



ACCO Brands Corporation

Corporate Product Compliance Policy



Revision History

Version	Revision Reason	Date	Author	Approver
Original Release	Original Release	April 14, 2015	Mike Kier, Vice-President, Associate General Counsel - Compliance & Litigation Rajini Janardhan, Director, Global Product Compliance	Pam Schneider, Senior Vice-President, General Counsel & Corporate Secretary
Revision 1	Clarification to the Original Release	June 12, 2015	Rajini Janardhan, Director, Global Product Compliance	Mike Kier, Vice-President, Associate General Counsel - Compliance & Litigation



ACCO Brands Corporate Product Compliance Policy

POLICY

ACCO Brands Corporation, including its direct and indirect subsidiaries worldwide, (collectively, “ACCO Brands”) is committed to ensuring that the computer accessories, office, school, and other products it manufactures, distributes, imports and/or sells (“Products”) are safe for their intended use and comply with all applicable standards, rules, laws, regulations and customer requirements (collectively, “Product Requirements”). ACCO Brands’ policy is to meet or exceed all applicable Product Requirements for its Products during its Products’ lifecycle.

ACCO Brands has established this Corporate Product Compliance Policy (this “Policy”) to ensure consistent adherence to Product Requirements across global and regional markets.

SCOPE

This Policy applies to all Products, including:

- All Products that are designed and manufactured by ACCO Brands;
- All Products whose design and/or manufacture are outsourced to third parties by ACCO Brands; and
- Third parties’ products whose design and/or manufacture are outsourced to ACCO Brands, except to the extent parts and materials are specified by the third parties.

All suppliers, vendors, subcontractors, agents or affiliates of suppliers and all ACCO Brands manufacturing facilities (collectively, “Suppliers”) that supply or manufacture finished Products, raw materials, components and/or OEM parts for ACCO Brands must comply with this Policy.

This Policy also applies to Product packaging and labeling. ACCO Brands defines packaging as any container, regardless of the country in which it is produced, that provides a means of marketing, protecting or handling a Product. Labeling also includes permanent labels such as tracking labels for traceability purposes. Packaging and labeling is generally subject to different legal, industry, and customer requirements than Products. ACCO Brands requires all Product packaging and labeling to comply with applicable requirements and all mandatory market certification(s), declaration(s) and regulations, as well as any voluntary certifications and markings.

OBLIGATORY COMPLIANCE

Compliance with this Policy is a requirement of doing business with ACCO Brands. Should a Supplier fail to comply with the requirements of this Policy or any Product Requirements, including any requirements



regarding packaging and labeling, ACCO Brands reserves all of its rights under law and under its Supplier agreements and purchase terms and conditions, including but not limited to the right to reject the Products, to terminate the relationship with the Supplier, and to pursue recovery of any damages or other available relief.

Any ACCO Brands employee who fails to comply with this Policy may be subject to disciplinary action, up to and including termination of employment.

MORE INFORMATION

If you are unsure how this Policy applies or to voice any Product Requirement concerns, you are encouraged to contact the ACCO Brands Global Product Compliance Department at globalproductcompliance@acco.com or the ACCO Brands Legal Department. Also, MySafeWorkplace, a telephone and internet-based reporting system, is available to anonymously report any activity that you think may violate this Policy. MySafeWorkplace can be accessed:

- Online from a link on the MyACCOBrands.com intranet at the "Need to raise a red flag?" box;
- At www.MySafeWorkplace.com;
- Through the MySafeWorkplace hotline at:
 - **1-800-461-9330** for U.S. and Canadian employees
 - **+800.1777.9999** for UK employees
 - Other international dialing instructions are available from the MySafeWorkplace.com website.

For more information, or questions or comments on this Policy, please email globalproductcompliance@acco.com.