

## Part 9 – California Workplace Violence Prevention Plan

### PURPOSE AND SCOPE

Bridge Investment Group Holdings LLC and its affiliates (each hereinafter referred to individually and collectively as “Bridge”) is committed to providing employees with a safe and healthy work environment. It is Bridge’s policy to maintain a workplace free of violence and threats of violence. In keeping with these commitments, Bridge has established this Workplace Violence Prevention Plan (“WVPP” or the “Plan”). The purpose of this Plan is to establish policies, procedures, and practices in connection with the prevention of Workplace Violence (as defined below) in Bridge’s California worksites and protection of employees from incidents of Workplace Violence.

### DEFINITIONS

The following definitions apply for the purposes of this Plan.

- **Workplace Violence** (“WPV”) means any act of violence or Threat of Violence (defined below) that occurs in a place of employment and includes, but is not limited to the following:
  - The threat or use of physical force against an employee that results in, or has a high likelihood of resulting in, injury, psychological trauma, or stress, regardless of whether the employee sustains an injury.
  - An incident involving a threat or use of a firearm or other dangerous weapon, including the use of common objects as weapons, regardless of whether the employee sustains an injury.
  - The following four types of violence:
    - **Type 1** violence is committed by a person who has no legitimate business at the worksite and includes violent acts by anyone who enters the workplace or approaches employees with the intent to commit a crime.
    - **Type 2** violence is directed at employees by a third-party invitee (e.g., customer, client, guest, patron, patient, student, or visitor).
    - **Type 3** violence against an employee by a present or former employee, supervisor, or manager.
    - **Type 4** violence is committed in the workplace by a nonworker who has or is known to have had a personal relationship with an employee (e.g., interpersonal relationship violence or domestic violence).
  - Workplace Violence does not include lawful acts of self-defense or defense of others.
- A **Threat of Violence** means any verbal or written statement, including, but not limited to, texts, electronic messages, social media messages, or other online posts, or any

behavioral or physical conduct, that conveys an intent, or that is reasonably perceived to convey an intent, to cause physical harm or to place someone in fear of physical harm, and that serves no legitimate purpose.

- A **Workplace Violence Emergency** is any unanticipated circumstance related to Workplace Violence that can be life-threatening or pose a risk of significant injury to employees or others.

## RESPONSIBILITY

The Plan administrator is Barry Wilson, Bridge’s Managing Director of Risk Management (“Plan Administrator”). The Pan Administrator is responsible for implementing and overseeing the WVPP.

Responsible Persons	Job Title/Position	WVPP Responsibility(ies)	Phone #	Email
Barry Wilson	Managing Director, Risk Management	<ul style="list-style-type: none"> <li>• Accountable for implementation and oversight of the Plan</li> <li>• Champions the benefits of the Plan to other Bridge executives and understands senior leadership’s expectations for the Plan</li> <li>• Provides Plan feedback and makes time to resolve escalated issues</li> <li>• Communicates organizational changes that affect the Plan</li> <li>• Oversees Plan compliance</li> </ul>	801.327.8853	Bigrisk@bridgeig.com
Kelsey Meyer Krissy Cavan	Human Resources	<ul style="list-style-type: none"> <li>• May receive initial report of threats/incidents of concern</li> <li>• Serves as a liaison to experts/other team members/consultants</li> <li>• Maintains employee information Coordinates counseling/oversees workplace investigations and disciplinary action</li> <li>• Recommends/assists in threat management plan development</li> <li>• Resolves Tier 1 WPV concerns as Incident Lead</li> <li>• Maintains WVPP documentation</li> <li>• Works closely with employee of concern’s manager</li> <li>• Informs appropriate</li> </ul>	404.995.8131801.716.5760	<a href="mailto:Kelsey.Meyer@bridgeig.com">Kelsey.Meyer@bridgeig.com</a> Krissy.Cavin@bridgeig.com

		<p>functions/disciplines of outcome</p> <ul style="list-style-type: none"> <li>• Updates relevant stakeholders of progress</li> <li>• Facilitates interaction with the Employee Assistance Program (“EAP”)</li> </ul>		
		<ul style="list-style-type: none"> <li>•</li> </ul>		
	Legal	<ul style="list-style-type: none"> <li>• Assists with investigations as requested</li> <li>• Provides legal advice on workplace investigation processes, findings and outcomes</li> <li>• Reviews documentation associated with disciplinary/termination actions as requested</li> <li>• Assists with development of termination packages as requested</li> <li>• Advises on the parameters of applicable statutes and legal precedent and provides notice of changes in the law</li> </ul>		
	Property Managers, Regional Managers, and Vice Presidents (Property Management Entities)	<ul style="list-style-type: none"> <li>• Ensures property/site compliance with the WVPP</li> <li>• Initiates/coordinates investigations or planned response actions as necessary or required</li> <li>• Works with HR and Risk Management to ensure follow-up assessments and action plans are completed</li> <li>• Coordinates with stakeholders to keep WPV policy up-to-date and available</li> <li>• Keeps WPV procedures up-to-date and available</li> <li>• Coordinates with outside expert resources as needed</li> <li>• Maintains and updates enterprise incident management policies and procedures</li> <li>• Assists with associated physical security concerns</li> </ul>		

