

Anti-Bribery and Anti-Corruption Policy



Policy Number:	LGL 003 Global	Policy Author:	Michael Kier VP, Associated General Counsel
Department:	Legal and Compliance		
Global Policy:	Yes	Policy Owner:	Corporate Compliance
Effective Date:	2011/06/30		
Revision Date:	2026/01/10		

PURPOSE

The purpose of this Policy is to prevent corruption and bribery in connection with ACCO Brands' business.

APPLICABILITY

- Global – All Employees

KEY POINTS

- ACCO Brands strictly prohibits all forms of bribery and corruption.
- Bribery is not limited to giving money. It can include offering, giving, requesting or accepting anything of value. Anything of value can include gifts, meals, entertainment, travel, jobs, discounts, favors, or donations.
- You must obtain pre-approval from the Legal and Compliance Department (CorporateCompliance@acco.com) before giving any gifts, meals, entertainment, or other things of value to a recipient that is affiliated with the government (such as governmental bodies, companies owned by the government, a government official, or a government official's relative).
- If you are hiring a third party that could interact with the government or customers on ACCO Brands' behalf, you must follow the Third Party Due Diligence Procedures. You must receive approval before using the third party or signing a contract with the third party.
- Remain vigilant for red flags that could indicate a third party is engaged in corruption or bribery.
- If you suspect or know of a violation of this Policy, you must report it to one of the resources in the Questions and Reporting section of this Policy.

CORRUPTION AND BRIBERY

Corruption is dishonest or fraudulent behavior. Bribery, in turn, is a common type of corruption. Bribery is directly or indirectly offering, giving, accepting, or requesting anything of value in order to improperly influence a decision or gain an unfair advantage. Let's look at what each piece of this definition means:

- **Directly or indirectly:** ACCO Brands cannot directly pay a bribe, nor can it indirectly allow a third party to pay a bribe on its behalf.
- **Offering, giving, requesting, or accepting:** Bribery does not require that a bribe be given or accepted—even offering, promising or requesting a bribe constitutes bribery.
- **Anything of value:** This term is extremely broad and includes, but is not limited to:

- money,
- gifts,
- meals,
- entertainment,
- travel,
- discounts,
- favors,
- jobs or internships (even if unpaid), or
- charitable or political donations.

- **To improperly influence a decision or gain an unfair advantage:** This term refers to paying a bribe to gain some benefit that ACCO Brands does not otherwise deserve, such as:
 - winning business,
 - obtaining favorable tax treatment,
 - reducing or lowering customs duties,
 - speeding up customs clearance, or
 - avoiding licensing and permitting requirements or accelerating the issuance of licenses or permits.

FACILITATION PAYMENTS

ACCO Brands does not permit facilitation payments—also known as “grease” or “expediting” payments. Facilitation payments are small payments made to speed up a routine governmental task, such as granting a license or permit. Facilitation payments do not include legally recognized fees available to everyone, such as expedited processing fees for passports. Any request for a facilitation payment must be reported to the Legal and Compliance Department (CorporateCompliance@acco.com) within 24 hours.

GIFTS, MEALS, ENTERTAINMENT, AND OTHER THINGS OF VALUE

Gifts, meals, entertainment, and many other things can all be considered bribes under certain circumstances. Reasonable business gifts, meals, entertainment, and other things of value are acceptable and permitted. However, there are some important rules that you must always follow:

General

- **Government recipients:** You must obtain pre-approval from the Legal and Compliance Department (CorporateCompliance@acco.com) before giving any gifts, meals, entertainment, donations, or anything else of value to a recipient affiliated with the government. This applies to:
 - governmental entities (e.g., branches of the local, state, provincial, or national government, public schools, political parties);
 - state-owned entities (e.g., companies partially or fully owned by or managed by the government);
 - public international organizations (e.g., the United Nations, NATO, European Central Bank, International Monetary Fund, World Bank, World Trade Organization, World Health Organization);
 - employees of any of the entities above (e.g., purchasing manager of a state-owned enterprise);
 - government officials (e.g., a senator, a mayor, etc.); and
 - relatives of governmental officials (e.g., immediate family members, including spouse, parents, children, siblings, in-laws and domestic partners).
- **Improper influence or special treatment:** Never give or receive anything of value to influence a decision or get special treatment (e.g., giving a gift to a purchasing manager when he is considering a proposal from ACCO Brands).
- **Local law limitations:** Comply with local laws, limitations, and customer limitations when giving or receiving a gift, meal, entertainment, or anything of value.

- **Records:** Keep complete and accurate records of expenses and follow the applicable travel and employee expense policies.

