

**RPM INTERNATIONAL INC.  
AND ITS SUBSIDIARIES AND OPERATING COMPANIES  
CONFLICT MINERALS POLICY**

**Purpose**

This Conflict Minerals Policy (this “Policy”) establishes the commitment of RPM International Inc. and its subsidiaries and operating companies (collectively, the “Company”) to responsible sourcing practices with respect to minerals that may finance or benefit armed groups responsible for serious human rights abuses in conflict-affected and high-risk areas.

The specific objectives of this Policy are to:

- Ensure compliance with applicable laws and regulations governing conflict minerals, including the reporting requirements of the U.S. Securities and Exchange Commission (SEC) under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (“Dodd-Frank Act”) and related SEC rules.
- Align the Company’s due diligence practices with recognized international standards, including the Organisation for Economic Co-operation and Development (OECD) Due

## Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

- Acknowledge and, where applicable, address obligations under the EU Conflict Minerals Regulation (Regulation (EU) 2017/821), which may apply to certain Company subsidiaries or customers operating in the European Union.
- Provide clear, consistent, and auditable procedures for each RPM Manufacturing Company to identify, assess, and report on the use of 3TG Minerals in its supply chain.
- Promote transparency and accountability with the Company’s suppliers, customers, and stakeholders regarding the origin of minerals used in RPM Products.
- Support broader corporate responsibility and environmental, social, and governance (ESG) objectives by contributing to the responsible global minerals supply chain.

### Scope

This Policy applies to:

- RPM International Inc. and all its subsidiaries and operating companies (each an “RPM Manufacturing Company”), regardless of jurisdiction.
- All employees, officers, directors, and designated representatives of each RPM Manufacturing Company who are involved in procurement, supply chain management, compliance reporting, or customer-facing activities related to conflict minerals.
- All direct suppliers of materials or components that are used in the manufacture of RPM Products or Materials Contracted to Be Manufactured, to the extent those materials

constitute or may constitute 3TG Direct Raw Materials as defined in Section 3 of this Policy.

This Policy applies to the following activities and materials:

- The sourcing and procurement of 3TG Direct Raw Materials from any supplier, worldwide.
- The manufacture of RPM Products that incorporate, or potentially incorporate, any 3TG Mineral.
- Materials Contracted to Be Manufactured that are incorporated into or become finished RPM Products, where the Company has had direct manufacturing influence.
- Annual supply chain due diligence, reporting, and certification activities required under applicable law.

This Policy does not apply to:

- Materials that an RPM Manufacturing Company only repackages, rebrands, re-labels, or resells without modification, where the RPM Manufacturing Company had no manufacturing influence.
- Packaging materials or manufacturing equipment, unless manufactured by the RPM Manufacturing Company for independent sale as an RPM Product.
- Office supplies, computers, telephones, or other indirect materials not used directly in the manufacture of RPM Products.
- Materials in the possession of an RPM Manufacturing Company prior to January 31, 2013.

**Recycled and Scrap Materials:** Where a supplier represents that 3TG Minerals in its materials are derived entirely from recycled or scrap sources, the relevant RPM Manufacturing Company must obtain and retain supporting documentation substantiating that claim. Such claims, if

verified, may reduce the Company's due diligence obligations in accordance with applicable SEC guidance.

## Definitions

The following definitions apply throughout this Policy:

**“3TG Mineral(s)” or “Conflict Mineral(s)”** refers to Tantalum, Tin, Tungsten, and/or Gold. It does not include metal compounds of Tantalum, Tin, Tungsten, and/or Gold that are not manufactured by the Company and that are only used or purchased by the Company.

**“RPM Product(s)”** means any products sold by an RPM Manufacturing Company.

**“Material(s) Contracted to Be Manufactured”** means any materials and/or products that an RPM Manufacturing Company contracts to be manufactured and that (1) the RPM Manufacturing Company incorporates into and is contained in a finished manufactured RPM Product, or that itself becomes a finished RPM Product, AND (2) the RPM Manufacturing Company has or had an influence that directly relates to the manufacture of the material and/or product. It does not include any product that an RPM Manufacturing Company only repackages and/or rebrands, re-labels and resells without making any modifications to the product itself, as long as the RPM Manufacturing Company did not have any influence in its manufacturing.

**“3TG Direct Raw Material(s)”** means any materials or parts used by an RPM Manufacturing Company to manufacture an RPM Product AND that (1) possess or could possess a 3TG Mineral, (2) are contained in, or potentially contained in, regardless of how de minimis the quantity may be, the finished RPM Product, and (3) are necessary to the functionality or

production of the RPM Product. It also includes all such materials contained in a Material Contracted to Be Manufactured.