		<ul style="list-style-type: none"> <li>• Assists with investigations/ termination proceedings</li> <li>• Ensures workplace standards are met and maintained</li> <li>• Supports in the delivery and routine scheduling of WPV related trainings</li> <li>• Supports in the facilitation of employee wellness checks as necessary or required</li> </ul>		
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All managers and supervisors are responsible for implementing and maintaining the WVPP in their work areas and for answering employee questions about the WVPP.

Bridge recognizes the important role that employees play in identifying, preventing, correcting, managing, and responding to Workplace Violence incidents and threats. As such, this Plan has been developed and implemented with the assistance and active involvement and participation of employees in identifying, evaluating, and correcting Workplace Violence hazards, designing and implementing the training required under this Plan, and in reporting and investigating Workplace Violence incidents and threats.

## EMPLOYEE COMPLIANCE

Bridge is committed to ensuring that its policies and procedures involving Workplace Violence prevention are clearly communicated and understood by employees covered by this Plan.

- Maintaining a safe and secure work environment, free from threats and acts of violence, is critical to our business. As such, all Bridge employees are required to comply with the WVPP. Because compliance starts with awareness and understanding, the WVPP will be communicated to new hires at the time of onboarding and on a logical schedule thereafter. Employees who violate the Plan may be required to participate in retraining, in addition to other disciplinary action. To ensure all Bridge employees are aware of and understand the various components of the WVPP. All employees will be expected to follow the WVPP in order to ensure a safe and healthy workplace. These expectations will be communicated to employees at the time of onboarding and will be updated on a logical schedule thereafter.
- Employee noncompliance may include, among other things, violations of Bridge’s code of conduct, harassment policy, security policies, etc. or engaging in behavior that perpetrated an act of harassment or discrimination may be subject to disciplinary action up to and including termination of employment.

## COMMUNICATION WITH EMPLOYEES

Bridge recognizes that maintaining a safe, healthy, and secure workplace requires open, two-way communication between employees, including managers and supervisors, staff, and other employers, on workplace safety, health, and security issues. Bridge’s communication system is

designed to facilitate a continuous flow of WVP information between management and staff in a form that is readily understandable by all employees, and includes the following:

- New hire and current employee refresher Workplace Violence prevention training programs, including training on Bridge's WVPP.
- Regularly scheduled meetings that address security issues and potential workplace violence hazards
- Effective communication between employees and supervisors about workplace violence prevention and violence concerns.
- Posted WVPP documents and information on [state where this information is maintained], which is accessible to all Bridge employees.
- How employees can report a violent incident, threat, or other workplace violence concern to Bridge or law enforcement without fear of retaliation, as detailed in this WVPP. Employees' concerns will be investigated in a timely manner and they will be informed of the results of the investigation and any corrective actions to be taken as necessary and appropriate under the circumstances.

## COORDINATION WITH OTHER EMPLOYERS

Bridge will implement the following effective procedures to coordinate implementation of this Plan with other employers to ensure that those employers and employees understand their respective roles, as provided in the Plan.

- All employees will be trained on workplace violence prevention.
- Workplace violence incidents involving any employee are reported, investigated, and recorded.
- At a multiemployer worksite, Bridge will ensure that if its employees experience workplace violence incident that Bridge will record the information in a violent incident log and shall also provide a copy of that log to controlling employer.

## WORKPLACE VIOLENCE INCIDENT REPORTING PROCEDURE

The effectiveness of Bridge's efforts under this Plan depends in significant part on employees reporting incidents of Workplace Violence, including Threats of Violence, and any other concerns related to Workplace Violence.

### **How to Report**

An employee who learns of, witnesses or directly experiences a Workplace Violence incident, including a Threat of Violence, or other Workplace Violence concern should immediately report the matter as outlined below.

Reports may be made verbally or in writing. When making a report, the employee should provide as much detail as possible, including the names of individuals involved and any witnesses. Bridge will keep reports related to Workplace Violence as confidential as possible, to the extent permitted under applicable law.

### **Workplace Violence Emergencies**

In the event of an actual or potential workplace violence emergency, employees should call 911 immediately and move to or remain in a safe location until the incident is resolved. Thereafter and once reasonably safe and practical to do so, employees must report the incident to any of the following: (1) their immediate manager or supervisor (who will elevate the report to Bridge Risk Management at the contact information below); (2) Bridge Risk Management directly; or (3) HR.

