



Senior Executive Stock Ownership Guidelines

Purpose

The Board of Directors of ACCO Brands Corporation (the "Company") believes that it is important to align the financial interests of its executive officers and other senior management ("Executives") with the long-term interests of our shareholders. Stock ownership is an effective tool in accomplishing this alignment as well as promoting sound corporate governance.

Ownership Guidelines ("Guidelines")

Executives shall attain the level of stock ownership appropriate to their position as a multiple of base salary or a number of shares, whichever is lower:

Executive Level	Multiple of Base Pay	Number of Shares
Chief Executive Officer	6 x base salary	500,000
Chief Operating Officer	4.5 x base salary	250,000
Chief Financial Officer and Presidents	3 x base salary	125,000
Other Executives Officers	2 x base salary	60,000
Other Executives	1.5x base salary	40,000

Participation

The Company's Guidelines apply to all participants in the Company's Executive Severance Plan (the "Plan"), as in effect from time to time. In the event one of the Executives also serves in a capacity as a member of the Board of Directors, he/she will be subject to the Guidelines in lieu of any stock ownership guidelines applicable to members of the Board of Directors.

Timeframe

The timeframes to achieve the Guidelines are as follows:

Executives employed on October 1, 2012 are expected to achieve the applicable stock ownership level by September 30, 2017.

Executives who become subject to a greater stock ownership level due to promotion or other Company decision are expected to meet the applicable level within five (5) years of the effective date of the promotion or Company decision.

Definition of Ownership

Stock ownership will include the following:

- Shares owned directly, in joint accounts or by a spouse or dependent child(ren);
- Shares held through Company retirement plans;
- Shares beneficially-owned through a trust, or similar estate planning device;
- Vested and unvested restricted stock units (RSUs); and
- Earned performance stock units (PSUs)

Retention Expectation

Following the vesting of PSUs or RSUs or the exercise of stock appreciation rights or stock options, Executives who have not yet met their applicable stock ownership levels (in stock or value) are expected to retain at least 50% of the net value of shares of stock received (i.e., the net value after deduction of the exercise price and all applicable tax and other required withholdings). Subject to the Company's insider-trading policy, an Executive may reduce his/her share ownership so long as his/her ownership level is maintained at or above the applicable ownership levels while the Executive remains subject to the Guidelines.

Stock Ownership Calculation as a Multiple of Pay

To account for stock price variances, stock ownership calculated as a multiple of pay shall be equal to the Executive's applicable multiple-of-pay under the Guidelines multiplied by the Executive's annual base salary at the time of the calculation, divided by the average of the daily highest and lowest share price of ACCO Brands common stock over the prior 12-month period as reported on the NYSE. Attainment and maintenance of the applicable stock ownership levels will be evaluated on a once-per-year basis, as of September 30.

Administration

The Compensation Committee of the Board of Directors ("Committee") shall be responsible for monitoring the application of the Guidelines, preparing a progress report on the application of the Guidelines at least once a year and delivering the report to the Board of Directors. Annually, Executives subject to the Guidelines will be provided a statement on which to declare their acknowledgment of the Guidelines and to report their then-current level of ownership.

If there are instances where these Guidelines would place a severe hardship on an Executive, the Committee, in its sole discretion, may develop an alternative stock ownership guideline for him/her that reflects both the intent of the Guidelines and the personal circumstances of the Executive.

The Committee has the sole discretion to remedy any deficiency if stock ownership levels are not met on a timely basis. Remedies may include providing a portion of annual incentive awards in Company stock or similar actions.

Adopted: October 21, 2008

Revised: August 9, 2011

Revised: December 5, 2012