



CODE OF CONDUCT

We Are ACCO Brands





A MESSAGE FROM OUR CEO

DEAR ACCO COLLEAGUES,

At ACCO Brands, we adhere to the highest ethical standards in the conduct of our business. Our Code of Conduct provides a framework for the standards that guide our behavior as employees at ACCO Brands.

The Code applies to all employees, officers and directors, as well as third-party agents of the company. We regularly talk about our expectation for the highest ethical behavior and that our Code of Conduct sets the tone for conducting ourselves honestly and fairly in dealings with employees, customers and suppliers.

It is very important that you understand and behave consistently with our Code of Conduct. That is why we are asking you to read the ACCO Brands Code of Conduct and familiarize yourself with the expectations for how we operate in the marketplace, in the investment community and with one another.

Knowing what to do if you encounter a situation or incident that you feel may be in violation of our Code of Conduct or any other ACCO Brands policy, is very important. If you ever see or suspect something improper, speak up. In most cases, talking to your manager will be the easiest way to resolve questions or concerns before they become more significant. Managers are expected to report potential misconduct and escalate reports raised by team members.

[ACCOethics](#) is a telephone and internet-based reporting system you can use to communicate actual or suspected unethical or illegal behavior.

There is a link to [ACCOethics](#) on the [myACCOBrands](#) internet connection. Any ACCO Brands employee, anywhere in the world, can contact the confidential service at any time from any location by phone or from any intranet connection. And, if you prefer, you can remain anonymous, where allowed by local law. You should also know that retaliation of any kind against anyone reporting suspected violations will not be tolerated.

Other options for reporting behaviors you feel are in violation of our Code of Conduct include contacting a Human Resources representative or reaching out to the Legal or Compliance Departments.

At ACCO Brands, we are proud of our pioneering past and promise for a purposeful future. Over the years we have entered new product categories, developed brands and expanded geographic reach. Even with this evolution, Our Code of Conduct is just as relevant today as it was in the past. Integrity is not just a core value, it is cornerstone of the way we work, driven by a commitment to the highest ethical standards in the way we conduct our business.

Thank you for your commitment to our company and its values.

Sincerely,

Tom Tedford

President, and Chief Executive Officer

OUR MISSION, VALUES AND LEADERSHIP PROMISE

To think, it all began with a paper clip. Now, more than a century later, our company has evolved into one of the world's largest designers, marketers and manufacturers of recognized consumer and end-user demanded brands used in businesses, schools and homes.

This level of accomplishment takes three key elements—a clear mission, unwavering values and a leadership promise that cascades throughout our company. Keep our mission, values and leadership promise close. Use them to shape the decisions you make each day.



OUR MISSION

At ACCO Brands, we make everyday challenges easier for people, so they feel good when they work, learn, and play. We provide those who WORK with more productivity, LEARN with more confidence, and PLAY with more enjoyment.



OUR VALUES

- » acts with **integrity**
- » treats others with **respect**
- » embraces **diversity**
- » encourages **creativity**
- » acts responsibly in our global **community**.



OUR LEADERSHIP PROMISE

As stewards of our talent and resources, we are fully committed to:

- » **leading by example**, holding ourselves to the highest standards of behavior and performance, taking full accountability for our results
- » creating a safe workplace with a **culture of high performance** that rewards achievement, teamwork, honesty and action
- » advancing **the best interests of ACCO Brands** and enabling our employees and our company to grow and succeed.

[Have a Concern?](#)



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ABOUT OUR CODE

Our vision, values and leadership promise protect our great brands and drive our great people. They are the key to our corporate culture and they begin here, with our Code of Conduct ("Code").

Our Code is where you can turn for help with everyday ethical situations and questions. It provides a summary of important laws, regulations and company policies that apply to our team and the work we do.

We each must follow our Code. It applies to everyone, at every level of the company and to every person and entity working on our behalf.

Although our Code is a great resource, it is not our only resource. It can't cover every possible situation we may face on the job, so use good judgment and never hesitate to ask for help from any of the resources in the [Speaking Up](#) section of our Code.

Asking for help is important because the consequences for violating our Code or the law can be severe, including discipline up to and including termination.

Ultimately our goal is to create a winning team that builds great products and brands. When we live our collective values and embrace our individual responsibilities, we inspire everyone around us to be (and build) their very best.

Any waiver of compliance with our Code for executive officers or directors of our company may be made only by the company's Board of Directors or the Corporate Governance and Nominating Committee and must be promptly disclosed to our stockholders.

Any waiver for other company employees or third party agents acting on our behalf must be approved by the company's General Counsel.

THE RESPONSIBILITIES OF OUR EMPLOYEES AND BUSINESS PARTNERS

As employees and representatives of ACCO Brands, we count on each other to:

- » know and follow our Code, our policies and the laws that apply to our jobs
- » use good judgment and handle every interaction and decision with the utmost integrity
- » speak up if we see or suspect misconduct
- » cooperate with any requests for information or investigations into misconduct
- » ask questions if we are ever unsure of what to do.

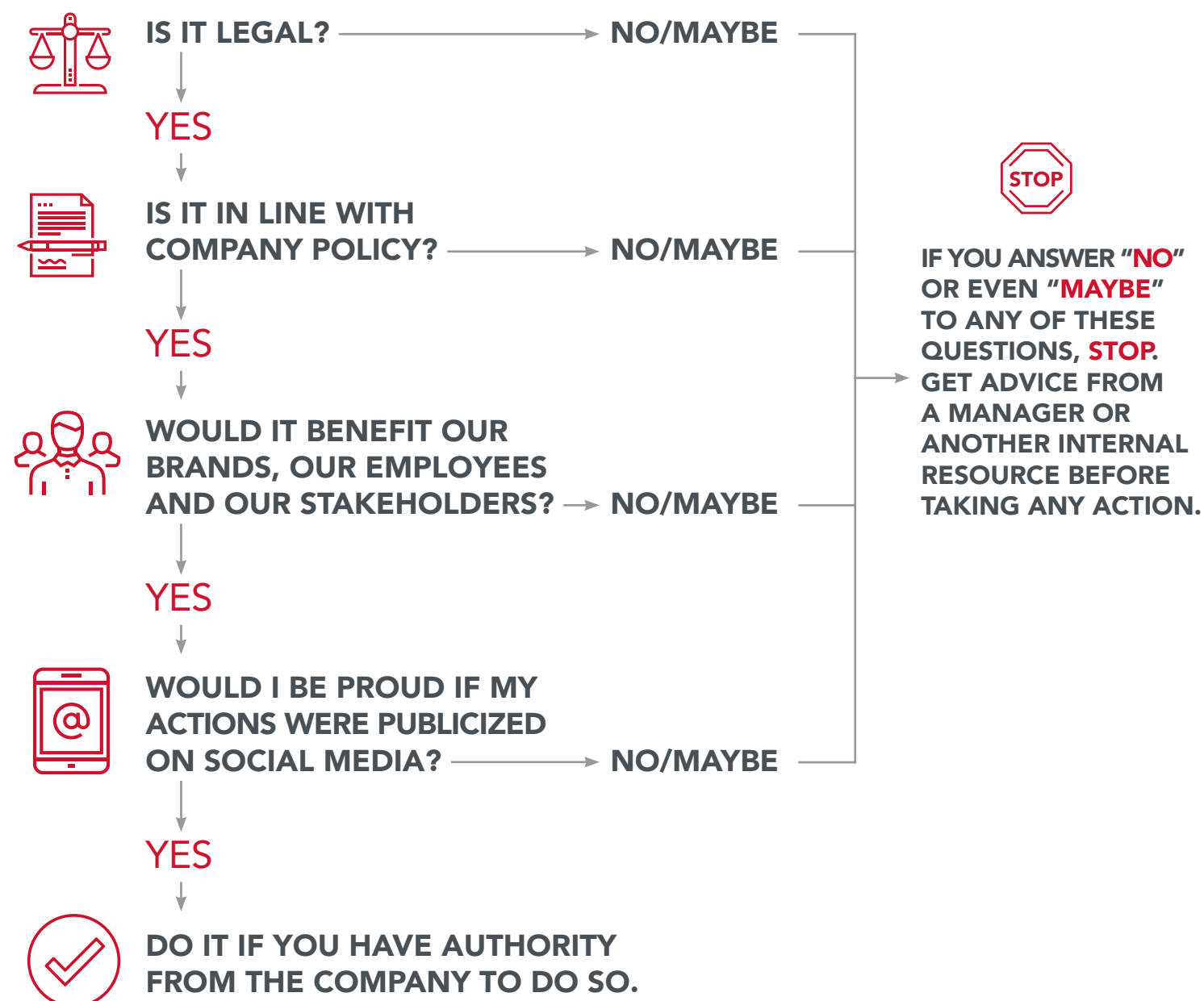
THE RESPONSIBILITIES OF OUR MANAGERS

Managers have additional responsibilities. If you're a manager, set an ethical tone from the top by:

- » behaving appropriately and in ways that support our Code
- » responding to employee questions and making the time to discuss them
- » reporting potential misconduct and escalating reports of misconduct raised by your team
- » taking action to prevent retaliation against anyone who reports a concern in good faith
- » living our leadership promise each and every day.

MAKING ETHICAL DECISIONS

EVEN IF YOU HAVE GOOD INTENTIONS, IT'S NOT ALWAYS CLEAR WHAT THE RIGHT THING TO DO IS. IF YOU EVER FEEL UNSURE ABOUT WHAT TO DO, START BY ASKING YOURSELF THE FOLLOWING QUESTIONS:





SPEAKING UP

Violations of our Code, our policies or the law can hurt our brands and our people. If you ever see or suspect something improper, speak up. Even if you're unsure, speaking up is always the right thing to do.

