

Ethics in Action — Brunswick's Integrity Playbook

A decorative graphic consisting of numerous thin, parallel blue lines that originate from a point on the left and fan out towards the right, creating a sense of motion and energy. The lines are set against a dark blue background.



Our Brunswick Connection,
A Message from Leadership

Integrity Anchors All Our Actions —

At Brunswick, we care just as much about how we get results as we do about getting results. That value defines how we treat each other, how we are viewed by our business partners, including our customers, and how we impact the communities in which we work. We are firmly committed to doing business with integrity and earning the trust of everyone that we encounter daily. No matter where you work in the company, our everyday actions uphold our commitment to doing business ethically and contribute to creating our ethical culture. All of our actions help create the Brunswick Connection defined as our commitment to putting the policies and principles in this Playbook into action in everything that we do.

The Brunswick Connection is a new way to discuss what has always been a part of the fabric and culture of Brunswick—do business the right way, the only way. It is the commitment we owe to our colleagues, stakeholders, consumers and to our communities to act with integrity. This Global Integrity

Playbook serves as a guide to help you strengthen and unite our Connection. Here, we provide you with hands-on guidance and tools as to how you can carry out the Brunswick Connection by making smart, ethical decisions in all our business dealings. In other words, the Playbook serves as a guide as to how you can model and promote the Brunswick Connection by putting ethics into action. As we continue to grow and transform as a global enterprise, the Brunswick Connection anchors our dedication to do the right thing to achieve sustainable business success while maintaining a strong reputation.

If you are ever in doubt, always remember your tie to the Brunswick Connection—by putting ethics in action there is never a right way to do the wrong thing.



David M. Foulkes
Chief Executive Officer



Table of Contents —

2	An Ethical Enterprise Introduction	26	We Avoid Conflicts of Interest
4	Our Brunswick Connection	28	Spotlight: Know the Rules About Gifts and Entertainment
5	Decision Diagram	30	We Compete Fairly
6	Let's Connect	32	<u>We Safeguard Our Assets and Information</u>
8	<u>We Protect Our Workforce</u>	33	We Appropriately Use and Protect Company Assets
9	We Celebrate and Respect Diversity in the Workplace	34	Spotlight: Know the Rules about Proper Use of your Systems
11	We Make Fair Employment Decisions	35	We Safeguard Confidential Information
13	Your Health & Safety Are Our Top Priority	38	Spotlight: We Protect Our Brand
15	We Support Global Human Rights	39	Spotlight: We Respect Privacy
17	We Care About the Environment	40	We Appropriately Use and Communicate Information
19	<u>We Conduct Business with Integrity</u>	42	We Represent the Company Properly
20	We Keep Accurate Records	44	Stuck with a Tough Decision?
22	We Design and Manufacture Safe and High-Quality Products		
24	We Never Bribe		



The Playbook

The Connection Starts With You!

Integrity anchors how we do business around the globe. This Playbook translates our integrity into action and demonstrates how each of us is accountable in creating and maintaining our Brunswick Connection. This Playbook applies to you, no matter your position in the company or where you are in the world. We rely on you to help us uphold and promote an ethical culture. If you see or suspect anything illegal or unethical, it is our duty to report the concern. No concern is too minor to report.

If you lead a team, you have an even greater responsibility. Lead by example, making sure your team members understand and follow the principles in this Playbook. Create the kind of workplace where employees feel comfortable coming forward with questions and concerns and support them when they raise issues. Never retaliate against employees for sharing concerns in good faith and prevent retaliation by others.

**Everyone, everywhere is accountable for acting with integrity
and upholding the Brunswick Connection.**

How the Brunswick Connection Helps You Make Decisions

Can We Do It? **YES** → Should We Do It? **YES** → How Do We Do It? Promoting **ETHICS** In Action



Let's Connect

Raise concerns early and often

You may remain anonymous

Confidentiality is protected

Retaliation is strictly prohibited

Part of our commitment in upholding the Brunswick Connection is to ensure you understand this Playbook and our policies. This includes asking questions, raising concerns and speaking up if you think someone is failing to protect our Brunswick Connection. There are many ways for you to ask a question or raise a concern through several different reporting avenues. Reports may be made anonymously, and translators are available through the toll-free Ethics Line. We investigate reports of misconduct thoroughly, disclosing information only to those who need it to resolve the issue.