Bridge Risk Management:      Barry Wilson – Barry.Wilson@bridgeig.com

Bridge Human Resources:      Kelsey Meyer – Kelsey.Meyer@bridgeig.com

### **Workplace Violence Incidents and Concerns**

To report workplace violence incidents and threats that do not rise to the level of a workplace violence emergency, employees are directed to notify any of the following: (1) their immediate manager or supervisor (who will relay the information to the Incident Response portal (<https://riskconnectbrdg.my.site.com/bridgeriskincidentportal/s/>)). In the event an employee cannot report to their immediate supervisor or manager for whatever reason (for example, in the event an employee's supervisor or manager is unavailable, or if the employee's supervisor or manager is the subject of a report), employees shall report incidents directly to the following channels:

- Email: BigRisk@bridgeig.com
- Bridge Incident Response Portal:  
<https://riskconnectbrdg.my.site.com/bridgeriskincidentportal/s/>
- Whistleblower Hotline 855-863-6590

### **No Retaliation**

Bridge prohibits retaliation against any employee for making a good faith report of actual or suspected threats or incidents of workplace violence, workplace violence concerns, other Company policies contemplated by this WVPP, or suspected violations of any laws or regulations applicable to workplace violence prevention and response. Violation of this prohibition against retaliation will not be tolerated, and employees who engage in retaliation will be subject to corrective action, up to and including termination.

## WORKPLACE VIOLENCE EMERGENCY RESPONSE PROCEDURES

Bridge has in place the following specific measures to respond to actual or potential Workplace Violence Emergencies:

### **Alerts**

In the event of an actual or potential Workplace Violence Emergency, upon Bridge's receipt of a report and any relevant details, it will alert other potentially impacted employees, where practicable, of the presence, location and nature of the Workplace Violence Emergency.

### **Shelter in Place, Lockdown, or Evacuate**

If appropriate, employees may be directed by Local Authorities, the Property Manager, or designated Evacuation Leaders to shelter in place or evacuate their work areas or workspace. Bridge's evacuation plans for each worksite are detailed in their Emergency Preparedness Plan.

### **How to Seek Help**

In the event of an emergency, including a Workplace Violence Emergency, contact law enforcement as provided in the preceding section on how to report workplace violence emergencies.

## INVESTIGATIVE PROCEDURES

Bridge's investigative procedures regarding workplace violence incidents may include, as necessary and appropriate under the circumstances, the following:

- Interview involved parties, such as employees, witnesses, law enforcement, and/or security personnel.
- Review security footage of existing security cameras if applicable.
- Examine the workplace for security risk factors associated with the incident, including any previous reports of inappropriate behavior by the perpetrator.
- Determine the cause of the incident.
- Take corrective action to prevent similar incidents from occurring.
- Record the findings, including completing the violent incident log as necessary, and ensuring appropriate corrective actions are taken.
- Obtain any reports completed by law enforcement.
- Support and resources will be provided to affected employees. These resources may

include referrals to counseling services, information about employee assistance programs, medical assistance, and time off work if necessary.

## POST-INCIDENT RESPONSE

Upon a determination that Workplace Violence has occurred, Bridge will use appropriate tools and actions to respond to the incident, which may include, *involving law enforcement, terminating an offender, deploying additional security resources, and/or reminding affected employees of Bridge's Employee Assistance Program and other supportive measures as appropriate.*

After resolution of a confirmed Workplace Violence incident, Bridge will determine the need for, and parameters and scope of, a post-incident evaluation based on the severity and circumstances. In such situations, Bridge will conduct an evaluation and assessment of the Plan and response actions taken. Such evaluation may consist of a review of the overall workplace security and response procedures to identify deficiencies that may have contributed to the incident, and to corrective actions or mitigation measures that should be considered to prevent similar incidents in the future.

## WORKPLACE VIOLENCE HAZARD IDENTIFICATION, EVALUATION, AND CORRECTION

Bridge will work with the appropriate personnel to perform workplace hazard assessments to identify and mitigate Workplace Violence hazards. In addition, periodic assessments will be performed by the Property Manager on an annual basis, after each Workplace Violence incident, including a Threat of Violence, whenever a new Workplace Violence hazard is discovered or workplace conditions warrant an assessment, and when otherwise required by Bridge to identify and evaluate workplace security hazards and Threats of Violence.

Bridge's assessments consist of identification and evaluation of Workplace Violence hazards and consideration of changes in employee work practices. Future assessments will include a review of historical data in conjunction with assessments and evaluations specific to each Workplace Violence typology through the methods specified below to identify and correct workplace security hazards.