When to speak up

If you see or suspect a violation of:

- » Our Code
- » Our policies and procedures
- » Any applicable law or regulation

How to speak up

Feel encouraged to contact:

- » Your manager
- » Another manager you trust
- » Your local Human Resources contact or Human Resources Department
- » Our [Legal and Compliance Department](#)
- » [ACCOethics](#)

In most cases, your manager will be the best person to resolve questions or concerns. If you feel uncomfortable addressing your concerns with your manager or if your concerns relate to your manager, you can always use any of the other resources listed above.

REVIEW OUR POLICIES: INTERNAL INVESTIGATION POLICY

Please note that you can also make reports of suspected misconduct to [ACCOethics](#), a telephone and internet-based reporting system. [ACCOethics](#) is designed for reports relating to serious misconduct such as accounting or auditing matters, but it can also be used to report other suspected misconduct. This system can be accessed on a 24-hour basis and offers a way for you to share your concerns anonymously, where permitted by law. Some countries limit the topics that can be reported on [ACCOethics](#); if you do not see the relevant topic listed on ACCOethics, you should raise your concerns using one of the other resources listed above.

Reports of potential misconduct help us meet the high standards we set for one another. We consider all reports and review and investigate as appropriate. Although reports will be kept confidential to the extent possible, the protections of confidentiality do not extend to anyone found to have violated our Code or the law.

How to escalate reports

Once an employee speaks up, we will fairly, independently, and appropriately, investigate the potential misconduct. To do that, it's important that reports be escalated to teams that are trained in conducting investigations. Most reports should be escalated to any one of the resources in this Speaking Up section. However, reports relating to certain serious topics require special handling.

If you receive a report regarding one of the following topics, you must continue to escalate the report until it reaches the [Legal and Compliance Department](#):

- Antitrust/Competition
- Bribery/Kickbacks
- Conflicts of Interest
- Fraud
- Money Laundering
- Theft
- Asset/Revenue Misstatements
- Discrimination
- Harassment
- Retaliation

NON-RETALIATION

We have a culture of speaking up and we want to do everything we can to protect it. That is why we do not tolerate retaliation against anyone who comes forward in good faith with a concern. Retaliation includes mistreatment, demotion or termination in response to a good faith report of potential misconduct.

Retaliation does not include discipline for your own misconduct, even if you report it, or for intentionally making a false report about someone else.

If you suspect or see signs of retaliation, we encourage you to report it immediately.





WE ACT WITH INTEGRITY

We live our values and do the right thing—whether or not anyone is watching us. We honor our great brands and the great people who build them by remaining honest, fair and trustworthy.

IN THIS SECTION:

- » Conflicts of Interest
- » Gifts, Entertainment and Hospitality
- » Accurate Recordkeeping and Financial Reporting
- » Third Party Relationships
- » Competing Fairly
- » Working with the Government
- » Insider Trading

[Have a Concern?](#)



CONFLICTS OF INTEREST

We value loyalty to our company because it promotes our shared success. In the same way that we each have a stake in our company's success, we also have a responsibility to protect it. We advance as a team when we work as a team, so we never allow personal interests or relationships to affect our objectivity in making business decisions on behalf of our company. When that happens, it's a conflict of interest and even the appearance of a conflict can be damaging.

We trust employees and third parties who conduct business on behalf of our company, to make business decisions that are in the best interest of our company. Each of us has a responsibility to avoid situations where a conflict (or apparent conflict) exists between the company's business interests and our own, personal interests. We must never use our position, contacts or knowledge about the company for personal gain.

Identifying Conflicts of Interest

It's impossible to list all of the circumstances that might signal a potential conflict of interest, but there are certain kinds of situations where conflicts often occur. They include:

- » **business opportunities** – when you compete with our company or take advantage of opportunities discovered through a connection with our company (e.g., by using company property, information or your position)
- » **financial interests** – when you invest in or conduct outside work with a business partner, competitor or any other organization that does (or seeks to do) business with our company

- » **gifts and entertainment** – when you exchange excessive gifts or entertainment with people or companies that do (or seek to do) business with our company
- » **improper benefits** – when you or someone close to you receives improper personal benefits, as a result of your position with our company
- » **outside activities or employment** – when you engage in any activity that could interfere with your ability to do your job
- » **personal relationships** – when you supervise or make employment decisions about a friend, family member or someone with whom you have a romantic relationship.

Identifying a conflict of interest is not always obvious. If you find that you need additional guidance, speak with someone in the [Legal and Compliance Department](#) immediately.

IS THAT A CONFLICT OF INTEREST?

Will it interfere with the decisions I make on behalf of the company?

Will it compete against our company's business interests?

Am I using company resources or my position for personal gain?

Could it appear to be a conflict to someone else?

Will it put me in a position of divided loyalty?

If you can answer "yes" or even "maybe" to any of the above questions, then you may be in a situation that could pose a conflict of interest. Salaried/white collar employees must promptly disclose conflicts of interest via the Conflict of Interest Disclosure Form. The Conflict of Interest Disclosure Form is available at anytime on SharePoint (English) and (All Other Languages). Hourly/blue collar employees must promptly disclose conflicts of interest to local Human Resources.

Q&A

Q: The holidays are coming up and I am in need of some extra money. Would it be okay for me to take a second job during this time?

A: You may be able to take a second job, as long as it doesn't interfere with your work here and your second employer is not one of our competitors, customers or suppliers. You should check with the Legal and Compliance Department to ensure there are no conflicts of interest.

WHAT DO I NEED TO DO?



- Recognize the kinds of situations where a conflict of interest would typically arise.
- Remember that it's not possible to list every situation that could pose a conflict of interest, so if you're unsure about a situation, ask.
- Disclose any actual, potential or perceived conflict of interest immediately.



REVIEW OUR POLICIES:
CONFLICT OF INTEREST POLICY

[Have a Concern?](#)



GIFTS, ENTERTAINMENT AND HOSPITALITY

We win business based on the merits of our products and services and we make decisions regarding suppliers and partners the same way. We understand that exchanging gifts, entertainment and hospitality can foster business relationships, but it can also create an actual or perceived conflict of interest. Excessive gifts, entertainment and hospitality can also be seen as a form of bribery or corruption. To prevent this, we have to use good judgment and ensure that anything we give or receive is reasonable under the circumstances.

We never want our objectivity to be compromised and we do not want to give the appearance that we are acting improperly. We have policies in place to help us each determine what is appropriate and what is not.

Identifying Inappropriate Gifts

You should only offer or accept something of value when doing so would be considered legal, ethical and reasonable. Never exchange any gift or offer of entertainment or hospitality that:

- » creates an obligation in return
- » is given to win favors
- » comes in the form of cash or a cash equivalent, such as a gift card
- » is excessive under the circumstances

It can sometimes be difficult to determine whether gifts, entertainment or hospitality are reasonable. If you are not fully confident that they're reasonable, you should contact your manager or the [Legal and Compliance Department](#) for guidance.



Reasonable gifts generally include:

- » Promotional items with ACCO Brands' logo or name
- » Chocolates
- » Flowers
- » Gifts of nominal value



Q&A

Q: One of our suppliers just sent me a thoughtful holiday gift basket of chocolates. What should I do?

A: If the basket appears modest in value, you may accept it or share it with your team. Remember that you should be confident anything you give or receive is reasonable in value. If you are not confident, you should raise it with your manager or the [Legal and Compliance Department](#). If the basket is not reasonable under the circumstances, you may have to inform the supplier of our policies and make arrangements to return it. In any case, you should always let your manager know about the gift.

Q: One of our business partners just sent me two tickets for my spouse and me to attend a local hockey game with her and her husband. The tickets appear to be inexpensive. May I accept?

A: Yes. Because your business partner is also attending the game and the tickets are inexpensive, you may accept the tickets. Note that if your business partner is not going to attend the game, you should check with the [Legal and Compliance Department](#) before accepting the tickets.

WHAT DO I NEED TO DO?

- Be extremely careful when dealing with anyone who could be affiliated with the government. Special rules apply when working with these individuals, and you must obtain pre-approval from the [Legal and Compliance Department](#) for any gifts, meals, entertainment, or anything else of value.
- Ensure all gifts, entertainment and hospitality are reasonable under the circumstances. If you are unsure, you should always seek guidance from your manager or the [Legal and Compliance Department](#).
- Never offer or accept anything that would embarrass our company or harm our reputation.
- Refuse anything that doesn't comply with the law, our Code or our policies.
- Never solicit gifts or favors and never accept anything that could be viewed as inherently compromising (e.g., cash, gift cards, loans, excessive entertainment or purely leisure travel).
- Accurately record any expenses for gifts, entertainment or hospitality. This includes providing details on the recipients, attendees, business purpose and value of items in your expense reports.



REVIEW OUR POLICIES:

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

GLOBAL TRAVEL AND EMPLOYEE EXPENSE POLICY

RECORD RETENTION POLICY

[Have a Concern?](#)



GIFTS, ENTERTAINMENT AND HOSPITALITY_{CONTINUED}

Making Ethical Decisions

If you are unsure whether giving or accepting a gift or offer of entertainment or hospitality would be appropriate, ask yourself:



Is the recipient a government official?

Yes, STOP and seek guidance.

No. _____



Is the gift, entertainment or hospitality excessive under the circumstances?

Yes, STOP and seek guidance.

No. _____



Is it given frequently?

Yes, STOP and seek guidance.

No. _____



Is there any reason, other than a legitimate business reason, for it?

Yes, STOP and seek guidance.

No. _____



Is it in the form of cash or a cash equivalent (e.g., gift card, credit card)?

