

THE VALUE OF 168



COMPLIANCE AWARENESS & TRAINING

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9th February 2021



Compliance Survey – December 2020

- Our first ever global survey on Compliance at RPM.
- Survey was anonymous.
- Five simple questions on our Compliance Program.
- Sent to approximately 10,000 employees with a Company email address.
- Survey was available in English, French, German, Spanish, Portuguese, Dutch and Polish.
- The response rate was fantastic with over 50% of targeted employees engaging in the survey.



CAN WE ASK YOU SOMETHING?

Here at RPM we know that our success depends on each of us following the right route and embracing our Value of 168®.

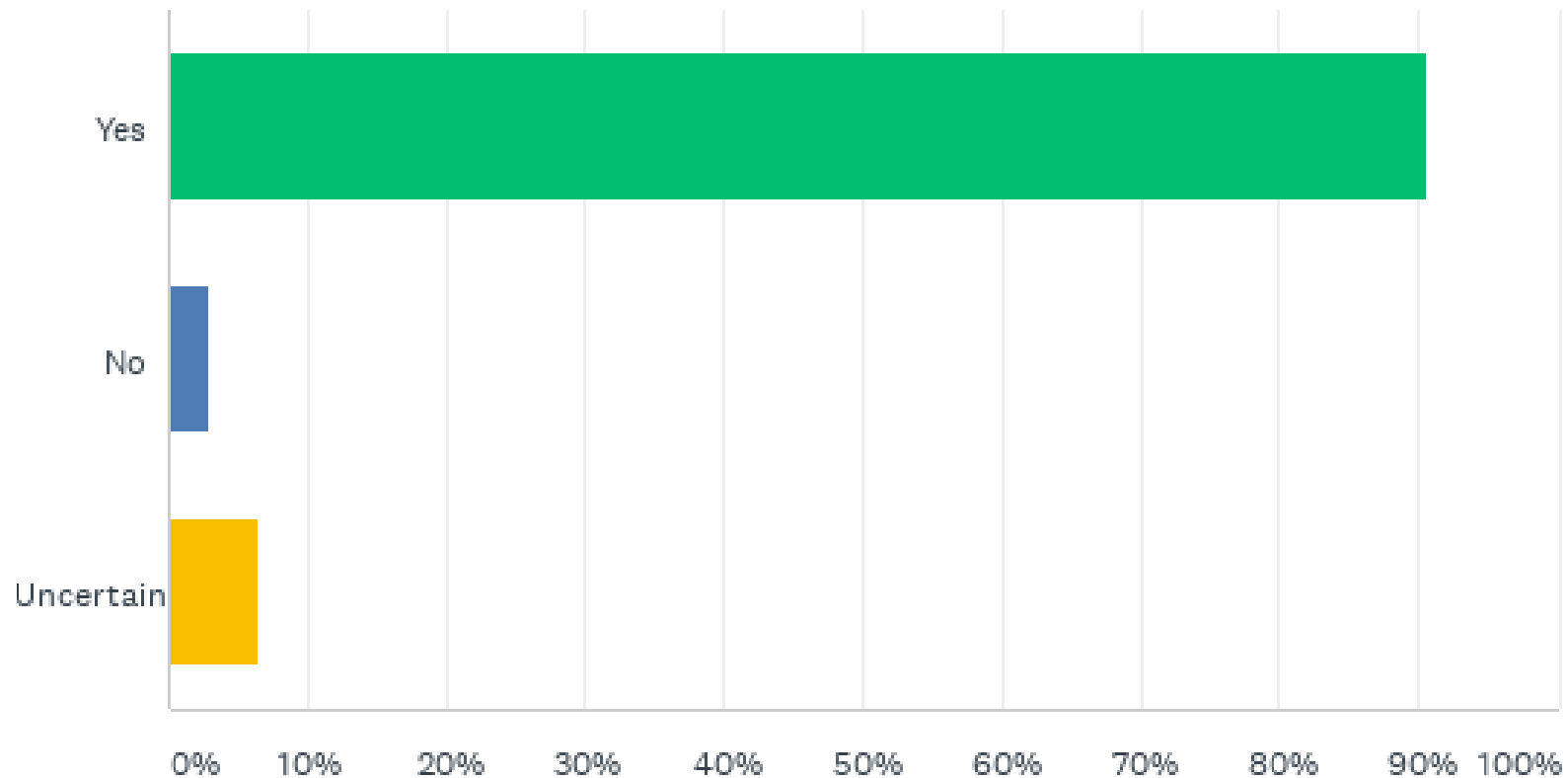
Please spare a couple of minutes to complete the online questions about our compliance program by January 15th 2021. We will maintain confidentiality and anonymity in our results.

