

BRUNSWICK'S HUMANS RIGHTS POLICY

Purpose:

This policy outlines Brunswick's position and compliance measures to respect and protect human rights and to combat global human trafficking and support anti-forced labor regulations in its supply chain. The policy was prepared in alignment with the International Labor Organization Conventions and the International Bill of Human Rights, as well as the UK Modern Slavery Act, the US Countering American Adversaries Through Sanctions Act ("CAATSA") and other similar regulations.

Applicability:

This policy applies to all of Brunswick's global divisions and business units. We separately maintain a Supplier Code of Conduct aligned with this policy and applicable to our global supply base.

Policy:

Brunswick Corporation ("Brunswick" or "Company") is a signatory to the United Nations Global Compact and committed to respecting human rights and operating in an ethical manner. The Company expects its employees, suppliers, agents, and subcontractors to engage in lawful and ethical business practices. Brunswick fully supports global efforts to protect human rights and has implemented and enforced the following policies and processes.

Child Labor:

All employees of Brunswick must meet the minimum legal age to work as established by applicable local law. If local law does not set a minimum age, all employees must be at least 16 years old, unless engaging in work that is deemed hazardous or safety-sensitive (defined below) and then the individual must be at least 18 years old. Exceptions to this age limitation must be reviewed by the Corporate Legal Department and will be evaluated for compliance with International Labor Organization ("ILO") Convention 138. Prior to hire, the age of any potential employee must be verified in accordance with applicable law.

Individuals under the age of 18 shall not perform hazardous work, which includes the following:

- A. Work with dangerous machinery, equipment or tools;
- B. Work with hazardous substances, agents or processes;
- C. Work at dangerous heights or confined spaces; or
- D. Work under particularly difficult conditions, such as long hours or over-night where the child is confined to the premises of the employer.

Forced Labor:

- A. All Brunswick employees are employed on a voluntary basis, and are not subject to exploitation, such as forced, bonded or indentured labor.
- B. Employees must maintain possession of their legal identity documents, including, but not limited to, identification cards, passport and immigration documents (this does not include providing documents to Brunswick to prove legal authorization to work in a specific jurisdiction);

- C. Employee freedom of movement shall not be restricted;
- D. Employees can terminate their employment of their own free will as outlined by applicable law;
- E. Employees shall work hours and be paid in compliance with applicable law; and
- F. Employees shall not be required to pay any fee, or other payments, to the employer for the purpose of being hired or as a condition of employment, except where permissible by applicable law and reviewed by the Legal Department.

Human Trafficking:

Brunswick strictly prohibits human trafficking in all our operations and in those of all subcontractors, suppliers and agents in our global supply chain. Employees shall not be subject to any form of forced, compulsory, bonded, or indentured labor. All work must be voluntary, and employees shall have the freedom to terminate their employment at any time without penalty, upon giving reasonable notice, and in compliance with applicable law.

Recruitment and Transportation Expenses:

Employees shall not be charged any fees or costs for recruitment, directly or indirectly, in whole or in part, including costs associated with travel to the receiving country, and processing official job-related documents and work visas in both home and host countries, except where permissible by applicable law and reviewed by the Legal Department.

Employees shall be provided with return transportation to their country of origin, or compensation for the cost of return transportation, upon completion of their employment contract and/or assignment.

Deposits:

Employees shall not be required to lodge monetary deposits or security payments, or have a portion of their pay withheld at any time as a condition of obtaining or retaining employment.

Wages, Benefits and Hours:

All employees shall be paid at least the minimum wage required by applicable law and shall be provided all legally mandated benefits. Wage payments shall be made at regular intervals and directly to employees, in accordance with applicable law, if any, and shall not be unlawfully delayed, deferred, or withheld. Deception in wage commitments, payment, advances, and loans is prohibited.

Working hours are established in compliance with local law and are not to exceed the maximum permissible.

Private Employment Agencies and Labor Recruiters

Brunswick should hire workers directly whenever possible. When the subcontracting of recruitment and hiring is necessary, the Company shall ensure that the labor agencies they engage operate legally, are certified or licensed by the competent authority in their country of operation, do not charge improper recruitment fees, use only trained recruiters, and do not engage in fraudulent recruitment practices that place workers at risk for human trafficking and sexual exploitation.

Humane Treatment:

The workplace shall be free of any form of inhumane treatment.

Disciplinary policies and procedures shall be clearly defined and communicated to all workers, and shall not include any inhumane disciplinary measures, including any corporal punishment, mental or physical coercion, or verbal abuse of workers. The use or threat of physical or sexual violence, harassment and intimidation against an employee, his or her family, or close associates, is strictly prohibited.

Non-Discrimination and Workplace Equality:

Brunswick values and advances diversity and inclusion in the workplace. The Company is committed to equal opportunity and works to maintain a workplace free of discrimination and harassment on the basis of race, religion, color, gender, creed, sexual orientation, gender identity, national origin, ancestry, citizenship status, marital status, pregnancy, age, disability, veteran status, genetic information, or other status, including, but not limited to, harassment that violates federal, state or local law. The Company believes in pay equity and bases its employment decisions on a variety of legitimate, business factors ranging from performance, skills, experience, as well as other factors.

Employees (or their family members) shall not be threatened with denunciation to authorities to coerce them into taking up or maintaining employment.

Freedom of Association:

Brunswick respects the rights of employees to participate in activities protected by the National Labor Relations Act or equivalent local legislations in the jurisdictions in which the Company operates.

Complaint Procedure:

Any concerns arising from this policy can and must be reported to the Ethics Program. You can contact the Ethics Program by visiting www.bcethics.com, calling the toll-free hotline 877-684-5252 (international numbers are available in the Integrity Playbook), contacting your local Ethics Counselor or contacting the Ethics Program directly (ethics.advisory@brunswick.com, 847-735-4318). All reports will be confidential in accordance with the Ethics Program's guidance, policies and/or procedures. Brunswick prohibits retaliation, including harassment, termination, or other adverse action, or the threat of adverse action against a reporter for submitting a good faith concern under this policy, or for participating in an investigation into concerns raised under this policy, regardless of whether the allegations is proven to be true.

Exceptions:

Non-applicable

Related Documents:

Brunswick Integrity Playbook Brunswick Supplier Code of Conduct Brunswick Whistleblower Policy

Policy Owner:

Sr Mgr, Global Compliance

Date of Issue:

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