Yes, STOP and seek guidance.

No. _____



Does the giver expect something in return, such as a favor?

Yes, STOP and seek guidance.

No. _____



Does it violate the recipient's rules, customs and policies?

Yes, STOP and seek guidance.

No. _____



Will it be inaccurately recorded in our books and records?

Yes, STOP and seek guidance.

No, OKAY to give or accept.



ACCURATE RECORDKEEPING AND FINANCIAL REPORTING

We make sure that our books and business records accurately reflect the financial state of our business. By doing so, we enhance our reputation and build our credibility with stockholders, customers and business partners. We each have a responsibility to record transactions honestly and to handle our business records with care.

We fulfill that responsibility by complying with our recordkeeping and records management policies, as well as our internal accounting and financial controls. In every transaction, whether we are filing an expense report, preparing a financial statement, approving a safety inspection or simply recording our time, we do so honestly, accurately and completely.



DID YOU KNOW?

There are various accounting principles, standards and procedures we must follow when we compile our financial statements, including the U.S. Generally Accepted Accounting Principles (GAAP) and the International Financial Reporting Standards (IFRS). Be sure to follow our accounting policies to comply with these principles and standards.

Identifying Business Records

Business records include any document or data with information related to a business dealing.

Examples include:

- » Accounting reports
- » Client reports
- » Contracts, bids and proposals
- » Emails and other correspondence
- » Expense reports
- » Meeting minutes
- » Performance evaluations
- » Regulatory filings
- » Timesheets and invoices
- » Account reconciliation
- » Inventory reporting
- » Documents supporting revenue recognition
- » Vendor invoices

TAKE NOTE:

ACCO Brands Finance personnel play a critical role in ensuring that we appropriately record and report information. Because of this, they are also required to comply with our Finance Code of Conduct, which explains the additional responsibilities of Finance personnel beyond those of all employees under our Code.

Q&A

Q: I am responsible for approving expenses from numerous employees who report to me. Do I need to review each expense or can I trust that the expenses are legitimate and accurate?

A: You should review each expense to determine whether it is legitimate, accurately recorded and appropriately supported. If an expense appears unusual in any way, seek clarification from the employee. Signing off on expense reports without reviewing them could be considered a form of falsifying records.

WHAT DO I NEED TO DO?

- Follow applicable laws and internal processes and policies when creating, maintaining, retaining or destroying documents.
- Never falsify or mischaracterize any record, account, book or transaction.
- Do not establish any undisclosed, unrecorded or off-the-record accounts for any purpose.
- If you ever have to respond to a government inspection or investigation, make sure the information you provide is complete, accurate, timely, and understandable.
- Avoid using applications like Snapchat, Telegram, Wickr and Hash for business purposes. These applications do not appropriately maintain business records and communications.



REVIEW OUR POLICIES:

ALL FINANCE & ACCOUNTING
POLICIES WITH DESCRIPTIONS

GLOBAL TRAVEL AND
EMPLOYEE EXPENSE POLICY

RECORD RETENTION POLICY

FINANCE CODE OF CONDUCT

[Have a Concern?](#)



THIRD PARTY RELATIONSHIPS

We understand that the third parties with whom we do business are often seen as a reflection of our company. Under certain circumstances, we can even be held liable for acts committed by third parties working on our behalf. That's why we exercise caution and perform proper due diligence when selecting third parties, only working with those who meet our high standards.

In contracting with third parties, we maintain transparency by making sure that all terms are in writing and that they clearly and accurately describe the agreement. Additionally, we monitor our third party business partners to identify and investigate any red flags for potential misconduct.

Identifying Third Parties

Third parties include any entities or individuals outside of our company, such as those who provide us with services, represent us, act on our behalf or do business with us.

Examples include:

- » Agents
- » Consultants
- » Contractors
- » Customs Agents
- » Distributors
- » Representatives

Identifying Red Flags

When doing business with a third party, we must be vigilant for red flags that could indicate potential misconduct.

Examples of red flags include instances when the third party:

- » receives an unusually large payment or commission, especially in round amounts
- » requests a commission before providing services
- » demands payment in cash
- » asks that payment be made to a different company or in a different country
- » refuses to provide details on expenses for reimbursement
- » claims a special relationship with a customer or government official
- » was recommended by the government
- » proposes providing gifts, entertainment or travel to others on our behalf
- » lacks the qualifications to provide the services for which it is hired
- » has a reputation for paying bribes.

TAKE NOTE:

Set expectations. Make sure any third party working with us or on our behalf knows and understands its responsibility to conduct business honestly and ethically. Communicate the importance of never giving or accepting anything of value if it could interfere—or even appear to interfere—with objective decision-making.

Due diligence. Before hiring a new third party that may interact with the government or customers on our behalf, [submit a third party due diligence request](#). This allows us to identify and address any red flags with potential business partners before we do business with them.

Monitoring activities. After selecting a third party, monitor their activities closely to ensure that they continue to meet contractual obligations and represent us with integrity. Hold them accountable and, if you identify a red flag, report it to any of the resources in the [Speaking Up](#) section.

Q&A

Q: I was reviewing an expense report submitted by a team member and noticed a large payment made to a consultant. We would normally pay half as much for the services rendered. What should I do?

A: Any payment to a third party that seems excessive should be questioned. Look for supporting documentation and talk to the person who prepared the report to gather additional information. If the payment still seems unreasonable, then you should report your findings through any of the resources in the [Speaking Up](#) section of our Code.

WHAT DO I NEED TO DO?

- Ensure third parties understand our values and expectations.
- Request due diligence on any new third party that could interact with the government or customers on our behalf.
- In contracting with representatives, consultants or distributors, make sure the following are included in your agreements:
 - the services to be performed
 - the basis for earning the commission or fee involved
 - the applicable rate or fee
 - compliance with legal obligations.
- Request and review documents, such as receipts, to support any reimbursements to third parties.
- Watch out for red flags that could indicate misconduct by a third party.



REVIEW OUR POLICIES:
SUPPLIER CODE OF CONDUCT
ANTI-BRIBERY AND
ANTI-CORRUPTION POLICY
GLOBAL CONTRACTS
POLICY AND GUIDELINES
THIRD PARTY DUE
DILIGENCE PROCEDURES

[Have a Concern?](#)



COMPETING FAIRLY

We are committed to compliance with laws that promote full and fair competition. We know that a free and open market leads to innovation, improved customer service and better insight into industry trends and advancements. That's why we win business based on the quality and merit of our products and services, not unfair business practices.

We are careful in all situations where there is a potential for violation of fair competition laws. We avoid collaboration—or anything that could give the appearance of an improper agreement—with competitors. In seeking competitive information, we use legitimate sources and never attempt to acquire such information unfairly or illegally. Ultimately, we recognize our duty to compete vigorously, but fairly and legally.

Identifying Unfair Competition Practices

Competition law varies by country. Conduct that is allowable in some countries may be illegal in others. Before you engage in any of the activities listed below, contact the [Legal and Compliance Department](#) to ensure compliance with relevant laws:

- » agreeing with customers, suppliers or competitors to fix prices or other material terms of resale
- » restricting production, sales or output
- » using dominance to coerce customers into buying unwanted products as a condition of purchasing other products
- » dividing markets, customers or territories
- » preventing other competitors from entering the market
- » refusing to deal with a particular customer or supplier in coordination with competitors.



DID YOU KNOW?

Competition law is also known as antitrust law, anti-monopoly law or trade practices law in different countries.

Receipt of Competitors' Information

In seeking competitor information, you should use legitimate sources and never attempt to acquire such information unfairly or illegally. If you receive an email or other document containing a competitor's confidential information by accident, you should immediately contact the in-house ACCO Brands Legal Counsel who supports your region or another member of the [Legal and Compliance Department](#) for guidance. You may share the email with in-house ACCO Brands Legal Counsel but should not circulate it further.

Q&A

Q: I am at an industry conference and a couple of our competitors approached me to meet with them for dinner later. They said that we should all discuss “territory strategy” so that we can get through a current slump in sales. How should I respond?

A: You should decline the invitation. We never discuss territory division with competitors because it would violate our policies and likely the law. Share with the competitors your objection to the discussion then report their request through any of the resources in the [Speaking Up](#) section of our Code.

WHAT DO I NEED TO DO?



- Speak with the [Legal and Compliance Department](#) before engaging in any of the activities listed in this section.
- Do not discuss pricing, production, marketing, inventories, product development, sales territories, goals or other proprietary or confidential information with a competitor.
- Never engage in illegal or improper acts to get access to a competitor's trade secrets, customer lists, financial data or similar information.
- Avoid even the appearance of engaging in unfair competition practices. If a competitor starts an inappropriate conversation, end it, remove yourself from the situation immediately and report the incident through any of the resources in the [Speaking Up](#) section.



REVIEW OUR POLICIES:
FAIR COMPETITION POLICY

[Have a Concern?](#)



WORKING WITH THE GOVERNMENT

We frequently work with various government agencies and representatives around the world. We're committed to building honest and transparent relationships with the government wherever we operate and to adhering to the highest ethical standards.

Because the laws and contractual obligations that apply when working with the government are often stricter than those that apply when working with private companies, we conduct due diligence to promote compliance with all applicable laws.

TAKE NOTE:

Gifts and entertainment. Do not offer or give anything of value to someone associated with the government unless it is in compliance with applicable laws and our Code. Before giving anything to someone associated with government, you must obtain approval from the [Legal and Compliance Department](#). The term "government" is broad and includes: governmental entities, state-owned entities, public international organizations, employees of those entities, government officials, and relatives of governmental officials.

