



Subject:	Global Conflict Minerals Policy	Effective: 05-31-2014
Policy Owner:	Mike Kier - Vice President, Associate General Counsel - Global Compliance and Litigation	Number:
Approved By:	Pamela Schneider	Page 1 of 2

## BACKGROUND

A portion of our products contain various metals, including tantalum, tin, tungsten and gold. Occasionally, these metals may be colloquially referred to as “conflict minerals” because they may be sourced out of mines located in the eastern Democratic Republic of the Congo (“DRC”), where a decade-long civil war is ongoing. Armed groups control some of these mines and the related minerals trade, using the proceeds to fund human rights abuses.

As used herein, "Conflict Minerals" include columbite-tantalite (coltan), cassiterite, gold, wolframite and the derivatives tantalum, tin and tungsten, without regard to their location of origin. The "DRC Region" refers to the DRC, Angola, Burundi, Central African Republic, Republic of Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia.

In an effort to purge supply chains of Conflict Minerals that directly or indirectly finance or benefit armed groups which are committing human rights abuses in the DRC Region, the U.S. government enacted Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act and Section 13(p) of the Securities Exchange Act of 1934 (the "Exchange Act"). Pursuant to these regulations, the U.S. Securities and Exchange Commission (“SEC”) adopted Rule 13p-1 under the Exchange Act and Form SD (together, the "Conflict Minerals Rule"). The Conflict Minerals Rule requires U.S. publicly-traded companies, such as ACCO Brands, to conduct certain inquiries and make specified disclosures concerning the use and source of Conflict Minerals that are necessary to the functionality or production of products they manufacture or contract to manufacture.

## POLICY

ACCO Brands is opposed to the violence in the DRC, and is committed to the implementation of a program that facilitates responsible sourcing of Conflict Minerals from the DRC Region. In addition, ACCO Brands takes its obligations under SEC rules, including the Conflict Minerals Rule, seriously. ACCO Brands has adopted this policy in furtherance of the foregoing and as part of our efforts to encourage our suppliers to respect human rights and source products and components in a socially and environmentally responsible manner.

ACCO Brands does not directly purchase any raw Conflict Minerals from mines, smelters or refiners, and believes that it is often many supply chain tiers removed from these market participants. Accordingly, ACCO Brands requires the cooperation of its suppliers in the implementation of this policy.

This policy applies to any Conflict Mineral that is necessary to the functionality or production of a product manufactured by ACCO Brands or which ACCO Brands contracts to manufacture, irrespective of whether ACCO Brands or the supplier has manufactured or provided the specifications for the particular component or part that contains Conflict Minerals.

## SUPPLIER EXPECTATIONS

We expect that our suppliers share our commitment to responsible sourcing. Without limiting the foregoing, and in furtherance of this policy, ACCO Brands expects the suppliers of in-scope products and components to:

1. Work with their suppliers to ensure traceability of Conflict Minerals at least to the smelter or refiner level. ACCO Brands reserves the right to request further evidence of the supply chain down to the mine level;
2. Source Conflict Minerals only from sources that do not support conflict;
3. Where possible, source Conflict Minerals from sources that are certified as conflict-free by an independent third-party;
4. Submit to ACCO Brands on request a completed Conflict-Free Sourcing Initiative Conflict Minerals Reporting Template and provide ACCO Brands with such written certifications and other information concerning the origin of Conflict Minerals included in products and/or components supplied to it as it may request from time to time;
5. Adopt a risk management strategy with respect to identified risks in the supply chain that is consistent with this policy;
6. Otherwise adopt policies, procedures and systems with respect to Conflict Minerals sourcing consistent with this policy and the Organisation for Economic Co-operation and Development's Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas; and
7. Require their direct and indirect suppliers to adopt policies and procedures that are consistent with this policy.

Suppliers also are encouraged to support industry efforts to enhance traceability and responsible practices in global minerals supply chains.

## **ASSESSING AND RESPONDING TO IDENTIFIED RISKS**

ACCO Brands believes in establishing and maintaining long-term relationships with suppliers whenever possible. If we determine that a supplier may be violating this policy, we may require them to commit to and implement a corrective action plan within a reasonable timeframe. Continued failure to adhere to ACCO Brands' policies and refusal to address issues of concern may lead to termination of our business relationship with the supplier. Nothing contained in this policy shall be interpreted to preclude ACCO Brands from terminating any supplier relationship at any time for any reason.

## **RECORD RETENTION**

To help evidence compliance with the Conflict Minerals Rule and as part of ACCO Brands' internal controls over financial reporting and disclosure, ACCO Brands will retain reviewable business records with respect to its reasonable country of origin inquiries for five years.

## **QUESTIONS**

If you have any questions or concerns about this policy, or wish to report any violations, please contact the ACCO Brands Director of Global Social Responsibility & Sustainability at (937) 495-4566 or email [ConflictMinerals@acco.com](mailto:ConflictMinerals@acco.com).