

THE VALUE OF 168



Center-Led Compliance

Tracy D. Crandall
Vice President, Associate
General Counsel and
Assistant Secretary

February 9, 2021

How do you feel about Compliance?



Compliance Program “Before” Center Led

- Long and Boring Training Sessions
- Long and hard-to-understanding policies
- Policies with no explanation
- Insufficient Help and Clarity
- Lack of integration with business reality



No Clear Direction



- Compliance Liaisons: What were you supposed to do? Were you adequately trained or engaged?
- Everyone Else: Did you have any real understanding of your compliance role or anyone's for that matter?

**Lack of Clarity =
Lack of Progress**

How is Center Led Approach Different?



- Challenging Everything
- Defining our direction
- Starting a long journey but on a straight path
- Reimagining Roles and Responsibilities
- Rebranding
- Communicating / Training Differently
- Simplifying Policies
- Acknowledging business realities and working with, not against them



Taking a New Path

ROUTE
168

- A journey we will take together on an established route
- We will not issue policies and walk away
- We will provide explanation and put things in context
- We will provide tools, structure and help with policy compliance
- We are the compliance experts so you do not need to be

We will journey down
Route 168 together



- Train with our help
- Send out our communications
- Spot and Issue; Ask for Help
- Help us with implementation of our strategies and plans
- We are the experts on these topics and are here to help you

Spot an Issue; Ask for
Help

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NAVIGATING THE WORKPLACE

Shelley Earl
Director of Global
Compliance

9th February 2021



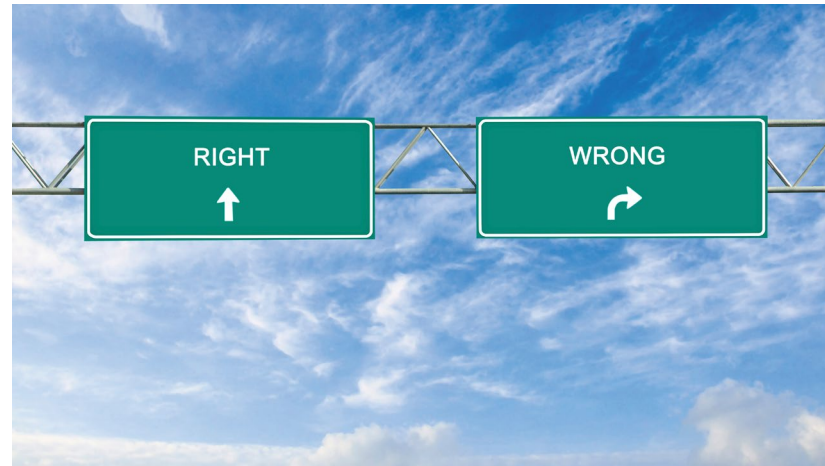
NAVIGATING THE WORKPLACE





Which Route is right?

- Navigating the workplace can be hard.
- Are our associates always able to identify which is the right route?
- Knowing right from wrong may be easy but associates may not know where to go for help?
- Reporting routes can be an associate's supervisor, management, HR, Legal and Compliance or the RPM Hotline.
- Reminder that Hotlines are local numbers or webpage and available in local languages.
- Sometimes our Associates know where to go but the fear of retaliation is real!
- How can we help?



☰ Compliance's Guide to
**Navigating the
Workplace -
Spot an Issue
Ask for Help**



Navigating the Workplace


- If we work together we can ensure when our associates **spot an issue** and need help, they know where to go.
- With an open-door policy, we can continue to build a culture in which associates feel they can speak up.
- When an issue is raised, we always need to treat these with the correct consideration.
- It is not expected that everyone be Compliance experts.
- The RPM Compliance Team are here to help and provide support on compliance and ethical concerns.



Reportable Events

- Revised Reportable Event Policy
- Important to review and understand what constitutes a reportable event.
- Reportable Events must be submitted within 24 hours of the event. **Exception for Data Privacy incidents – these require immediate reporting.**
- Reportable Events are submitted through RPM's online portal: [RPM International Inc. | Reportable Event Form \(ethicspointvp.com\)](http://RPM International Inc. | Reportable Event Form (ethicspointvp.com))
- Reportable Events are not a scorecard, they are an important control in our business.





Reportable Event Form

New Report Follow Up Policies Print

Statement of Purpose

This form is intended for use by group and company managers to notify RPM International Inc. of matters required under RPM's Reportable Events Policy. If you require further guidance, please refer to RPM's Reportable Event's Policy that is available on the tab above, or contact RPM's legal department.

The details of your submission can only be accessed by authorized users. You may be contacted for additional information after further review of your submission.

Items marked with a diamond ♦ are required fields.