If you would like to make a report, you can contact:



Your
Supervisor



In Person or By
Email Directly to Your
Local Ethics Counselor



U.S. Toll-Free
Ethics Line
(877) 684-5252



Web-Reporting
System
www.bcethics.com



Ethics Office
In Person/Mail
26125 N. Riverwoods Blvd.
Mettawa, IL 60045
(847) 735-4318
ethics.advisory@brunswick.com
Fax (847) 735-4388



The Company's
Office of General
Counsel
corporate.secretary@brunswick.com

Our Ethics Hotline is a confidential service managed for Brunswick by an independent third party. The Ethics Hotline is available in multiple languages, online and by phone, 24 hours a day, 7 days a week. When contacting the Ethics Hotline, you can decide whether to remain anonymous or identify yourself.



We Forbid Retaliation

It is quite simple—retaliation is never tolerated. Retaliation is when someone, either directly or indirectly, does something to punish you in response to raising a good faith concern or participating in an investigation. Examples include intimidation, exclusion from opportunities, false negative performance reviews and/or termination.

Retaliation is never tolerated and must be reported. Any employee who retaliates against someone who raises a good faith concern will be subject to discipline, up to and including termination of employment.

If you believe someone has retaliated against you, promptly make a report using any of the reporting avenues described in this Playbook.

It is a violation of the Brunswick Connection to knowingly make a false accusation, lie to an investigator or refuse to cooperate with an investigation. Reporting in “good faith” does not mean that you have to be right when you raise a concern; it just means you have a good faith basis for your belief that a violation has, or may have, occurred and that you are truthful when making your report.



Our Investigation Process

- **Assign Investigator** — individuals with the right knowledge, objectivity and discretion
- **Conduct Investigation** — determine facts through interviews and/or documents
- **Corrective Action** — if necessary, recommend corrective actions to appropriate managers or stakeholders for implementation
- **Feedback** — if appropriate, provide general feedback to the reporter about action items

Ethics in Action

Q: Will my career be damaged if I make a report?

No. Part of our duty to the Brunswick Connection is our commitment to maintaining an open environment where issues can be raised in good faith without negative consequences to the reporter. We will investigate all reported instances of retaliation and take prompt corrective action where appropriate.

Q: I observed a situation I suspect violates the Playbook. Should I report it, even if I'm not completely sure there is a problem?

Absolutely! You are responsible for immediately reporting possible violations of the Playbook, even where you hear about the violation second-hand or where you don't have any evidence to support the concern. Your report will be taken seriously and investigated as appropriate. It is better to report a suspicion that turns out to be a nonissue than to ignore a possible violation of the law or Company policy.

Find Out More

Procedures for Processing Complaints Regarding Accounting and Financial Matters (E.02.01)

[Whistleblower Policy](#) (E.02.03)

[Anti-Harassment Policy](#) (H.01.02)

We Protect
Our Workforce





We Celebrate and Respect Diversity in the Workplace

An essential element of our Brunswick Connection is respecting and promoting diversity and inclusion in the workplace. At our core, we must treat each other with respect and dignity by welcoming diverse people, thoughts and ideas. We are all more successful when we embrace an inclusive environment free from disrespectful and insensitive behavior.

The Brunswick Connection requires us to maintain appropriate standards of conduct in the workplace. This means we do not tolerate any form of disrespectful behavior, bullying, harassment and/or discrimination by anyone, including supervisors, coworkers, vendors, clients, customers or other third parties. No one should ever harass, bully and/or discriminate against another in the workplace because of one's race, color, religion, national origin, sex, age, sexual orientation, pregnancy, disability, citizenship status, veteran status or any other status protected by applicable law. This prohibition applies whether you are on Company premises or engaged in off-hours or off-site business-related functions, such as holiday parties or business travel. Bullying, harassment and discrimination are strictly prohibited, even where it does not rise to the level that would violate the law.

Tips to Uphold the Brunswick Connection



- Listen and be receptive to different points of view.
- Speak up if you suspect discrimination or harassment by contacting your Ethics Counselor or through any other reporting mechanism.
- Do not discriminate or harass.



What Does Harassment Look Like?

Workplace harassment can take many forms. It is unwelcome conduct—verbal, physical or visual—that creates an intimidating, hostile or offensive work environment. Workplace harassment can qualify with “off-color” or “inappropriate” jokes, teasing, insults, bullying, offensive conduct in the workplace or practical jokes directed at a person, or it can occur when a term of employment is tied to unwelcome sexual advances.

