

Toolbox Talk – Raising Concerns

- It can often be difficult to know who or where to go to when you have a concern or have seen something that you think is just not right.
- If you have a concern that our values or policies are being broken, please don't stay silent, speaking up is the right thing to do.
- Concerns could be for a variety of reasons including:
 - Bullying and harassment
 - Unsafe working conditions
 - Fraud or theft
 - Workplace violence
 - Alcohol or drug use
 - Misuse of company property
 - Conflict of interest
 - Falsification of records, or
 - Violations of Company policy or ethics
- We appreciate that speaking up can be difficult and the fear of retaliation is real, which can lead to people staying quiet about wrongdoing. Please be assured that we are here to listen and at RPM, employees are protected from retaliation for raising concerns in good faith.
- This means that if you suspect or know about improper conduct, RPM's retaliation policy prohibits any form of retaliatory action taken against you for raising that issue, making a report, participating in an investigation, or for refusing to participate in any activity you suspect or know to be improper or wrong, including exercising workplace rights that are protected by law.
- This does not mean that you will be excused from continuing to perform your job or following our workplace rules just because you file a complaint or report your concerns. You are still responsible for fulfilling your job responsibilities.
- Our company's retaliation policy prohibits a manager or other leader from taking adverse action against you for reporting your concerns in good faith.
- For example, if you report misconduct, like bullying, and you report it in good faith, the retaliation policy prohibits you from being terminated, demoted, suspended, reprimanded, disciplined, transferred, threatened, harassed, or in any manner discriminated against for raising your concerns.
- RPM's retaliation policy also prohibits more subtle forms of retaliation, like issuing an unfounded bad evaluation, assigning undesirable work, or bullying, because an employee raised concerns.

- I've said the term "good faith" a few times during this talk. Concerns raised in bad faith, or concerns that are made up, are not the kind of genuine, good faith complaints that are covered by the retaliation policy.
- For example, if you report a complaint that isn't true about your coworker to try to get them in trouble, that would not be a good faith complaint covered by the retaliation policy and you may be subject to disciplinary action for doing so.
- On the other hand, raising concerns about a manufacturing procedure you believe is unsafe, or conduct you believe may violate the Company's harassment policy, for example, are concerns raised in good faith, and it would be against our policy to take retaliatory action against you for raising those concerns. That is true, whether the concerns you raise are found to be substantiated or not substantiated.
- If you have concerns about illegal, unethical, or other activity that just doesn't seem right, please raise it to whomever you feel comfortable, whether it be a supervisor, another member of management, Human Resources, Legal or Compliance, or RPM's hotline, posters with the hotline details can be found posted in the plant, or details can be found on RPM's website www.rpminc.com.
- If you believe you have been retaliated against, you should report it to your supervisor or manager. If you feel uncomfortable doing so, you can report it to any member of management, Human Resources, Legal or Compliance, or through the Company hotline.