Your Information (You, the person completing the form)

Your Name & Contact Information	<input type="checkbox"/> Save "Your Name & Contact Information" for future use. <small>(By checking this box you agree to allow NAVEX Global to store your information in a "Cookie" on this computer.)</small>	
	♦ First Name <input type="text"/>	♦ Last Name <input type="text"/>
	Job Title <input type="text"/>	
	♦ Phone Number <input type="text"/>	♦ Email <input type="text"/>

Include the area code, extension, and/or dialing codes if Format: username@domain.com

The Reportable Event Policy includes **examples** of reporting incidents in respect of:

- Privacy & Data Security Incidents
- EH&S, Accidents, Injuries & Property damage
- Business Interruption/loss of business
- Government inspections, inquiries, investigations & fines
- Lawsuits, Claims & Warranty Claims
- Policy Violations & Investigations
- Business Development
- Human Resources
- Credit/Financial transactions
- Trade

If there is doubt over whether an incident is a Reportable Event –

REPORT IT



Reportable Events

Of note in the revised policy is the reporting requirements for allegations and investigations regarding fraud, theft, violation of the V&E of 168 or employee issues that fall into the following categories:

- Accounting / Audit Irregularities
- Bribery/Kickbacks/Improper Payments;
- Conflicts of Interest;
- Discrimination;
- Falsification of Company Records;
- Fraud;
- Gifts, Entertainment or Expense Reporting;
- Harassment;
- Hostile Work Environment
- Improper Loans to Executives;
- Insider Trading;
- Release of Confidential or Proprietary Information;
- Retaliation of Whistleblowers;
- Sexual Harassment;
- Substance Abuse;
- Theft;
- Trade/Export Control Discrepancy;
- Wage/Hour Issues;
- Workplace Violence/Threats;
- Wrongful Termination;
- Any other material violation of a Company Policy

Investigations should not commence until the Reportable Event has been submitted and guidance has been provided from the RPM team regarding how to proceed.

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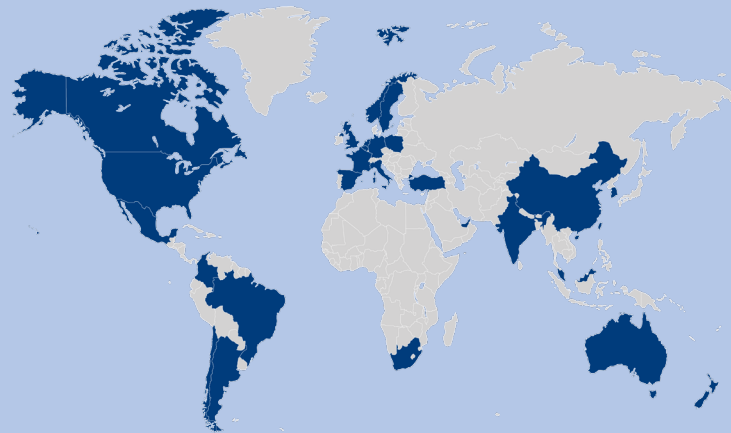
Navex Hotline & Reportable Event Data 2019-2020

Brian Frasier
Director – Global Compliance
February 9th, 2021



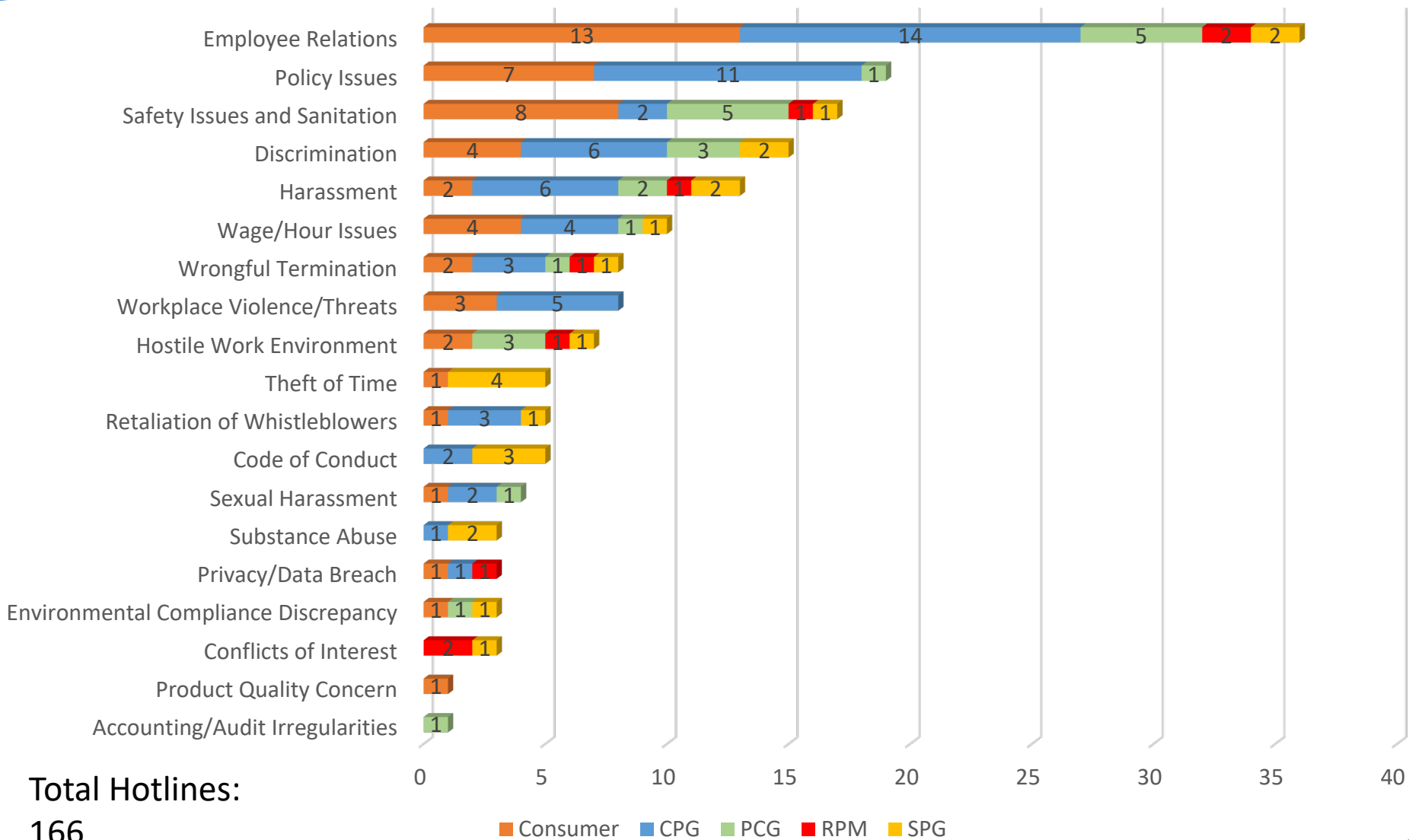
A world leader in specialty coatings, sealants, building materials and related services.