- Intentionally brushing against a coworker.
- Telling “off-color” jokes about sex, race, national origin or religion.
- Forwarding or sharing pornographic or offensive emails through Company electronic information systems.
- Requiring or intimidating an employee into dating or a sexual relationship by threatening job termination or other employment ramifications.

Ethics in Action

Q: I work with several suppliers and have built strong relationships with their representatives. One of them has started flirting with me recently and sending me suggestive emails. I feel uncomfortable but I am not sure what to do since the supplier representative does not work for Brunswick. What should I do?

Even though the representative is not an employee, you should report the situation. The Brunswick Connection demands a work environment free from harassment, even from third parties who are not employees. Harassment could include emails and unwelcome flirting by a non-employee that creates a hostile, intimidating or uncomfortable work environment. Brunswick takes all reports of harassment seriously and will investigate as appropriate.

Q: I observed a situation I suspect violates the Playbook. My manager often loses his temper and yells at all the people on the team when we miss a deadline. Is that harassment?

It depends, but regardless, the situation creates a negative work environment. This behavior is something that the company will address because it violates our obligation under the Brunswick Connection to share a respectful workplace. Raise your concerns with your local Ethics Counselor, or through any other reporting mechanism.

Find Out More

[Anti-Harassment](#) (H.01.02)

[Electronic Communication and Internet Usage](#) (E.02.07)

[Social Media](#) (H.01.05)



We Make Fair Employment Decisions

The Brunswick Connection supports a demographically diverse workforce. We are committed to fairness in our employment decisions by adhering to the basics of equal employment opportunity. That means that all employment decisions—whether to hire, promote, or fire someone—are based on merit, skill and job-related performance, and/or other legitimate business reasons.

Examples of Equal Employment Opportunity Violations



- A supervisor is considering two equally talented employees for a promotion in his department: a newly married woman and a man who is married with children. He decides to promote the man, believing that when the woman has children, she will be more likely to take extended leave or resign.
- An employee with a disability that causes her to use a wheelchair is passed over for a sales position involving extensive public interaction, even though she has excellent social skills and outstanding performance reviews and credentials. The explanation offered is that someone who is not in a wheelchair would probably achieve higher sales.

Tips to Uphold the Brunswick Connection



- Hire and promote based on qualifications, skills and achievements.
- Comply with all applicable labor and employment laws.
- Expect partners to behave consistently with and to respect our fair treatment and equal opportunity standards.

Ethics in Action

Q: I applied for a job in a department with five male employees. The manager offered the job to a male (I am female). I feel as though I may have been discriminated against. What can I do?

If you believe you experienced discrimination, report this to your supervisor, the Ethics Hotline, your local Ethics counselor or through one of the other reporting mechanisms outlined in this Playbook. The issue will be promptly investigated, as appropriate. You will not be subjected to retaliation for making a good faith complaint.

Q: I'm afraid our customers would be uncomfortable with a candidate's physical disability. Is this a legitimate reason not to hire him?

No. To deny an applicant a job based on disability, race or other protected classification is unlawful discrimination. If the applicant is the best qualified person for the job, we should hire him. The Brunswick Connection values all individuals for their diverse backgrounds, approaches and ideas. We expect nothing less.

Find Out More

[Equal Employment Opportunity and Affirmative Action](#) (H.01.01)

[Reasonable Accommodations](#) (H.01.10)

[Electronic Communication and Internet Usage](#) (E.02.07)

[Social Media](#) (H.01.05)



Your Health & Safety Are Our Top Priority

The Brunswick Connection bolsters our commitment to our people to create and support a safe and healthy work environment where everyone can perform at their best. We actively promote the health and safety of our employees through policies and programs that identify and address risks and hunt for ways to improve our processes. Safety always comes first!

In addition to adhering to safe working procedures to actively prevent workplace accidents, we each must remain free from using drugs, alcohol or any other substance that may impair our ability to work safely and effectively. Our Brunswick Connection prohibits employees from using, possessing, transferring, selling, dispensing, manufacturing or otherwise being under the influence of drugs or alcohol, including marijuana, while conducting Company business on or off Company premises, or while operating any Company vehicle or equipment.