Due diligence. Before hiring a new third party that may interact with the government on our behalf, ensure that the third party is screened through our due diligence procedures. If you are hiring a company affiliated with the government, you should also notify the [Legal and Compliance Department](#).

Government investigations. We must respond promptly to any requests made as part of a government investigation. Immediately forward any government requests to the [Legal and Compliance Department](#) in order to ensure full cooperation. Always provide complete and accurate information and know that we prohibit retaliation for reporting misconduct or safety concerns in good faith.

WHAT DO I NEED TO DO?

- Know and follow the rules that apply to your work and the country in which you work. Pay extra attention to any unique legal requirements and restrictions.
- Consult the [Legal and Compliance Department](#) before providing any gifts, entertainment or hospitality to a government official.
- [Submit due diligence requests](#) for new third parties interacting with the government on our behalf.
- Notify the [Legal and Compliance Department](#) of any governmental investigation or request for information immediately.
- Provide complete, timely and accurate information to the government.



Q&A

Q: I'm hosting an event where government officials will be in attendance and I want to provide lunch to everyone at the event. I don't want to violate our policies. What should I do?

A: You should seek guidance from the [Legal and Compliance Department](#). The rules that apply to giving business courtesies—such as meals—to government officials can be complex. If you're unsure of what to do in a given situation, you should always ask for guidance before proceeding.



REVIEW OUR POLICIES:

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY
THIRD PARTY DUE DILIGENCE PROCEDURES
GLOBAL TRAVEL AND EMPLOYEE EXPENSE POLICY
RECORD RETENTION POLICY

[Have a Concern?](#)



INSIDER TRADING

We believe in fostering trust in the marketplace and ensuring equal access to information, giving everyone a fair chance to invest in our company. As part of our jobs, we often work with—or are exposed to—inside information, which is information that has not been released to the public. That information could allow someone to buy, sell or hold our securities—often our stock—unfairly for their own gain. To prevent that, we don't trade on inside information and we don't tip off others so they can trade on it.

By avoiding improper insider trading, we promote efficient securities markets and maximize shareholder value. We also ensure compliance with all applicable insider trading laws and regulations. We each must honor these laws and understand the implications of both trading on inside information and sharing inside information with individuals outside the company.

Identifying Improper Insider Trading

It is generally improper to buy or to sell a security based on inside information that is both material, meaning it could affect the price of a security or someone's decision to buy or sell a security and nonpublic, meaning it has not been released to the public yet.

Examples of potential inside information include:

- » actual or potential significant business deals
- » budgets
- » changes in executive leadership
- » financial earnings or losses
- » new products or projects.

Inside information can take many forms, so it is important to exercise caution if you have access to it in the course of doing your job. The consequences for violating insider trading laws can be severe, including fines or imprisonment. If you have questions about what kind of information is inside information and how to avoid insider trading, contact your manager or the [Legal and Compliance Department](#).

Q&A

Q: My department is working secretly to acquire a competitor. In my excitement about the project, I told my sister that she should purchase some of our stock, but I didn't tell her why. Have I done anything wrong?

A: Yes. The information you shared is inside information and if your sister purchases stock before the acquisition becomes public, both of you could be at risk of violating insider trading laws. Immediately report this to the General Counsel.

Q: My coworker just let me know that our acquisition of a competitor has gone public. Is it safe for me to buy more shares of company stock now?

A: Maybe. When trading on material information, you should confirm that the information has gone public. Check a publicly available source, such as an industry website or journal, to make sure your coworker is right and that it is safe to trade. You can always confirm information with the [Legal and Compliance Department](#) before trading.

WHAT DO I NEED TO DO?



- Make sure you read and understand our Insider Trading Compliance Policy.
- Never trade on inside information you receive about our company or any other publicly traded company.
- Never tip off others, like family and friends, about inside information so that they may trade.
- Be aware that insider trading can result in serious criminal penalties, civil penalties and disciplinary action, including termination.



REVIEW OUR POLICIES:

**INSIDER TRADING
COMPLIANCE POLICY**

[Have a Concern?](#)



WE TREAT OTHERS WITH RESPECT

We strive to create an environment where everyone feels safe, valued and connected. We treat others the way we want to be treated and we recognize everyone's right to dignity and respect.

IN THIS SECTION:

- » Harassment and Discrimination
- » Workplace Violence
- » Health and Safety
- » Human Rights
- » Privacy

[Have a Concern?](#)



HARASSMENT AND DISCRIMINATION

We appreciate the contributions of every member of our team and believe that everyone deserves to be treated with dignity and respect. When we each feel valued in the workplace, we are all motivated to do and be our very best.

We use care in our interactions and avoid behavior that is threatening, bullying or abusive. We work to create a positive environment where employees are able to do their jobs without fear of harassment or discrimination and we each are responsible for knowing what harassment means so that we can report it whenever we see it. Harassment is offensive conduct that interferes with an employee's ability to do his or her work. Harassment can involve sexual conduct or references to personal characteristics and examples include:

VERBAL

- » Demeaning or derogatory jokes
- » Racial slurs
- » Threats
- » Name-calling
- » Crude remarks

PHYSICAL

- » Pushing or shoving
- » Brushing against another's body
- » Unwanted sexual advances

VISUAL

- » Offensive cartoons
- » Offensive emails
- » Graphic drawings or pictures
- » Foul or obscene stares or gestures

If you're a manager and you become aware of any of the listed behaviors or anything similarly inappropriate, you must report it immediately. Either notify your local Human Resources representative or use the resources in the [Speaking Up](#) section.

If you are subjected to any harassing behaviors yourself or know someone who is, report it through the resources in the [Speaking Up](#) section. Please know that we never tolerate retaliation against employees who report this kind of behavior in good faith.

Note that you are not prohibited from speaking with self-regulatory organizations or governmental regulatory authorities when addressing possible cases of harassment either in addition to or in lieu of reporting internally.

Q&A

Q: One of my colleagues keeps telling sexist jokes. No one else seems to mind and I don't want everyone to think I don't have a sense of humor. What should I do?

A: If you feel comfortable raising the issue with your colleague, you should let him know that you find the jokes offensive. If you do not feel comfortable discussing it with him or if he continues making the jokes, you should report the situation to your manager or another resource in the [Speaking Up](#) section of our Code.

WHAT DO I NEED TO DO?



- Treat everyone with respect and dignity and show appreciation for the contributions of all of our team members.
- Respect the personal beliefs, cultures and values of every individual. Listen and be respectful to different backgrounds and points of view.
- Never treat someone differently based on that person's race, color, ethnicity, national origin, religion, sex, sexual orientation, gender expression, age, physical or mental ability, veteran status, military obligation, marital status or any other category protected by law.
- Never access, store or transmit anything that's intimidating, obscene or discriminatory.
- Work to maintain a workplace free of all forms of harassment, bullying and abusive conduct.



REVIEW OUR POLICIES:

CONTACT YOUR LOCAL HUMAN RESOURCES DEPARTMENT FOR MORE INFORMATION

[Have a Concern?](#)



WORKPLACE VIOLENCE

We are committed to promoting a culture of safety and to keeping everyone in our facilities secure. This means we have zero-tolerance for workplace violence. Our policy applies not only to employees, but to anyone within our facilities.

It's important that we report any threatening or intimidating behavior, so that we can concentrate fully on our jobs without fear for our personal safety or the safety of our family, friends or property.

Identifying Workplace Violence

Watch out for and report any threatening or intimidating behavior, including:

- » threats or acts of physical harm
- » the intentional destruction of company property or a coworker's property
- » harassing or threatening notes, phone calls, texts, emails or social media posts
- » stalking.

TAKE NOTE:

Secure workplace. Prevent unauthorized access into our facilities. Direct visitors to the main entrance and escort them to the proper destination. Notify your manager immediately if you become aware of a safety or security risk.

Weapons. Subject to applicable law, you are prohibited from possessing, transferring, selling or using weapons—including keeping or transporting weapons in a vehicle in the parking area—while on company premises, while conducting company business or while attending or participating in company events, regardless of any permit held. Contact your local Human Resources representative if you have questions as to what constitutes a prohibited weapon.



Q&A

- Q:** A coworker often throws small objects whenever he gets frustrated at work. He hasn't damaged any property by doing so. Should I say something?
- A:** Yes. Even though he hasn't damaged any property yet, his behavior is destructive and could create an unsafe work space. You should contact your manager or your local Human Resources Department.

WHAT DO I NEED TO DO?

- Know and follow all policies regarding workplace violence.
- Watch out for and report any threatening or intimidating behavior.



REVIEW OUR POLICIES:

CONTACT YOUR LOCAL HUMAN RESOURCES DEPARTMENT FOR MORE INFORMATION



HEALTH AND SAFETY

We know that a workplace injury or illness can be detrimental to the life of a coworker, customer or visitor. We put health and safety first so that we can all return home to our loved ones, unharmed and keep others in our workplace and community safe, as well.

We consider health and safety to be a team effort, not the job of just one person or one department. We work together, use common sense, follow laws, comply with health and safety standards and speak up about unsafe conditions.

Identifying Health and Safety Risks

We each have a responsibility to speak up if we see or suspect a health or safety risk. Look out for:

- » someone who isn't wearing personal protective equipment, when it's required
- » someone skipping any part of a required safety training
- » someone taking a shortcut or ignoring a safety requirement
- » someone undertaking work he or she is not trained to do
- » suspected hazards or unsafe working conditions
- » personal injuries (or near misses), broken equipment or property damage
- » suspected substance abuse or violent acts or threats
- » accidents, environmental contamination or suspected risks of contamination
- » anything that could adversely affect the safety of our products.

This is not an exhaustive list, so be alert, use good judgment and speak with your manager about any unsafe condition.