3TG Direct Raw Materials do not include:

- Packaging materials or materials used to manufacture packaging materials, unless the RPM Manufacturing Company manufactures the packaging material for sale as an independent RPM Product.
- Equipment used to manufacture RPM Products, unless the RPM Manufacturing Company manufactures such equipment for sale as an independent RPM Product.
- Materials contained in, or used to service and maintain, the mechanical tools and equipment used to manufacture RPM Products.
- Indirect products used by the Company but not directly used to manufacture any RPM Product (e.g., office supplies, paper, computers, telephones).
- Any materials in the possession of an RPM Manufacturing Company prior to January 31, 2013.

**“DRC Region”** refers to the Democratic Republic of Congo and its adjoining countries of Angola, Burundi, Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia.

**“Reasonable Country of Origin Inquiry (RCOI)”** means an inquiry into the country of origin of 3TG Minerals conducted in accordance with SEC rules and OECD guidance, designed to determine whether conflict minerals originated from the DRC Region or from recycled or scrap sources.

### **Determination of Products That May Contain 3TG Minerals**

1. During January of each year, each RPM Manufacturing Company will review all materials within its supply chain during the prior calendar year that may have been used to manufacture an RPM Product or Material Contracted to Be Manufactured to determine whether such materials constitute a 3TG Direct Raw Material.
2. No later than February 28th of each year, each RPM Manufacturing Company will submit a certification through the Company’s designated compliance management system. The certification shall be distributed by RPM’s Director of Compliance Audit and each RPM Manufacturing Company shall certify whether any materials in its supply chain and used during the prior year constitute a 3TG Direct Raw Material. If one or more such 3TG Direct Raw Materials exist, the certification must include the

relevant RPM Manufacturing Company and supplier information for each 3TG Direct Raw Material in the format specified by the compliance department.

## **Company Due Diligence Procedures**

### **Coordination and Data Submission**

RPM's Director of Compliance Audit is responsible for coordinating with all relevant RPM Manufacturing Company representatives for the uploading of all 3TG Direct Raw Material data into the Company's designated compliance management system and for submitting appropriate RCOI questionnaires to relevant suppliers through the Company's designated conflict minerals due diligence provider. All data submission and RCOI distribution must be completed by May 1st of each year.

### **Supplier Engagement**

3. RPM's due diligence provider will assist the RPM Manufacturing Company in obtaining supplier responses for any reported 3TG materials and conduct the RCOI questionnaire. If a supplier does not respond or expresses reluctance, the RPM Manufacturing Company must directly communicate with that supplier and continue to request appropriate responses.
4. If by May 1st of any year a 3TG Direct Raw Material supplier has not responded to the requested questionnaire, the relevant RPM Manufacturing Company and/or the Company's due diligence provider must provide a list of any such non-responding suppliers to a Director of Compliance Audit. The Director of Compliance Audit will confer with RPM Manufacturing Company management and the due diligence provider to determine appropriate measures to obtain a satisfactory response.
5. To ensure consistency across all RPM Manufacturing Companies, RPM's Director of Compliance Audit will function as the primary facilitators and liaisons between all RPM Manufacturing Companies and must be notified of any RPM Manufacturing Company's use of the due diligence provider during a conflict minerals campaign. Compliance with all obligations under this Policy remains the individual responsibility of each RPM Manufacturing Company.
6. A designated representative from each RPM Manufacturing Company must be assigned to review responses to questionnaires and/or the due diligence provider's relevant Conflict Minerals Smelter Validation Report to determine whether any answers or other due diligence findings indicate: (a) that the supplier misrepresented or is not being truthful when answering any questionnaire questions, or (b) that there is reason to believe that any 3TG Minerals in any RPM Manufacturing Company's products may have originated from the DRC Region or supported armed conflicts in the DRC Region. If either concern exists, the RPM Manufacturing Company must inform RPM's Director of Compliance Audit. The RPM Manufacturing Company is responsible for contacting

and communicating with its supplier to resolve concerns to the satisfaction of RPM's Director of Compliance Audit.

**Note:** *Without more, a supplier's response stating that it does not know the origin of a 3TG Mineral does not, standing alone, constitute a "reason to believe" that the mineral came from the DRC Region or supported armed conflict in that region.*

7. By May 1st of each year, or the first business day thereafter if May 1st falls on a weekend, RPM's Director of Compliance Audit will review any unresolved matters and determine whether there is a reason to believe that a 3TG Mineral contained in any RPM Product originated from the DRC Region or supported its armed conflict.