QUICK FACTS

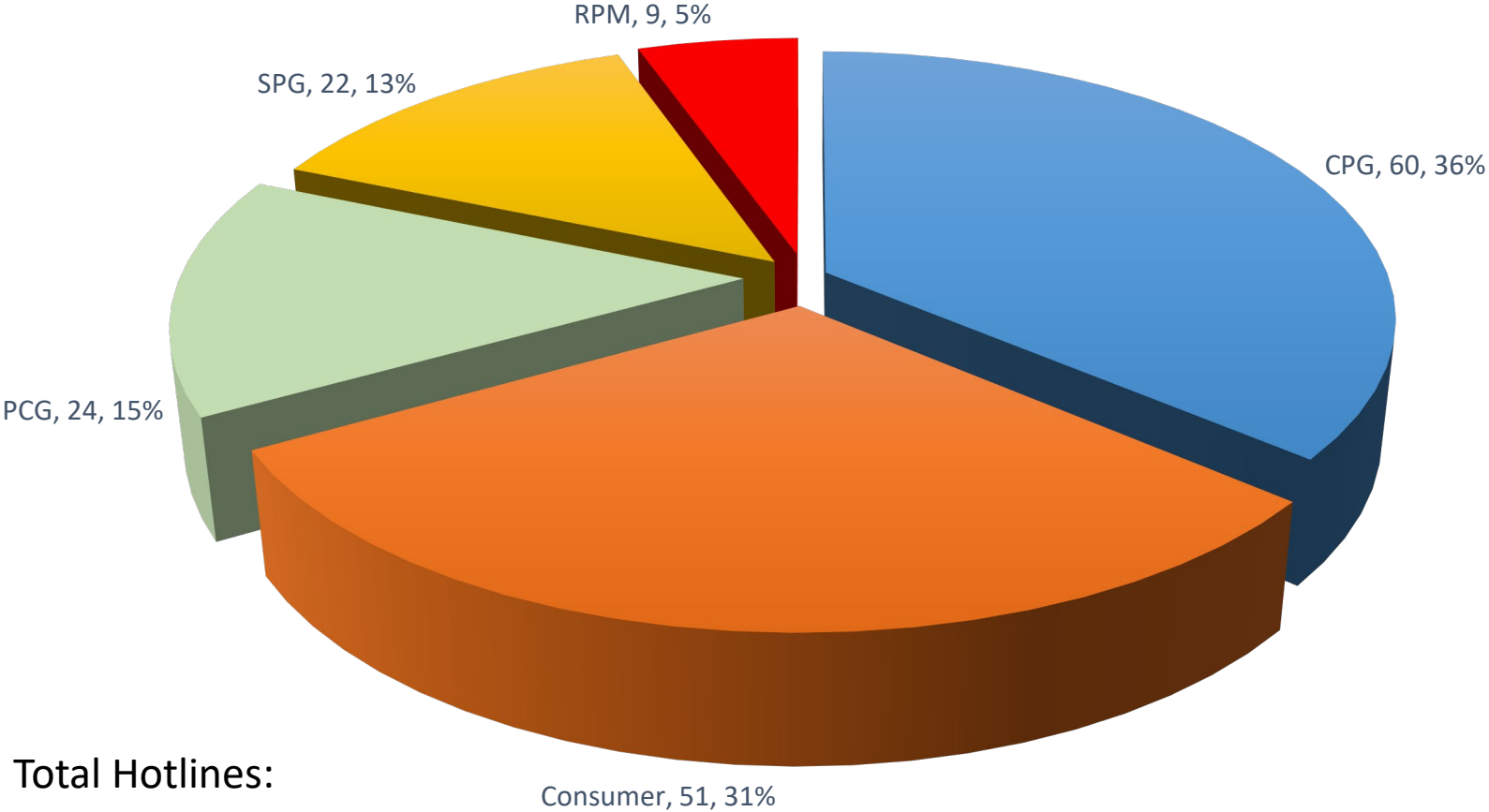


FISCAL 2020 SALES:	\$5.5 Billion	CPG (6,126 employees)	\$1.9 bil
SALES LOCATIONS	165 countries and territories	CG *(3,577 employees)	\$1.96 bil
EMPLOYEES	*14,755	PCG (3,089 employees)	\$1.12 bil
MANUFACTURING LOCATIONS	26 countries	SPG (1,963 employees)	\$616 mil

