



ACCO Europe Supplier Social Responsibility Policy

1. Introduction

At ACCO Europe, we know that our corporate values are an essential element of continuing success in the marketplace. These values – Integrity, Leadership, Teamwork and Accountability – are vital to the success of our organisation.

Our corporate success is dependent on our reputation with our co-workers and suppliers.

This Supplier Social Responsibility Policy supports our corporate values by providing guidelines to ensure that every ACCO Europe supplier respects human rights, workplace safety and protection of the environment in every community where the supplier operates.

Each of our suppliers is fully responsible for complying with this Social Responsibility Policy within their businesses

2. Working Conditions / Health & Safety

- Employees must be provided with a safe and healthy working environment. The supplier will take adequate steps, as appropriate, to reasonably minimise accidents and injury to health within the working environment. The supplier will provide adequate means of evacuation and train employees in emergency preparedness
- If provided, the supplier will ensure that dormitory facilities are clean, safe and meet the basic needs of employees.

3. Child Labour

- All workers must meet or exceed the local minimum age Law requirements, but in no event shall workers under 15 years of age be employed. Depending on the nature of work being performed, the supplier may seek to limit employment to workers over 18 years of age.

4. Forced Labour

- The supplier will not allow the use of forced, bonded or involuntary prison labour.

5. Discrimination

- ACCO Europe's policy prohibits suppliers engaging in or supporting discrimination in hiring, remuneration, access to training, promotion, termination or retirement based on race, national origin, caste, sexual orientation, religion, age, physical disabilities or veteran status.

- ACCO Europe's policy is that suppliers respect employee's observance to tenets or practices relating to race, national origin, caste, sexual orientation, religion, age, physical disabilities or veteran status.
- ACCO Europe's policy prohibits behaviour, including gestures, language and physical contact, that is sexually coercive, threatening, abusive or exploitative. These abuses include, but are not limited to, sexual harassment, corporal punishment, mental or physical coercion, and physical or verbal abuse.

6. Freedom of Association/Right to Collective Bargaining

- ACCO Europe's position is that it is not necessary for a union to exist between the supplier and its employees in order to establish terms of employment. However the supplier must respect its employee's rights to enter into a collective bargaining unit and must not discriminate based on union membership.

7. Working Hours

- The supplier will comply with applicable local laws and industry standards on working hours; however, employees must not work more than 12 hours in a day and 6 days in a week for more than 3 consecutive weeks.
- Overtime work shall be voluntary except where specified in a freely negotiated bargaining agreement

8. Wages and Benefits

- The wages and benefits offered to employees must meet or exceed the legal minimum laws and standards.
- Deductions from wages will not be made for disciplinary purposes.
- Employees must be provided with clear details about their wages and benefits on a regular basis.

9. Environmental

- The supplier will conduct its business such that it is in compliance with applicable environmental laws, norms and regulations.
- The supplier should promote improvement of the environment

10. Management Systems

- The suppliers will communicate this Policy to employees. Any local policy must be consistent with the requirements set forth in this Policy.
- The supplier shall investigate, address and respond to the concerns of employees with regard to compliance with this Policy.
- The supplier shall refrain from disciplining or otherwise discriminating against any employee for providing information concerning the supplier's compliance with this policy.

- The supplier will periodically review the adequacy, suitability and continuing effectiveness of the systems implemented to meet the requirements of this Policy.
- The supplier will implement appropriate corrective actions to address any identified non-conformance.

S. G. Wells

European HR Director

Date: May 2005

Issue: 2