

ACCOethics Notice

Effective Date: 2024.01.01

ACCO Brands Corporation, including its affiliates (collectively, “ACCO Brands,” “we,” “us,” or “our company”), is committed to conducting business ethically, honestly, and in accordance with all applicable laws. It is also committed to protecting privacy in connection with the use of ACCOethics—ACCO Brands’ ethics hotline.

ACCOethics may be used by all employees and others to report concerns relating to potential misconduct.

The use of ACCOethics is voluntary. Individuals can also make reports to:

- Their manager,
- Another manager they trust,
- ACCO Brands Human Resources Department,
- ACCO Brands Legal and Compliance Department (CorporateCompliance@acco.com), or
- ACCOethics.

What does this notice cover?

This notice describes how ACCOethics can be used to report concerns as well as how we collect and use the personal data submitted to ACCOethics on ACCOethics.com or by phone.

What concerns can be reported on ACCOethics?

ACCOethics can be used to report concerns related to compliance with our Code of Conduct, our policies, or applicable laws.

Some countries limit the topics that can be reported under local law. You will see a list of reportable topics when you begin making your report. If the topic is not listed, you should contact one of the following channels to share your concerns:

- You manager,
- Another manager you trust,
- ACCO Brands Human Resources Department, or
- ACCO Brands Legal and Compliance Department (CorporateCompliance@acco.com).

Can concerns be reported anonymously?

Yes, where allowed by local law. However, we encourage you to identify yourself so that we can more thoroughly investigate your report and follow up with you. As set forth in the Code of Conduct, ACCO Brands has a strict non-retaliation policy to protect anyone making a good faith report of suspected misconduct.

Which ACCO Brands entity is the controller of your personal data?

The data controller for your personal data is:

ACCO Brands USA LLC (“ABUL”)
Four Corporate Drive,
Lake Zurich, IL, 60047-8997
Phone Number: 1-800-222-6462
Email: DataPrivacy@acco.com

ABUL works together with our local [ACCO Brands affiliates](#) around the world to handle concerns reported on ACCOethics.

What personal data do we collect?

We will collect and use the following personal data on ACCOethics:

- Your name (optional),
- Your email address (optional),
- Your phone number (optional),
- Your work location (optional), and
- Any names or other personal data you choose to provide in your report (optional).

How do we use your personal data and what is the legal basis?

We collect personal data on ACCOethics to receive and respond to concerns related to compliance with our Code of Conduct, our policies, and applicable laws. Once we receive a report, we will investigate it as appropriate under local law and the [ACCO Brands Internal Investigation Policy](#).

We rely on three legal bases to process personal data on ACCOethics: (1) complying with applicable local laws and (2) pursuing our legitimate interest in complying with foreign laws, and (3) pursuing our legitimate interest in promoting ethics and compliance throughout ACCO Brands.

With whom do we share personal data?

We may share personal data with the following entities:

ACCOethics Hosting Company

ACCOethics is hosted by a third party on behalf of ABUL:

Convercent, Inc.
3858 Walnut Street, #255,
Denver, Colorado 80205
Phone: 1-866-403-2713
Website: www.convercent.com

ACCO Brands Affiliates

We may share personal data with our local [ACCO Brands affiliates](#) as needed to investigate reports.

Potential Purchasers

We do not sell your personal data, though we may transfer that data to a potential purchaser of our business, including the potential purchaser's consultants, attorneys, or financial advisers.

Other Third Parties

Finally, we also share personal data with the following categories of third parties:

- IT service providers;
- attorneys, consultants, and investigators;
- auditors, accountants, and actuaries;
- local, state, federal, or other government authorities or law enforcement officials; and
- other entities as necessary in furtherance of the interests of employees, contractors, or ACCO Brands.

We require third-party data processors to implement adequate technical and organizational measures to protect personal data, to notify us of a potential data breach, and not to use personal data for purposes other than providing services to us.

To which countries do we transfer your personal data?

Personal data may be transferred to ABUL and service providers in the United States as described above. Personal data regarding employees in the European Economic Area ("EEA") may be transferred to service providers and regional HR management located in the EEA and the United Kingdom.

Whenever data is sent to third-party countries, we take steps to ensure it is adequately protected. This is done through government-approved adequacy decisions, certifications, Binding Corporate Rules, or Standard Contractual Clauses. If you have questions about the methods we use to ensure adequate data protection, you can reach out to DataPrivacy@acco.com at any time.

What rights do you have?

You have rights over how your personal data is used, including:

- to request details regarding the processing of your personal data;
- to request a copy of your personal data;
- to have your personal data transferred to another data controller;
- to correct or delete your personal data;
- to withdraw your consent, where we rely on that consent to process your data;
- to object to or restrict the processing of your personal data;
- to submit a complaint with your regional data protection authority; and
- raise your concerns through any legally protected channel.

Exercising Rights

You can exercise your rights by contacting CorporateCompliance@acco.com or DataPrivacy@acco.com.

Limitations

These rights may be limited, for example, if during the fulfilment of your request, information about another individual would be disclosed or if you ask us to delete data that we are legally required to store or need to operate our business. They may also be limited by legal privileges and protections.

Complaints

If you have a privacy concern, you can reach out using the contact details in the “Whom do I contact with any questions or concerns about my personal data?” section below. You also have the right to lodge a complaint with the relevant data protection authority for your region.

Legally Protected Channels

Under local law, employees may be entitled to report concerns through certain legally protected channels. ACCO Brands and ACCOethics do not in any way limit employees’ rights to raise concerns through legally protected channels.

How long will we maintain your information?

We will keep your personal data for as long as needed to fulfil the purpose for which it was collected. We will also maintain your information as needed to establish compliance with our legal obligations. For more details, please see the [ACCO Brands Record Retention Policy and Schedule](#).

How will I know if this notice has been updated or changed?

As our business evolves and new processes are implemented or changed, we may need to update this notice. We will update the Effective Date to show the most recent revision date.

What is ACCO Brands’ policy on retaliation?

As set forth in the Code of Conduct, ACCO Brands has a strict non-retaliation policy to protect anyone making a good faith report of suspected misconduct.

Whom do I contact with any questions or concerns?

If you have any questions or concerns about ACCOethics, we recommend you contact CorporateCompliance@acco.com.

For certain regions, ACCO Brands has appointed local data protection officers. Any questions or concerns about your personal data can be sent to the relevant data protection officer using the contact details below:

- Brazil – DataPrivacy@acco.com
- Germany – DataPrivacy@acco.com

ABUL has appointed the following data protection representative in the EU:

Leitz ACCO Brands GmbH & Co KG

Siemensstraße 64,
70469 Stuttgart, Germany
DataPrivacy@acco.com

ABUL has appointed the following data protection representative in the UK:

ACCO UK Limited

Millennium House, 65 Walton Street
Aylesbury, Buckinghamshire, HP21 7QG
DataPrivacy@acco.com