



ACCO Brands Corporation

Global Social Responsibility Policy



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ACCO Brands Corporation, including its direct and indirect subsidiaries worldwide, (collectively, “ACCO Brands”) is committed to conducting its business with the highest ethical and security standards in compliance with the laws in the countries in which it conducts business.

In keeping with our values, ACCO Brands has established this Global Social Responsibility Policy (this “Policy”) to demonstrate our commitment to:

- Conducting business in a socially responsible and ethical manner;
- Protecting the environment and the safety of people;
- Supporting human rights; and
- Engaging, respecting and supporting the unique customs and cultures of the communities within which ACCO Brands operates.

ACCO Brands has always endeavored to conduct business responsibly and ethically. This Policy is guided by international human rights principles encompassed in the Universal Declaration of Human Rights, The International Labor Organization’s Declaration on Fundamental Principles and Rights at Work, the United Nations Global Compact’s 10 principles and the United Nations’ Guiding Principles on Business and Human Rights.

This Policy applies to all persons working for ACCO Brands or on its behalf in any capacity, including employees at all levels, directors, officers, third-party agents and business partners of ACCO Brands.

ACCO Brands Supplier Workplace and Security Code of Conduct

ACCO Brands Supplier Workplace and Security Code of Conduct (the “Code”) applies to all suppliers, vendors, subcontractors, agents or affiliates of suppliers and all ACCO Brands manufacturing facilities (collectively “Suppliers”) and is aligned with expectations and commitments of this Policy. The Code is also aligned with ACCO Brands’ customer expectations. All Suppliers that supply or manufacture finished goods including its packaging, raw materials, components, subassemblies and / or OEM parts (collectively “Products”) for ACCO Brands must comply with the Code, as well as all applicable laws and regulations of the country in which the Supplier operates.

In addition, Suppliers must also comply with ACCO Brands Code of Conduct which can be downloaded from:

<http://ir.accobrand.com/phoenix.zhtml?c=112835&p=irol-govConduct&language=us&country=us>



Workplace Code of Conduct

The Workplace Code establishes the following minimum requirements:

Prohibit Forced Labor and Abuse of Labor

Supplier shall ensure there is no use of forced labor, including but not limited to withholding working documents, involuntary, non-consensual overtime and prison, coerced, indentured or bonded labor, slave labor or any form of human trafficking. Employees shall be free to leave their employment after reasonable notice as required by applicable law or contract.

Prohibit Child Labor

Supplier shall ensure that all employees are at least 15 years of age, the age for completing compulsory education, or meet the local legal working age, whichever is highest.

Prohibit Harassment and Abuse

Supplier shall ensure that workplace is free from sexual, psychological, physical and verbal harassment, abuse or intimidation.

Prohibit Unsafe Working Conditions

Supplier shall provide safe and healthy workplace facilities, including but not limited to factories, dormitories and canteens, which meet the applicable environmental laws and regulations. The supplier shall maintain a productive workplace by taking a proactive approach to health and safety by implementing policies, systems and training designed to minimizing the risk of accidents, injuries related to work, and exposure to health risks.

Must be Open, Transparent and Cooperative

Supplier shall give full disclosure and keep ACCO Brands informed of all practices and resources related to production of its products. Supplier must not deny access to ACCO Brands or its auditors to monitor compliance with the Code.

Eliminate Discrimination

Supplier shall ensure employees are not subject to any discrimination in employment, including hiring, salary, benefits, advancement, discipline, termination, or retirement, on the basis of sex, gender identity, race, religion, age, disability, sexual orientation, marital status, nationality, union affiliation, political opinion, social or ethnic origin. All employment decisions must be based on the principle of equal employment opportunity.



Recruit Responsibly

Recruiting policies and procedures shall include effective measures to protect migrant, temporary, or seasonal workers against any form of discrimination. This includes providing migrant or other vulnerable workers with an understandable and accurate employment contract. We also expect you to communicate to migrant workers the terms of their employment contract in their native language prior to departure from their home country. It is not acceptable at any time to charge a worker a recruitment fee or similar fees—even if the collection of such fees is allowed under local law. If such fees are charged, we expect you to repay them in short order. Hold your agents and any labor brokers and recruiters used in the recruitment process to the same standards.

Freedom of Association and Collective Bargaining

Supplier shall allow employees the right to choose, form, and belong or not belong to a union, or similar representative organizations and to bargain collectively without fear of reprisal, intimidation or harassment.

Wages and Benefits

Supplier shall remunerate employees with rates that equal or exceed minimum wage or the appropriate prevailing wage, in accordance with applicable laws, and provide fringe benefits required by law and/or contract. The supplier shall provide employees with a clear, detailed, written account of each pay period and must not deduct wages illegally or for disciplinary purposes.

Working Hours and Overtime

Supplier shall ensure employee working hours do not exceed the maximum hours of daily and weekly labor set by local laws including overtime and employees shall be granted at least 24 consecutive hours of rest in every seven-day period, if required by local law. All overtime shall be consensual and required overtime pursuant to a collective bargaining or similar agreement is considered consensual. In addition to compensation for regular hours, employees shall be compensated for overtime hours at the rate legally required in the country of manufacture.

Protect the Environment

Supplier shall protect the indoor and outdoor environmental health by adhering to all applicable regulatory environmental laws, rules and requirements, including but not limited to, air, water, ground, and sound quality and chemical and waste management. In manufacturing operations, adverse effects on the community, environment and natural resources shall be minimized while safeguarding the health and safety of the public.