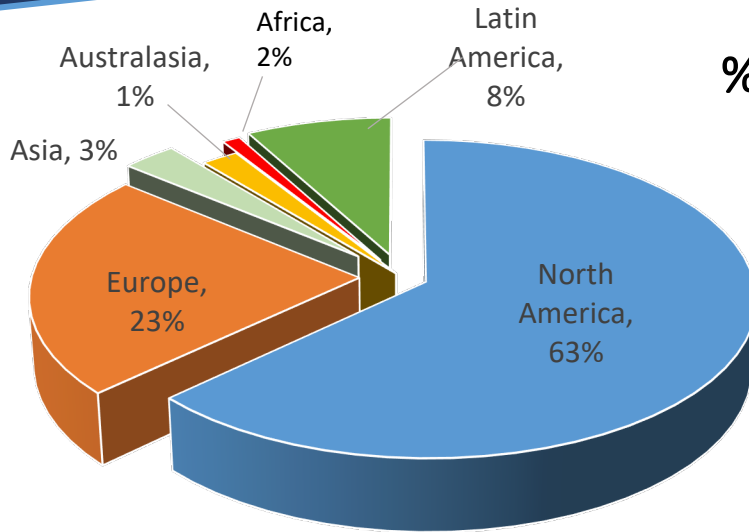
Hotline Report Categories: 2019-2020 by Group



Hotline Reports by Operating Group: 2019-2020

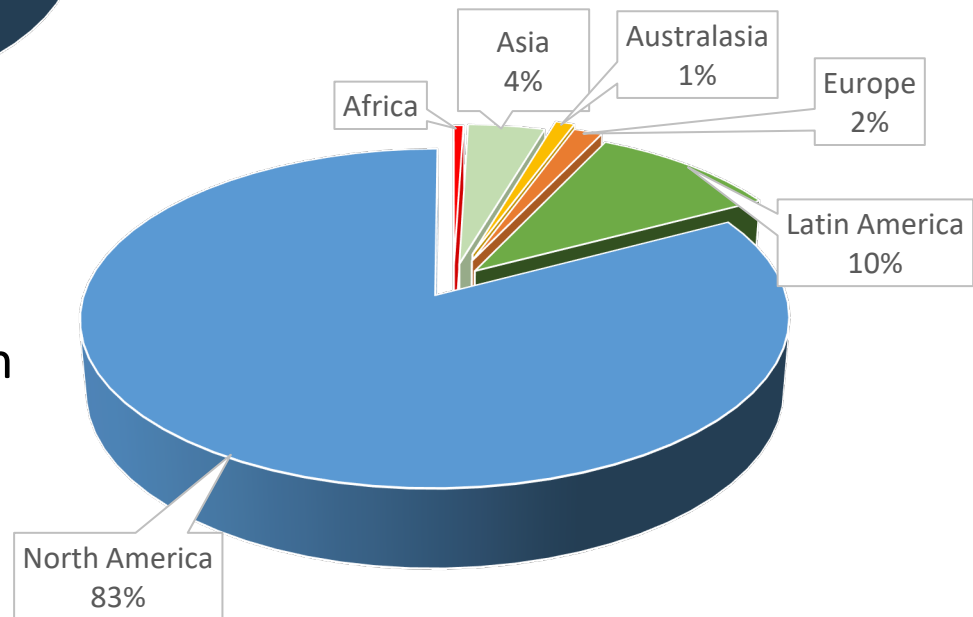


Total Hotlines:
166



% of Employees by Region

% of Hotlines by Region





Navex Hotline Trends: 2019 vs 2020

Navex Hotline vs PRIOR YEAR						
All data represent closed investigations. Ongoing investigations are not included in this data.						
	2019			2020		
	# Reports	% Founded	% Anonymous	# Reports	% Founded	% Anonymous
Company (employees)	87	33%	64%	79	33%	75%
Consumer (3,577)	35	20%	57%	16	38%	75%
PCG (3,089)	9	11%	88%	15	53%	87%
CPG (6,126)	33	48%	60%	27	26%	59%
SPG (1,963)	9	44%	67%	13	31%	85%

