

## CASH POLICY

### **Purpose**

RPM International Inc., its affiliates (“the Company”), officers, directors and employees (collectively “Employee(s)”) must avoid any actual or perceived impropriety or corruption. In addition, all Employees must ensure that Company financial records are accurate, complete and transparent. Due to their very nature, cash payments are difficult to track, trace and document. As a result, legitimate cash transactions disproportionately pose a greater risk of being incorrectly perceived as inappropriate or corrupt than other forms of financial payments and, as such, must be limited.

### **Scope**

This Policy applies to all Employees of 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**

Employees are responsible for taking the appropriate steps, as outlined below, to ensure the consistent and proper use, handling and documentation of cash transactions:

- Cash is to be used to pay only for low cost (i.e., less than \$50 or the equivalent) items or services that are required urgently, in each case, when no other payment method is available.
- Individual locations are not permitted to have more than \$1,000 USD (or the equivalent) of petty cash on hand. If the location has specific circumstances requiring petty cash in excess of \$1,000 USD (or the equivalent), this must be approved in writing by the Group CFO (for Corporate, VP Finance & Controller).
- Cash should not be used to pay wages except in exceptional circumstances and must be pre-approved in writing by the Group CFO (for Corporate, VP Finance & Controller).
- Reimbursement from petty cash is not an alternative to standard procurement or expense reimbursement procedures and each request for reimbursement from petty cash shall be reviewed critically by the petty cash manager.
- Petty cash expenditure requests shall not exceed \$50 without manager preapproval.
- Petty cash reimbursement requires a receipt for the expenditure.
- Petty cash claims without receipts require manager approval and will be approved only in exceptional circumstances.

- Petty cash receipts and requests for reimbursement must be specific and include, at a minimum, where, when, by whom and for what purpose the money was used.
- All petty cash uses shall be booked to the proper account in the general ledger at the time of disbursement/receipt.
- Cash shall not be used to reimburse expenses incurred by or compensation to non-employees.
- Cash gifts are never permissible.
- Employees shall not accept cash from third parties except in limited circumstances where cash is accepted for the payment of goods such as at distribution outlets.

Contact your Financial Manager with any questions regarding this Policy. If you have any concerns regarding the applicability of this Policy to your current processes, contact [Compliance@rpm-inc.com](mailto:Compliance@rpm-inc.com) for guidance.

**A suspected violation of this policy can be reported to a supervisor or the Human Resources, Legal or Compliance departments. A suspected violation may also be reported via the internet with the Company's Third-Party vendor by using the [Hotline Online](#) or by the appropriate phone number for your country location [Hotline Phone](#). Any employee who violates this Policy or who directs or who knowingly permits a subordinate to violate a Policy may be subject to disciplinary action up to and including termination. RPM retains the right to report any violations of a Policy that are also illegal to the appropriate authorities.**