



BRUNSWICK™

NEXT NEVER RESTS™



**Brunswick Supplier
Code of Conduct**

Overview

At Brunswick, we are dedicated to maintaining the highest standards of business and ethical conduct across all divisions and in all our business relationships. This Supplier Code of Conduct outlines the principles and guidelines that our suppliers are expected to adhere to including environmental responsibility, ethics, labor practices, human rights, and anti-corruption measures. In situations where local laws are inadequate, we require compliance with International Labour Organization (ILO) standards and industry best practices.

Applicability

Brunswick's Supplier Code of Conduct applies to suppliers, vendors, and other third parties who provide services or supplies to Brunswick ("suppliers") and our global divisions, subsidiaries, and affiliates ("Brunswick," "we," or "us").

Scope

We expect suppliers to operate in accordance with all applicable laws and regulations and the principles in this Supplier Code of Conduct at all times when conducting business with us.

Environmental Responsibility

Safeguarding the environment is paramount to our commitment to responsible operations. Suppliers are expected to adopt environmentally sustainable practices to minimize ecological impact and contribute positively to the planet.

- Suppliers must comply with all applicable environmental laws, regulations, and standards in their respective operating regions.
- Suppliers should strive to minimize resource consumption, such as water, energy, and other natural resources, by implementing efficient practices and technologies.
- Suppliers must take measures to prevent pollution and minimize the negative environmental impacts of their operations, including proper waste management and reduction of carbon emissions.
- Suppliers are encouraged to use environmentally friendly materials and practices that promote sustainability and reduce ecological impact.
- Suppliers should consider the conservation of biodiversity and protection of ecosystems in their operations, particularly if they operate in ecologically sensitive areas.
- Suppliers are encouraged to track and publish their greenhouse gas emissions and establish programs to reduce such emissions in alignment with efforts to minimize climate change.

Ethics

Ethical behavior is a fundamental aspect of our values. Suppliers are expected to uphold the highest standards of integrity and honesty in all business dealings.

Business Integrity & Anti-Corruption

Suppliers must conduct their business with unwavering integrity and avoid all forms of corruption, bribery, and unethical practices. This includes refraining from offering, promising, or providing any improper payment, favor, or benefit, whether directly or indirectly, to influence business decisions, gain an unfair advantage, or compromise the integrity of individuals or organizations. We expect that suppliers comply with the US Foreign Corrupt Practices Act ("FCPA"), UK Anti-Bribery Act, and similar global anti-corruption laws in which suppliers operate, sell, or provide services to us.

Antitrust & Fair Competition

Suppliers must comply with antitrust and fair competition laws of the countries in which they do business. For example, suppliers must not engage in price-fixing, price discrimination, bid rigging, market allocation or any other unfair trade practices in violation of applicable antitrust and fair competition laws.

Conflicts of Interest

Suppliers' decisions must remain free from bias or personal gain that may adversely affect their obligations and responsibilities. Suppliers must disclose any potential or actual conflicts of interest that may arise in their business relationships with our company by completing a conflict disclosure form on www.bcethics.com.

Gifts

Gifts, hospitality, or entertainment provided to our employees or representatives by suppliers should be infrequent, reasonable, transparent, and in compliance with applicable laws and regulations. These gestures should never compromise the recipient's judgment or create the perception of impropriety. Certain exchanges are never acceptable, such as cash or cash equivalents, items offered with the expectation of receiving anything in return, or gifts that are considered illegal, illicit, or otherwise would be viewed unfavorably.

Intellectual Property

Suppliers must respect the intellectual property rights of Brunswick and others and ensure that their products and services do not infringe upon the rights of third parties. If intellectual property is shared with us, it must be done transparently and with proper authorization.

Suppliers must not publicize or market their relationship with Brunswick, nor use any Brunswick trademarks, without prior written consent.

Privacy

Suppliers must handle any personal data or sensitive information shared by our company with the utmost care and in compliance with relevant data protection laws. This includes maintaining appropriate security measures and obtaining necessary consents for data collection, processing, and sharing.

Responsible Sourcing, Product Safety and Compliance

Quality, safety, and regulatory compliance are critical in today's global market. Suppliers must align with our commitment to delivering products that meet the highest safety and quality standards, including those adhering to Organization for Economic Cooperation and Development (OECD) guidelines. We recognize that product safety and compliance contribute not only to the well-being of consumers but also to the reputation and success of our brands. As such, suppliers must:

- Understand their products and the markets and/or industries into which they can, and cannot, be sold, including, but not limited to, adherence to applicable laws and regulations, safety and quality standards, labeling and certification.
- Notify Brunswick if there are certain markets and/or industries where their products cannot be sold, any standards, laws, regulations or certifications that are not met.
- Ensure that the products they provide meet the highest standards of quality and safety, adhering to applicable laws and regulations in the markets where products are sold.
- Understand and comply with all relevant product safety, labeling, and certification requirements in markets where products are sold.

- Provide transparent information regarding the origin, sources and practices involved in their supply chains. This includes disclosing sub-suppliers and materials used, ensuring they meet ethical and environmental standards.
- Provide timely responses to surveys regarding trade compliance, CTPAT, compliance with global sanctions, and product compliance, including, but not limited to Conflict Minerals and chemical makeup.
- Provide Safety Data Sheets (SDSs) for any products that require SDSs in accordance with applicable regulatory requirements.