The Brunswick Connection also does not tolerate any form of violence or threats in the workplace by any employee, vendor, or visitor. Team members who engage in such behavior will be subject to disciplinary action, up to and including termination of employment. Under no circumstances should anyone bring a weapon to work.

Tips to Uphold the Brunswick Connection



- Play an active role in ensuring your own safety and the safety of others.
- Training requirement? Comply with it. Safety gear? Wear it. Unsafe condition? Report it—immediately.
- Know and comply with applicable occupational health and safety laws and related company policies.
- Never bring illegal drugs or other controlled substances onto company property or report to work under the influence of drugs or alcohol.

Ethics in Action

Q: I have a safety concern, but if I bring it up now, it will slow down production. I don't want my supervisor to be upset with me. What should I do?

Report it. Deadlines are important, but safety always comes first. So, we make tough calls when necessary and uphold our Brunswick Connection by raising any health and safety concerns immediately, even if that may mean slowing production, missing a deadline or losing a business opportunity.

Q: I work in the Assembly Department and I'm currently taking medication that may cause drowsiness, and some other side effects. Do I need to report that I'm taking this medication and the possible side effects?

Yes. Employees who are using prescription or non-prescription drugs that may impair alertness or judgment—and therefore could jeopardize their safety and that of their colleagues—should inform their supervisor, HR or Occupational Health Department upon reporting to work. As part of the Brunswick Connection, each of us carries the obligation to achieve and maintain a healthy and safe work environment.

Find Out More

[Substance Abuse Policy for Employees](#) (H.05.01)

[Workplace Safety](#) (H.05.03)

[Workplace Violence Prevention](#) (H.05.04)



We Support Global Human Rights

The Brunswick Connection requires us to respect all human rights in everything we do, including freedom of association and personal political involvement.

Everyone who works for Brunswick does so of his or her own free will, in a safe and healthy environment. We strictly prohibit discrimination, slavery and child labor, and ensure we have controls and protections to avoid them. The Brunswick Supplier Code of Conduct similarly requires all suppliers, vendors and other third parties who do business with Brunswick to comply and adhere to these requirements.

The Brunswick Connection also respects the rights of employees to associate with whomever they choose and to be involved in politics outside of work. For activities where there is no direct connection to a specifically identified employment concern, it is important not to use Brunswick's name, property or other resources to support your personal political activities. Personal political activities must be on your own time at your own expense, and in compliance with applicable laws. For your own personal political activities, you should never imply that your time, resources or money is from or endorsed by Brunswick.

Tips to Uphold the Brunswick Connection



- Forced or child labor is absolutely forbidden. We expect the highest compliance with global human rights and local laws regarding labor, time and wages.
- Our suppliers and business partners are accountable to comply with these same principles through our Supplier Code of Conduct.
- Personal politics must be done on your own personal time, without using Brunswick resources and without suggesting you speak for or on behalf of Brunswick.

Examples of Inappropriate Political Activities in the Workplace



- A manager asks employees in his department to purchase tickets to a political fundraiser for a candidate supported by a major customer.
- In the Company parking lot after work, a coworker distributes flyers for a candidate running for a political office.
- A manager sends an email from his office computer to his coworkers urging them to vote for a candidate he supports.

Ethics in Action

Q: My friend is running for political office, and I would like to help with the campaign. Is this allowed?

Yes. Your personal political activity is your business. Just make sure that you do not use Brunswick resources, including Company time, email or the Brunswick name, to advance the campaign.

Q: My manager is very vocal about his political beliefs, which are much different than mine. Sometimes he even makes comments about candidates' races, religions or national origins which I find offensive. Can he deny me promotions or raises, or even terminate me, because I have a different outlook on politics?

No, your manager cannot take employment action against you because of your differing political beliefs. Moreover, if his conduct creates an intimidating, hostile or offensive work environment under the Company's Anti-Harassment Policy, you have an obligation to report it so it can be investigated as appropriate.


Find Out More

[Anti-Harassment](#) (H.01.02)



We Care About the Environment and the Communities in Which We Work

The Brunswick Connection commits us to providing products and experiences in a manner that minimizes our impact to the environment and ensures the environmental sustainability of our business operations. We work hard for sustainable use of natural resources in our facilities and products and are committed to minimizing environmental impact during the manufacture, distribution, use and disposal of our products. For more information regarding Brunswick's commitment to environmental sustainability, please see our Sustainability Report, available at brunswick.com/corporate-responsibility/sustainability.



