

*Effective Date: June 1, 2025*

*Draft Date: March 31, 2025*

**RPM International Inc.  
Legal Review of Agreements Policy**

This policy shall apply to all Agreements (defined below) entered into by any affiliated company (each a “Company,” and collectively the “Companies”) of RPM International Inc. (“RPM”).

**All Agreements of any nature or type, regardless of dollar amount or term, even if reviewed by outside legal counsel, must be approved by the respective Company or Group Legal Department prior to execution (which includes digital or online execution or assent) by any Company.**

An “Agreement” means all contracts (including renewals thereof), agreements, letters of intent, indications of interest, commitments, guarantees, online “clickwraps,” and other written (whether a formalized document or in the form of a letter, email, note, text, sms, or otherwise) undertakings, bonds, covenants, settlements, pledges, promises, and other obligations that may address topics including, but not limited to, confidentiality, nondisclosure, business combination or joint venture, noncompetition, employment, consulting, representation, services, sales, purchases, supply, licensing, agency, or distribution, or that may relate to an acquisition, lease, or purchase of vehicles, real property, equipment, or materials, or to the application or installation of products. Excluded from the scope of this policy, and the definition of Agreement above, are routine commercial documents such as project quotations, purchase orders, order acknowledgements, order cancellations, change orders, and invoices that are issued in connection with a broader Agreement previously entered into by a Company and that do not otherwise require a signature or other online acknowledgment.

A suspected violation of this policy can be reported to a Company supervisor, or to any member of the Company or Group Human Resources, Legal, or Compliance Departments. Employees are also welcome to contact RPM’s [Hotline](#) to report their concerns. 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 this Policy, or who engages in retaliatory actions, may be subject to disciplinary action up to and including termination. RPM retains the right to report any violations of this Policy that are also illegal to the appropriate authorities.