



BLUEROCK RESIDENTIAL GROWTH REIT, INC.

Human Rights Policy

Respect for Human Rights

Respect for human rights is a fundamental value of Bluerock Residential Growth REIT, Inc., and its subsidiaries (collectively, “we,” “our,” “us,” or the “Company”). We strive to respect and promote human rights consistent with the UN Guiding Principles on Business and Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights in our relationships with our employees, vendors, contractors, and tenants. We are committed to ensuring the preservation of human rights within the Company and at the properties we operate. This Human Rights Policy (the “Policy”) is guided by international human rights principles encompassed by the Universal Declaration of Human Rights, including those contained within the International Bill of Rights and the International Labor Organization’s 1998 Declaration on Fundamental Principles and Rights at Work.

This Policy applies to the Company, the entities that the Company owns, the entities in which the Company holds a majority interest and the facilities that the Company manages. The Company also expects our vendors, suppliers, contractors, and tenants to uphold these principles and urges them to adopt similar policies within their own businesses. Where we identify adverse human rights impacts resulting from or caused by our business activities, we commit to cooperating in fair and equitable remediation, and where we are linked to or involved in such adverse impacts through our relationships with third parties, we seek to promote access to remediation. The Policy is overseen by the Company’s Corporate Responsibility Committee (the “CR Committee”).

Community and Stakeholder Engagement

We recognize that we are part of the communities in which we operate, and we remain open to dialogue that will enable us to consider and learn from the views of the community as we conduct our business. Where appropriate, we engage with a wide range of civil society and stakeholders on human rights issues related to our business.

Diversity and Inclusion

We value the diversity and support inclusion of the people with whom we work. We are committed to equal opportunity and are intolerant of discrimination and harassment. We work to maintain workplaces, properties and communities that are free from discrimination or harassment on the basis of race, sex, color, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender identification or expression, or any other status protected by applicable law. We make decisions on recruitment, hiring, placement, development, training, compensation and advancement at the Company based on qualifications, performance, skills and experience. We do not tolerate disrespectful or inappropriate behavior, unfair treatment or retaliation of any kind. Harassment is not tolerated in the workplace or in any work-related circumstance outside the workplace.

Safe and Healthy Workplace

The safety and health of our employees is of paramount importance. Our policy is to provide a safe and healthy workplace and comply with applicable safety and health laws and regulations, as well as internal requirements pursuant to our Occupational Safety and Health Policy and Procedures Manual. We work to provide and maintain a safe, healthy and productive workplace by addressing and remediating identified risks for accidents, injury and health impacts.

Workplace Security

We are committed to maintaining a workplace that is free from violence, harassment, intimidation, discrimination and other unsafe or disruptive conditions attributable to internal and external threats. The prohibition against these conditions is specified in our Employee Handbook, and are maintained with respect for employee privacy and dignity.

Forced Labor and Human Trafficking

We prohibit the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, military labor, modern forms of slavery and any form of human trafficking.

Child Labor

We prohibit the hiring of individuals that are under 18 years of age for positions in which hazardous work is required.

Work Hours, Wages and Benefits

We compensate employees competitively relative to the industry and local labor market. We work to ensure full compliance with applicable wage, work hours, overtime and benefits laws.

We encourage healthy living for our staff as well as a positive work/life balance and uphold this with competitive time-off policies and scheduling flexibility as warranted. To support this goal, we have implemented the Bluerock Employee Assistance Program, which supports employees and their dependents with confidential access to mental health professionals, access to assistance with health concerns, legal and financial assistance, dependent and elder care referral services, financial tools and more.

Employee Reporting

We value and encourage candid communications with respect to work conditions. The Company complies with applicable labor and employment laws wherever we operate and we ensure that employees are aware of our adherence to these laws as well as this Policy. Any employee who recognizes a conflict between the language of this Policy and the laws, customs and practices of his or her work environment, or who has questions about this Policy or who would like to report a potential violation of this Policy confidentially, is encouraged to raise those questions and concerns with local management and our Human Resources Department. Employees can also report suspected violations of this Policy via email at ethics@bluerockre.com or by calling the toll-free BRG Ethics Hotline: 800-795-9242. Employees are also encouraged to report suspected violations of this Policy in accordance with our Whistleblower Policy, which can be found on the Company's website: <https://ir.bluerockresidential.com/governance-documents>.

No reprisal or retaliatory action will be taken against any employee for raising concerns under this Policy. The Company will investigate, address and respond to the concerns of employees and will take appropriate corrective action in response to any violation.

This Policy is aligned with the Company's Code of Business Conduct and Ethics. This Policy, including related information, can be found on the Company's website: <https://ir.bluerockresidential.com/governance-documents>.

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1. Found at: [UN Guiding Principles on Business and Human Rights](#)
 2. Found at: [The International Covenant on Civil and Political Rights](#)
 3. Found at: [The International Covenant on Civil and Political Rights](#)
 4. Found at: [The Universal Declaration of Human Rights](#)
 5. Found at: [The International Bill of Rights](#)
 6. Found at: [The International Labor Organization's 1998 Declaration on Fundamental Principles and Rights at Work](#)