

RPM INTERNATIONAL INC. AND ITS SUBSIDIARIES

USE OF CASH POLICY

As directed by RPM International Inc.'s ("RPM") Code of Conduct referred to as the "Values & Expectations of 168," all of RPM's and its subsidiaries' (collectively with RPM, the "Company") officers, directors and employees (collectively, "Employee(s)") must avoid any appearance of impropriety or corruption. In addition, all Employees must ensure that Company financial records are accurate, complete and transparent. Due to their very nature, cash payments are difficult to track, trace and document. As a result, legitimate cash transactions disproportionately pose a greater risk of being incorrectly perceived as inappropriate or corrupt than other forms of financial payments. To mitigate this risk, all Employees are responsible for taking the appropriate steps, as outlined below, to ensure the consistent and proper use, handling and documentation of cash transactions:

- Cash is to be used to pay only for low cost (i.e., less than \$50 or the equivalent) items or services that are required urgently, in each case, when no other payment method is available.
- Cash should not be used to pay wages except in exceptional circumstances.
- Reimbursement from petty cash is not an alternative to standard procurement or expense reimbursement procedures and each request for reimbursement from petty cash shall be reviewed critically by the petty cash manager.
- Petty cash expenditure requests shall not exceed \$50 without manager preapproval.
- Petty cash reimbursement requires a receipt for the expenditure.
- Petty cash claims without receipts require manager approval and will be approved only in exceptional circumstances.
- Petty cash receipts and requests for reimbursement must be specific and include, at a minimum, where, when, by whom and for what purpose the money was used.
- All petty cash uses shall be booked to the proper account in the general ledger at the time of disbursement/receipt.
- Cash shall not be used to reimburse expenses incurred by or compensation to non-employees.
- Cash gifts are never permissible.
- Employees shall not accept cash from third parties except in limited circumstances where cash is accepted for the payment of goods such as at distribution outlets.

Contact your Financial Manager with any questions regarding this Policy. If you have any concerns regarding the applicability of this Policy to your current processes, contact compliance@rpm-inc.com for guidance.

Any Employee who violates this Policy may be subject to disciplinary action up to and including termination.