

BRUNSWICK'S CONFLICT OF INTEREST POLICY

Purpose:

The purpose of this Policy is to set forth procedures for identifying and disclosing potential actual or perceived conflicts of interest.

Applicability:

All Brunswick employees.

Definitions:

1. Company: Brunswick Corporation and all divisions, subsidiaries, and affiliates
2. Employee: All regular, temporary, full or part-time employees
3. Family Member: An employee's spouse, Significant Other, person with whom he/she/they resides, or the following related by blood or marriage (including foster and step): parent, child, brother, sister, grandparent, grandchild, aunt, uncle, first cousin, niece, or nephew. A Family Member is also any parent, child, brother, or sister of an employee's spouse.
4. Significant Other: A person with whom an individual has an intimate relationship, such as a girlfriend or boyfriend.

Policy:

A. Conflicts of Interest

A conflict of interest arises when an employee's personal or family interests interfere—or appear to interfere—with his/her ability to make sound business decisions on behalf of the Company. Conflicts may result from a number of issues, including outside employment, an interest in a competing company, or romantic or family relationships. Employees must avoid not only actual conflicts of interests, but also situations that appear to be a conflict between employee personal interests and the interests of the Company.

Examples of Conflicts of Interest:

- An employee or his/her/their Family Member directly or indirectly owning an interest in (other than ownership of a minimal amount of stock—less than \$50,000 market value in shares of a publicly-traded company), or providing services to, a competitor of the Company or an entity that does business with the Company.

- An employee supervising one of his/her/their own Family Members.
- An employee working at an outside job that interferes with his/her/their position at the Company or using Company property, equipment, information, or other resources to complete work at an outside position.

B. Disclosing Conflicts of Interest

If an employee becomes aware of an actual or potential conflict of interest, he/she/they must disclose it as soon as reasonably practicable by completing the Conflict of Interest Disclosure Report Form (available at www.bcethics.com). An employee may also use the Form for advance approval to proceed before entering into a potential conflict.

Salaried employees must also complete Conflicts of Interest training and an online Conflicts of Interest Disclosure Questionnaire on an annual basis. Even if a conflict has been previously disclosed and approved, salaried employees must disclose it during the Conflicts of Interest Disclosure Questionnaire process each year it remains in existence.

C. Gifts, Meals, and Entertainment

Gifts, meals, and entertainment must support a reasonable business purpose, be infrequent, comply with all applicable laws and Company policies, and be an inexpensive non-cash gift – generally less than \$100 in value. Gifts offered to or received from anyone should never include cash or cash equivalents, such as gift cards. Entertainment may only take place in a setting consistent with the Company commitment to mutual respect.

If, as part of legitimate business practices, an employee seeks to offer or receive a gift greater than \$100 in value, other than business meals, he/she/they must disclose the gift by completing the Gifts & Entertainment Disclosure (available at www.bcethics.com), and the gift must be approved by a manager and the Ethics Office prior to the offer, receipt, or acceptance of the gift.

Gifts offered to or received from government officials should never exceed \$100 in value. Any government gifts must be given or received openly and transparently, properly recorded in the Company's books and records, provided only to reflect esteem or gratitude and be acceptable under local law. Questions about whether a gift, meal, or entertainment to or from a government official is allowable should be directed to the Law Department or the Ethics Office.

Exceptions:

Non-applicable

Related Documents:

Brunswick's Integrity Playbook – available on Brunswick Connect and www.bcethics.com

Code of Ethics for Senior Financial Officers and Managers – E.02.02

Employment of Relatives – H.02.04

Outside Employment – H.02.05

Gift & Entertainment Disclosure Form – available at www.bcethics.com

Conflict of Interest Disclosure Report Form – available at www.bcethics.com

Policy Owner and Who to Contact:

Associate General Counsel – Labor & Compliance

Date of Issue:

June 2023