[START](#)

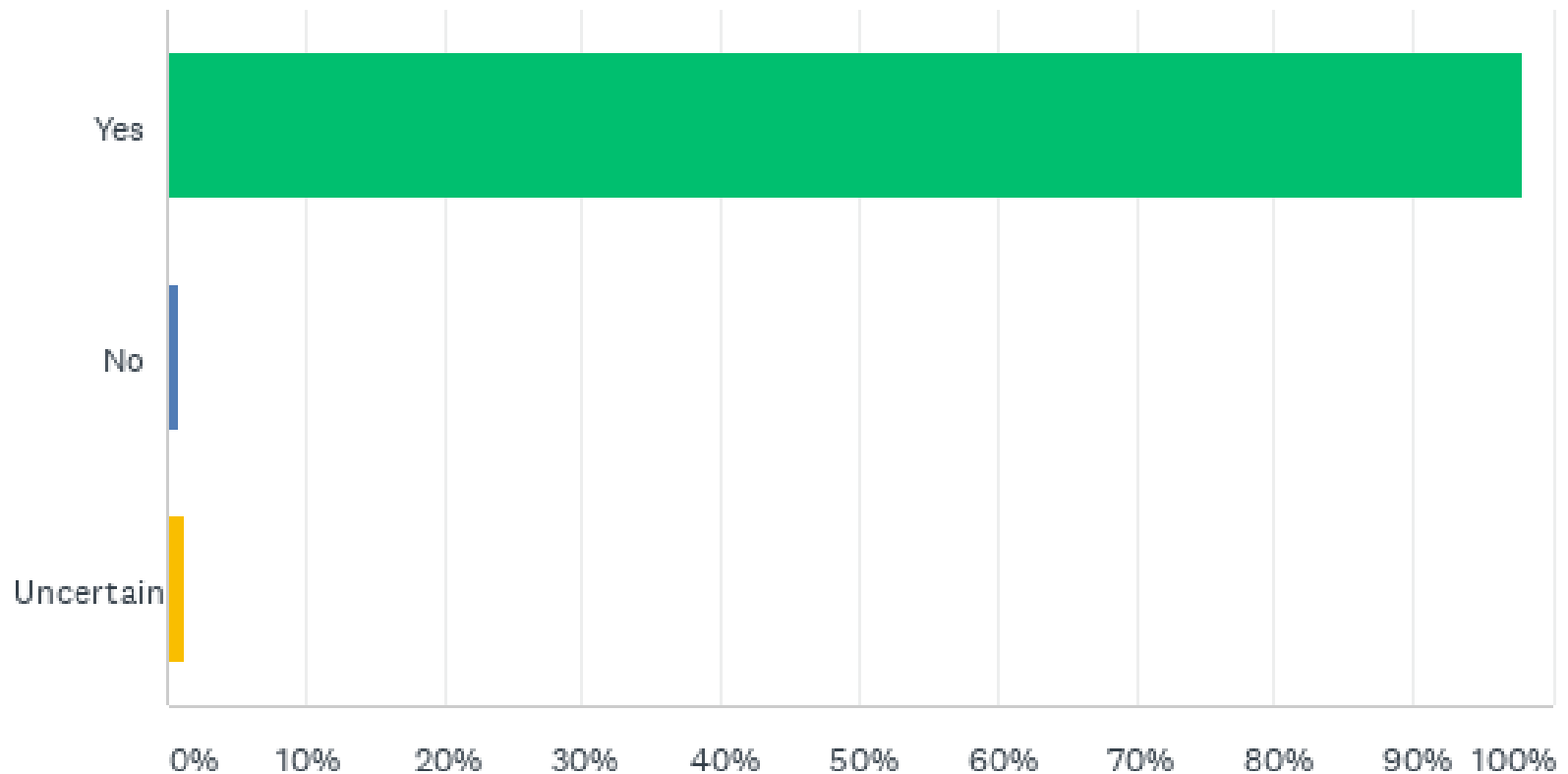


If you have any issues in opening the survey please copy the link below into your browser
<https://www.surveymonkey.com/r/RPMCompliance2020>

