

RPM INTERNATIONAL INC.
EMAIL MANAGEMENT POLICY

This Policy applies to all subsidiary locations of RPM International Inc. (the “Company”) and their employees resident outside the United States.

Email, instant messages and text messages will be destroyed no later than six months from the date of initial creation or receipt. The Company will cause e-mails and instant messages, to the extent saved, to be deleted automatically from the email server and users will need to delete text messages from their mobile cellular devices. Email and instant message back-ups will be deleted in accordance with the Company’s back-up policy.

As a result, any business-related email and instant message communication that is or includes, as attachments or otherwise, business records that require retention beyond six months in accordance with the applicable records management policy for the Company, shall be saved for no longer than is required and as a PDF on the file server, printed and stored as a paper file, or retained in a folder on the email server designated for document retention. If saved in print, the printed copy of the message should contain the following header information: who sent the message; who the message was sent to; date and time message sent; and subject of the message.

An employee may not, in order to avoid deletion of a message, forward a message to create a new creation/receipt date, save a message to external media or another computer, forward a message to a personal email account, save a message to the hard drive or take any other action intended to avoid timely deletion, other than as specifically set forth above. To the fullest extent permitted by local laws, the Company reserves the right to audit hard drives, mobile cellular devices and external media, including within personal devices if there is reason to believe that the personal device was used to circumvent this Policy, to ensure compliance with this Policy.

All deletions in accordance with this Policy are subject to suspension in accordance with any applicable litigation hold.