



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. Accordingly, the Company adopted these stock ownership guidelines effective as of October 21, 2008 (the "Effective Date").

Ownership Guidelines

The stock ownership guidelines as a multiple of base salary are as follows:

Level	Multiple of Pay
Chief Executive Officer	5 x base salary
Chief Financial Officer and Presidents	3 x base salary
Other Executives	2 x base salary

Participation

The Company's stock ownership guidelines apply to all participants in the Company's Executive Severance Plan (the "Plan"), as in effect from time-to-time. In the event one of these Executives also serves in a capacity as a member of the Board of Directors, they will be subject to these Employee Stock Ownership Guidelines in lieu of any stock ownership guidelines applicable to members of the Board of Directors.

Timeframe

The timeframe to achieve the ownership guidelines are as follows:

- Executives employed at the time of the GBC merger date (August 17, 2005) are required to achieve the applicable stock ownership guideline by August 16, 2012
- Employees who have either been newly promoted or hired after August 17, 2005, but prior to the Effective Date, are required to achieve the applicable stock ownership level within seven years of their promotion or hire date
- Employees promoted or hired after the Effective Date are required to achieve the applicable stock ownership level within five years.

If an executive becomes subject to a greater ownership amount, due to promotion, the executive is expected to meet the higher ownership amount within the later of the original period or three (3) years from the effective date of the promotion.

Once achieved, ownership of the guideline amount must be maintained for as long as the executive is subject to these stock ownership guidelines.



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Definition of Ownership

Stock ownership will include the following:

- Stock owned directly
- Stock held through Company retirement plans
- Stock beneficially owned through a trust, spouse and/or dependent children
- Unvested restricted stock units
- Performance share units at Target

Stock Ownership Target Calculation

The stock ownership target calculation is equal to the target multiple of pay multiplied by the annual base salary, divided by the average of the highest and lowest share price of ACCO Brands common stock over the prior 12 month period as reported on the NYSE. Compliance will be evaluated on a once-per-year basis, as of September 30 of each year to be discussed during the next following Compensation Committee Meeting.

Administration

The Compensation Committee of the Board shall be responsible for monitoring the application of these Stock Ownership Guidelines, and prepare a progress report on the application of the Stock Ownership Guidelines at least once a year, and deliver the report to the Board. Annually, Executives subject to the Share Ownership Guidelines will be provided a compliance statement for them to declare their acknowledgment of the share ownership guidelines and to report the number of shares they may beneficially own.

There may be instances where these Executive Stock Ownership Guidelines would place a severe hardship on a Covered Executive. In such instances, the Compensation Committee will make the final decision as to developing an alternative stock ownership guideline for the Executive that reflects both the intention of these Stock Ownership Guidelines and the personal circumstances of the Covered Executive.

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