### **Supplier Requirements and Contractual Commitments**

All suppliers of 3TG Direct Raw Materials must, as a condition of doing business with any RPM Manufacturing Company:

- Cooperate fully and in a timely manner with all RCOI and due diligence questionnaires issued by or on behalf of the Company.
- Provide accurate and truthful information regarding the origin of 3TG Minerals in their products.
- Maintain and, upon request, provide records relating to the sourcing of 3TG Minerals, including smelter and refinery information.
- Flow down equivalent conflict minerals due diligence obligations to their own upstream suppliers.

RPM Manufacturing Companies are encouraged to incorporate conflict minerals representations and cooperation obligations into their supplier agreements. At minimum, purchase orders and supplier onboarding documentation should reference this Policy and require supplier compliance.

### **Inquiries from Company Customers**

Each RPM Manufacturing Company is likely to receive inquiries from customers about the existence of Conflict Minerals in the products it provides. Each RPM Manufacturing Company must establish procedures to access its 3TG Direct Raw Material suppliers' questionnaire

responses in a manner that enables efficient review when responding to such customer inquiries.

All RPM Manufacturing Company representatives tasked with answering customer questions relating to Conflict Minerals must refer to the relevant 3TG Direct Raw Material supplier's conflict minerals responses before providing any answer. No representations regarding the

conflict mineral status of any RPM Product may be made without first consulting such responses.

### Roles and Responsibilities

Role	Responsibilities
<b>Director of Compliance Audit</b>	Policy ownership; coordination across all RPM Manufacturing Companies; oversight of due diligence provider; review of unresolved smelter concerns; escalation to General Counsel and Chief Compliance Officer as needed; annual SEC reporting coordination; policy review and update.
<b>RPM Manufacturing Company Designated Representatives</b>	Annual 3TG Direct Raw Material review and certification; supplier engagement and questionnaire follow-up; review of smelter validation reports; customer inquiry response; attendance at annual training.
<b>RPM's Due Diligence Provider</b>	Engages with RPM Manufacturing Companies to assist with RCOI inquiries and supplier responses.
<b>Procurement / Supply Chain Personnel</b>	Incorporation of conflict minerals obligations into supplier agreements; day-to-day supplier relationship management for 3TG suppliers; communication of non-response escalation to Designated Representatives.
<b>General Counsel / Chief Compliance Officer</b>	Ultimate escalation point for unresolved smelter or supplier concerns; authority to approve supplier relationship terminations; oversight of this Policy.

## **Training**

All designated representatives of RPM Manufacturing Companies who are responsible for conflict minerals compliance activities, including supply chain review, supplier engagement, questionnaire review, and customer inquiry response, must complete conflict minerals training on an annual basis.

Training must cover:

- The requirements of this Policy and applicable law (Dodd-Frank Section 1502 and SEC rules).
- An overview of OECD due diligence guidance and, where applicable, EU Conflict Minerals Regulation obligations.
- Procedures for identifying 3TG Direct Raw Materials and engaging suppliers.
- How to respond accurately to customer inquiries regarding conflict minerals.
- Record retention requirements and use of the compliance management system.

Training completion must be documented and records retained in accordance as outlined in the Record Retention section of this Policy. New personnel assuming relevant responsibilities must complete training ahead of the annual certification process.

## **Record Retention**

All records related to conflict minerals compliance, including annual certifications, supplier questionnaire responses, smelter validation reports, due diligence provider outputs, internal review documentation, customer inquiry records, and training completion records must be retained for a minimum of five (5) years from the date of creation or receipt, consistent with SEC requirements.

Records must be stored in the Company's designated compliance management system or such other secure system as directed by the Director of Compliance Audit, in a manner that supports efficient retrieval for audit, regulatory, or customer inquiry purposes.

## **Policy Review and Updates**

This Policy will be reviewed annually by the Director of Compliance Audit, or more frequently if required by changes in applicable law, regulations, or business circumstances. Any material

updates to this Policy must be approved by the Chief Compliance Officer and communicated to all RPM Manufacturing Companies promptly.

The Director of Compliance Audit will monitor developments in conflict minerals regulation, including changes to SEC rules, OECD guidance updates, and applicable EU regulatory developments, and will update this Policy accordingly.

### **Compliance Technology and Third-Party Providers**

The Company utilizes a designated compliance management system for the collection, storage, and review of conflict minerals data, and a designated third-party conflict minerals due diligence provider for RCOI questionnaire distribution and smelter validation. The identity of these systems and providers is maintained in a separate operational reference document issued by the Director of Compliance Audit.

References in this Policy to “the Company’s designated compliance management system” and “the Company’s designated conflict minerals due diligence provider” shall be interpreted in accordance with that operational reference document, which may be updated from time to time without requiring a formal amendment to this Policy.

### **Reporting**

Each year, the Director of Compliance Audit reviews and updates the SEC SD conflict minerals report, preparing it for review by the RPM General Counsel and Chief Compliance Officer prior to the May 31st filing deadline.