*RPM: 1 report

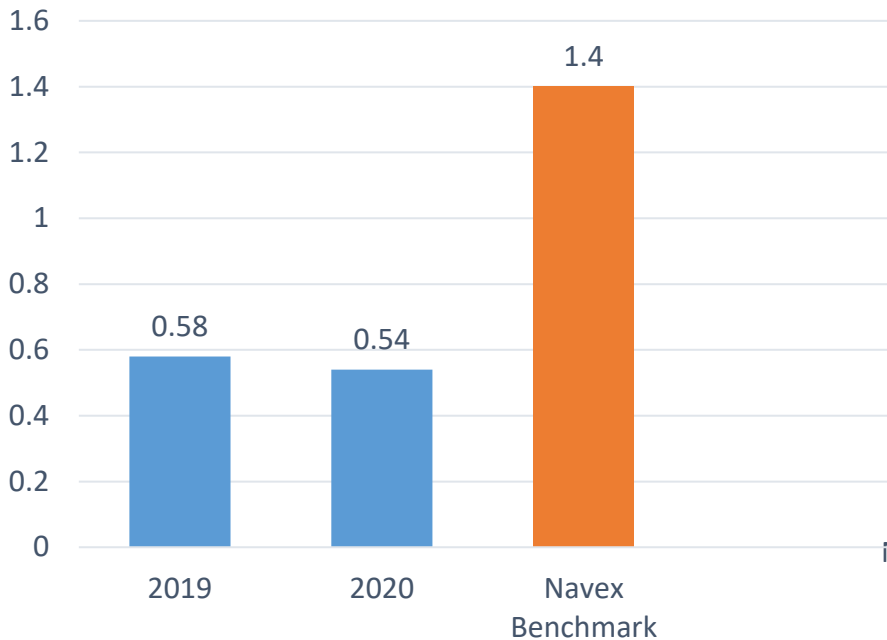
*RPM: 8 reports

Navex Founded Benchmark: 43%

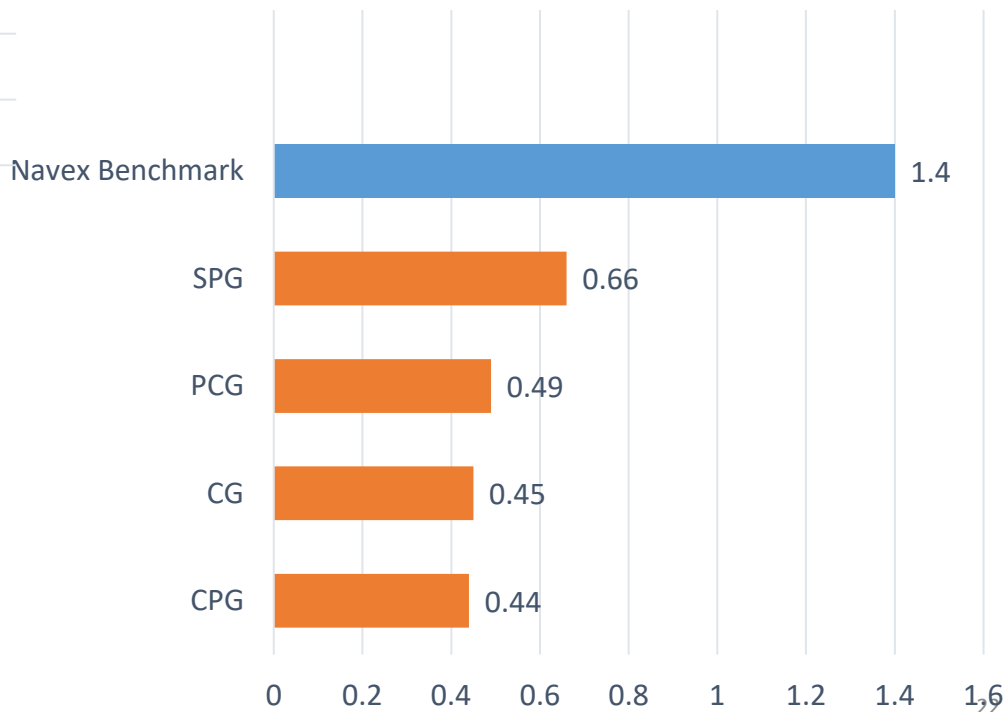
Navex Anonymous Benchmark: 59%



Navex Hotline Benchmarks



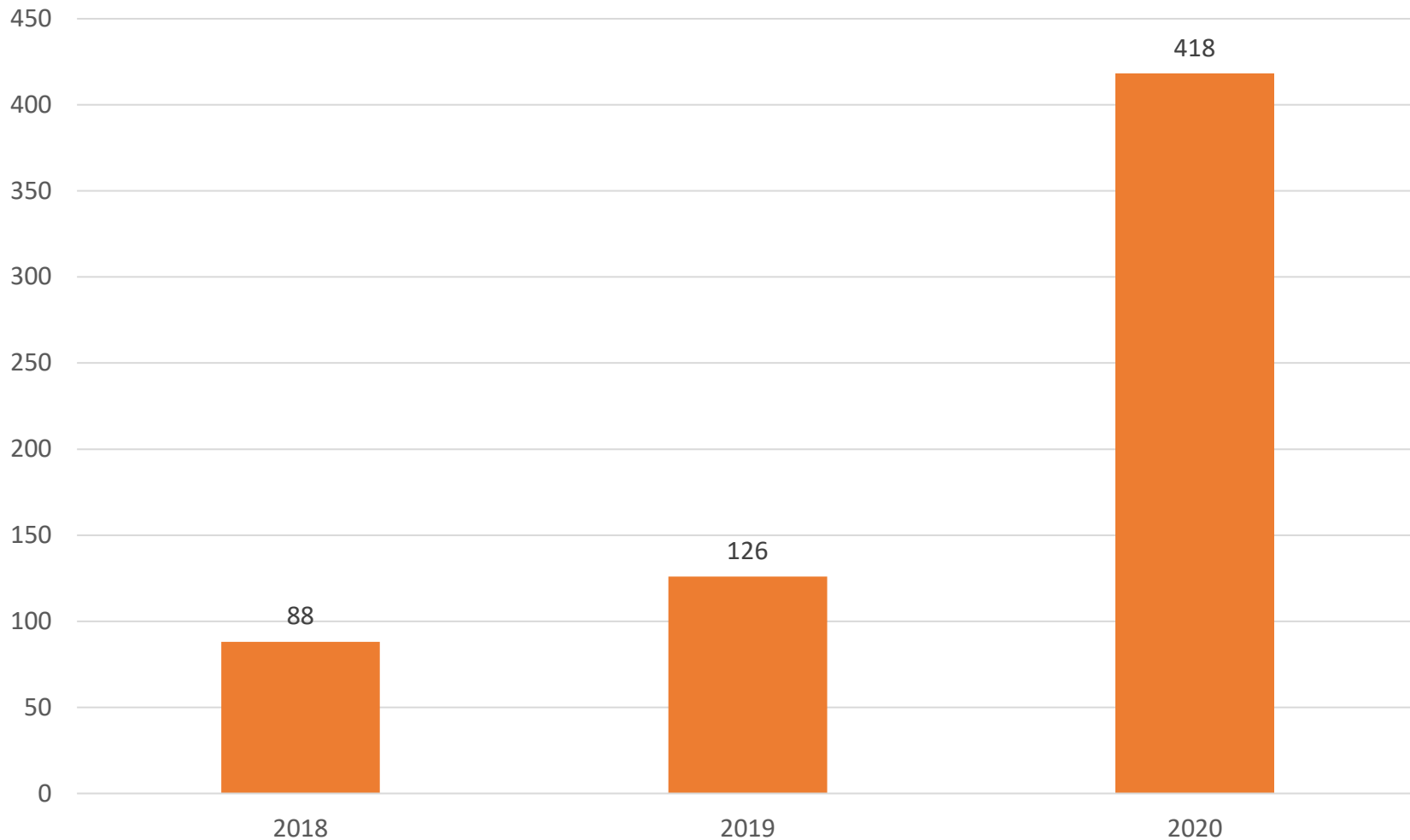
Report Volume per 100 Employees



2020 Report Volume per 100 Employees By Group

Reportable Events

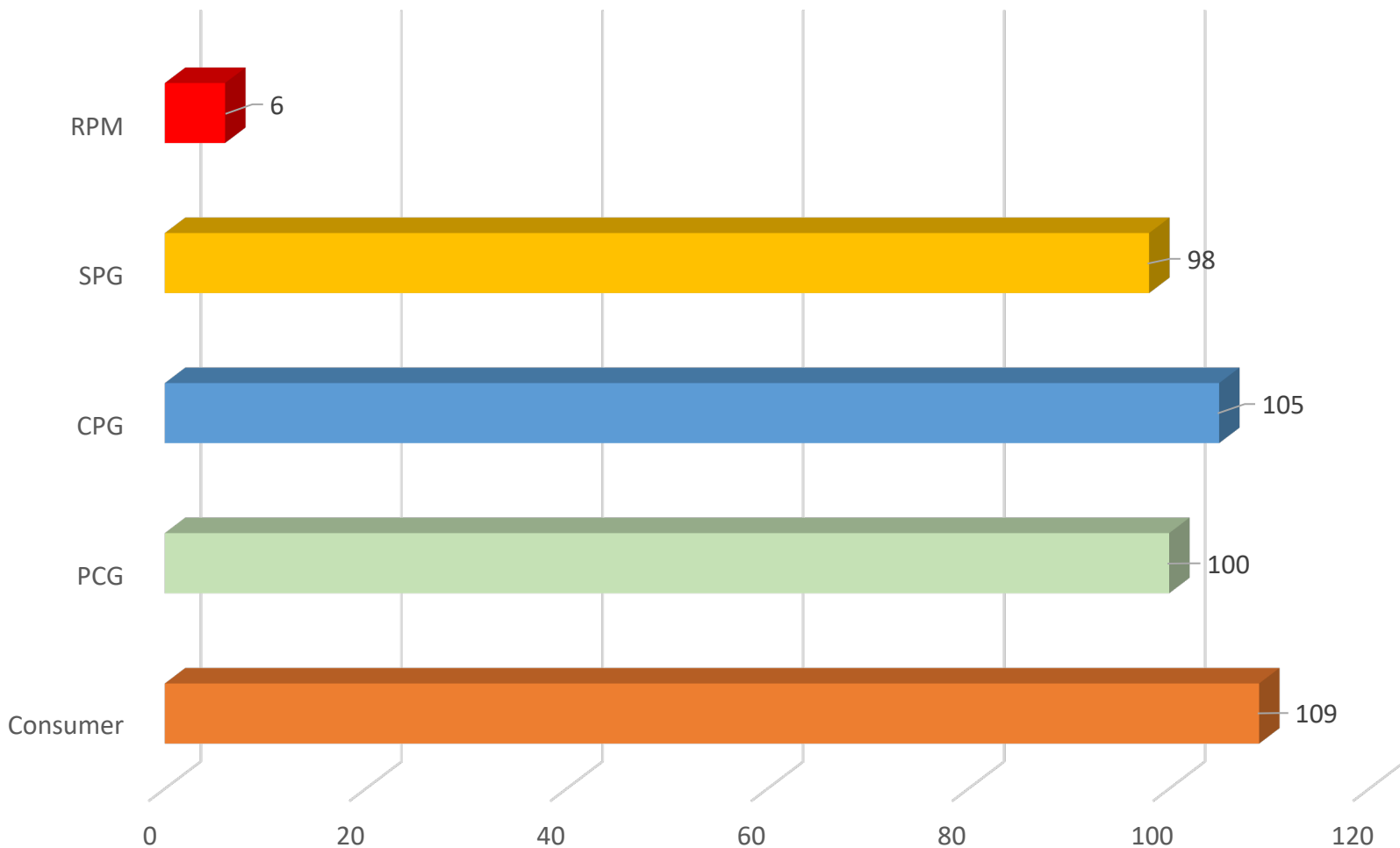
Reportable Events Submitted: 2018-2020



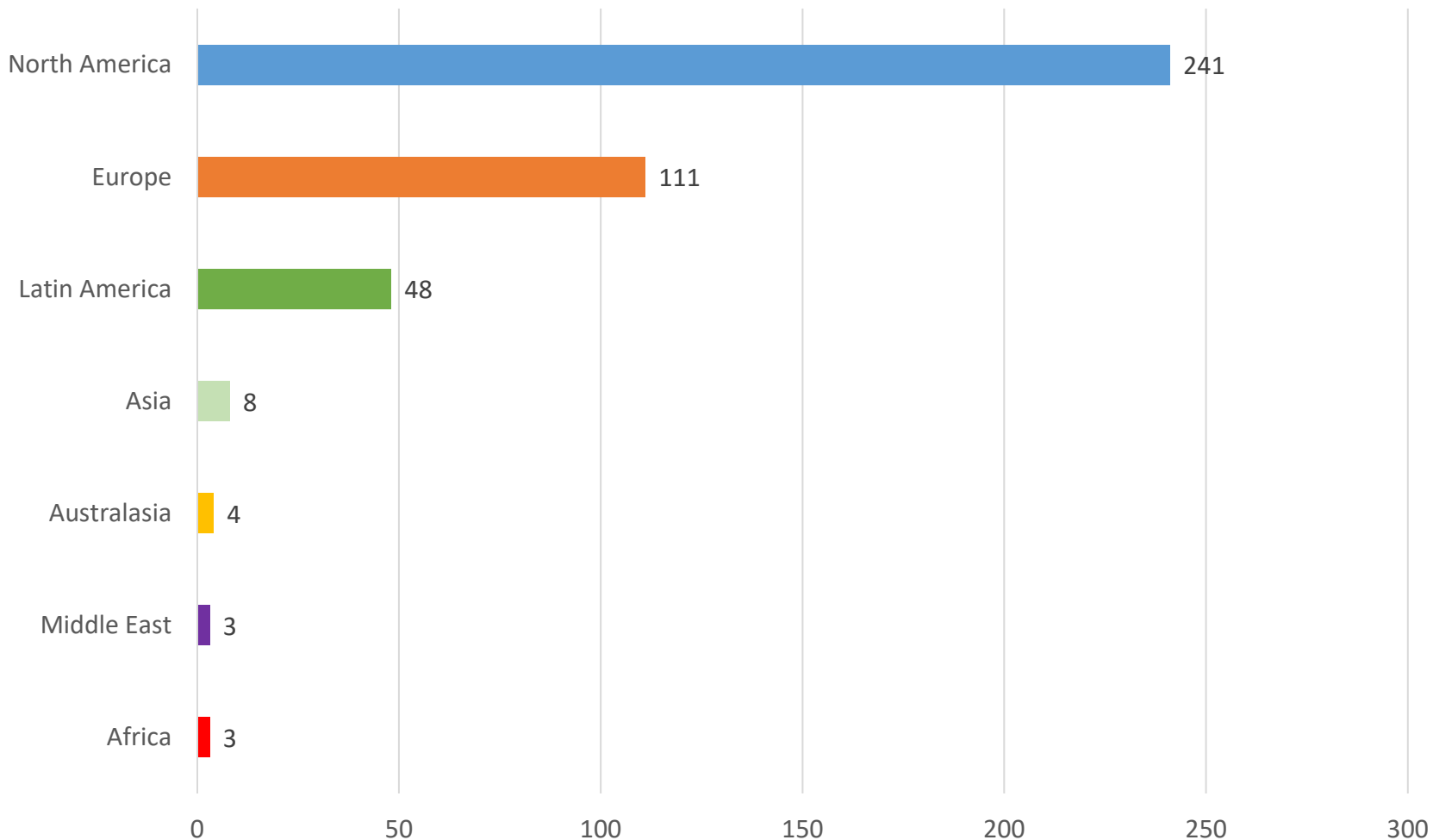


Reportable Events 2020: Groups

Total Reported Events:
418

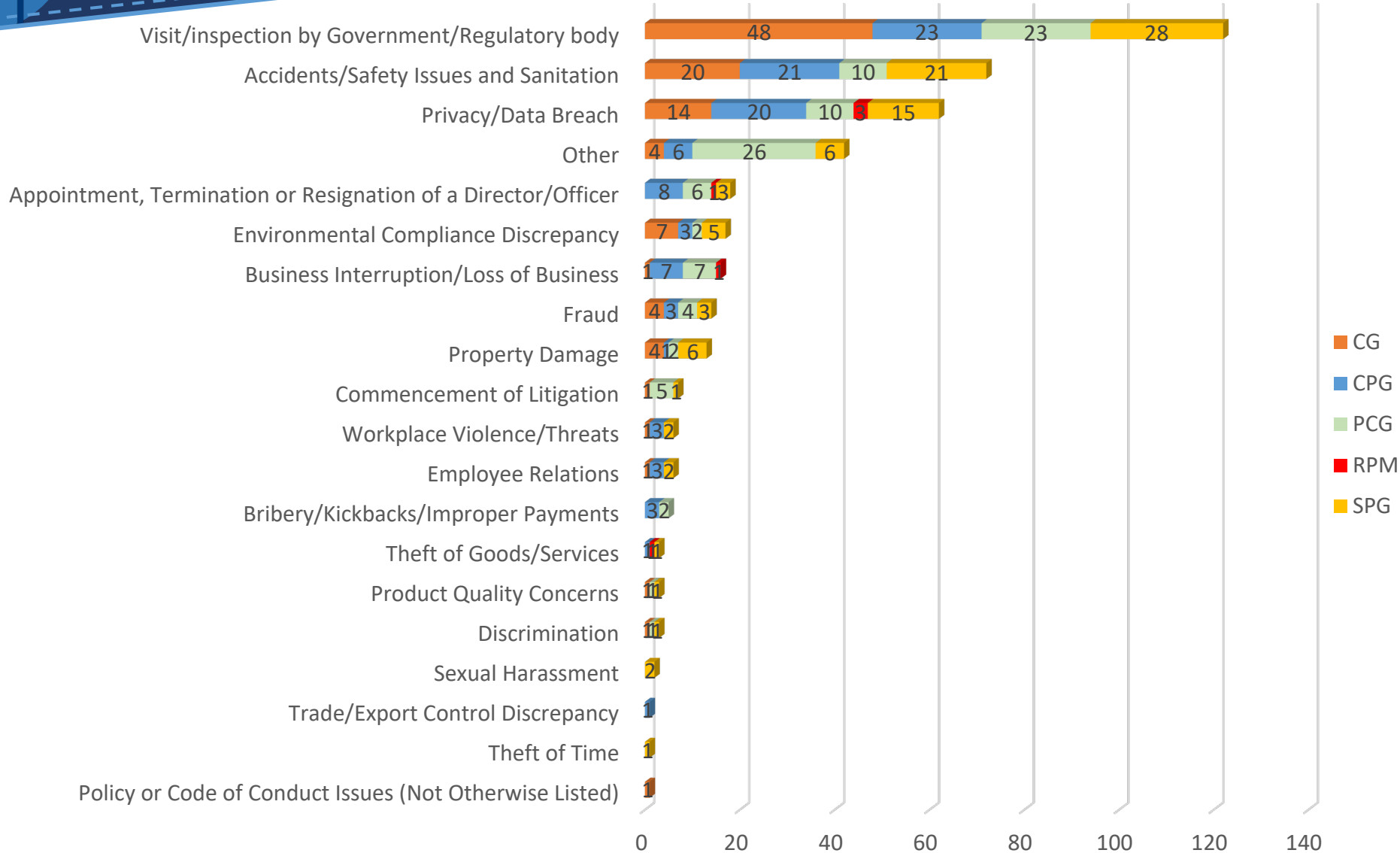


Reportable Events 2020: Region





Reportable Events 2020: Types of Issues by Group