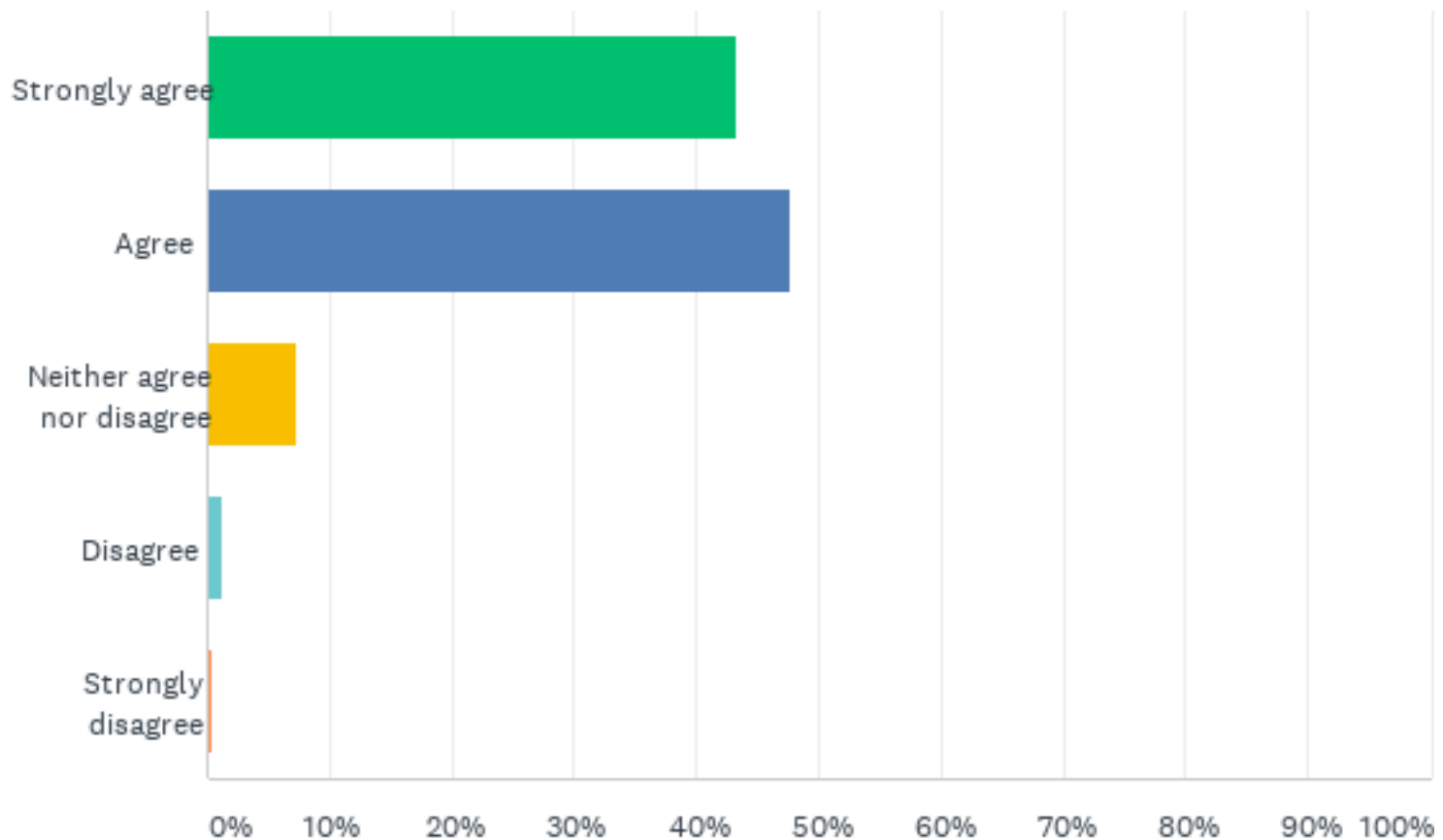
Q1. Do you know who/where to go to in the organization if you have a compliance question or concern?



Q2. Are you familiar with the RPM Code of Conduct, the Values & Expectations of 168?

