

Hiring Employees of Independent Auditors Policy

PURPOSE

The purpose of this policy is to define a process to be utilized when the Company is considering hiring employees, former employees or close family members of employees of its Auditors, Deloitte, who work on the Company's audit to ensure that the Company's hiring practices do not impair the independence of the Auditors and to avoid any conflict of interest, actual or apparent, or other prohibition under any applicable laws, regulations or listing exchange standards.

SCOPE

This global policy applies to all RPM companies globally including wholly and majority-owned subsidiaries.

POLICY

The hiring of any current or former employee of Deloitte, for any position within the Company, irrespective of role or department, must be submitted as a "Reportable Event" using the [RPM Reportable Event Portal](#) *prior* to an employment offer being made (Refer to the [Reportable Events Policy](#)). In addition, the hiring of, or promotion to, any RPM Corporate Officer position, Group President or Group CFO, requires communication to RPM (via a "Reportable Event") if the individual has any close family member that are current employees of Deloitte, prior to an offer of employment being made. All such hires must be pre-approved by RPM.

HOW TO REPORT A SUSPECTED VIOLATION

A suspected violation of this policy can be reported to your immediate supervisor, Human Resources, or the Legal & Compliance department. Employees are also welcome to contact the Company's [Hotline](#) to report their concerns to RPM. Allegations will be investigated thoroughly and objectively. For more information, refer to RPM's [Hotline and Non-Retaliation Policy](#). Any employee who violates this Policy, including the failure to report a Policy violation, directs or who knowingly permits a subordinate to violate a Policy or who engages in retaliatory actions may be subject to disciplinary action up to and including termination.