ACCO Brands - Tax Strategy

1. Overview of the Group

The ACCO Brands Group ("ACCO Brands"), whose ultimate parent ACCO Brands Corporation is a publicly listed company on the NYSE, is one of the world's largest suppliers of business, academic and consumer products. Its brands include Derwent, Esselte, Five Star, GBC, Hilroy, Kensington, Leitz, Mead, NOBO, Quartet, Rapid, Rexel, Swingline, Tilibra and Wilson Jones. Product lines include staplers & punches, paper shredders, binding machines, laminators, notice boards & easels, stationery products and computer accessories, DIY tools and artists' colouring pencils. ACCO Brands has many customers, both local and global, to whom it offers a wide portfolio of products and services through its extensive logistics, distribution and sales networks.

2. Purpose

The purpose of the Tax Strategy is to communicate the policy for the management of tax within ACCO Brands EMEA and its subsidiary undertakings ("the Group") which includes all UK companies/branches of the group (including dormant companies) for all UK taxes. It is important to ensure that consistent and effective tax standards are maintained across the Group as tax (both direct and indirect) can have a significant cash and profit and loss impact on the Group and therefore on many of the Group's business activities. This Tax Strategy will be owned by the European Leadership Team ("ELT") of ACCO Brands and any amendments will be discussed and approved by the ELT. It is effective for the year ending 31 December 2019 and will remain in effect until any amendments are approved by the ELT. The ELT will be responsible for ensuring that the Tax Strategy is published in accordance with Schedule 19 of the United Kingdom Finance Act 2016 and regards this publicly available document as complying with its duty under that legislation. This Tax Strategy will be reviewed, updated and republished with the following years' version annually in line with legislation.

3. Tax objectives

The Group Finance department is responsible for all taxes within the Group. Its objective in relation to tax is to support the Group's strategy whilst ensuring compliance with relevant laws and filing obligations.

Tax performance will be measured in the following ways:

• A clearly understood, communicated and supported strategy;

• Paying the appropriate amount of tax by the due dates;

• Forecasting and planning tax cash payments accurately;

• Ensuring the most effective tax elections, claims and options are considered, with respect to materiality, to manage the tax paid by the Group but will not use them for purposes which are knowingly inconsistent with the intent of the legislation;

• Ensuring that any transactions undertaken by the Group are affected tax efficiently;

• Implementing and maintaining controls and procedures relating to all taxes ensuring that the correct amount of tax is paid;

• Act in a proactive fashion in relation to the Group's tax affairs; and,

• To maintain the Group's reputation as a fair contributor to the worldwide economy which applies tax rules in good faith and in the spirit they are intended.

The Group's strategic objective is to comply with legal requirements in the taxing jurisdictions in which the Group operates, in a manner that ensures we pay the right amount of tax while creating sustainable shareholder value, underpinned by a tax philosophy based on an open, co-operative and transparent relationship with the Tax Authorities.

4. Risk management
Effective risk management is paramount for the Group and underpins its business strategy. The Group's appetite for risk is a carefully calibrated part of the business model aligned to the strategic and corporate objectives. The Group's on-going tax risk approach is based on principles of reasonable care and materiality and such tax risks are reviewed on a regular basis to ensure that such risks are adequately managed.

5. Roles and responsibilities
The ELT is ultimately responsible for tax governance. The ELT has delegated this responsibility to the Senior Vice President Finance ("SVP Finance") who will report to the ELT as required. The ELT is responsible for ensuring there is an appropriate framework for the implementation of the policy and oversight of the identification and management of tax risk. The ELT maintains responsibility for implementing new controls where material tax risks are identified.
The SVP Finance has ownership of the Group's tax operations and oversight of tax risk, with the detailed analysis and preparation of the tax records covered by the Financial Controllers.
Performance of the Group Finance team, the Financial Controllers and these other stakeholders is reportable to the SVP Finance who in turn reports up to the ELT.
The SVP Finance's responsibilities also include: Regular communication with the
ELT regarding management of material tax risks and opportunities;
Reviewing any significant transactions; (e.g. acquisitions, disposals, financing
arrangements);