TAKE NOTE:

Drugs and alcohol. Working under the influence of illegal drugs and alcohol can pose a safety hazard and affect your reliability and judgment, which is why we do not tolerate anyone working under the influence of these substances.

Health conditions. If you have a health condition that could affect your ability to safely perform your job, it may be best to speak with a manager or the Human Resources Department. Your safety is our top priority and we want to make sure that you are placed on projects and in areas that will not jeopardize your health and safety or the health and safety of those around you.



Q&A

- Q:** My coworker asked me to implement a process that will save time, but could pose a workplace safety risk. What should I do?
- A:** Don't do it. We never compromise the safety of our colleagues or anyone else in an effort to save time or money. Explain to your coworker your decision, then report the issue to your manager or through the other resources in the [Speaking Up](#) section of our Code.

WHAT DO I NEED TO DO?

- Know and comply with policies designed to promote health, safety and security.
- Complete all training requirements and only undertake work you are trained to do.
- Speak up about any personal injuries, property damage or violent acts or threats.
- Report accidents, hazards, injuries, illness, property damage and any suspected contamination.
- Protect your colleagues and promote a culture of safety whenever possible.



REVIEW OUR POLICIES:

CONTACT YOUR LOCAL HUMAN RESOURCES DEPARTMENT FOR MORE INFORMATION

[Have a Concern?](#)



HUMAN RIGHTS

We believe in having a positive impact on people and our world, so we set high standards for ourselves and our business partners. We expect our employees and business partners to demonstrate the utmost respect for human rights and to comply with all applicable policies, laws and regulations, including those relating to working conditions and safety.

Identifying Human Rights Abuses

We never knowingly do business with any individual or company that violates applicable employment laws or participates in human rights abuses, including:

- » forced labor
- » human trafficking or slavery
- » physical punishment
- » unequal treatment
- » unfair wages
- » unlawful child labor
- » unlawful discrimination
- » unsafe working conditions.

If you suspect an employee, business partner or other third party of engaging in any activity that goes against our values, policies or the law, report it using one of the resources in the [Speaking Up](#) section.

Conflict Minerals

Conflict minerals are certain types of minerals mined in countries that have been linked to the financing of wars and human rights violations. We are committed to being a responsible corporate citizen and are opposed to human rights abuses. We follow laws that require disclosure of conflict mineral use and we encourage everyone with which we do business to adopt similar standards.

Q&A

Q: I heard that a third party we are considering partnering with has a reputation for engaging in questionable labor practices, but I'm not involved in the selection process. Should I say anything?

A: Yes. Whenever you learn about an activity that goes against our policies or our values or could reflect negatively on our company, speak up. Let your colleagues who are involved in the decision know what you learned.

WHAT DO I NEED TO DO?



- Protect human rights. Stand up against all forms of slavery, including involuntary or forced labor, unlawful child labor, human trafficking and the funding of armed groups engaged in human rights abuses.
- Do not tolerate any act of recruiting, harboring or transporting someone for unlawful purposes within our company or its supply chain.
- Monitor our relationships with third parties closely to ensure they comply with the laws, our policies and our commitment to treating everyone with dignity and respect.
- Never be complicit in human rights abuses. Speak up if you see or suspect abuse.



REVIEW OUR POLICIES:
SUPPLIER CODE OF CONDUCT
GLOBAL CONFLICT MINERALS POLICY



PRIVACY

We respect individuals' privacy. Privacy refers to the way that companies, governments, and other organizations handle personal information. When people give us their personal information, they should feel confident that it will be protected and used appropriately. Doing so is not just the right and legal thing to do, but it also helps protect ACCO Brands' consumer-focused privacy reputation.

While privacy laws vary around the world, the fundamental principles are generally the same. We should only use personal information in the ways we've told people we'll use their information. We should only use personal information for legitimate, specific purposes. We should limit the information we collect to what is needed and should delete it once it is no longer needed. When we store personal information, we should make sure that it is kept secure. Finally, we should respect individuals' privacy rights.

Identifying Personal Information

Personal information is any information about an identifiable individual. Personal information is extremely broad and includes, but is not limited to:

- » Name
- » Email address
- » Purchasing habits
- » Work history
- » Personality traits

However personal information generally does not apply to information about companies or other legal entities.

Identifying Sensitive Personal Information

Sensitive personal information is a subset of personal information that requires extra attention and protection. Most laws have special requirements for the following types of personal information:

- » Race or ethnic origin
- » Political opinions
- » Religious beliefs
- » Trade union membership
- » Health and biometric information
- » Sex-life information
- » Criminal history information
- » Financial information

If you are ever collecting or handling sensitive personal information, you should contact DataPrivacy@acco.com for guidance.

Individuals' Privacy Rights

Under many privacy laws, individuals have rights over their personal information—including the right to access the information a company holds about them, to obtain a copy of that information, to object to that information being used, or to have that information deleted. While these rights are limited in some cases, it's important we properly respond to any privacy requests in a timely manner to comply with the law and to protect individuals' privacy.

If you receive any of the above privacy requests, follow the relevant procedures for your region. If you don't know how to handle a request, you can contact DataPrivacy@acco.com for support.

Privacy by Design

An important part of privacy is ensuring we incorporate "privacy by design" into how we do business and consider the privacy impact of any new or changed processes. To do this, ask yourself the following questions. If you answer "Yes" to any of the questions, you should contact DataPrivacy@acco.com to get guidance on any potential privacy impacts.

- » Will I be collecting or using any new types of personal information?
- » Will I be changing the way I handle existing personal information?
- » Will I be transferring the personal information to another country?
- » Will I be transferring or sharing the personal information with a third party?
- » Will I be changing the system that stores the personal information?



DID YOU KNOW?

Personal information is also known as personal identifiable information (PII). However, you should know that personal information is generally broader than PII and includes all information about an individual—not just information that could be used to identify the individual.

WHAT DO I NEED TO DO?



- Only use personal information in ways that are consistent with our Code and policies.
- Reach out to DataPrivacy@acco.com with any privacy questions or concerns.
- Ask yourself the "Privacy by Design" questions when implementing a new or changed process.
- Immediately report any suspected data breach to [Cybersecurity](#).



REVIEW OUR POLICIES:

**DATA PROTECTION AND
PRIVACY POLICY**
GDPR POLICY
LGPD POLICY

[Have a Concern?](#)



WE INSPIRE CREATIVITY

We foster a culture of creativity where employees feel that their ideas are valued, their minds are engaged and their thoughts are respected. We work together to look at situations from multiple angles, come up with new ideas and protect what we've created.

IN THIS SECTION:

- » Confidential Company Information
- » Cybersecurity
- » Use of Company Assets
- » Intellectual Property

[Have a Concern?](#)



CONFIDENTIAL COMPANY INFORMATION

We understand the value of confidential company information and our responsibility to protect it. Maintaining confidentiality prevents the misuse of information and it helps us protect our brand and preserve trust, confidence and loyalty.

We store confidential information properly and we keep it secure whether the information belongs to us or to third parties with which we do business, such as customers and suppliers. We never share confidential information with anyone who doesn't need it in order to do his or her job.

If you come across confidential information belonging to our company or a third party, do not share it without the proper authorization.

Keep in mind that our confidentiality policies do not prohibit you from communicating or cooperating with any self-regulatory organization or state or federal regulatory authority with or without internal approval.

Identifying Confidential Information

Confidential information is information that is not known to the public that might be of use to competitors or harmful to our company or our customers if disclosed. It can include:

- » financial information, such as costs and profit margins
- » human Resources information, such as employment data and wage and salary data
- » manufacturing information, such as methods and standard operating procedures
- » sales / marketing information, such as customer information and contract terms
- » strategic information, such as planned acquisitions and divestitures
- » supplier information, such as supplier lists and quality data
- » technical information, such as blueprints and prototypes.

Q&A

Q: I received an internal email with confidential business information. I know I can't share it with anyone outside of our company who isn't authorized to see it, but can I share it with a coworker?

A: You should only share confidential business information with employees who are authorized to see it and have a need to know the information as part of their job duties.

WHAT DO I NEED TO DO?

- Assume all company information, unless approved for public distribution, is confidential and must be protected.
- Only access the confidential information you need in order to do your job.
- Honor non-disclosure agreements and do not share the confidential information of others with any third party.
- Adequately protect any confidential information belonging to our customers, consumers, suppliers or other business partners.
- Avoid discussing confidential information in public places where others can hear.
- Never email confidential information to your personal email account.
- Immediately report suspected theft or abuse of confidential, proprietary or trade secret information.



REVIEW OUR POLICIES:

**INTELLECTUAL PROPERTY RIGHTS,
CONFIDENTIALITY AND INVENTION
ASSIGNMENT POLICY**

[Have a Concern?](#)



CYBERSECURITY

We rely on the use of data, an essential corporate asset, for many of our day-to-day tasks, so we're careful to keep it secure and protect against cyberattacks. Although vulnerabilities to cyberattacks can come in many forms, one of the most important steps that we can take to keep our data secure is to avoid the biggest threat of all—human error.

We, as users, are the most important safeguard. We have a responsibility to stay alert to the most common malicious threats to our networks and implement best practices designed to stop—or at least limit—them. This will help make sure that our data is accurately maintained, appropriately available, sufficiently recoverable and protected against unauthorized access, use, destruction, disclosure or modification.

TAKE NOTE:

Strong passwords. Keep in mind the following tips to create strong passwords: use passphrases (they are easier to remember and harder to crack); use different passwords for different systems; use a password manager; ensure your email password is particularly strong; enable two-factor authentication when possible; and never use real answers to security questions (e.g., where you were born, your favorite color, etc.).

