ACCO Brands Corporation

Modern Slavery Statement

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This Statement relates to the year ended December 31, 2022 and describes the activities of ACCO Brands Corporation and its consolidated subsidiaries ("ACCO Brands," “the Company,” "we," "us" and "our") to address slavery and human trafficking in our business and supply chains. Not all the entities in our consolidated group are subject to the **California Transparency in Supply Chains Act, UK Modern Slavery Act,** and the **Australia Modern Slavery Act**. We have prepared this Statement on a consolidated basis for the entire ACCO Brands group because we have common policies and compliance programs relating to slavery and anti-human trafficking across our business.

This Statement is posted on our appropriate websites. The Statement also has been submitted to the registries in Australia and the United Kingdom.

OVERVIEW

Business and Supply Chain Overview

ACCO Brands is a global enterprise that designs, markets, and manufactures well-recognized consumer, school, technology and office products. Our product categories include computer and gaming accessories; storage and organization; notebooks; laminating, shredding and binding machines; calendars; stapling; punching; dry erase boards, and do-it-yourself tools, among others. Our widely-known brands include AT-A-GLANCE®, Barrilito®, Derwent®, Esselte®, Five Star®, Foroni®, GBC®, Hilroy®, Kensington®, Leitz®, Marbig®, Mead®, NOBO®, PowerA®, Quartet®, Rapid®, Rexel®, Swingline®, Tilibra®, TruSens® and Wilson Jones®.

ACCO Brands has three operating business segments, each of which is comprised of different geographic regions. The Company’s three operating segments are as follows:

Operating Segment	Geography	Primary Brands	Primary Products
ACCO Brands North America	United States and Canada	Five Star®, Quartet®, AT-A-GLANCE®, GBC®, Swingline®, Kensington®, Mead®, Hilroy® and PowerA®	Computer and gaming accessories, school products, planners, storage and organization (3-ring binders), dry erase boards, laminating, binding, stapling and punching products.
ACCO Brands EMEA	Europe, Middle East and Africa	Leitz®, Rapid®, Esselte®, Kensington®, Rexel® GBC®, NOBO®, Derwent® and PowerA®	Storage and organization products (lever-arch binders, sheet protectors, indexes), computer and gaming accessories, stapling, punching, laminating, shredding, do-it-yourself tools, dry erase boards and writing
ACCO Brands International	Australia/N.Z., Latin America and Asia-Pacific	Tilibra®, GBC®, Barrilito®, Foroni®, Marbig®, Kensington®, Artline®*, Wilson Jones®, PowerA®, Quartet®, Spirax® and Rexel® *Australia/N.Z. only	School notebooks, storage and organization products (binders, sheet protectors and indexes), laminating, shredding, writing and arts products, janitorial supplies, dry erase boards, stapling and punching products

Our product designs are tailored to end-user preferences in each geographic region, and where possible, leverage common engineering, design, and sourcing. Because we sell different products in different regions, our suppliers, and therefore to some extent our supply chains, also differ by region.

We manufacture some of our products and some are third-party sourced. In 2022, we manufactured approximately 40% of our products locally where we operate and sourced the remainder. We have manufacturing facilities in Australia, Belgium, Brazil, Canada, China, Czech Republic, England, Germany, Italy, Mexico, Poland, Portugal, Sweden, and the United States. Sourcing primarily comes from China, but we also source from other North American, South American, Asian, Far Eastern and European countries.

We maintain distribution centers in Australia, Brazil, Belgium, Canada, Czech Republic, England, France, Germany, Italy, New Zealand, Poland, Sweden, and the United States. We also have other smaller offices in China, England, Germany, Hong Kong, Japan, Poland, Taiwan, and the United States.

For additional information concerning our business, manufacturing facilities and distribution centers, see our Annual Report on Form 10-K for 2022 that we filed with the U.S. Securities and Exchange Commission and the subsequent filings that we make. These filings are available on our website here.

Due to our internal hiring procedures, labor policies and the locations of most of our employees, ACCO Brands believes that the risks of slavery and human trafficking in our own workforce are remote. In addition, these risks are further mitigated since ACCO Brands does not use migrant labor. We have less influence over the labor practices of our sourced product vendors and their supply chains and believe our principal risk of slavery and human trafficking is that forced labor could occur without our knowledge in violation of our policies in upper tiers of the supply chain. Accordingly, we have established the compliance procedures discussed in this Statement primarily to mitigate the risk of slavery and human trafficking in our supply chains for third-party sourced products.

SELECTED POLICIES

ACCO Brands Code of Conduct

ACCO Brands Corporation observes high ethical standards in the conduct of its business. The company respects internationally accepted legal principles and strives to obey the laws of those countries in which it does business. A detailed compilation of the company's commitment to ethical behavior and human rights is published in its Code of Conduct, which is available to all stakeholders on our website here.