Gifts

- **Value of gifts:** Only give or accept modest gifts that are reasonable under the circumstances. As noted above, gifts of any value to recipients affiliated with the government must be pre-approved by the Legal and Compliance Department (CorporateCompliance@acco.com).
- **Type of gifts:** You should never give or accept gifts that would reflect poorly on ACCO Brands. Promotional items with ACCO Brands' name or logo are often the best gifts.
- **Cash and cash equivalents:** Cash or cash equivalents (such as gift cards, pre-paid cards, money transfers, checks, or loans) are never acceptable business gifts.
- **Frequency:** Frequent gifts to or from the same individual, even if inexpensive, are not appropriate.
- **Requests for gifts:** You should never request or demand a gift. If you receive a request or demand for a gift, you should immediately report it to one of the resources in the Questions and Reporting section of this Policy.
- **Transparency:** Gifts must be given openly and under the appropriate circumstances - not secretly or through a third party.
- **Prizes:** Prizes for giveaways and raffles that are randomly chosen are not considered gifts under this Policy and are generally acceptable.

Meals and Entertainment

- **Extravagant Meals and Entertainment:** Only accept or give meals and entertainment that are reasonable under the circumstances.
- **Attendance:** Meals and entertainment are only appropriate when both the recipient and the giver will be attending for a legitimate business purpose. For example, a modest lunch during negotiations or a modest dinner after a business conference are both appropriate.

THIRD PARTIES INTERACTING WITH THE GOVERNMENT OR CUSTOMERS

ACCO Brands can be liable for the actions of third parties if they engage in bribery on behalf of or for the benefit of our company - even if we do not know about it.

When working with third parties that **interact with the government or customers on our behalf**, you must:

1. Follow the Third Party Due Diligence Procedures;
2. Request and maintain documentation on any third party's expenses; and
3. Look out for red flags that could indicate potential corruption or bribery are occurring.

Third Party Due Diligence

If you are hiring a third party that could interact with the government or customers on our behalf or for our benefit, you must follow the Third Party Due Diligence Procedures. **You must receive approval before engaging the third party or**

signing a contract with the third party. If you would like to request an exception or alternative to third party due diligence, please contact CorporateCompliance@acco.com.

Documentation for Expenses

You should maintain adequate documentation for all expenses and reimbursements paid to a third party. You should avoid providing the third party with per diem payments or fixed amounts that a third party can use for gifts, meals, entertainment, or other things of value without providing supporting documentation.

Red Flags

When dealing with third parties, be on the lookout for these red flags that could indicate potential bribery or corruption:

- There are rumors of, or the third party has a reputation for, offering or accepting bribes;
- The third party requests advanced or excessive payment;
- The third party requests that payments be made through another company or person;
- The third party requests that payments be made to a bank in another country;
- The third party requests payment in cash;
- The third party has or claims to have a "special relationship" with a government official or governmental entity;
- A government official insists that ACCO Brands use the third party;
- The service agreement with the third party lacks details about what specific services the third party is providing;
- The third party provides minimal detail on invoices or expense claims;
- The third party has no or little background providing the service for which it is hired; or
- The third party is not properly registered or incorporated to do business.

If you become aware of any of these red flags, immediately report the information to one of the channels in the Questions and Reporting section of this Policy.

ACCURATE RECORD-KEEPING

Ensure that all relevant accurately reflect the relevant business transaction. Never misstate facts, omit information, or modify records or reports in any way to mislead others. Moreover, never assist others in doing so. Keep adequate receipts, support, and documented approvals. When describing these transactions, you should always document:

- **Who** received the payment, gift, meal, entertainment, or other thing of value;
- **What** was given;
- **When** was it given;
- **Where** was it given (i.e., what was the context); and
- **Why** was it given (i.e., what was the legitimate business purpose).

You should also be on the lookout for suspicious records. Bribes are often hidden using names such as "marketing expenses," "consulting fees," "marketing support," "business development expenses," "commissions," or "service fees".

TRAINING

All management and other relevant employees, including all employees with customer-facing or vendor-facing responsibilities, all employees in procurement, sales, or government affairs, and all employees in high-risk jurisdictions, are required to complete training on a regular basis to assist them with understanding and complying with this Policy.

QUESTIONS AND REPORTING

If you have any questions about this Policy, please contact the Legal and Compliance Department at CorporateCompliance@acco.com.

Anti-Bribery and Anti-Corruption Policy



If you receive a request to give or accept a bribe, you must immediately report to one of the resources below.

If you believe this Policy may have been violated, you should immediately report the issue to your manager, another manager you trust, the Legal and Compliance Department (CorporateCompliance@acco.com), the Human Resources Department, or ACCOethics (ACCOethics.com). ACCOethics is a confidential reporting system that can be accessed at any time by phone or the internet. Reports to ACCOethics can be made anonymously, where permitted by local law.

ACCO Brands has a strict non-retaliation policy to protect anyone making a good faith report of suspected misconduct, including suspected corruption or bribery.

APPENDIX

REFERENCES

Third Party Due Diligence Procedures

REVISION HISTORY

2017 / 06 / 05

2011 / 06 / 30