

**RPM INTERNATIONAL INC.  
AND ITS SUBSIDIARIES AND OPERATING COMPANIES  
EMPLOYEE / EXECUTIVE OFFICER LOAN POLICY**

It has been and will continue to be the policy of RPM International Inc. (“RPM”) and its subsidiaries and operating companies (collectively, with RPM, the “Company”) that there shall be no Company loans to employees except in the limited circumstances described below without prior notification to and approval by the applicable Group President or Executive Vice President of RPM. Under no circumstances shall the Company loan or otherwise extend credit to an executive officer of RPM.

The only permissible loans to non-executive officer employees shall be loans that are lawful, directly related to an employee’s relocation of his/her principal residence and deemed necessary and appropriate by the applicable Group President or Executive Vice President of RPM. In general, a relocation loan should only be applicable to an officer level employee. If the applicable Group President or Executive Vice President of RPM determines that a relocation loan is necessary and appropriate under the circumstances, the loan must first be (a) reasonable in amount relative to the officer’s position and compensation; (b) documented in writing; (c) properly and completely reflected on the financial books and records of the operating company; and (d) approved in writing in advance by the applicable Group President and Chief Financial Officer. This Policy does not, however, replace or otherwise modify RPM’s overall employee relocation and assistance policy.

This Policy does not apply to employee loans procured under and pursuant to the terms and conditions of RPM’s 401(K) plan or similar plan.

All loans that fall under this policy shall be reported in advance on the Reportable Events portal.

**A suspected violation of this policy can be reported to your supervisor, human resources or to any member of the legal and compliance department. 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.**