

## NON-HARASSMENT POLICY

### **Purpose**

The purpose of this Policy is to provide notice that RPM International Inc. (“RPM”) and its affiliates (collectively, the “Company”) strives to provide an environment free from harassment on any basis including but not limited to harassment on the basis of race, color, ethnicity, religion, national origin, citizenship, gender, age, sexual orientation, gender identity, veteran or military status, pregnancy status, cultural affiliation, physical or mental disability or other characteristic protected by laws.

### **Scope**

This Policy applies to all employees of the Company at all locations.

### **Policy**

It is and shall continue to be the policy of the Company to provide its employees with a productive and professional work environment in which they are treated with dignity and respect. RPM prohibits discriminatory practices. To this end, the Company endeavors to maintain a workplace free from all forms of harassment and will actively investigate any allegation, evaluate the conduct and the context of the behavior, and take appropriate action.

To the extent that this Policy conflicts with the local laws of any country, such laws shall govern.

### **Sexual Harassment**

Sexual harassment is conduct of a sexual nature that is persistent or offensive and interferes with an employee’s job performance or creates an intimidating, hostile or offensive work environment. Sexual harassment is unwelcome sexual advances, requests for sexual favors, and other verbal, non-verbal, or physical conduct of a sexual nature when, for example:

- a) submission to such conduct is made either explicitly or implicitly a term or condition of an individual’s employment;
- b) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or
- c) such conduct has the purpose or effect of unreasonably interfering with an individual’s work performance or creating an intimidating, hostile or offensive working environment.

### **Examples of prohibited conduct**

Though sexual harassment encompasses a wide range of conduct, some examples of specifically prohibited conduct include the following:

- Physical assaults of a sexual nature;

- Unwelcome sexual advances, propositions or other sexual comments, such as sexually oriented gestures, noises, remarks, jokes, or comments about a person's sexuality or sexual experience;
- Preferential treatment or promises of preferential treatment to an employee for submitting to sexual conduct, including soliciting or attempting to solicit any employee to engage in sexual activity for compensation or reward;
- Subjecting, or threats of subjecting, an employee to unwelcome sexual attention or conduct or intentionally making performance of the employee's job more difficult because of that employee's sex;
- Sexual or discriminatory displays or publications anywhere in the Company's workplace; and
- Retaliation for sexual harassment complaints.

### **Other Types of Harassment**

Harassment on the basis of race, color, ethnicity, religion, national origin, citizenship, gender, age, sexual orientation, gender identity, veteran or military status, pregnancy status, cultural affiliation, physical or mental disability or other characteristic protected by law is strictly prohibited. While, other types of harassment could include behavior similar to the illustrations above pertaining to harassment of a sexual nature; it can also involve other unprofessional conduct if that conduct has the purpose or effect of violating someone's dignity, creating an intimidating, hostile or offensive environment for them. For example:

- Verbal conduct including threats, epithets, derogatory comments or slurs based on an individual's protected classification;
- Visual conduct including derogatory posters, photography, cartoons, drawings or gestures based on protected classification; and
- Physical conduct including assault, unwanted touching or blocking normal movement because of an individual's protected status.

### **Confidentiality**

All harassment complaints and investigations are treated confidentially to the extent possible.

### **How to Report Suspected Violation and Management Duty to Respond**

**A suspected violation of this policy can be reported to your supervisor, Human Resources, or to any member of the Legal or Compliance Departments. Employees are also welcome to contact the Company's [Hotline](#) to report their concerns to RPM. A suspected violation received by anyone in a management or supervisory role must be reported to RPM as a [Reportable Event](#). 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 submit a Reportable Event, 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.**