Supplier Workplace and Security Code of Conduct

As indicated in our Supplier Workplace and Security Code of Conduct, which has been approved by executive leadership, ACCO Brands is committed to ensuring that workers are treated with respect and dignity and we seek relationships with suppliers that are committed to manufacturing under fair and safe labor conditions, respecting human rights.

The Supplier Workplace and Security Code of Conduct is publicly available on our website here. In addition, it is distributed to employees and new suppliers as part of training and is available in 15 languages including English.

Among other things, the Supplier Workplace and Security Code of Conduct provides that:

- Suppliers shall not use forced labor, whether in the form of prison labor, indentured labor, bonded labor, or otherwise.
- Suppliers shall not employ people younger than 15, under the minimum legal age or the minimum age for completing compulsory education in the country of manufacture, whichever is higher.
- Suppliers shall treat every employee with respect and dignity, and shall not subject any employee to physical, sexual, psychological, or verbal harassment or abuse.

- Suppliers shall pay employees at least the minimum wage required by local law, or the prevailing industry wage if no minimum wage law applies and shall provide legally mandated benefits.
- Suppliers shall not require workers to work more than the maximum hours of daily and weekly labor set by local laws, and workers should be granted at least one day off in every seven-day period if required by local law.

We expect our suppliers to take responsibility for conforming to our relevant policies. The Supplier Workplace and Security Code of Conduct indicates that the supplier is responsible for ensuring compliance for itself and any sub-contractor(s) and factories.

VERIFICATION OF PRODUCT SUPPLY CHAINS TO ADDRESS AND EVALUATE RISKS OF SLAVERY AND HUMAN TRAFFICKING

ACCO Brands seeks to identify and evaluate the potential risks for slavery and human trafficking in its supply chains through reviewing the supplier's geographic location and the nature of its manufacturing activities for us. As discussed below, we also conduct factory assessments of new suppliers, as well as annual audits.

As a source of market intelligence to help identify risk, ACCO Brands participates in various trade organization groups that are focused on this issue and utilizes industry benchmarking data and information published by the U.S. government to help identify potentially high-risk areas.

Audit of Suppliers

ACCO Brands' Supplier Workplace and Security Code of Conduct provides that, to ensure compliance with the Code, we have the right to monitor factories through audits by third parties and visits by ACCO Brands' personnel. In addition, our forms of purchase order terms and conditions and manufacturing agreement provide for inspection rights to audit compliance with the Code.

To become an ACCO Brands supplier, a supplier must undergo a factory assessment that reviews quality, social and security practices, and standards. Our internal personnel conduct these assessments.

Slavery and human trafficking risk are reviewed as part of the assessment. In addition, we use a third-party service provider, which is a well-known international firm that specializes in supply chain audits, to conduct annual social responsibility audits of suppliers. These audits include a slavery and human trafficking assessment. As part of our ongoing focus on mitigating supply chain

risk, we are in the process of reviewing our supplier data collection process and reporting across a number of different areas, including slavery and human trafficking, with a view to determining whether to enhance our policies and/or procedures.

Factories that make finished products and/or branded components that identify ACCO Brands or any of its subsidiaries, a licensor or a customer are audited based on a risk assessment. Other third-party factories in designated low risk countries are audited if determined to be appropriate by ACCO Brands' compliance staff based on the perceived risk.

Audits include reviews of documents, interviews with workers and site visits of production facilities and worker housing. We conduct unannounced, semi-announced and announced audits, depending upon the risk profile of the supplier. Our audit program also includes unannounced audits to the extent a supplier is required to correct a violation of our Supplier Workplace and Security Code of Conduct or local law. The frequency of audits is based on the perceived risk of the supplier and other relevant factors.

Our audit process includes a Corrective Action Plan ("CAP") on a specified time frame if deficiencies in an audit category are identified. The failure to complete requested corrective actions may result in termination of the supplier relationship.

ACCO Brands partners with a leading NGO to help ensure its slavery and anti-human trafficking compliance programs remain current to meet changing social standards in our global environment. An example of this includes recent enhancements to our audit to address migrant worker labor risks. We also monitor and adapt our audit compliance procedures to take into account evolving regional social and political issues that may impact workers in our supply chain.

Supplier Reporting

ACCO Brands requires suppliers to complete periodic reporting separate from our audits as a means of helping to ensure continued compliance to relevant ACCO Brands Codes and Policies. Reporting is either directly to ACCO Brands' compliance staff or through third-party systems. ACCO Brands reviews the following:

- Supplier Workplace and Security Code of Conduct – Suppliers are required to review and acknowledge compliance with each clause of the Code.
- Human Trafficking and Anti-Slavery Laws – Suppliers are required to complete a Questionnaire to help identify compliance with relevant laws and risks of modern slavery deeper in the supply chain.
- Conflict Minerals –Suppliers are required to provide information in support of our Conflict

Minerals Policy to identify risks of 'conflict minerals' in our supply chain.

