

Supplier Code
of Conduct



BRUNSWICK

Table of Contents

OVERVIEW	3
APPLICABILITY	3
SCOPE	3
ENVIRONMENT	3
ETHICS	4
HEALTH AND SAFETY	4
PRODUCT SAFETY	5
LABOR & HUMAN RIGHTS	6
LEGAL COMPLIANCE	6
SUPPLIER RESPONSIBILITY & CONSEQUENCES	6
BRUNSWICK CODE OF CONDUCT	6
CONTACT INFORMATION	7

OVERVIEW

Brunswick adheres to the highest standards of ethical conduct. We comply with applicable laws and regulations of the countries and regions in which we operate and conduct our activities in an honest and ethical manner. We expect the same commitment to compliance and ethical conduct from you.

APPLICABILITY

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

SCOPE

We expect you to operate in accordance with the principles in this Supplier Code of Conduct at all times when conducting business with us.

ENVIRONMENT

Brunswick is committed to providing products and experiences in a manner that minimizes our impact to the environment. We continue to work toward environmental sustainability in our business operations, and we expect our suppliers to:

- Conduct your business activities in accordance with applicable environmental laws, regulations, rules, and standards;
- Work to provide services and products that have the lowest practical impact on the environment, including the most efficient use of energy as well as recycling or reusing materials and products whenever feasible and minimizing: the volume and toxicity of waste generated; your water use; and the volume of pollutants released to the environment; and
- Cooperate fully with us to address environmental requirements.

Brunswick expects its suppliers to operate in accordance with the principles set forth.

ETHICS

Business Integrity & Anti-Corruption

You must uphold the highest standards of integrity in all business interactions with Brunswick and our employees. We expect that you will remain in compliance with the Foreign Corrupt Practices Act (FCPA), UK Anti-Bribery Act, and similar global anti-corruption laws that apply to you in any country in which you operate, sell, or provide services to us. You must have a zero-tolerance policy with respect to bribery, corruption, extortion, embezzlement, and similar crimes in any dealings with us.

All of your business dealings with us should be transparent and accurately reflected in your books and records.

You should maintain policies that provide your employees the opportunity to confidentially report legal violations, including potential bribery and corruption.

Conflicts of Interest

There is the potential for a conflict of interest if one of your employee(s) or his or her family member(s) has a close relationship with a Brunswick employee who can make a decision that may affect your business with us. You must disclose any such relationships before entering into negotiations with us, or before signing any agreement with us.

Gifts

Gifts, meals, and entertainment offered to our procurement and sourcing employees must be reasonable, infrequent, and support legitimate business interests. Entertainment with our employees may only take place in a setting consistent with a commitment to mutual respect. You may not offer our employees gifts of cash or cash equivalents (such as gift cards).

Privacy & Intellectual Property

You must safeguard and make only appropriate use of confidential or personal information you obtain from us in the course of our business relationship. You should use your best efforts to remain in compliance with applicable laws and ensure that privacy and valid intellectual property rights are protected.

HEALTH AND SAFETY

We expect you to provide your workers with a safe and healthy work environment. We believe that all work-related injuries and illnesses can be prevented. Consistent with our own expectations as described in our Workplace Safety Policy, Brunswick expects our suppliers to:

- Comply with all safety and health laws, regulations, and standards applicable to your business and products;
- Implement and maintain safety and health management programs and processes that include, but are not limited to, assessing and controlling employee exposure to workplace hazards, identifying and planning for emergency events, and continually improving safety and health performance;
- Provide training to ensure employees are adequately trained and educated on applicable safety and health matters; and
- Strive for the prevention of workplace injuries and illnesses.

Suppliers must ensure that its suppliers and subcontractors who work on Brunswick business are aware of and comply with this Code.

PRODUCT SAFETY

You must deliver products and services that meet safety and quality standards required by applicable law as well as our quality standards.

You must cooperate and assist Brunswick in connection with product safety issues regarding materials or components you supply or have supplied to us, including, but not limited to, product recalls, product handling guidelines, field campaigns, and client bulletins.

Anti-Counterfeit

Brunswick strives to ensure that all of its products are of the highest quality and reliability. Therefore, Brunswick must prevent the use of counterfeit parts in its products and has processes to detect and report counterfeit parts or suspected counterfeit parts that may appear in the supply chain.

You are expected to know the origins of all parts and materials you supply to us and to ensure their authenticity. You must respond to our reasonable requests for information regarding the source of any parts or materials.



LABOR & HUMAN RIGHTS

Prevention of Child Labor & Human Trafficking

We do not tolerate child labor, forced labor, or human trafficking (as defined by the International Labour Organization (ILO)) in our supply chain. We expect suppliers to provide safe and healthy working conditions at all of your operations, and to foster an inclusive work environment that is free of harassment and discrimination. We expect you to meet or exceed legal requirements for compensation, working hours, and working conditions of your employees.

LEGAL COMPLIANCE

We expect our suppliers to comply with all applicable laws, rules, and regulations. In addition, we expect you to cooperate with reasonable requests designed to assist Brunswick with complying with our legal obligations.

SUPPLIER RESPONSIBILITY & CONSEQUENCES

Brunswick expects our suppliers to comply and adhere to this Code. You must inform us promptly of any breach or concerns related to this Code.

You must take steps to ensure that your employees, suppliers, and subcontractors who work on Brunswick business are aware of and comply with this Code.

Brunswick may visit your facilities, review your documentation, and conduct a full audit if necessary to ensure compliance with this Code.

Brunswick reserves the right to take appropriate action, up to and including termination of supply agreements for violations of applicable law or this Code, at its sole discretion.

BRUNSWICK CORPORATION CODE OF CONDUCT

You acknowledge that you have read, fully understand, and agree to conduct your business in accordance with the Brunswick Code of Conduct, which is available at: www.Brunswick.com/company/ethics/Codeofconduct.php

CONTACT INFORMATION

Please direct questions about this Supplier Code of Conduct to your Brunswick Procurement representative.



