

## RPM INTERNATIONAL INC.

### Anti-Violence policy

#### Purpose

The safety and security of employees is of vital importance to RPM International Inc. (“RPM”) and its subsidiaries’ (hereinafter collectively referred to as the “Company”). Therefore, the Company has adopted a zero-tolerance policy concerning work-related violence. Threats or acts of violence, including intimidation, bullying, physical or mental abuse and/or coercion—will not be tolerated.

It is our goal to have a work environment free from acts or threats of violence and to respond effectively in the event that such acts or threats of violence do occur.

#### Scope

The conduct prohibited by this policy applies to conduct by all persons involved in our operations, including employees, supervisors, managers, temporary or seasonal employees (“employees”), agents, clients, vendors, customers, or any other third-party interacting with the Company (“third parties”). It should be read in conjunction with RPM’s [Weapons in the Workplace Policy](#) and [Non-Harassment Policy](#).

#### Policy

Work-related violence is any intentional conduct that is sufficiently severe, abusive or intimidating to cause an individual to reasonably fear for their own personal safety or the safety of their family, friends and/or property such that employment conditions are altered or a hostile, abusive and intimidating work environment is created for one or more employees, or others present in the workplace.

Examples of work-related violence include, but are not limited to:

- Threats or acts of violence occurring on Company premises, regardless of the relationship between the parties involved in the incident.
- Threats or acts of violence occurring off Company premises involving someone who is acting in the capacity of a representative of the Company.
- Threats or acts of violence occurring off Company premises involving an employee if the threats or acts affect or may affect the business interests of the Company.
- Incidents occurring off Company premises that may lead to an incident of violence on Company premises; and
- Threats or acts of violence resulting in the conviction of an employee, or an individual performing services for the Company on a contract or temporary basis, under any criminal code provision relating to violence or threats of violence when that act or the conviction adversely affect the legitimate business interests of the Company.

Examples of conduct that may be considered threats or acts of violence under this policy include, but are not limited to:

- Threatening physical contact directed toward another individual.
- Threatening an individual or the individual’s family, friends, associates or property with harm.
- The intentional destruction or threat of destruction of the Company’s or another’s property.

- Menacing or threatening phone calls, emails or messages.
- Posting threatening content or making violent statements about the workplace on social media.
- Stalking.
- Veiled threats of physical harm or similar intimidation; and/or
- Communicating an endorsement of the inappropriate use of firearms or weapons.

Work-related violence does not refer to work environment arguments or debates that are zealous or impassioned, provided there is no resort to any form of coercion. Discussions about sporting activities, popular entertainment or current events are not considered work-related violence when there is no threat of violence being directed to the work environment or any individual connected with it. Rather, work-related violence refers to behavior that demonstrates an intention to engage in violence, condones violence in our work environment, or targets any individual with acts or threats of violence.

### Reporting

Employees should help maintain a violence-free work environment. To that end, employees must immediately report any incident that violates this policy to a supervisor, another member of management, Human Resources, any member of the Legal or Compliance Departments, or through the Company's Hotline. If an emergency exists, employees should call the emergency services.

### Investigation

All complaints or concerns of Workplace Violence will be promptly and thoroughly investigated. In some instances, law enforcement may be notified. The Company will make the sole determination of whether and to what extent, it will act upon threats or acts of violence. In making this determination, the Company may undertake a case-by-case analysis in order to ascertain whether there is a reasonable basis to believe that work-related violence has occurred.

**For US Employees Only:** This policy in no way prohibits employees from engaging in activities that are protected under applicable state and federal laws, including but not limited to any activity that is protected under Section 7 of the National Labor Relations Act, which includes the right of employees to speak with others, engage in debates and protest about their terms and conditions of employment. No provision of this policy statement or any other provision in this policy alters the at-will nature of employment with the Company.

**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.**