

Reporting and Anti-Retaliation Policy

Purpose

Employees may be concerned about how best to report concerns and/or fear that reporting actual, potential or perceived wrongdoings may subject them to retaliation. The purpose of this Policy is to inform employees how to report complaints through the Hotline or other reporting mechanisms, how RPM International Inc. (“RPM”) handles investigations submitted, as well as our non-retaliation policy as set forth in the Values and Expectations of 168 (the “Code of Conduct”).

Scope

This Policy applies to all employees of RPM and its affiliates (the “Company”) at all locations. If any provision of this Policy does not comply with local law applicable to a particular affiliate, that affiliate may implement an appendix to this Policy to comply with local law, provided that the appendix will conform with the principles contained within this Policy, as determined by the general counsel for that affiliate’s group. Where a local appendix has not been implemented, all provisions of this Policy that comply with local law will remain in effect.

Policy

A. Conduct

Employees have an obligation to report to management each suspected or known instance of improper, unethical or illegal conduct or activity (such as financial matters, harassment, fraud or retaliation), violation of applicable law and breach of the Company’s Code of Conduct or another Company policy.

B. Ways to Report

The Company offers multiple ways to raise concerns or report suspected issues of non-compliance.

1. Employees are encouraged to report any concerns to their supervisors, managers or other appropriate Company management. Any manager receiving a report must bring the report immediately to the attention of the Human Resources, Legal or Compliance Department. If the issue remains unresolved, or you feel uncomfortable reporting an issue to your supervisor or management, you may contact the Human Resource, Legal or Compliance Department for assistance or you may report such conduct through the Company Hotline - <https://iwf.tnwgrc.com/rpminternational>. The Hotline instructions and country telephone numbers can be accessed at: <https://www.rpminc.com/media/2104/hotline-instructions-updated.pdf>
2. The Company Hotline is administered by a third-party service provider. Consistent with applicable law, reports made to the Hotline may be made anonymously. Each

report is first reported to the RPM International Compliance Department, which routes them as appropriate for handling.

C. Non-Retaliation

1. The Company strictly prohibits any form of retaliatory action against any employee who, in good faith and associated with any suspected or known improper conduct, raises an issue, makes a report, participates in an investigation, refuses to participate in suspected improper or wrongful activity, or exercises workplace rights protected by law.
2. Any employee that reports misconduct in good faith, will not be terminated, demoted, suspended, reprimanded, disciplined, transferred, threatened, harassed or in any manner discriminated against as a result of making such report.
3. If you believe that you have been retaliated against, you should report it to your supervisor or manager. If you feel uncomfortable reporting such retaliation to such person, you may report the retaliation to a more senior manager, to Human Resources, Legal or Compliance management or through the Company Hotline.

D. Investigations

1. The Company will investigate each report as appropriate under the circumstances.
2. Investigations will be handled confidentially to the extent possible and appropriate under the circumstances, however, confidentiality cannot be guaranteed.

Officers and directors of the Company must ensure compliance with this Policy. An Employee of the Company who violates this Policy may be subject to disciplinary action up to and including termination. As indicated in RPM's "Values and Expectations of 168," RPM retains the right to report any violations of law to appropriate authorities.