Identifying Cyberattacks

No matter how strong our systematic defenses are, we each must stay vigilant and use common sense in order to avoid cyberattacks, examples of which include:

- » **phishing** – emails that ask users to click on a link and enter their personal data
- » **malware** – code that could steal data or destroy something on a computer (e.g., Trojans, viruses and worms)
- » **ransomware** – malware that threatens harmful activity (e.g., publishing personal data) unless a ransom is paid
- » **password attacks** – attempts to access our systems by cracking a user's password
- » **denial-of-service (DoS) attacks** — attempts to send so much data or traffic to a network that it no longer functions
- » **man-in-the-middle (MITM) attacks** — attempts to impersonate others in an online information exchange to gain someone's personal information
- » **drive-by downloads** – downloads of malware on a website that infects anyone who visits the site
- » **malvertising** – a way to compromise a computer when you click on an affected ad
- » **rogue software** – malware that masquerades as legitimate and necessary security software that will keep a system safe.



Q&A

- Q:** I know that our IT department recently installed anti-virus protection. Would it be okay if I clicked on a link in an email if I am not 100 percent sure who the sender is?
- A:** No. You have to be wary of email attachments and links. Even with anti-virus protection, devices aren't always safe from online attacks.

WHAT DO I NEED TO DO?

- Remember that ACCO Brands and other legitimate organizations will never ask you for your password. You should not share your password with any website or anyone else.
- Avoid clicking on links or downloading attachments from unknown senders. If you receive a suspected phishing email, report it to Cybersecurity. If you clicked on any of the links or attachments, immediately report it to the Service Desk.
- Use common sense and if an online ad or offer seems too good to be true, then it probably is.
- Know that we do not pay requests for a ransom in the event of a ransomware infection.



REVIEW OUR POLICIES:

CONTACT CYBERSECURITY@ACCO.COM FOR MORE INFORMATION

[Have a Concern?](#)



USE OF COMPANY ASSETS

We believe that using company assets responsibly and in ways that guard against waste and abuse is essential to our success. Protecting company assets—everything that our company owns or uses to conduct business—helps us generate revenue streams, add to our market value and maintain our competitive advantage.

We expect our employees, contractors, temporary workers and other third parties with access to our company's assets to protect them and use them for their intended purpose and in accordance with our policies. We each must do our part to handle all of our property, systems and information with care and take measures to prevent damage, theft, loss, waste and improper use.

Identifying Company Assets

Company assets can include physical property, electronic systems and communications. Examples include:

- » Buildings and furniture
- » Business plans and engineering ideas
- » Data
- » Databases and customer lists
- » Email and internet access
- » Equipment, inventory and office supplies
- » Hardware and software
- » Patents and copyrights
- » Phones and computers
- » Trade secrets and trademarks

TAKE NOTE:

Computer and messaging systems. When using your work computer or messaging systems, always use good judgment. Keep in mind that anything you create, store, download, send or receive using our systems is company property and can be reviewed by us at any time, as permitted by applicable law.

Travel. While traveling, be particularly careful to protect your mobile devices, laptops, flash drives or any other devices that may contain company information. Ensure that all such devices are within your sight or securely stowed at all times and that they are easy to distinguish from the devices of other travelers (e.g., enclosed in a uniquely colored case or marked with a bright non-permanent sticker). You should also always use a VPN when connecting to public Wi-Fi networks, avoid charging smart phones in public ports and be sure to obstruct the view of your device when you are around others (e.g., on a plane or in a coffee shop).



Q&A

Q: One of my coworkers took some staplers, flash drives and other supplies home from a vacant cubicle. When I confronted him about it, he claimed it was fine because the supplies weren't assigned to anybody. What should I do?

A: Let your manager or the Human Resources Department know. Taking office supplies and other acts of theft violate our Code and our policies.

WHAT DO I NEED TO DO?

- Report any physical property or equipment that is damaged, unsafe or in need of repair.
- Do not take, lend, sell, donate or give away anything without authorization. Taking assets belonging to our company or others without authorization is a form of theft. If you are unsure whether it is okay to take something, always ask.
- Keep laptops and mobile devices physically and electronically secure using products such as Kensington® locks.
- Lock your workstation when stepping away.
- Use strong passwords and keep passwords safe.
- Install security software and updates as directed.



REVIEW OUR POLICIES:

CONTACT YOUR LOCAL HUMAN RESOURCES DEPARTMENT FOR MORE INFORMATION

[Have a Concern?](#)



INTELLECTUAL PROPERTY

Our creative works and original thought give our company a competitive advantage that we must all protect. Guarding our intellectual property ensures that we have the resources we need to be successful.

We trust employees to use our intellectual property solely for business purposes and to never disclose confidential intellectual property to a third party without company approval. We also respect others' intellectual property—we take care not to infringe on patents, trademarks and other such rights held by any third party.

Identifying Intellectual Property

Intellectual property is a valuable asset for our company, and in order to protect it, it's important we recognize what could be considered intellectual property. Intellectual property includes:

- » Copyright
- » Confidential know-how
- » Patents
- » Trade dress or design rights
- » Trade names
- » Trade secrets
- » Trademarks

If you're not sure whether something is intellectual property, always feel free to ask IP@acco.com.

Q&A

Q: I just interviewed a prospective employee who used to work for one of our competitors. During the interview, she said that if she's hired she would be happy to share some of the marketing secrets she learned while on the job there. How should I handle this?

A: Just as we respect our company's intellectual property, we also respect the intellectual property of other companies. The applicant's eagerness to disclose what could be protected information is inappropriate. Report this to the [Legal and Compliance Department](#) or the Human Resources Department.

WHAT DO I NEED TO DO?

- Safeguard the intellectual property and protected information of our company and our licensors from theft, fraud, loss and unauthorized use.
- Use care when discussing our research and development with customers or others outside of the company. We risk losing patent rights if you share information about a potential patent while we are still working on it.
- Make sure any authorized use of intellectual property complies with our policies and guidelines. Remember that unauthorized use, misuse or non-company use is a violation of our standards and may violate the law.
- Keep in mind that all intellectual property created during the course of and within the scope of your employment belongs to our company.



REVIEW OUR POLICIES:

**INTELLECTUAL PROPERTY RIGHTS,
CONFIDENTIALITY AND INVENTION
ASSIGNMENT POLICY**

[Have a Concern?](#)



WE EMBRACE DIVERSITY

Just as the diversity of our various brands gives our company an advantage—the diversity of our employees similarly represents a competitive advantage. Diversity allows us to learn more from each other and, together, build a great workplace—one that fosters respect and understanding.

IN THIS SECTION:

- » Diversity and Inclusion
- » Speaking on Behalf of ACCO Brands
- » Social Media
- » Political Activities and Lobbying





DIVERSITY AND INCLUSION

We recognize the benefits that diversity and inclusion provide. We know that the unique talents, experiences and perspectives that each employee brings helps us better serve the increasingly interconnected, globalized world in which we live. We promote diversity in its many forms and are committed to equal opportunity and fair treatment in all aspects of our business. We celebrate our employees' many different points of view. We make business-related decisions based on merit and do not tolerate retaliation against anyone who reports discriminatory behavior in good faith.

Identifying Protected Categories

To remain a diverse and inclusive workforce, we do not discriminate against anyone based on characteristics protected by law, including:

- » Age
- » Citizenship status
- » Color
- » Disability
- » Gender
- » Gender identity
- » Marital status
- » Medical condition
- » National origin
- » Pregnancy
- » Race
- » Religion
- » Sexual orientation
- » Veteran status

Q&A

Q: I am drafting a job advertisement for a position that just opened up. Right now, it says that selected applicants should be "young and energetic," as they will have to "stand for long periods of time and lift 30 to 50 pounds." Should I change any of the language?

A: Yes. The current language indicates a preference based on age, which would likely discourage many older yet qualified applicants from applying. Take out the phrase "young and energetic" so that you encourage applicants of all ages to apply.

WHAT DO I NEED TO DO?

- Listen to and respect different points of view.
- Think about how your words or actions may affect others.
- Never make employment-related decisions, such as hiring, firing, pay, job assignments, promotions or layoffs based on a protected category.
- Report any behavior that you consider unfair or disrespectful.



REVIEW OUR POLICIES:

CONTACT YOUR LOCAL HUMAN RESOURCES DEPARTMENT FOR MORE INFORMATION

SPEAKING ON BEHALF OF ACCO BRANDS

We know that everything we communicate about our company can have an impact on our reputation, coworkers and brands. Although we have many products and operate in numerous markets, we work to send one clear message.

We want to make sure that information about our company is consistent and accurate, which is why only certain people are authorized to speak on our behalf. Unless we are a designated spokesperson, we don't speak on behalf of the company, but instead, forward inquiries to the appropriate company resource.

TAKE NOTE:

Matters of public concern. We comply with laws that protect the rights of employees to speak publicly about matters of public concern and engage in protected concerted activities related to the terms and conditions of employment. Nothing in our Code or our policies is intended or should be construed to interfere with or limit your legal rights.

Q&A

Q: A reporter called to ask for a comment in connection with my work. I know the answer to her question. Can I tell her what she wants to know?

A: No. You should not answer any questions from reporters unless you are authorized to do so or receive approval first. If you have any questions about your response, you should contact the Corporate Communications Team.

WHAT DO I NEED TO DO?

- Refer all media requests for information to the Corporate Communications Team.
- Never share our company's confidential information on social media or any other kind of website.
- If you are invited to participate in a speaking engagement or to publish an article on behalf of our company, seek approval first.
- Be careful about what you publish. If you wouldn't feel comfortable sharing something at work, then don't share it online.