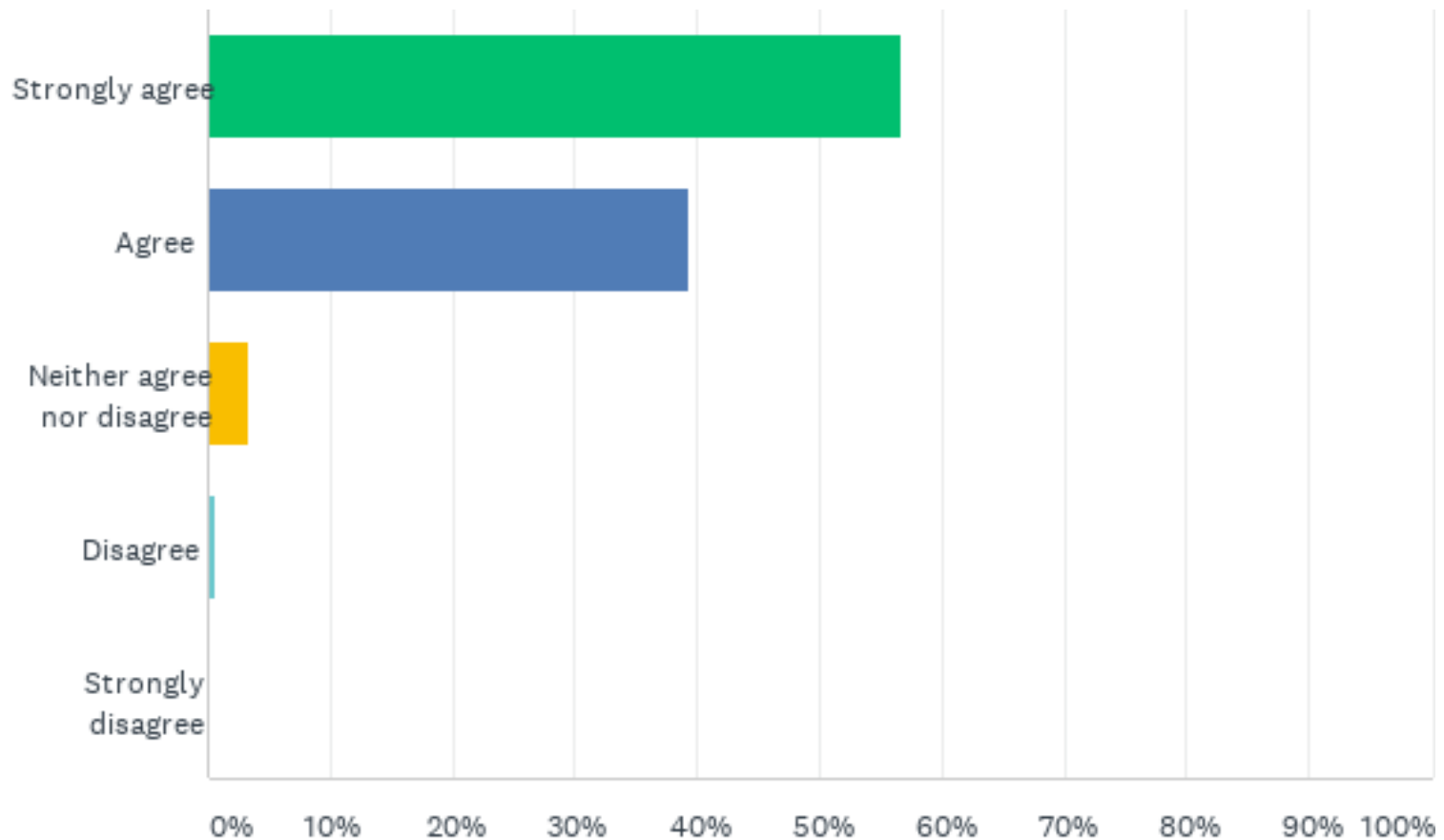


Q3. The organization provides informative and understandable compliance training



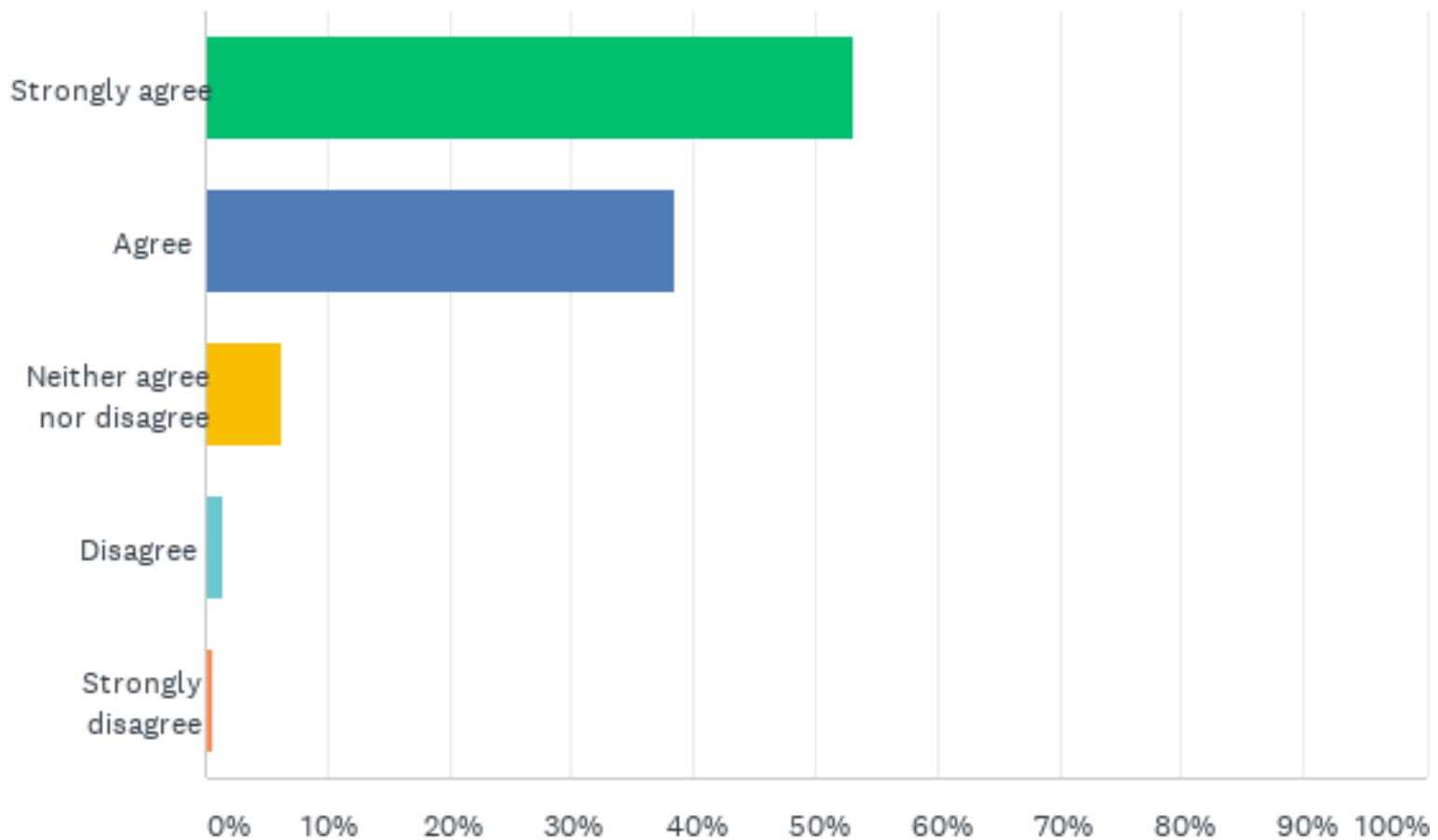
Compliance Survey – December 2020

Q4. I am aware of Data Privacy regulations and how they may impact my role.



Compliance Survey – December 2020

Q5. The organization does a good job of communicating ethical values and expectations.



Compliance Survey – December 2020

Employee Feedback

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“Love this company”

“Sometimes I think it is assumed that people know more than they actually do about ethics and compliance.”

“Learned a lot this year, look forward to additional trainings!”

“I don’t believe that the same standards are held across the board pending status, and/or position within the organization. There seems to be bias at many different levels.”

“My department rarely shows any type of work ethics.”

“#5 - I agree but is the organization walking the talk as far as ethical values? Some improvement noted. This is from an almost 37 year employee.”

“There is always a fear of retaliation even with “anonymous” reporting.”

“There is always a little mumbling about how much “compliance stuff” we are asked to complete but it is actually a comfort to know we are really, really prepared.”

Good communication to management but could do better to supervisors and hourly associates

“The compliance training is essentially done in its own silo, it is not integrated into the daily operations of the company.”

“RPM places a high value on doing the right thing which is consistent with my personal values”

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POLICY UPDATE

Currently in development is our revised RPM Policies and Compliance Resource Page.

The website will be replacing our current policy page and will be designed to provide much more information to assist with Legal and Compliance needs.

It will include sections dedicated to:

- RPM Corporate Policies (including Legal, HR, IT and Finance)
- Data Privacy
- Reportable Events
- Hotline Policy and Posters
- Compliance Resources (Route 168)
- Covid-19 Policies and Resources
- Supplier, Applicator & Distributor Code of Conduct and Resources

This will be delivered through a private URL.

IT is working for the site to have multi-lingual functionality to provide policies and materials in multiple languages.