Labor Practices & Human Rights

At the heart of our commitment to ethical business practices lies the core principles of labor practices and human rights. We firmly believe that every worker, regardless of their origin or background, deserves to be treated with dignity, respect, and fairness. We expect our suppliers to contribute to a just and equitable global workforce by supporting the protection of human rights, following universally accepted employment practices, and prioritizing health and safety.

Non-Discrimination and Equal Opportunities

- Suppliers are expected to uphold the principles of non-discrimination and equal opportunities in all aspect of their operations, including but not limited to hiring practices, employee treatment, and promotion decisions.
- Suppliers should foster an inclusive and diverse workforce, ensuring that all employees have equal access to opportunities for professional growth and development, and must never discriminate based on race, gender, age, disability, or any other protected characteristic.

Freely Chosen Employment and Forced Labor

- Suppliers must ensure that all employment is based on a voluntary choice, free from any form of force, coercion, or deception. Workers must not be subjected to any forced or involuntary labor, including debt bondage, human trafficking, or exploitative practices.
- Suppliers employing foreign migrant workers must respect their human rights and provide fair and ethical treatment. Migrant workers must not face discriminatory practices and should receive the same working conditions and benefits as local workers.
- Migrant workers must have the right to freedom of movement and the ability to leave their employment and living quarters during non-working hours. Employers must not confiscate identity documents, such as passports, work permits, or residence permits, and workers should have easy access to these documents.
- Supplier employees shall not be required to pay any fee, or other payments, to the employer or recruitment agency for the purpose of being hired, or as a condition of employment, except where permissible by applicable law.

Child Labor

- Suppliers are strictly prohibited from using child labor. The term "child" refers to anyone below the legal minimum age for employment, or under the age for compulsory schooling, or under the minimum age for employment in the country of operation, whichever is higher.
- All work must be age-appropriate and not interfere with a child's education, development, or well-being.

Working Hours

- Working hours must comply with local laws and regulations.

This Supplier Code is not intended to, in any way, grant new and additional third-party rights, including for workers, nor modify or otherwise limit any of Brunswick's contractual or legal rights.

- Suppliers must ensure that overtime work is properly compensated and does not pose a health or safety risk to workers.

Wages and Benefits

- Suppliers must provide workers with wages and benefits that meet or exceed the legal minimums established by local laws or industry standards.
- Deductions from wages should be transparent, lawful, and communicated clearly to workers. Deductions from wages as a disciplinary measure shall not be permitted.
- Wages should be paid regularly and on time.

Freedom of Association

- Suppliers must respect their workers' right to form and join trade unions, engage in collective bargaining, and partake in other lawful forms of worker representation, and must not infringe upon these rights.

Health and Safety

- Suppliers must provide a safe and healthy working environment for all employees, complying with applicable laws and regulations.
- Adequate training, protective equipment, and measures to prevent accidents and injuries should be provided.
- The workplace shall be free of any form of inhumane treatment, including corporal punishment, mental or physical coercion, or verbal abuse of workers. The use or threat of physical or sexual violence, harassment, or intimidation against an employee, his or her family, or close associates, is strictly prohibited.
- Where Supplier provides accommodations for personnel, it must be safe, hygienic, and offer reasonable living conditions that respects workers' dignity and privacy.

Supplier Responsibility and Consequences

Brunswick recommends that suppliers implement appropriate policies, procedures, and management systems related to the content of this Code. We expect suppliers to effectively communicate to their personnel and third parties with whom they do business the standards to which the supplier is committed, as well as relevant laws, regulations, and protections.

- Suppliers are expected to adhere to this Supplier Code of Conduct and ensure that their operations and practices align with the outlined principles and standards.
- Failure to comply with this code may result in various consequences, including but not limited to, corrective action plans, contract termination, and legal remedies. Our company reserves the right to take appropriate measures to address non-compliance.
- If violations are identified, suppliers are required to promptly implement corrective actions to rectify the situation and prevent future occurrences.
- Suppliers are expected to conduct regular self-assessments and audits to ensure compliance with this Supplier Code of Conduct. Brunswick may also conduct independent assessments to verify compliance.
- Suppliers must promptly report any violations of this Code and take appropriate corrective actions to address issues identified. Brunswick may provide guidance on remediation processes.

Conclusion

By adhering to this Supplier Code of Conduct, our suppliers play a pivotal role in maintaining high levels of business integrity, ethical labor practices, environmental sustainability, and product safety. Brunswick is committed to fostering a responsible and sustainable supply chain, and we value our suppliers' partnership in achieving these goals. If there is any conflict between the Supplier Code of Conduct and a confidentiality agreement, contract, or other agreement, please contact your Brunswick partner to further discuss.

Brunswick values open and honest communication with our suppliers. We encourage suppliers to promptly report any concerns or potential violations of this Supplier Code of Conduct via the Brunswick ethics hotline at www.bcethics.com. The Ethics Hotline is a confidential service that allows reporters to voice their concerns without fear of retaliation. The Ethics Hotline is available in multiple languages, online and by phone, 24 hours a day, 7 days a week. Reporters may make reports anonymously if they choose, however, reporters that elect to report anonymously should maintain their report number and access code to reply to any questions for further or clarifying information. All calls and online reports will be promptly reviewed and investigated.