REVIEW OUR POLICIES:

CORPORATE COMMUNICATIONS POLICY

[Have a Concern?](#)



SOCIAL MEDIA

We believe that social media offers a great way to build relationships and exchange ideas and we promote honest and authentic online communications. We respect your right to use social media, but when posting about work-related matters, you must be transparent about your relationship with our company. We rely on you to use good judgment and to be honest and ethical in the way you communicate online.

Use social media in a way that's consistent with our values, policies and the law. Be aware that you are responsible for everything you publish and that we have zero tolerance for cyberbullying and the use of social media to intimidate, harass or discriminate against fellow employees.

TAKE NOTE:

Matters of public concern. We comply with laws that protect the rights of employees to speak publicly about matters of public concern and engage in protected concerted activities related to the terms and conditions of employment. Nothing in our Code or our policies is intended or should be construed to interfere with or limit your legal rights.

WHAT DO I NEED TO DO?

- When posting online about the company, its products or brands, always disclose your relationship to the company and label any posts as personal and purely your own. If you are unsure of how to do this properly, please contact the [Legal and Compliance Department](#) or the Corporate Communications Team.
- Do not share confidential business information over social media. We should not disclose information that is financial, operational or legal in nature or any other information that pertains to our customers or suppliers.
- Know that you are personally responsible for what you publish. Don't use ethnic slurs, personal insults, obscenity or engage in any conduct that would not be acceptable in the ACCO Brands workplace.
- Respect copyright. Do not post content that is not yours. Before posting someone else's work, please check with the owner first.



REVIEW OUR POLICIES:

SOCIAL MEDIA AND INTERNET POSTINGS POLICY

POLITICAL ACTIVITIES AND LOBBYING

We believe that participating in the political process is part of being a good citizen. It helps us become more productive members of society and be actively involved in making our communities better.

Although we respect the rights of our employees to engage in the political process and we appreciate the various political viewpoints that can be found on our team, political participation must remain separate from our work at ACCO Brands and consistent with the law and company policies.

TAKE NOTE:

Donations and gifts. You are permitted to engage in political activities, including the contribution of political donations and gifts, but our company does not reimburse anyone for such expenditures. Use your own resources to further causes, candidates or campaigns that you care about. Also note that we prohibit making any gifts or payments to government officials and politicians with the hope of a business-related favor in return. In other words, we don't bribe—we expect our employees to follow all applicable laws, policies and regulations regarding bribery.

Q&A

Q: I was invited by a local news station to discuss work that I have been doing on a political campaign. The station wants to introduce me by providing my name, occupation and place of work. Is this okay?

A: This might be okay. Reach out to the Corporate Communications Team first to get approval and then, if approved, ensure that your participation complies with our policies. Make it clear that any opinions you express are your own.

WHAT DO I NEED TO DO?

- Never use company resources, e.g., time, money, email, phone systems, personnel or facilities, to engage in political activities unless pre-approved by your manager.
- Do not use the company name in any political activity without prior approval and make it clear that, when voicing your political opinions, you are speaking for yourself.
- Ensure that your participation in political activities is lawful and does not reflect unfavorably on the company.



REVIEW OUR POLICIES:

CONTACT YOUR LOCAL HUMAN RESOURCES DEPARTMENT FOR MORE INFORMATION

[Have a Concern?](#)



WE SUPPORT THE COMMUNITY

Our corporate responsibility extends beyond the walls of our businesses—we behave responsibly when we engage with the communities where we live and work on behalf of the company.

IN THIS SECTION:

- » Anti-Corruption and Anti-Bribery
- » Trade Compliance
- » Money Laundering
- » Product Safety
- » Community Involvement and Corporate Citizenship
- » Protecting the Environment

[Have a Concern?](#)



ANTI-CORRUPTION AND ANTI-BRIBERY

We do business with integrity for the betterment of our entire community: our shareholders, our employees, our business partners, our customers and the places where we do business. We're committed to doing business the right way and never tolerate acts of corruption anywhere in our company. Corruption includes any abuse of power for personal gain, such as paying or accepting bribes. Bribery can undermine local governments, create unfair competition and harm communities. It can also cause damage to our company and its reputation.

We earn the loyalty of our customers based on the merits of our products and people, not because of bribes or kickbacks. As a company that does business around the world, we are subject to many different anti-bribery laws. The consequences for violating these laws can be severe for you and our company. All of us have a responsibility to follow anti-bribery laws everywhere we do business and to never engage in any activity that could even suggest something improper.

Identifying Bribes

Generally, anti-bribery laws prohibit offering, giving, promising or receiving anything of value to get or keep business or improperly influence a business decision. Bribes are not limited to cash—a bribe can be anything of value. Examples include things like:

- » Gifts
- » Entertainment
- » Meals

- » Discounts
- » Favors
- » Jobs or internships
- » Cash or cash equivalents (such as gift cards)
- » Charitable or political contributions

The difference between a bribe and an acceptable business courtesy is not always clear. You should follow our [Gifts, Entertainment and Hospitality](#) guidelines and raise any questions with the [Legal and Compliance Department](#) to avoid even the appearance of a bribe.

TAKE NOTE:

Government. Stricter rules often apply when working with the government. Remember the term "government" is broad and includes: governmental entities, state-owned entities, public international organizations, employees of those entities, government officials, and relatives of governmental officials. It is often difficult to know whether a person or entity is part of the "government," so be cautious when working with anyone who could potentially be connected to the [government](#).

Third parties. We can be held responsible for the actions of third parties doing business on our behalf. That's why we conduct due diligence and select only reputable third parties who share our values. When working with third parties, be sure to set clear expectations and closely monitor their activities to ensure they continue to meet our standards and comply with the law.

Watch out for any of the red flags mentioned in the [Third Party Relationships](#) section of our Code.

Facilitation or "grease" payments. Facilitation or "grease" payments are made to low-level government officials to speed up or "take care of" routine government actions, such as processing permit applications or issuing licenses. Regardless of the amount, these payments are prohibited under our policies and the laws of many countries.

Recordkeeping. Keeping accurate books and records helps us detect and prevent corruption. Always record transactions accurately, in a timely manner and in accordance with our [policies and internal controls](#).



DID YOU KNOW?

Since we are a company that does business around the world, it's important to understand the many different anti-corruption and anti-bribery laws that apply to our business globally, including the U.S. Foreign Corrupt Practices Act (FCPA), the U.K. Bribery Act (UKBA), the Brazilian Clean Companies Act (CCA) and the Canadian Corruption of Foreign Public Officials Act (CFPOA). These laws can apply in every country where we do business, not just the countries where they were enacted. Always follow our policies and procedures, which are designed to promote compliance with all the laws that apply to our business.

Q&A

Q: A distributor held training for several of our customers on our behalf. The training included a sightseeing trip and a large banquet paid for by the distributor. Is that a problem?

A: Yes. Many anti-bribery laws prohibit meals or travel unless they have a legitimate business purpose. These laws prohibit entertainment and excessive meals. If you receive a request to pay for these events, you should refuse to make the payment and report the situation to one of the resources in the [Speaking Up](#) section of our Code.

WHAT DO I NEED TO DO?

- Be cautious when working with government officials.
- Ensure any gifts, entertainment or hospitality are reasonable under the circumstances.
- Challenge questionable behavior.
- Monitor third parties closely for any corruption red flags.
- Contact the [Legal and Compliance Department](#) with any questions.
- Report suspected violations of our Code, our policies or the law.



REVIEW OUR POLICIES:
**ANTI-BRIBERY AND
ANTI-CORRUPTION POLICY**
**THIRD PARTY DUE
DILIGENCE PROCEDURES**

[Have a Concern?](#)



TRADE COMPLIANCE

We export and import products and information to countries around the world, recognizing that our ability to conduct business internationally is a privilege, not a right. In order to maintain this privilege, we must comply with all applicable trade control laws, regulations, boycott laws and trade sanctions in the countries in which we do business. We understand that there are times that the laws of more than one country may apply in cross-border transactions and that we have a responsibility to conduct due diligence or ask for guidance in order to determine the right path to take.

We also have a responsibility to accurately describe, classify and document the value of goods and the country of origin for every import and export and to never conduct any business that will breach trade sanctions. If an economic sanction has been imposed, it may impact our operations so we need to seek guidance before exporting to certain foreign governments or individuals.

TAKE NOTE:

International regulations. The regulations, customs and practices of more than one country may govern a particular transaction. If a conflict arises and you are unsure of how to proceed, make sure to contact the [Legal and Compliance Department](#) with questions.

Boycotts. We do not participate in or promote boycotts that the United States government does not support. If you receive a request to participate in one or if you just receive a question about our position on the matter, you should contact the [Legal and Compliance Department](#) immediately.

Classifying imports and exports. If you conduct business internationally and you need to classify an import or export, make sure that you do so in advance and based on the country of origin, the destination, the end use and the end user.

WHAT DO I NEED TO DO?

- Follow the laws of the countries where you do business.
- Document international transactions completely and accurately.
- Obtain required licenses before exporting or re-exporting our products.
- Verify that transactions do not involve restricted or sanctioned individuals, entities, regions or countries by contacting the [Legal and Compliance Department](#) for guidance.
- Know that in certain countries, economic sanctions, embargoes and laws may differ from those in the United States. Contact the [Legal and Compliance Department](#) for guidance.
- Review the export classifications of any hardware, software, technology or services and ensure any required export licenses or other authorizations are in place before proceeding.



REVIEW OUR POLICIES: TRADE SANCTIONS POLICY

MONEY LAUNDERING

We never want to encourage criminal activity by giving those who make money in illegal, illicit or immoral ways the opportunity to hide its criminal origin. Money laundering is a process criminals, terrorists and others use to move funds gained from illegal activity through legitimate businesses to make the funds appear legitimate. We are committed to conducting business in a way that prevents this practice.

