

**RPM INTERNATIONAL INC.**  
**RECORDS AND INFORMATION MANAGEMENT POLICY**

**APPLICABLE TO RECORDS CREATED OR MAINTAINED  
IN THE UNITED STATES**

The records and data of RPM International Inc. (the “Company”) are important assets. Company records include essentially all records you produce or receive in your capacity as an employee, whether paper or electronic. A record may be as obvious as a memorandum, a letter, an e-mail, a contract or a formula, or something not as obvious, such as a computerized desk calendar, an appointment book or an expense record. The law requires the Company to maintain certain types of corporate records, usually for a specified period of time. Failure to retain those records for those minimum periods could subject you and the Company to penalties and fines, cause the loss of rights, obstruct justice, spoil potential evidence in a lawsuit, place the Company in contempt of court, or seriously disadvantage the Company in litigation. Accordingly, compliance with this policy is expected and mandatory for all Company employees.

**SCOPE AND DEFINITIONS**

This Policy is applicable to the Company and all Company-related records created, received, maintained, or stored by the Company in the United States (“Records”). Records must be retained for the time period set forth on Schedule A attached hereto and incorporated herein and, upon the expiration of that time period, must be destroyed, unless retention is otherwise required by any applicable litigation hold. Records designated as “permanent” on Schedule A shall never be destroyed. The Company Email Management Policy is set forth on Schedule B attached hereto and incorporated herein.

**IMPLEMENTATION AND COMPLIANCE**

***Responsible Officers/Personnel***

The General Counsel and Associate General Counsel shall have primary responsibility for oversight of the implementation and compliance by the Company with this Policy, including the Email Management Policy.

The General Counsel and/or Associate General Counsel may appoint one or more “Records Manager(s)”, who shall have responsibility for implementation and compliance by the Company with this Policy. The Assistant to the General Counsel shall serve as the Records Manager until further notice.

## ***Employee Responsibilities***

Each employee of the Company shall ensure that Records under the employee's control are retained and disposed of consistent with this Policy, including the Email Management Policy.

## ***Definition of a Record***

All records created in the ordinary course of the Company's business are "Records" and are the property of the Company and are subject to this Policy. This pertains to *all* forms of *all* media, including, but not limited to:

- handwritten, typed, or printed documents on paper;
- electronic documents (e.g., e-mail, instant messages, text messages, spreadsheets, databases, Web sites, cloud storage, diskettes, CDs, flash drives);
- video;
- audio;
- graphic representations and
- network servers and document management systems.

## ***Requests for Exceptions***

Requests for exceptions from this Policy shall be submitted to the Records Manager, with final approval granted by the Associate General Counsel. All requests for exceptions must be supported by evidence that the purpose and basic objectives of this Policy will be met.

## **RECORDS RETENTION SCHEDULE**

Records must be kept for the period of time indicated on Schedule A. All Company employees are expected to become familiar with and comply with Schedule A. Copies of Schedule A are also available from the General Counsel's office and from the Records Manager.

To the extent that there are conflicts about the period to retain a certain record, keep for the longest of the conflicting periods after consulting the Records Manager.

Schedule A will be revised from time to time to reflect changing legal requirements and business needs and will be distributed by the General Counsel to the Records Manager as applicable.

## **COPIES OF RECORDS**

In no case shall copies of Records be retained longer than the official version of the Record or otherwise be retained in contravention of any Policy.

### DRAFTS OF RECORDS

Drafts of Records shall be retained for the applicable period set forth on Schedule A. Should no period be set forth on Schedule A, drafts shall be destroyed no later than six months following completion/submission/execution of the final Record.

### DESTRUCTION OF RECORDS

Disposal of Records and all copies thereof shall take place in accordance with the Schedule and such process will be in conformance with legal requirements, including the secure destruction of Records containing confidential, consumer or health-related information, or personally-identifiable information about employees or third parties. Secure disposal of paper documents includes burning, pulverizing or shredding so that the information cannot practicably be read or reconstructed.

Records not otherwise required to be maintained for a longer period will be deleted after 10 years if the records are not already destroyed according to Schedule A.

### LITIGATION HOLD

Destruction of Records under the Schedule shall be suspended pursuant to a Litigation Hold as provided in the Company's Litigation Hold Policy. Once Records are subject to a Litigation Hold, destruction of any of those Records, even inadvertent destruction, may result in severe penalties. Please reference the Litigation Hold Policy for further details.

Any employee of the Company who violates this Policy or who directs anyone to violate this Policy may be subject to disciplinary action up to and including termination as indicated in RPM's Values and Expectations of 168. The Company retains the right to report any violations of law to appropriate authorities.

SCHEDULE B

**RPM INTERNATIONAL INC.**  
**EMAIL MANAGEMENT POLICY**

**APPLICABLE TO 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, Records (as defined in the Company's records retention policy) that require retention beyond six months, shall be saved 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. When a message and attachment are subject to different retention periods under the Company's records retention policy, the longer retention period shall apply to both the message and attachment, which should be retained together. All such saved records shall be retained only for the period required by the Records Retention Policy and for no longer.

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. The Company reserves the right to audit hard drives, mobile cellular devices and external media to ensure compliance with this Policy.

All deletions in accordance with this Policy are subject to suspension in accordance with any applicable Litigation Hold.