



Senior Executive Stock Ownership Guidelines

Purpose

The Board of Directors of ACCO Brands Corporation (the “Company”) believes that it is important to align the financial interests of its executive officers and other senior management (“Executives”) with the long-term interests of our shareholders. Stock ownership is an effective tool in accomplishing this alignment as well as promoting sound corporate governance.

Ownership Guidelines (“Guidelines”)

Executives shall attain the level of stock ownership appropriate to their position as a multiple of base salary or a number of shares, whichever is lower:

Executive Level	Multiple of Base Pay	Number of Shares
Chief Executive Officer	6 x base salary	500,000
Chief Financial Officer and Presidents	3 x base salary	125,000
Other Executives	2 x base salary	60,000

Participation

Executives covered by these Guidelines include the Chief Executive Officer, Chief Financial Officer, Business Unit Presidents and other select senior management. In the event one of the Executives also serves in a capacity as a member of the Board of Directors, these Guidelines prevail.

Timeframe

Executives are expected to meet the applicable level of share ownership within five (5) years of the effective date of becoming an Executive covered by the Guidelines. Once covered by the Guidelines, if an Executive is promoted to a higher level, the Executive is expected to meet the new applicable level of share ownership within five (5) years of the promotion effective date.

Definition of Ownership

Stock ownership will include the following:

- Shares owned directly, in joint accounts or by a spouse or dependent child(ren);
- Shares held through Company retirement plans;
- Shares beneficially-owned through a trust, or similar estate planning device;
- Vested and unvested restricted stock units (RSUs), including dividend equivalents paid thereon; and
- Vested performance stock units (PSUs), including dividend equivalents paid thereon

Retention Expectation

Following the vesting of PSUs or RSUs or the exercise of stock options, Executives who have not yet met their applicable stock ownership levels (in stock or value) are expected to retain at least 50% of the net value of shares of stock received (i.e., the net value after deduction of the exercise price and all applicable tax and other required withholdings) until they attain their applicable stock ownership level. Subject to the Company’s insider-trading policy, once an Executive is above his/her applicable stock ownership level, he/she may reduce his/her share ownership so long as his/her ownership level is maintained at or above the applicable ownership levels while the Executive remains subject to the Guidelines.



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Administration

The Compensation Committee of the Board of Directors (the "Committee") shall be responsible for establishing, as well as monitoring the application of, the Guidelines. Annually, Executives subject to the Guidelines will be provided a statement reflecting their then-current level of ownership.

If there are instances where these Guidelines would place a severe hardship on an Executive, the Committee, in its sole discretion, may develop an alternative stock ownership guideline for him/her that reflects both the intent of the Guidelines and the personal circumstances of the Executive.

The Committee has the sole discretion to remedy any deficiency if stock ownership levels are not met on a timely basis. Remedies may include providing a portion of earned annual incentive awards in Company stock or similar actions.

Adopted: October 21, 2008

Revised: August 9, 2011

Revised: December 5, 2012

Revised: October 16, 2018