RPM Policies - FY21 New and Updated Policies and Procedures

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Issued in FY21 to date:

- Distributor and Applicator Code of Conduct
- Hotline & Non-retaliation
- Conflicts of Interest
- Reportable Events (Revision)

In production:

- Acceptable Use
- Request for Change
- Gifts, Entertainment and Donations
- EEO
- Anti- Harassment
- Vendor Master Changes
- Investigations Procedures
- Anti-Bribery, Anti-Corruption
- Anti-Trust
- Modern Slavery Statement
- EH&S Statement
- Employer of Choice Statement
- Trade Compliance



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Route 168 Awareness Campaign



Route 168

- Our Route 168 Compliance Campaign is designed to deliver compliance messages across RPM through a theme in a visually appealing method.
- The materials are intended to raise awareness of compliance and ethics topics.
- With the end goal of ensuring Associates know where they can go without fear of retaliation so when they:

**SPOT AN ISSUE... they
ASK FOR HELP!**



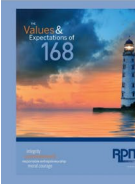
We are RPM and our success depends on each of us following the right route and embracing our Value of 168® to make the right decisions.

If you have a concern regarding unethical or inappropriate conduct, discuss it with your manager, a supervisor, human resources or contact the hotline below:

888-898-4088

Or visit the website:

<https://iwf.tnwgrc.com/rpminternational>



The hotline is confidential, easy-to-use, always available and staffed by an independent third party. As permitted by applicable law you may choose to remain anonymous. The Company reviews and investigates all reports and prohibits retaliation for good faith reporting.

Route 168



When in Doubt... Ask for Help!

Don't steer the wrong way when presented with an ethical or compliance dilemma.

We know doing the right thing is often not easy, here at RPM you can trust that you are not alone, we are here to help.

To help keep you on the right road to compliant and ethical decision making, please reach out to your leadership or us at compliance@rpminc.com.

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We are RPM and our success depends on each of us following the right route and embracing the Value of 168® to make the right decisions.

LEARN MORE: www.rpminc.com CONTACT: compliance@rpminc.com

ENSURE PERSONAL DATA IS SAFE ON ROUTE 168

DID YOU KNOW?
22% of data breaches are the result of human error and another 12% are the result of misuse or mishandling. Data breaches involving sensitive data have the potential to significantly damage individuals and often result in increased fines and penalties.

Know the sensitive data you have, keep it secure at all times and report any potential loss, misuse or unauthorized access via the [Reportable Events page](#) immediately.

Sensitive personal data examples include:

- Race
- Political or religious affiliation
- Trade union membership
- Health
- Sex life
- Criminal background
- Biometric (fingerprint, facial recognition)
- Social Security Number or equivalent

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LEARN MORE: www.rpminc.com CONTACT: dataprotection@rpminc.com

CYBER CRIME PREVENTION

Protecting RPM

THE GROWING RISK OF CYBER CRIME

- Cyber-crime is the fastest growing crime globally, ranking 3rd in the World behind Government Corruption and Narcotics.
- The estimated global cost of cyber security attacks in 2015 was \$400 billion.
- The projected cost in 2019 was estimated to be in excess of a \$1 trillion.
- Intellectual Property theft makes up at least a quarter of the cost of Cybercrime.

COMMON EXAMPLES OF CYBER CRIME

- Phishing is where the fraudster will send out a legitimate looking email attempting to trick the employee into providing data.
- Hacking is when a criminal uses technology to gain access into an individual or company account to gain unauthorized access to information and system for their personal gain.
- Malware attacks are targeted to steal data from the business.
- Ransomware attacks will demand a payment from the business to allow access back to the system and data.

CYBER CRIME RISK AREAS

RISK

- Personal information requests.
- Intellectual Property information requests.
- Payroll information.
- Customer and supplier account information.
- Wire fraud - Bank detail changes.
- Change to customer and supplier details.
- Change of delivery address for POs.
- Purchase Order Fraud.

PROTECTING RPM

- Be vigilant. Who is the sender?
- Do not reply to suspicious emails.
- Use strong passwords
- Always verify information requests independently.
- Password protect sensitive information.
- Follow Internal Controls designed to mitigate risk.
- Always be wary of emails that request immediate action.
- Do not click on links, download or open attachments from unknown senders.
- Keep IT Updates updated, control your spam risk.
- Consider cell phone risk as well.
- Communicate the attempt to management.

WE ARE RPM AND OUR SUCCESS DEPENDS ON EACH OF US FOLLOWING THE RIGHT ROUTE AND EMBRACING OUR VALUE OF 168® TO MAKE THE RIGHT DECISIONS.

