

Toolbox Talk: Halloween Month, Double, double toil and trouble!

At Halloween, it's not Zombies, Ghouls and Ghosts that keep the Compliance team up at night, but there are lots of scares and spooky risks that, as employees of RPM, you need to be aware of.

Some of the topics discussed today could directly affect your role and spotting the warning signs could avoid toil and trouble!

Bribery and Corruption

Bribery & Corruption can often be difficult to detect as they often take place in secret and are concealed. But you can help reduce the risk of bribery & corruption in the workplace by spotting red flags, including, for example:

- A supplier offers the procurement team tickets to an expensive sporting event during a tender process;
- Scrap material, i.e. metal and pallets are sold for cash, are not recorded in the financial records;
- Payment is requested to expedite or obtain a license or permit, for example an environmental license;
- A payment or a favor to an individual is made to secure a contract or specification.

Human Rights

Modern Slavery is a real issue in supply chains in today's world, with nearly 30 million people across the world exposed to modern slavery. Modern slavery includes many types of human rights abuses like forced labour, human trafficking, child labour and debt bondage.

Victims of modern slavery can be hidden in plain sight. They may be working in as agency staff in our supplier's production facilities, serving you meals, driving taxis, or hand-washing your car.

There are many red flags we need to be aware of to help us identify victims of modern slavery, some of the main one include:

- signs of mental or physical abuse;
- Signs of malnourishment, sleep deprivation, or lack of medical care;
- disconnected from family, friends, and the community;
- unable to move freely and leave the job or where they live;
- few or no personal possessions;
- unstable or unhealthy living conditions;
- school age and working during school hours.

It is important that if you ever spot any red flags or have any concerns about anyone working for any of our business partners showing signs of modern slavery that you report it to your supervisor, HR, the legal and compliance team or use the company's hotline.

Trade compliance

Trade compliance covers a wide range of rules surrounding the import and export of goods across international borders.

It can be a very complex topic but there are a few key rules we all need to be aware of.

No RPM business is able to buy from or sell to any business or person in, or transit goods through:

- North Korea,
- Iran,
- Syria,
- Crimean, Luhansk or Donetsk Region of Ukraine,
- Russia,
- Belarus,

Nor should any RPM business be buying from or selling to the following countries without prior approval from the RPM Legal Department:

- Cuba,
- Venezuela, or
- Sudan.

In your role you may be involved in the distribution, labelling of products or handling of raw materials, if you spot any red flags that raise concerns that products have been brought in from any of these regions or are being sent to customers directly or indirectly to those countries report it to the legal and compliance team immediately.

If ever you have any concerns regarding any of the topics raised above or any other issues, it is important that you report immediately to a supervisor, HR, legal and compliance, or use the company's hotline, which is available on RPM's website or listed on the Speak Up posters in the plant.

The company will thoroughly investigate all reports.

Should you have concerns about reporting issues, the Company prohibits retaliation against employees who make reports in good faith and takes efforts against retaliatory actions.