



ACCO BRANDS SUPPLIER WORKPLACE CODE OF CONDUCT

PURPOSE

ACCO Brands Corporation is committed to ensuring that workers are treated with respect and dignity, that working conditions in ACCO Brands' supply chain are safe and that manufacturing processes are environmentally responsible. ACCO Brands expects that all of its suppliers, sub-suppliers and factories are in compliance with all laws and regulations and with this Supplier Code of Conduct. Suppliers shall implement this Code and applicable laws and regulations into their operations and submit to verification and monitoring upon request. Compliance with the zero tolerance requirements is a condition to either start or maintain a business relationship with ACCO Brands. ACCO Brands is committed to engaging with its suppliers to ensure continuous and measurable improvements over time. The following sets out the minimum requirements deemed essential to protect the integrity of our supply base.

ZERO TOLERANCE

NO 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.

NO 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.

NO 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.

NO HARRASSMENT AND ABUSE: Supplier shall ensure that workplace is free from sexual, psychological, physical and verbal harassment, abuse or intimidation.

BE OPEN, TRANSPARENT AND COOPERATIVE: Supplier shall give full disclosure and keep ACCO Brands informed of all practices and resources related to production. Supplier shall not deny access to ACCO Brands or its auditors to monitor compliance with this Code.

CODE OF CONDUCT REQUIREMENTS

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 shall not deduct wages illegally or for disciplinary purposes.

PROTECT THE ENVIRONMENT: The supplier shall protect the indoor and outdoor environmental health by adhering to all applicable regulatory environmental laws,

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING: Supplier shall allow employees the right 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.

ELIMINATE DISCRIMINATION: Supplier shall ensure employees are not subject to any discrimination in employment, including hiring, salary, benefits,



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.

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.

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 including a description of recruitment or similar fees in their native language prior to departure from their home country, and holding Suppliers' agents, any labor brokers and recruiters used to the same standards.

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.

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 shall be based on the principle of equal employment opportunity.

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.

WORKING HOURS AND OVERTIME: Supplier shall ensure employee working hours do not exceed the maximum hours of daily, weekly and monthly 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.

PROHIBIT CORRUPTION AND BRIBERY: Supplier shall conduct business with integrity, respecting relevant laws and avoiding bribes, fraudulent practices, or any other unlawful means of gaining an undue advantage.

Notice of violations: Any inquiries or case of non-compliance with any part of this Code should be reported to ACCO Brands immediately.

<http://www.mysafeworkplace.com>

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>



ACCO BRANDS SUPPLIER SECURITY CODE OF CONDUCT

In accordance with regulations from:
Authorized Economic Operator (AEO)
Customs Trade Partnership against Terrorism (C-TPAT)

BUSINESS PARTNER REQUIREMENTS: Suppliers shall 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 shall 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 shall stipulate how seals are to be controlled and affixed to loaded containers – to include procedures for recognizing and reporting compromised seals and/or containers for the appropriate foreign authority. All containers shall be sealed using ISO 17712:2010 standards.

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

PROCEDURAL SECURITY: Procedures for the handling of incoming and outgoing cargo shall include the protection against the introduction of any illegal material and exchange or tampering of manifested cargo. Security controls shall include designated security guard(s) or monitored CCTV cameras to supervise the introduction/removal of cargo. Suppliers shall 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 other appropriate law enforcement agencies if illegal or suspicious activities are detected.

PERSONNEL SECURITY: Processes shall be in place to screen prospective employees and to conduct periodic background checks of current employees.

PHYSICAL ACCESS CONTROLS: Unauthorized access to the shipping, loading dock and cargo areas shall be prohibited. Controls shall include the positive identification of all employees, visitors and Suppliers. Procedures shall 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 shall 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 shall be provided inside and outside the facility, as well as in parking areas.

SECURITY TRAINING AND THREAT AWARENESS: A threat awareness program shall be established and maintained by security personnel to recognize and foster awareness of the threats posed by terrorists at each point in the supply chain. Employees shall 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.

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