



ACCO Brands Corporation

Corporate Polyvinyl Chloride (PVC) Policy



Revision History

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ACCO Brands Corporate Polyvinyl Chloride (PVC) Policy

For more information, or questions or comments on the ACCO Brands Corporate Polyvinyl Chloride (PVC) Policy, please email:

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1 CORPORATE VISION

Guided by our corporate value of acting responsibly in a global community, ACCO Brands is committed to providing customers with safe and environmentally responsible products that meet evolving regulatory requirements. As part of this commitment, ACCO Brands' long-term goal is to eliminate or minimize applications of PVC because of its significant environmental and health impacts throughout its manufacture, use and disposal life cycle, where technologically and economically feasible.

2 PVC and PHTHALATE FACTS

PVC is a synthetic polymer material made of vinyl chloride monomers. The chlorine in PVC represents about 57% of the weight of the pure polymer. PVC is used in a wide range of products including pipes, wire and cable coatings, packaging materials, upholstery, floor coverings, housewares, medical devices and children's toys. Pure PVC is a rigid material and in order to provide the range of properties needed in finished products, PVC polymer is mixed with a number of additives as fillers, stabilizers, lubricants, pigments, flame retardants or plasticizers.

In order to make PVC usable, plasticizers are used as an additive to soften PVC and make it more flexible. Most commonly used plasticizers are a group of chemicals called phthalates. Many phthalates are known endocrine disruptors and many others are thought to be carcinogenic at certain levels. Because phthalates are not chemically bonded to PVC, they tend to leach from products with use over time.

3 REGULATORY AND MARKET ENVIRONMENT

Due to potential environmental and human health risks associated with flexible PVC, it is banned or regulated in a number of countries. In addition, due to safety concerns with elevated levels of phthalates in consumer products, several phthalates have come under increased scrutiny and global regulatory actions. Public health and consumer advocacy groups have been pushing not only for broad restrictions, but removal of various phthalates from all consumer products. Major global retailers have been voluntarily restricting or removing products containing PVC or phthalates from their store shelves.

4 ACTION PLAN

4.1 Long-Term Goal

To eliminate use of PVC from ACCO Brands' own branded products and packaging.



4.2 Immediate Action:

Starting immediately, default design specification for all new product/packaging development and procurement is PVC free plastic and the use of suitable alternatives that do not require plasticizers. Our Sourcing policy will give preference to the use of PVC free materials, providing they are of the same or better functionality as PVC and are readily and reliably available at reasonable prices.

The continued use of PVC is only permissible where PVC substitution with non-PVC material is not technologically feasible or economically affordable.

All uses of PVC must be authorized by Product Compliance.

Exceptions may be granted by Product Compliance, with the following documentation:

1. A justification explaining how the material properties of PVC are required in order to ensure the satisfactory performance of the product.
2. Completion of full bill of materials, identifying parts or components that are PVC.
3. Identification of the phthalate or non-phthalate alternative(s) if used.
4. Quality control plan to monitor the use of the PVC and ensure that its restricted phthalate content is monitored and controlled to appropriate levels.