CERTIFICATIONS AND CONTRACTUAL TERMS AND CONDITIONS

As earlier noted, ACCO Brands requires suppliers to certify compliance with the Supplier Workplace and Security Code of Conduct.

If we determine that a factory does not comply with our Supplier Workplace and Security Code of Conduct, we typically strive to work with the supplier to develop and implement an appropriate CAP. However, depending upon the circumstances, ACCO Brands may elect to end its relationship with a supplier at any time for failing to adhere to the Code.

In addition, our forms of purchase order terms and conditions and manufacturing agreement require that suppliers comply with our Supplier Workplace and Security Code of Conduct and that they require their subcontractors and suppliers who manufacture products or components for us or who provide services for us abide by the Supplier Workplace and Security Code of Conduct and any other codes, policies and procedures to which our direct supplier has agreed to comply.

INTERNAL ACCOUNTABILITY STANDARDS AND PROCEDURES

Relevant new employees are provided with a copy of the ACCO Brands Code of Conduct and Supplier Workplace and Security Code of Conduct. These materials also are included on our online employee intranet that all employees can access. In addition, employees periodically undergo training, as further discussed below. Failure of employees to abide by the requirements of the ACCO Brands Code of Conduct can result in corrective action up to and including termination of employment.

ACCO Brands has an independent compliance function that is headed by the Vice President, Associate General Counsel - Global Compliance and Litigation and Vice President, Global Compliance Operations to ensure that the Code of Conduct and the Supplier Workplace and Security Code of Conduct are supported. We also use specialist outside counsel to assist us with certain aspects of our slavery and human trafficking compliance.

Each factory's performance in relevant audit categories is reported to the compliance team, which works with the sourcing departments and suppliers to implement any CAPs and, together with the sourcing departments, monitors the implementation and effectiveness of the CAPs. ACCO Brands maintains a supplier audit database that stores information on the results of supplier audits and any CAPs.

ACCO Brands has a hotline and confidential web form for employees, suppliers, and other interested parties to report violations of its policies, including the provisions of the Supplier Workplace and Security Code of Conduct that address slavery and human trafficking. Contact information for these mechanisms is on our website here.

We assess the effectiveness of the actions being taken to assess and address slavery and human trafficking risks through the number of supplier audits performed, the findings of supplier audits, the implementation of any required CAPs and the number and type of complaints received through our hotline.

TRAINING

ACCO Brands provides training to relevant employees and management on a local level who have direct responsibility for supply chain management. Our training includes, but is not limited to, training regarding our Code of Conduct and the Supplier Workplace and Security Code of Conduct, slavery and human trafficking and mitigating the risk of the supply chain being impacted by the same. ACCO Brands also provides periodic training updates and refresher training to these personnel.

ACCO Brands provides training to suppliers directly or through third parties. Factories undertaking audits by our third-party service provider are trained on the audit process and remediation of violations.

CONSULTATION AND APPROVAL

ACCO Brands is committed to a group-wide response to slavery and human trafficking. We consult with companies across our consolidated group to ensure their slavery and human trafficking risks have been appropriately identified, assessed and addressed and that the entities that are part of our consolidated group are aware of the actions they need to take to addressed slavery and human trafficking.

In addition, the subsidiaries in our consolidated group subject to the California Transparency in Supply Chains Act, UK Modern Slavery Act and the Australian Modern Slavery Act were consulted in the development of this Statement. The Statement has been approved by their respective Boards of Directors as required and as described below.

UK Modern Slavery Act

Solely for purposes of compliance with the UK Modern Slavery Act, this Statement has been approved by the Board of Directors of ACCO UK Limited and its parent company, ACCO Brands Europe Limited, and signed by a director of each of those entities, on June 13, 2022.

A signed copy of this Statement is available upon request by contacting us here.

Australian Modern Slavery Act

Solely for purposes of compliance with the Australian Modern Slavery Act, this Statement has been approved by the Board of Directors of ACCO Brands Australia Holding Pty Ltd (ABN 58 130 787 923) and signed by a director of that entity, on June 10, 2022. ACCO Brands Australia Holding Pty Ltd is a holding company signing this Statement on behalf of itself and its direct and indirect subsidiaries, ACCO Brands Australia Pty Ltd (ABN 16 000 265 047) and Pkart Pty Limited (ABN 51 084 958 556). Of these three Australian companies, ACCO Brands Australia Pty Ltd ("ACCO Brands Australia") is the only operating company.

ACCO Brands Australia's products and supply chains are described earlier in this Statement. The principal risks of modern slavery practices in ACCO Brands Australia's supply chain, and the actions taken by ACCO Brands Australia to assess and address these risks and to assess the effectiveness of actions being taken, are generally the same as those of other ACCO Brands business units, which are discussed earlier in this Statement.

A signed copy of this Statement is available upon request by contacting us here.



Christopher Neil Hopkinson
For and on behalf of ACCO Brands Europe Limited
Duly authorized by the Board of Directors on 06 June 2023

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