

RPM SUPPLIER CODE OF CONDUCT

RPM affiliates proudly aspire to be entrepreneurs who create value for all. To maintain that standard, suppliers to RPM or its affiliates (together, “RPM affiliates”) must be committed to a way of doing business that is ethical, responsible and consistent with the principles expressed in RPM’s Values and Expectations of 168 (<http://www.rpminc.com/about-rpm/worldwide-code-guidelines/>), RPM’s Code of Conduct. As such, we expect and require that each of our suppliers, vendors, service providers, contractors, agents and consultants (each a, “Supplier”) be a good corporate citizen and engage in legal, ethical and socially responsible business practices, as follows:

Compliance with Laws and Standards. Comply with all applicable laws, rules and regulations and relevant internationally recognized environmental, social responsibility, governance and ethical business standards. Where there are no relevant local or international requirements or standards, comply with industry best practices.

Business Conduct.

Competition and Trade. Comply with applicable antitrust, competition and trade laws, rules and regulations. Do not engage in unfair trade or anti-competitive trade practices. Ensure that no goods sent to RPM affiliates are associated with, either through manufacture, ownership, shipment or otherwise, (a) countries on the U.S. sanctioned parties list (Iran, Syria, North Korea, and the Region of Crimea) or (b) entities or individuals subject to any sanctions programs of the United States, European Union or any other applicable country. Ensure that any shipment or transfer of products to RPM affiliates comply with U.S. and other relevant countries’ export and trade regulations.

Corruption and Conflicts of Interest. Remain free of corruption and conduct business in a fair and ethical manner. Do not offer, give or receive inappropriate gifts, assurances or other things of value for the purpose of seeking an unfair or inappropriate advantage or favorable treatment. Comply with applicable anticorruption and anti-bribery laws. Ensure your books and records are accurate, complete and comply with applicable accounting and recording standards. Do not engage in business transactions that may create, or be perceived as creating, a conflict of interest.

Data Protection and Privacy. Protect personal information in a manner consistent with internationally recognized data protection standards and applicable laws.

Confidentiality. Protect RPM affiliates' sensitive and confidential information and do not disclose it or use it for the benefit of any other party.

Supply Chain. Provide representatives of RPM affiliates with accurate and complete information about policies, procedures, workforce, use of subcontractors and other relevant information necessary for them to reasonably evaluate performance with this Supplier Code of Conduct.

Suspension and Debarment. Disclose to RPM any suspension, debarment or comparable action taken by any government agency with respect to Supplier or any of its affiliates.

Social Responsibility.

Working Conditions. Provide a safe workplace and working environment. Have a safety program that is actively supported by management and that complies with applicable laws, rules and regulations and ensures identification and reporting of hazards, incidents and risks.

Worker Rights. Share RPM's commitment to human rights and worker rights. Act consistent with internationally proclaimed standards, specifically in relation to reasonable, fair and appropriate compensation, right to work, safety, freedom of association, work hours, overtime, wages and benefits and prevention of harassment, slavery, human trafficking and child and forced labor.

Harassment. Create and maintain an environment free from any threats of violence, sexual exploitation, abuse and harassment of any kind.

The Environment and Product Stewardship.

Environmental Protection. Protect the environment and the health of employees, customers and neighbors. Act responsibly by minimizing impacts on the environment.

Environmental Stewardship. Develop an environmental stewardship program that includes the following focus areas: energy conservation (improving energy efficiency reduces emissions and energy costs) and conservation and reuse programs (including waste minimization and recycling).

Resource Optimization. Use appropriate resources efficiently to reduce waste and emission generation. Optimize methods of transportation in the supply chain, and seek sustainable transportation modes wherever possible.

Product Stewardship. Identify and evaluate renewable/recycled material opportunities. Evaluate and assess existing formulations containing substances that are under regulatory/toxicological review to develop and responsibly provide "safer" alternative formulations. Support a collaborative approach to developing new, competitive and sustainable offerings. Optimize the use of packaging materials and pursue recyclable/renewable options. Seek environmentally conscious development, manufacture and disposal methods.

Product Disclosure. Provide RPM affiliates with all information necessary for them to comply with disclosure, reporting and registration requirements related to products they purchase.

Conflict Minerals. Facilitate RPM's conflict minerals reporting obligations by providing responses to RPM affiliates' requests for documentation regarding the sourcing of conflict mineral materials used in the goods sold.

Product Safety. Ensure that the goods sent to RPM affiliates comply with all applicable, relevant and appropriate environmental, health, safety, and quality standards.

Reporting and Auditing.

Reporting. Report all suspected and actual violations of this Supplier Code of Conduct immediately to RPM's Vice President, Operations or RPM's Chief Compliance Officer, each at 2628 Pearl Road Medina OH 44256, or by reporting it to RPM's Compliance Hotline at <https://iwf.tnwgrc.com/rpminternational>.

Auditing. You agree that we have the right to verify your compliance with this Supplier Code of Conduct and our contractual relationships and to take corrective action, including, but not limited to, inspections and audits of your premises and records and termination of our relationship with you, if we have reason to believe you are not in compliance with this Supplier Code of Conduct.