Prohibit Corruption and Bribery

Suppliers shall conduct business with integrity, respecting relevant laws and avoiding bribes, fraudulent practices, or any other unlawful means of gaining an undue advantage.



Management Systems

Supplier shall adopt or establish a documented and sustainable management system whose scope is related to the contents of this Code. The management system shall be designed to ensure: a) compliance with applicable laws, regulations and customer requirement related to operations and products; b) conformance with this Code; and c) identification and mitigation of operational risks related to this Code.

Sustainability of Resources

Supplier shall only use materials derived from operations that are in compliance with the environmental and social laws and regulations of the country of origin. Due diligence shall be exercised with respect to sourcing and extraction of raw materials, including e.g. tin, tantalum, tungsten and gold used in products. The due diligence shall be consistent with relevant parts of the OECD Due Diligence Guidance¹ or equivalent processes.

Informed Workplace

Supplier shall communicate information on employee rights and obligations defined by this Code and applicable laws both orally and through the posting of ACCO Brands Supplier Code of Conduct in a conspicuous place frequented by all employees in the local languages of the employees.

Security Code of Conduct

ACCO Brands also expects its Suppliers to conduct business using the highest security standards in compliance with U.S. Customs and Border Protection's ("USCPB") Customs Trade Partnership against Terrorism ("C-TPAT") and European Customs Administration's Authorized Economic Operator ("AEO") security guidelines.

The Security Code establishes the following minimum requirements:

Business Partner Requirements

Supplier must have written and verifiable processes for the selection of business partners including manufacturers, product Suppliers and vendors of raw materials, parts, or other subcontracting services.

Container Security

Procedures must be in place to verify the physical integrity of the container structure prior to stuffing. A seven-point inspection process is required for all containers. Written procedures must stipulate how seals are to be controlled and affixed to loaded containers – to include procedures for recognizing and reporting

¹ OECD Due Diligence Guidance for responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, <http://www.oecd.org/corporate/mne/mining.htm>



compromised seals and/or containers for the appropriate foreign authority. All containers must be sealed using ISO 17712:2010 standards.

Physical Access Controls

Unauthorized access to the shipping, loading dock and cargo areas should be prohibited. Controls must include the positive identification of all employees, visitors and Suppliers. Procedures must be in place to challenge unauthorized / unidentified persons.

Physical Security

All buildings should be constructed of materials that resist unlawful entry and protect against outside intrusion. Physical security must include adequate locking devices for external and internal doors, windows, gates and fences and the segregation and marking of international, domestic, high-value, and dangerous goods cargo within the warehouse by a safe, caged or otherwise fenced-in area. Adequate lighting must be provided inside and outside the facility, as well as in parking areas.

Personal Security

Processes must be in place to screen prospective employees and to conduct periodic background checks of current employees.

Procedural Security

Procedures for the handling of incoming and outgoing cargo should include the protection against the introduction of an illegal material and exchange or tampering of manifested cargo. Security controls must include designated security guard(s) or monitored CCTV cameras to supervise the introduction and / or removal of cargo. Suppliers must have written procedures for the following:

- Verifying seals on containers, trailers and railcars;
- Detecting and reporting shortages and / or overages;
- Tracking the timely movement of incoming and outgoing goods;
- Storage of empty and full containers to prevent unauthorized access; and
- Notifying Customs and / or appropriate law enforcement agencies if illegal or suspicious activities are detected.

Information Technology Security

Automated systems must use individually assigned accounts that require a periodic change of password. IT security policies, procedures and standards must be in place and provided to employees in the form of training. A system must be in place to identify abuse of IT, including improper access and tampering or altering of business data. All system violators must be subject to appropriate disciplinary actions.



Security Training and Threat Awareness

A threat awareness program should be established and maintained by security personnel to recognize and foster awareness of threats posed by terrorists at each point in the supply chain. Employees must be made aware of the procedures the company has in place to address a situation and how to report it. Additional training should be provided to employees in the shipping and receiving areas, as well as those receiving and opening mail. Additionally, specific training should be offered to assist employees in maintaining cargo integrity, recognizing internal conspiracies, and protecting access controls.

OBLIGATORY COMPLIANCE

Compliance with this Policy is a requirement of doing business with ACCO Brands. Should a Supplier fail to comply with the requirements of this Policy, ACCO Brands reserves all of its rights under law and under its Supplier agreements and purchase terms and conditions, including but not limited to the right to reject the Products, to terminate the relationship with the Supplier, and to pursue recovery of any damages or other available relief.

MORE INFORMATION

If you are unsure how this Policy applies or to voice any concerns, you are encouraged to contact the ACCO Brands Vendor Compliance Department at vendorcompliance.socialresponsibility@acco.com or the ACCO Brands Legal Department. Also, MySafeWorkplace, a telephone and internet-based reporting system, is available to anonymously report any activity that you think may violate this Policy. MySafeWorkplace can be accessed:

- Online from a link on the MyACCOBrands.com intranet at the "Need to raise a red flag?" box;
- At www.MySafeWorkplace.com;
- Through the MySafeWorkplace hotline at:
 - **1-800-461-9330** for U.S. and Canadian employees
 - Other international dialing instructions are available from the MySafeWorkplace.com website.