We comply with anti-money laundering, financial crimes and anti-terrorism laws in the countries where we operate. We use good judgment, work to know our customers and pay close attention when working with third parties, especially if a transaction involves cash payments.

Identifying Questionable Transactions

One of the keys to preventing money laundering is to be able to identify questionable transactions. Examples include:

- » attempts to pay in cash
- » requests to ship to a country other than where the payment originated
- » attempts to avoid recordkeeping requirements
- » payments made by individuals or companies who are not parties to the transaction
- » suspicious changes in the pattern of a customer's transactions.

Q&A

Q: A seemingly unrelated third party recently began making payments on behalf of one of our long-time distributors. I do not want to accuse the distributor of wrongdoing, but I'm concerned about the payments. What should I do?

A: Contact the distributor for details. If the responses you receive do not make sense or are unsatisfactory, report it to any of the resources in the [Speaking Up](#) section.

WHAT DO I NEED TO DO?

- Stay alert for potential money laundering and other crimes.
- Understand how customers use our products and services.
- Know who's behind every transaction and only conduct business with reputable companies engaged in legitimate business activities.
- Take action to prevent the use of our activities for criminal purposes by reporting suspicious activity.



REVIEW OUR POLICIES: ANTI-MONEY LAUNDERING POLICY

[Have a Concern?](#)



PRODUCT SAFETY

We manufacture, distribute, import and sell our products with our customers in mind and are dedicated to always making their safety our priority. The importance we place on product safety helps protect those who use our products every day; it's the reason why consumers trust and respect our brands.

We have established product requirements that comply with all applicable standards, rules, laws, regulations and customer requirements. Each of us is responsible for meeting these requirements throughout each product's life cycle. We must also strive to ensure superior performance and reliability and report any unfavorable, unexpected or undesirable result associated with product use.

Q&A

Q: We are working with a supplier that is widely respected. Due to this company's reputation, its representative believes that the company shouldn't be subject to our strict product safety review process and that we should sidestep our normal procedures for the sake of time. How do I respond?

A: We never compromise on safety for the sake of time, convenience or any other reason. Explain our policies and procedures to the representative and insist that they be followed so that we can maintain our high standards. If the representative remains persistent, then you should report it through one of the resources in the [Speaking Up](#) section of our Code.

WHAT DO I NEED TO DO?



- Know and comply with any product safety requirements associated with your work. Stay alert for new regulations and attain all certifications as necessary.
- Ensure that all selected vendors meet or exceed our safety and product testing requirements.
- Whether it is completing a training, monitoring safety inside a factory or just asking the right questions, do whatever possible in your role to promote product safety.
- Identify and look for opportunities to reduce risk during each product's life cycle.



REVIEW OUR POLICIES:

CORPORATE PRODUCT COMPLIANCE POLICY

COMMUNITY INVOLVEMENT AND CORPORATE CITIZENSHIP

We are committed to making an investment in the communities where we live and work. We highly value fundraising and volunteering our time to support various community organizations and causes—locally and globally.

We have donated millions of dollars in assistance and in-kind donations around the world to programs that promote cultural, health, welfare and other causes that our employees are passionate about. We recognize our responsibility to manage not only our corporate performance, but also our social impact.



Q&A

Q: I am an active member of a local charity and would like to gather donations at work. Is that okay?

A: Maybe. You should contact your local Human Resources Department to get permission before gathering donations in the workplace and to ensure compliance with all relevant company policies.

WHAT DO I NEED TO DO?



- If you choose to volunteer in charitable activities outside of work, make sure your participation doesn't conflict with the work you do for us.
- Never use company time or resources for your charitable activities, unless you have permission to do so.



REVIEW OUR POLICIES:

CONTACT YOUR LOCAL HUMAN RESOURCES DEPARTMENT FOR MORE INFORMATION

[Have a Concern?](#)



PROTECTING THE ENVIRONMENT

We work to not only provide a safe workplace for our employees, but to do business in an environmentally responsible manner. As part of our commitment to the environment, we are careful to design products and processes in ways that reduce our carbon footprint while still meeting the needs of our customers.

We have established environmental standards that comply with applicable laws and reduce the environmental impact of our operations. We each have a responsibility to adhere to these standards and select suppliers that do so, as well. It's imperative that we, alongside our suppliers, recognize that environmental responsibility is integral to producing world-class products.

Identifying Ways to Reduce Environmental Impact

We are engaged in several activities that help preserve natural resources, including:

- » Conserving water resources
- » Reducing waste
- » Conserving energy
- » Reducing packaging
- » Sourcing responsibly

Q&A

Q: I recently learned that one of our storage containers has a design flaw that may cause it to leak fluids that can harm the environment. What should I do?

A: You should speak up. Whenever you learn of a practice that could have a negative impact on the environment, contact your manager or use one of the other resources in the [Speaking Up](#) section.

WHAT DO I NEED TO DO?

- Ensure that all waste products, hazardous materials and other similar substances are stored, handled and disposed of in accordance with our policies and applicable laws and regulations.
- Report any instance of unsafe handling of waste products to your manager immediately.
- Be proactive to conserve natural resources and promote sustainability.



REVIEW OUR POLICIES:
CONTACT YOUR LOCAL HUMAN RESOURCES DEPARTMENT FOR MORE INFORMATION

ACCOethics Reference Guide

[ACCOethics](#) is a telephone and internet-based reporting system that is available for you to report suspected misconduct. This system can be accessed on a 24-hour basis and offers a way for you to share your concerns anonymously, where permitted by law. Some countries limit the topics that can be reported on [ACCOethics](#); if you do not see the relevant topic listed on [ACCOethics](#), you should raise your concerns using one of the other resources in the [Speaking Up](#) section.

Access online by visiting [accoethics.com](#) or toll-free by phone:

Australia	1 800 763 983	Japan	0800 170 5621
Austria	* See Below	Malaysia	60 1 800 81 3692
Belgium	0 800 260 39	Mexico	800 681 6945
Brazil	0 800 892 2299	Netherlands	0 800 022 0441
Canada	800 235 6302	New Zealand	0800 002341
Chile	800 914 012	Norway	800 62 492
China	400 120 3062	Poland	00 800 141 0213 or 00 800 005 266
Czech Republic	* See Below	Portugal	800 180 367
Denmark	8082 0058	Romania	* See Below
Finland	0800 07 635	Russia	* See Below
France	0805 080339	Singapore	800 852 3912
Germany	0800 181 2396	Spain	900 905460
Greece	800 999 9025	Sweden	020 889 823
Hong Kong	800 906 069	Switzerland	0800 838 835
Hungary	36 212111440	Taiwan	00801 49 1818
India	000 800 100 4175	Turkey	800 113 0803
Ireland	1800 904 177	United Kingdom	0 808 189 1053
Italy	800 727 406	United States	1 800 461 9330

* Note that there is not an international toll-free number available for this country. You may make a collect call / reverse charge call to 1 720 514 4400 to reach [ACCOethics](#). Operator assistance may be required and local charges may apply.



INDEX

This index will enable you to locate various topics in our Code. If you have questions about a topic not listed here, please contact any of the resources in the [Speaking Up](#) section.

Anti-Corruption and Anti-Bribery

- See also
- Accurate Recordkeeping and Financial Reporting
 - Gifts, Entertainment and Hospitality
 - Third Party Relationships
 - Working with the Government

Anti-Monopoly Law

Antitrust Law

Brazilian Clean Companies Act (CCA)

Canadian Corruption of Foreign Public Officials Act (CFPOA)

Competition Law

Discrimination
See also
Human Rights

Fair Competition

Generally Accepted Accounting Principles (GAAP)

Gifts, Entertainment and Hospitality
See also
Anti-Corruption and Anti-Bribery

Harassment

Human Rights
See also
Harassment and Discrimination

International Financial Reporting Standards (IFRS)

Sanctions

Sexual Harassment

Third Party Relationships
See also
Anti-Corruption and Anti-Bribery

Trade Practices Law

United Kingdom Bribery Act (UKBA)

United States Foreign Corrupt Practices Act (FCPA)

Whistleblower Protections
See also
Speaking Up
Non-Retaliation
Harassment and Discrimination
Confidential Company Information

Working with the Government
See also
Anti-Corruption and Anti-Bribery

POLICY LINKS

Below are the key policies mentioned in the Code.

- Anti-Bribery and Anti-Corruption Policy
- Anti-Money Laundering Policy
- Corporate Communications Policy
- Corporate Product Compliance Policy
- Conflict of Interest Policy
- Fair Competition Policy
- Fraud Reporting Policy
- Global Conflict Minerals Policy
- Global Travel and Employee Expense Policy
- Insider Trading Compliance Policy
- Intellectual Property Rights, Confidentiality and Invention Assignment Policy
- Record Retention Policy
- Social Media and Internet Postings Policy
- Supplier Code of Conduct
- Third Party Due Diligence Procedures
- Trade Sanctions Policy





CLOSING THOUGHTS

Although we are home to some of the most iconic, widely recognized and well-established academic, consumer and business products in the world, we know that our employees are the true key to our success.

We depend on you. We depend on your talent, your enthusiasm and your overall positive attitude. You make us great. Help us stay true to our culture, by promoting ethics, honesty and integrity in all that you do.

Know and follow our Code and always speak up if you feel or believe that something isn't right. By doing so, you will reinforce our values, vision and leadership promise and help us to continue delivering exceptional value to our shareholders, customers and consumers.

Thank you for all that you do to help us fulfill our mission as we make everyday challenges easier for people, so they feel good when they work, learn, and play.