Navex Hotline & Reportable Event Takeaways

This data assists to provide opportunities to leverage the information in the hotline and incident management systems to improve our compliance program – and our organizational culture of integrity and respect. This information points to several opportunities to increase program effectiveness:

Navex System:

- **Consistency in Reporting Issues From All Sources:** Navex is the system of record. By ensuring all incidents and issues get reported through Navex, provides a complete picture of risks by documenting all reports in one centralized management system. Having consistency in reporting helps to track and report on issues, and trends affecting the business.

Hotlines:

- **Case Closure Time:** Many complaints can quickly be resolved and closed out. Complaints responded to in a timely manner increase trust and positive perception in the system and process.
- **Contact and follow up with Named reporters:** It is critical to reach out and inform the reporter that the matter is being investigated and obtain any other important and relevant information to conduct a thorough investigation.

Reportable Events:

- **Spot and Issue – Ask For Help:** Partnership and communication is key. The Reportable Event process works to ensure incidents that occur and affect our company receive, when necessary, the proper level of support and resources to collaborate and assist with.
- **HR Investigations are a Reportable Event:** Employees choosing to have their complaint addressed internally rather than the Hotline is ideal and the goal, however, a Reportable Event still must be submitted.
- **Reportable Events must be submitted within 24hrs:** Any Privacy/Data Breach incident to include lost/stolen devices must be reported immediately.

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Any questions?

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