CONTACT US: COMPLIANCE@RPMINC.COM

Awareness Materials are designed to be informative, eye catching and can be delivered through a variety of methods – newsletters, email blasts through complianceawareness@rpminc.com and in hard copy posters for facilities. They can be stand alone messages or supportive of training / business initiatives.

Route 168

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- To make our compliance Road Trip a success we need your help – especially from our HR teams.
- Dissemination of information across our Company is key.
- Support is needed for the distribution of hard-copy posters across the facilities.
- We will be providing most locations with hard copy posters including our new Hotline Poster, and timelines to support dissemination.
- Due to geography and language some materials may need to be printed locally to support the program.
- Your continued support of the Compliance Program in messaging and ensuring an open- door policy.



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TRAINING



Computer based training has increased significantly from the Compliance Department in the last 12 months.

We still need your assistance to ensure:

- That Employee information is correct;
- Completion is monitored and chased locally;
- Live training for Employees without Company email is completed and updated; and
- We receive feedback on courses and future needs.

Training – overcoming the Challenges of the new LMS

The launch of training from Oracle has had some challenges:

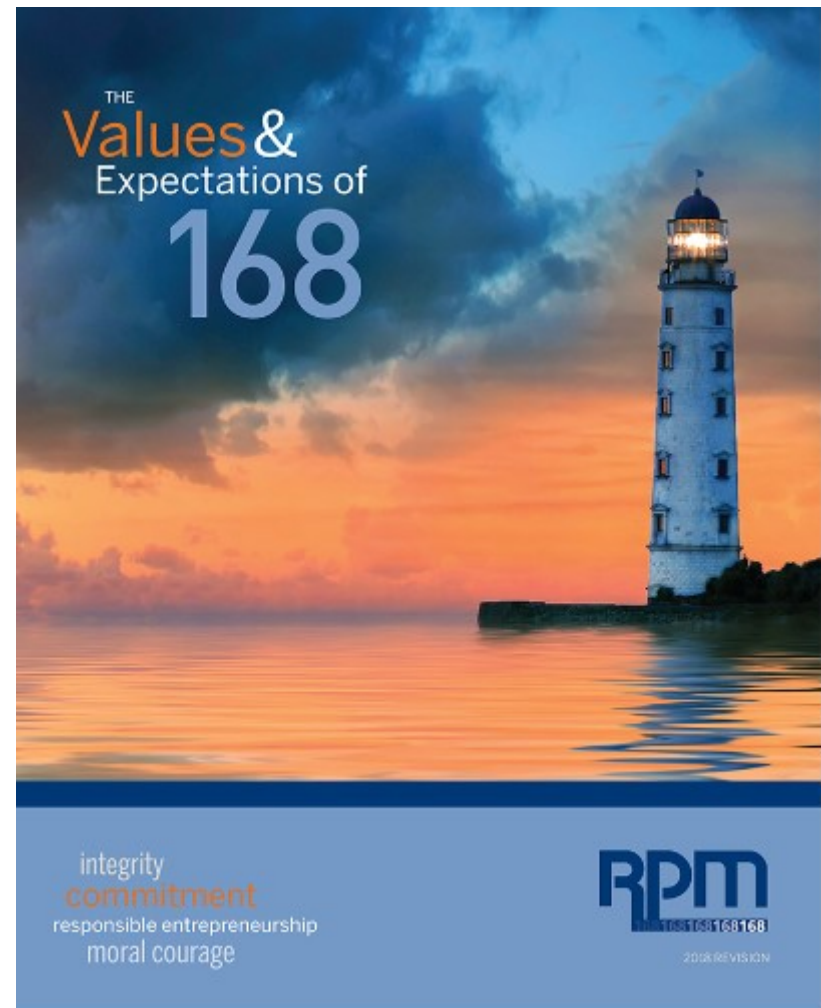
- Courses not being marked as complete;
- Updating of live training in Oracle locally;
- Problem with the New Hire Training assignment; and
- Terminated employees continuing to show in training and receiving notifications.

Next Training due through Oracle is Conflicts of Interest; this will be sent to all employees excluding Production. This training has already been deployed to non-Oracle employees.



Values & Expectations of 168 Training

- New starters with Company email addresses now have training deployed through SAI or Oracle (Excl. RO US & Canada). **It is critical that employee details are kept current and updated in Oracle and RPM One.**
- For new employees without email addresses training should be conducted locally during onboarding.
- Records of live/local training should be kept locally and where possible updated into the LMS.
- We need to ensure any employees currently untrained in the 2018 versions of V&E of 168 are identified and trained in the coming months.
- New ability to add V&E168 training dates into RPM One to be rolled out.
- We are happy to assist with Live and Teams/virtual training.

