

RPM INTERNATIONAL INC.
RECORDS AND INFORMATION MANAGEMENT POLICY

Records, data and other documents, information and communications are important assets. Company Records, defined below, include all records you produce or receive in your capacity as an associate of RPM International Inc. or any of its affiliated companies (collectively, the “Company”), whether in paper or through digital means. The law requires that the Company maintain certain types of corporate records for a specified period of time. Failure to retain those records for those minimum periods or keeping records longer than necessary could subject you and the Company to penalties and fines, cause the loss of rights, obstruct justice, spoil potential evidence in a lawsuit, place the Company in contempt of court, or seriously disadvantage the Company in litigation.

Purpose

The purpose of this Policy is to define what constitutes a Company Record and set forth appropriate timelines related to the preservation and deletion of those Company Records.

Scope

This Policy applies to all employees (collectively or alone “you” or “your”) of the Company and any and all records created, received, maintained or stored by the Company or in the course of performing your duties for the Company (“Company Records”). This pertains to all forms of media, including, but not limited to:

- handwritten, typed, or printed documents on paper;
- digital records (e.g., e-mail, instant messages, text messages, spreadsheets, electronic notes, storage apps, databases, websites, cloud storage, and flash drives- see the [RPM Business Communications Policy](#) and the [Digital Records Management Policy](#) for additional information);
- video and audio recordings;
- graphic representations; and
- network servers and document management systems.

Policy

Company Records must be retained for the time period set forth on [Schedule A](#) for those governed by the United States, or for the different period set forth on the data retention or information management schedule applicable to the respective jurisdictions and/or local law. If you have questions related to the retention of Company Records in your jurisdiction, please contact your group’s internal legal counsel or dataprotection@rpm-inc.com.

Upon the expiration of the designated retention time period, Company Records must be destroyed, unless retention is otherwise required by RPM policy, law or a litigation hold.

Company Records designated as “permanent” shall never be destroyed. To the extent there are conflicts about the period to retain a certain Company Record, you shall keep it for the longer of the conflicting periods. Copies of Company Records shall not be retained longer

than the designated retention time or otherwise be retained in contravention of any Company Policy.

Drafts of Company Records shall be retained for the applicable period set forth on [Schedule A](#). Should no period be set forth on [Schedule A](#), drafts shall be destroyed no later than six (6) months following completion/submission/execution of the final Company Record.

Disposal of Records shall comply with all applicable legal requirements, including secure destruction of Company Records containing confidential, consumer or health-related information, or personally identifiable information about employees or third parties. Secure disposal of paper documents includes burning, pulverizing or shredding so that the information cannot be read or reconstructed.

Litigation Holds

Destruction of Company Records shall be suspended pursuant to a Litigation Hold as provided in the Company's Litigation Hold Policy. Once Company Records are subject to a Litigation Hold, destruction of any of those Company Records, even inadvertent destruction, may result in severe penalties. Please reference the [Litigation Hold Policy](#) for further details. The Company retains the right to report any violations of law to appropriate authorities.

Requests for Exceptions

Requests for exceptions from this Policy shall be submitted to dataprotection@rpm-inc.com, with final approval granted by the RPM General Counsel. All requests for exceptions must be supported by evidence that the purpose and basic objectives of this Policy will be met.

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. The Company retains the right to report any violations of a Policy that are also illegal to the appropriate authorities.