomfoolery is strictly prohibited on the Company’s premises.
7. All spills must be immediately cleaned up and reported.
8. Drawers and filing cabinets must be kept closed when not in use.
9. Filing cabinet drawers must be filled from the bottom up or the cabinet must be securely fastened /anchored.
10. Portable ladders must be secured against movement and placed on a base that is stable. The base of an inclined portable ladder must be no further from the base of the wall or structure than ¼ of the height to where the ladder contacts the wall or structure.
11. If you have questions, ask your supervisor, a member of the Occupational Health and Safety Committee or the Safety Officer.
12. Follow instructions and do not take chances.
13. Wear your personal safety equipment.
14. Never operate equipment you have not been trained to use.
15. Keep your work area clean.
16. Avoid injury by lifting correctly. The maximum weight that one person is permitted to lift is 75 lbs.
17. Ensure the job can be completed safely.

FIRST AID

Every office will have a first aid kit on site.

HAZARD WARNING SIGNS

Whenever possible, we will display warning signs where a potential hazard may cause injury. We will post where hazards exist and will not remove them unless the hazard has been controlled.

ACCIDENT INVESTIGATION POLICY

All accidents that result in injury or property damage, or that could have resulted in serious injury or property damage (a “near miss”), must be thoroughly investigated. The investigation will seek to determine the cause of the incident so that appropriate action may be taken to prevent recurrence. The Safety Officer will be responsible for conducting the investigation. The investigation report will be completed as soon as possible after the incident and reported to the Occupational Health and Safety Committee. The Safety Officer and appropriate supervisor will determine steps to be taken to prevent recurrence. Any disputes arising from the investigation will be investigated and determined by Human Resources.

Accident and Near Miss Reporting

REQUIRES FIRST AID – TREAT AT THE SCENE

SUPERVISOR:

1. Complete supervisor report of the injury (state workers' compensation form ("WC Form") or internal investigation form).
2. Abate any unsafe conditions identified during the injury investigation.
3. Train all employees on how to prevent similar injury in the future.

REQUIRES MEDICAL TREATMENT – TRANSPORT EMPLOYEE TO DESIGNATED NETWORK MEDICAL CLINIC

SUPERVISOR:

1. Complete supervisor report of the injury (state WC Form or internal investigation form).
2. Notify the Safety Officer of the injury.
3. Abate any unsafe conditions identified during the injury investigation.
4. Train all employees on how to prevent similar injury in the future.

HUMAN RESOURCES:

1. Complete first report of the injury if not completed by supervisor.
2. Complete DWC 3 – Employers Wage Statement.
3. Submit claim to workers' compensation carrier within 3 days of injury.

SERIOUS INJURY – CALL 911 FOR EMERGENCY MEDICAL TO AREA HOSPITAL

SUPERVISOR:

1. Complete supervisor report of the injury (state WC Form or internal investigation form).
2. Notify the Company's Chief Operating Officer of the injury.
3. Comply with any restrictions prescribed by a doctor upon the worker's return to work ("RTW").
4. Abate any unsafe conditions identified during the injury investigation.
5. Train all employees on how to prevent similar injury in the future.

HUMAN RESOURCES:

1. Complete DWC 3 – Employers Wage Statement Submit claim to workers' compensation carrier within 3 days of the injury.
2. Log any medical treatment on the OSHA 300 Log.
3. Report to Occupational Safety and Health Administration ("OSHA") directly if the claim involves fatality, hospitalization, amputation, or loss of eye.
4. Review any restrictions prescribed by a doctor upon RTW and review the injured worker's job description to identify any affected tasks.
5. Communicate with injured worker at least weekly and following any scheduled medical appointments.

Alcohol and Drug Policy

If there is any awareness or suspicion that a worker, supplier, or visitor is under the influence of narcotics or alcohol, such worker, supplier or visitor will be removed from the premises immediately.

Should a worker report to work while under the influence of narcotics or alcohol, the worker will be sent home in a cab or driven home by their supervisor.

Anti-Money Laundering Policy

Money laundering is strictly prohibited. Money laundering is the process by which individuals or organizations try to conceal illicit funds or make these funds look legitimate. The laws in certain countries require the Company to report suspicious activity. If you deal directly with customers or vendors, the following examples may be indications of potential money laundering: attempts to make large payments in cash; payments by someone who is not a party to the applicable contract; requests to pay more than what is provided by the contract; payments made in currencies other than those specified in the contract; payments from an unusual account; and transactions forming an unusual pattern or many repetitive cash payments. If you suspect a transaction in which you are participating has indicators of money laundering, please contact the toll-free BRG Ethics Hotline at 800-795-9242 or via the following email address: ethics@bluerockre.com.

Disciplinary Action

Compliance with Company and legislative health and safety standards is necessary to maintain a safe and healthy work environment. Careless work and irresponsible behavior directly affect the quality of health and safety in the workplace. Absenteeism also influences safety by placing additional duties on fellow workers. The following instances shall be cause for verbal or written warning and possible dismissal:

- health and safety violations under this Policy;
- poor conduct or misconduct;
- theft;
- sexual harassment;
- racial discrimination;
- carelessness;
- willful damage to company property; and
- drug or alcohol use.

THE FOLLOWING IS A GUIDELINE FOR DISCIPLINARY ACTIONS FOR SAFETY INFRACTIONS BASED ON SERIOUSNESS OF THE OFFENSE:

1. First offense: You will be given a documented verbal warning, and will be subject to possible suspension or termination depending on the seriousness of the offense.
2. Second offense: You will be given a written warning and suspension, and will be subject to possible termination depending on the seriousness of the offense (suspension or termination to fit seriousness of the offense).
3. Third offense: You may be suspended or terminated (suspension or termination to fit seriousness of the offense).

Acknowledgment & Receipt

Date: _____

I, _____, hereby acknowledge receipt of the Bluerock Residential Growth REIT, Inc. Occupational Safety & Health Policy and Procedures Manual.

I have read, understand and agree to the terms of employment and will carry out and abide by the operational procedures and rules as outlined therein.

I HEREBY AGREE:

1. To adhere to all company policies and procedures.
2. To the use of safety equipment, at all times, which is required by my safe work procedures and by my clients.
3. That I shall comply with government and client regulations at all times.
4. That I am responsible and accountable for my health and safety performance.

EMPLOYEE'S SIGNATURE:

BLUEROCK RESIDENTIAL GROWTH REIT, INC.:

[This page is to be placed in employee's file at time of signing.]