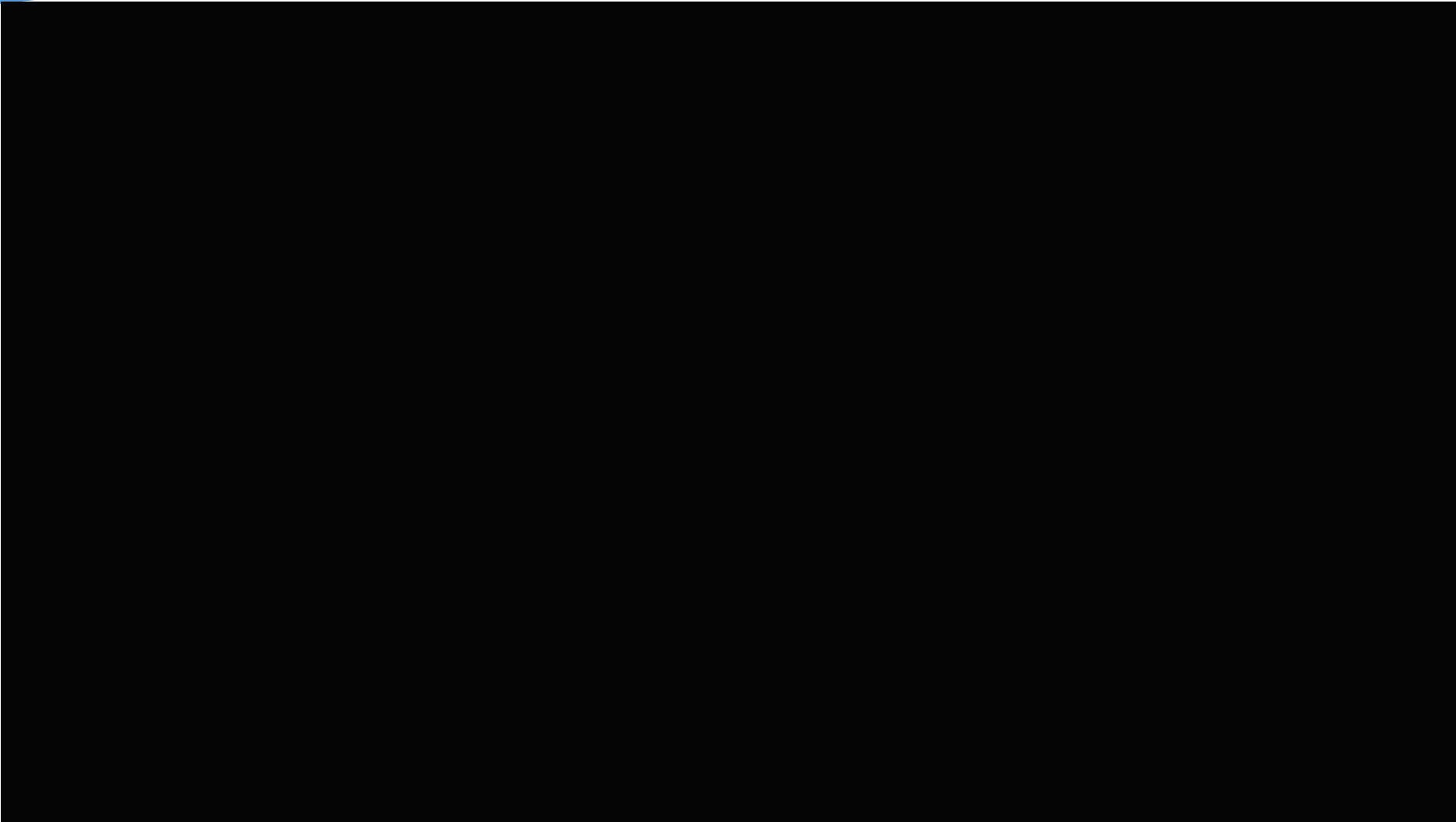


- In the coming months we will be piloting a program to get better awareness of Compliance Topics into our production facilities.
- Using ideas implemented through the MS168 program, we will be introducing short one to two minute sessions into plant meetings, i.e. shift handovers approximately once a month.
- These will take the form of quick targeted updates and introductions on compliance topics to be introduced through plant supervisors or HR.
- This will allow easier access to our employees through routinely scheduled, already socially distanced practices to deliver our compliance messages in easy to digest and quick sessions.
- These topics will be supported with materials through RPM's Route 168 Awareness campaign.





What is Compliance At RPM?



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Thank you

Any Questions?