Privacy Notice

ACCO Brands Corporation ("ACCO Brands") is committed to conducting business ethically, honestly, and in accordance with all applicable laws. In striving to meet that standard, ACCO Brands relies on employees to report concerns relating to potential misconduct—and ACCO Brands strictly prohibits retaliation for any reports made in good faith. Reports can be raised to your manager, the Corporate Compliance Department, the Human Resources Department, the Legal Department, or on this website.

Who maintains this website?

This website hosted by Convercent, Inc. (929 Broadway, Denver, CO 80203, USA; Phone Number: 1-866-403-2713; Website: www.convercent.com) ("Convercent") on behalf of ACCO Brands USA LLC (Four Corporate Drive, Lake Zurich, IL, 60047-8997; Phone Number: 1-800-222-6462; Email: DataPrivacy@acco.com; Website: www.accobrands.com) ("ACCO Brands USA").

What information may be reported on this website?

This website may be used to report violations of our Code, our policies, or applicable laws. The reportable topics are listed on MySafeWorkplace when you begin the submission process.

Use of this website is voluntary; you may also make reports to your manager, the Corporate Compliance Department, the Human Resources Department, or the Legal Department.

Is anonymous reporting allowed on this website?

Yes. However, we encourage you to identify yourself, so that we can more thoroughly investigate your report and follow up with you.

What data is collected on this website?

All information you provide about yourself or others will be included in the report. Data we collect includes:

1. Your name,
2. Your email address,
3. Your phone number,
4. Your work location,
5. Your title,
6. The name of any other individuals involved in the reported misconduct,
7. The name of any other witnesses to the reported misconduct, and
8. Any other data you provide in the "Description" section of the report

What is the basis and purpose for collecting data on this website?

ACCO Brands USA processes data submitted on this website to comply with local laws, to further its legitimate interest in compliance with foreign laws as well as good corporate

governance, and based on your consent. Data collected on this website will only be processed to investigate and take action in response to reported misconduct.

Who may receive data submitted on this website?

Your data will only be shared with a restricted number of people as necessary to investigate and take action in response to your report.

Any data submitted on this website is collected by Convercent. Convercent is a data processor acting on behalf of ACCO Brands USA, the data controller, pursuant to a data processing agreement.

Data is then transferred to ACCO Brands USA management in the United States for further review and investigation. Depending on the content of the report, it will be handled by the Legal Department, Corporate Compliance Department, Internal Audit Department, or Human Resources Department. These business units are strictly separate from other business units. Their employees are specifically trained on and responsible for the confidentiality of reported data.

In the course of investigating or taking action in response to reports, ACCO Brands USA may share data with your employer and the following categories of third parties:

1. Outside counsel,
2. Outside accountants,
3. Self-regulatory agencies,
4. Governmental entities, or
5. Other third parties necessary for the completion of a comprehensive investigation of the reported misconduct

To what countries is data submitted on this website transferred?

Data submitted to this website is stored on Convercent's servers in the Ireland and Germany. Data is then transferred to ACCO Brands USA in the United States.

How is data submitted to this website protected?

To the extent permitted by law, your identity and any information you provide will be treated as strictly confidential throughout the investigation process, though affected employees are allowed to be informed of and given access to any accusations relating to them.

ACCO Brands USA and Convercent maintain adequate organizational and technical measures to protect data submitted on this website.

How long is data submitted on this website maintained?

Data will be deleted or anonymized within two months following the end of the investigation, as long as the data is not further required in order to defend or to proceed with any legal or administrative proceedings as well as any disciplinary or other official proceedings; in these cases, reported data will be stored for as long as required to proceed and finalise pending proceedings.

What are my rights with regard to consent?

By clicking the checkbox at the top of this notice, you consent to the collection of your personal data and the transfer of your personal data to ACCO Brands USA's headquarters in the United States for investigation purposes. If you do not consent, please report your concerns through any of the other methods listed above. If at any time you would like to revoke your consent, please contact DataPrivacy@acco.com. Please be aware that revocation of consent may be limited in some situations—for example, where we can demonstrate that we have a legal requirement to process your data. In some instances, this may mean that we are able to retain data even if you withdraw your consent.

What do I do if I have a complaint about the data submitted on this website?

If you have concerns or questions regarding how your data is processed, you may contact DataPrivacy@acco.com.