



ACCO Brands Corporation

Global Conflict Minerals Policy

BACKGROUND

ACCO Brands Corporation (“ACCO Brands”) is subject to the U.S. Conflict Minerals Rule. Under that Rule, to the extent that “conflict minerals” are necessary to the functionality or production of products that ACCO Brands manufactures or contracts to manufacture, we are required to engage in a reasonable country of origin inquiry to determine whether the conflict minerals originated in the Democratic Republic of the Congo (the “DRC”) or one of the other covered countries under the Conflict Minerals Rule. Additional inquiries and disclosure obligations are triggered to the extent that the conflict minerals are from a covered country or we are unable to determine the source of the conflict minerals.

As defined in the U.S. Conflict Minerals Rule, "conflict minerals" include columbite-tantalite (coltan), cassiterite, gold, wolframite and the derivatives tantalum, tin and tungsten, without regard to their location of origin. In this policy, we sometimes refer to those minerals and derivative metals as “3TG.” The covered countries contemplated by the Rule are the Democratic Republic of the Congo, Angola, Burundi, Central African Republic, Republic of Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia.

The European Union also has adopted a Conflict Minerals Regulation, which seeks to promote responsible 3TG sourcing from “conflict-affected and high-risk areas” worldwide, not just those areas in the DRC region. ACCO Brands is not subject to the EU Conflict Minerals Regulation. However, our general principles on responsible sourcing and human rights are aligned with the spirit of that Regulation. We seek to use responsibly sourced 3TG in our products, wherever in the world the 3TG originates from.

POLICY

ACCO Brands is committed to the responsible sourcing of 3TG, including from the covered countries. In addition, ACCO Brands takes its regulatory obligations, including under the U.S. Conflict Minerals Rule, seriously. ACCO Brands has adopted this policy in furtherance of the foregoing and as part of our efforts to encourage our suppliers to respect human rights and source products and components in a socially and environmentally responsible manner.

ACCO Brands does not directly purchase any raw 3TG from mines, smelters, or refiners, and believes that it is often many supply chain tiers removed from these market participants. Accordingly, ACCO Brands requires the cooperation of its suppliers in the implementation of this policy.

This policy applies to any 3TG that is necessary to the functionality or production of a product manufactured by ACCO Brands and its direct and indirect subsidiaries or which ACCO Brands and any of its direct or indirect subsidiaries contracts to manufacture, irrespective of whether ACCO Brands or the supplier has manufactured or provided the specifications for the particular component or part that contains 3TG.

Our sourcing decisions take into account workers' rights and livelihoods. Accordingly, we do not seek to embargo responsibly sourced 3TG from the covered countries or conflict-affected and high-risk areas.

SUPPLIER EXPECTATIONS

We expect that our suppliers share our commitment to responsible sourcing. Without limiting the foregoing, and in furtherance of this policy, ACCO Brands expects the suppliers of in-scope products, components and parts to:

1. Source 3TG only from sources that do not support conflict;
2. Where possible, source 3TG from smelters and refiners that are conformant with an independent "conflict free" assessment protocol;
3. Work with their suppliers to ensure traceability of 3TG at least to the smelter or refiner level; ACCO Brands reserves the right to request further evidence of the supply chain down to the mine level;
4. Submit to ACCO Brands on request a completed Responsible Minerals Initiative Conflict Minerals Reporting Template, and provide ACCO Brands with such written certifications and other information concerning the origin of 3TG included in products, components and/or parts supplied to it as it may request from time to time;
5. Adopt a risk management strategy with respect to identified risks in the supply chain that is consistent with this policy;
6. Otherwise adopt policies, procedures, and systems with respect to 3TG sourcing consistent with this policy and the Organization for Economic Co-operation and Development's Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, including its related supplements; and
7. Encourage their direct and indirect suppliers to adopt policies and procedures that are consistent with this policy.

Suppliers also are encouraged to support industry efforts to enhance traceability and responsible practices in global minerals supply chains.

ASSESSING AND RESPONDING TO IDENTIFIED RISKS

ACCO Brands believes in establishing and maintaining long-term relationships with suppliers whenever possible. If we determine that a supplier may be violating this policy, we may require them to commit to and implement a corrective action plan within a reasonable timeframe. Continued failure to adhere to ACCO Brands' policies and refusal to address issues of concern may lead to termination of our business relationship with the supplier. Nothing contained in this policy shall be interpreted to preclude ACCO Brands from terminating any supplier relationship at any time for any reason.

RECORD RETENTION

To help evidence compliance with the U.S. Conflict Minerals Rule and as part of ACCO Brands' internal controls over financial reporting and disclosure, ACCO Brands retains business records with respect to its reasonable country of origin inquiries for five years.

GRIEVANCE MECHANISM AND REPORTING

If you have any questions or concerns about this policy, or wish to report any violations, please email ConflictMinerals@acco.com.