ACCO BRANDS SUPPLIER CODE OF CONDUCT

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. We expect all our suppliers, in the spirit of continuous improvement, to meet minimum expectations as determined by factory audits and to improve their environmental and social performance over time.

Freely Chosen Employment: Suppliers shall not use forced labor, whether in the form of prison labor, indentured labor, bonded labor, or otherwise.

Child Labor: Suppliers shall not employ people younger than 15, under the minimum legal age or the minimum age for completing compulsory education in the country of manufacture, whichever is higher.

Harassment and Abuse: Suppliers shall treat every employee with respect and dignity, and shall not subject any employee to physical, sexual, psychological, or verbal harassment or abuse.

Nondiscrimination: Suppliers shall not subject any person to discrimination in employment (including hiring, salary, benefits, advancement, discipline, termination, or retirement) on the basis of gender, race, religion, age, disability, sexual orientation, nationality, political opinion, or social or ethnic origin.

Health and Safety: Suppliers shall comply with applicable environmental laws and regulations and provide a safe and healthy working environment that minimizes negative health and injury impacts to employees.

Freedom of Association: Suppliers shall recognize and respect the right of employees to freedom of association and collective bargaining.

Wages and Benefits: Suppliers shall pay employees at least the minimum wage required by local law, or the prevailing industry wage if no minimum wage law applies, and shall provide legally mandated benefits.

Hours of Work: Suppliers shall not require workers to work more than the maximum hours of daily and weekly labor set by local laws and workers should be granted at least one day off in every seven-day period, if required by local law.

Environmental: In manufacturing operations, adverse effects on the community, environment and natural resources are to be minimized while safeguarding the health and safety of the public. All environmental laws and regulations are to be followed.

Ethics: Suppliers are to uphold the highest standards of ethics, which includes no bribes, or any other unlawful means of gaining an undue advantage.

Management System: Suppliers shall adopt or establish a management system whose scope is related to the content of this Code. The management system shall be designed to ensure a) compliance with applicable laws, regulations and customer requirements 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: Suppliers must only use materials derived from operations that are in compliance with the environmental and social laws and regulations of the country of origin.

Monitoring and Compliance

To ensure compliance with our Code, ACCO Brands shall have the right to monitor factories through audits by third parties and visits by ACCO Brands personnel. The supplier is responsible for ensuring compliance by itself and any sub-contractor(s) as if it were the supplier itself. We seek relationships with suppliers that are committed to manufacturing under fair and safe labor conditions and sound environmental practices. If we determine that a particular factory does not comply with our Code, we typically strive to work with the supplier to develop and implement an appropriate corrective action plan. Nevertheless, depending upon the circumstances, ACCO Brands may elect to end its relationship with a supplier at any time for failing to adhere to our Code.

Notice of violations: Any worker with any knowledge of violation of this Code should contact ACCO Brands at: http://www.actresponsibly.com/social-responsibility.html

May 1, 2012

ACCO BRANDS SUPPLIER SECURITY CODE OF CONDUCT

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

Business Partner Requirements: Suppliers 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 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.

Personnel Security: Processes must be in place to screen prospective employees and to periodically check current employees.

Procedural Security: Procedures for the handling of incoming and outgoing cargo should include the protection against the introduction of any 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/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 other 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 the abuse of IT including improper access and tampering or the altering of business data. All system violators must be subject to appropriate disciplinary actions for abuse.

Security Training and Threat Awareness: A threat awareness program should be established and maintained by security personnel to recognize and foster awareness of the threat 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.

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May 1, 2012