Assessments for Type 1 through Type 4 Workplace Violence hazards (described under the "Definitions" section above) include, but are not limited to:

- Review of the security situation in the surrounding area based on availability of crime statistics.
- Review of layered physical security mechanisms including but not limited to, lobby security, lobby turnstiles and landlord security video, internal access control, doors, locks, physical barriers, security video and evacuation exits.
- Review of access to, and freedom of movement within the workplace by employees.



- Review and assessment of access to, and freedom of movement within the workplace by non-employees including (i) non-employees with personal relationships to employees, (ii) recently discharged employees and, (iii) persons with whom an employee is having a dispute.
- Review of the frequency and severity of threatening or hostile situations that may lead to violent acts by clients, students, customers, vendors, or visitors.
- Review of frequency and severity of reports of internal threats of physical or verbal abuse.
- Review of employee disciplinary and discharge procedures.
- Review of frequency and disclosure of restraining or protection orders by employees involving the workplace

Review of prior violent acts, Threats of Violence, verbal abuse, and property damage committed by non-employees with personal relationships to employees. As part of Bridge’s ongoing commitment to employee health and safety, Bridge has implemented robust corrective measures to mitigate and prevent workplace hazards. The identification of hazards or risks as a result of the above assessment procedures will be corrected in a timely manner based on the severity of the circumstances and when they are first observed or discovered. Bridge’s corrective measures include, but are not limited to, the following:

- All corrective actions taken will be documented and dated on the Workplace Violence Incident Log form.
- Corrective measures for workplace violence hazards will be specific to a given work area.

**Examples:**

- Make the workplace unattractive to criminals by:
  - Improve lighting around and at the workplace.
  - Utilize surveillance measures, such as cameras and mirrors, to provide information as to what is going on outside and inside the workplace and to dissuade criminal activity.
  - Hire security guards and have them patrol the workplace interior and perimeter.
  - Install security surveillance cameras in and around the workplace.
- Provide workplace violence systems, such as door locks, violence windows, physical barriers, emergency alarms and restraint systems by:
  - Post emergency telephone numbers for law enforcement, fire, and medical services
  - Control, access to, and freedom of movement within, the workplace by non-employees, include recently discharged employees or persons with whom one of our employees is having a dispute.
  - Install effective systems to warn others of a violence danger or to summon assistance, e.g., alarms or panic buttons.
- Provide employee training/re-training(refreshers) on the WVPP, which could

include but not limited to the following:

- Recognizing and handling threatening or hostile situations that may lead to violent acts by persons who are service recipients of our establishment.
- Ensure that all reports of violent acts, threats of physical violence, verbal abuse, property damage or other signs of strain or pressure in the workplace are handled effectively by management and that the person making the report is not subject to retaliation by the person making the threat.
- Improve how well our establishment's management and employees communicate with each other.
- Provide/review employee, supervisor, and management training on emergency action procedures.
- Increase awareness by employees, supervisors, and managers of the warning signs of potential workplace violence via training.

In addition, when an imminent hazard or risk exists which cannot be immediately abated without endangering employees and/or property, Bridge will remove exposed personnel from the area, except those necessary to correct the existing hazard or condition. Such employees whose presence is necessary to correct such hazardous conditions or concerns will be provided with necessary safeguards or protective equipment needed to correct such conditions or concerns.

Bridge will continue to welcome employee input as it pertains to hazard identification or potential Workplace Violence concerns, and such feedback will be considered and incorporated into this Plan or related policies as appropriate under the circumstances.

## TRAINING AND INSTRUCTION

All employees, including managers and supervisors, will receive training regarding this Plan. This training is informed in part by Bridge's existing security and safe workplace-related training, which have been developed with reference to historical employee feedback on these topics. Bridge will continue to welcome feedback from employees in designing and implementing the training under this Plan, and such feedback will be considered on an ongoing basis as future training is developed and implemented.

Training will be provided when the Plan is first established and on an annual basis thereafter. Additional training will be provided whenever Bridge is made aware of new or previously unrecognized Workplace Violence hazards or when material changes are made to this Plan.

Bridge will ensure that the training provided pursuant to this Plan complies with applicable law and will maintain records as required.

## REVIEW AND EVALUATION

Bridge will review this Plan (i) annually; (ii) when a deficiency is observed or becomes apparent; and (iii) after a Workplace Violence incident. Bridge recognizes and values the role that employee feedback plays in Bridge's ability to assess and analyze the effectiveness of this Plan, and accordingly continues to encourage employees to utilize the feedback procedures provided for under this Plan.

This Plan is effective as of July 1, 2024.

**Date of Last Review:** Initial iteration – no review history

**Date of Last Revision(s):** No revision history