

RESPONSIBLE PROCUREMENT POLICY

Purpose

RPM International Inc. (RPM) and its subsidiaries (hereinafter collectively referred to as the “Company”) are committed to doing business in a manner that is ethical, responsible and consistent with our values of Transparency, Trust and Respect, and the principles expressed in RPM’s Values and Expectations of 168 [RPM Code of Conduct](#).

RPM knows that customers, associates, shareholders, and other stakeholders expect a responsible approach when it comes to managing our supply chain, to ensure that we conduct business with Transparency, Trust and Respect. As such, we expect and require that our suppliers, vendors, service providers, contractors, agents, and contractors (each a, “Supplier”) be a good corporate citizen and engage in legal, ethical and socially responsible business practices.

Scope

This Policy applies to the Company’s interactions with Suppliers. Suppliers must ensure compliance with the requirements of this policy within their own operations and supplier base.

This policy should be read in conjunction with [The Values and Expectations of 168](#), [Human Rights Policy](#) and the [Supplier Code of Conduct](#).

Policy

Our Company policy is to purchase goods and services that:

- are produced and delivered under conditions that support and promote fundamental human rights;
- are produced and delivered under conditions that do not involve the abuse or exploitation of any persons;
- are produced, manufactured, and sold in accordance with all applicable laws; and
- minimize adverse impacts on the environment.

Our Company policy is to:

- evaluate Suppliers through our supplier onboarding process, this includes evaluation on the following topics: employment and human rights, bribery and corruption, environmental, ethical conduct, cyber security and business stability;
- conduct on-site audits as we determine to be appropriate;
- expect all Suppliers to adhere to the Supplier Code of Conduct (the “[Supplier Code of Conduct](#)”);
- collaborate with Suppliers to remediate instances of non-compliance with the Supplier Code of Conduct in a timely manner.

Non-adherence can result in the termination or non-renewal of our Company’s relationship with the Supplier.

Additional information regarding our commitment to corporate social responsibility and sustainability is available at [World Leader in Specialty Coatings | RPM International Inc.](#)

Compliance

If a Supplier learns of an instance of non-compliance with the Supplier Code of Conduct, the Supplier is expected to notify our Company accordingly. The Company reserves the right to assess compliance with the Supplier Code of Conduct through supplier visits and/or certifications to evaluate the social and environmental impact of the Supplier and its products.

Review Mechanism

The Vice President of Procurement has overall authority for the implementation of the policy and will incorporate relevant updates as deemed necessary.

Date: December 12, 2025

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