Examples of What We Have Done and Will Continue to Do



- We make efforts to reduce the amount and cost of energy used.
- We strive to reduce the amount of waste created or resources consumed.
- We minimize the impact on the environment in the production, use and disposition of our products.
- We develop products that lead to an improved environmental footprint through their lifecycle.
- We promote safe and responsible use of our products by our consumers.
- We make the communities where our products are made and used better.

Tips to Uphold the Brunswick Connection



- Comply with all applicable environmental laws and company policies.
- Report to management any spills, leaks or unauthorized discharges.
- Be vigilant to ensure we do not use more energy or water than necessary and aspire to reduce energy and water consumption when developing new products and processes.
- Ensure our supplier and business partners follow agreed upon environmental standards.
- Minimize waste and recycle or find appropriate alternate uses for waste materials.
- Take personal actions such as turning off lights, using less paper, shutting off electronics and recycling—small actions can make a big difference.

We Conduct
Business with
Integrity





We Keep Accurate Records

Our Brunswick Connection requires us to keep truthful, complete and accurate financial reports and accounting records, while following appropriate processes and controls. You should never falsify any record or account, including time reports, expense reports and any other Brunswick records. Fraud is absolutely prohibited and employees who engage in any scheme to defraud anyone will be subject to discipline up to and including termination of employment.

Just as we do not tolerate bribery; we do not tolerate money-laundering. No sale or business relationship is worth compromising our Brunswick Connection. By following our processes and controls for vendor and customer selection, including the third-party due diligence process, we confirm our commitment to complying with anti-money laundering laws and upholding the Brunswick Connection. Be sure to contact the Corporate Law Department if you are aware of suspicious transactions or activity.

Tips to Uphold the Brunswick Connection



- Record and classify transactions in the proper accounting period and in the appropriate account and department.
- Ensure all reports to regulatory authorities are full, fair, accurate, timely and understandable.
- Never falsify or distort the true nature of any transaction or record.

Examples of Fraud



- Forging or altering checks.
- Falsifying reports, including expense reports.
- An employee using his corporate credit card to charge personal expenses.
- Inflating year-end sales numbers by shipping inventory that is known to be defective or “non-conforming” and will be returned.
- A boat assembler improperly scrapping certain parts as being defective, then taking the parts home and, over time, collecting enough to assemble her own boat.
- Altering, removing or destroying documents except in accordance with policy.

Ethics in Action

Q: I recently learned that some payments were recorded as advertising when they were actually for entertainment. Since the total amount spent was accurate, is it a problem if the expense coding is not exactly correct?

Yes. The Brunswick Connection requires that our books must be kept in accurate detail and fully reflect all of our transactions. False transactions or misrepresentations about finances violate our policies and may violate the law.

Q: I have been asked by my supervisor to sign a financial record that I do not believe is accurate, but my supervisor insists its correct. What should I do?

Never sign a business record if you believe it is not complete, accurate and truthful. The Brunswick Connection also prohibits your supervisor or anyone else from influencing, coercing or manipulating you or anyone to provide an inaccurate record. You should share your concerns with your supervisor and/or make a report.

Find Out More

[Employee Reimbursable Travel and Business Expenses](#) (X.00.02)

[Whistleblower Policy](#) (E.02.03)

[Anti-Corruption and Anti-Bribery](#) (L.01.03)



We Design and Manufacture Safe and High-Quality Products

When it comes to our products, we never compromise. Around the world, consumers choose Brunswick brands because of their high-quality and reliability. It is critical that Brunswick products live up to their high reputation. To ensure that is the case, the Brunswick Connection ensures that we sell and manufacture safe products that meet or exceed all applicable safety and regulatory requirements where they are sold.

To support the Brunswick Connection, you should speak up immediately if something does not feel right, or to report any safety-related concern, defect or malfunction. Never make a decision that would undermine the integrity consumers have in our products.

Examples of Upholding the Brunswick Connection



- A customer service representative receives a phone call from a customer who reports that one of the Company's products broke during use, injuring the customer. The representative gets as much information from the customer as she can and immediately reports the matter to her supervisor.
- A production employee notices that a hose from a new supplier does not fasten securely. She suspects that motor vibration may shake the hose loose and informs her supervisor of the need to investigate the new part more thoroughly.

Failing to Support the Brunswick Connection

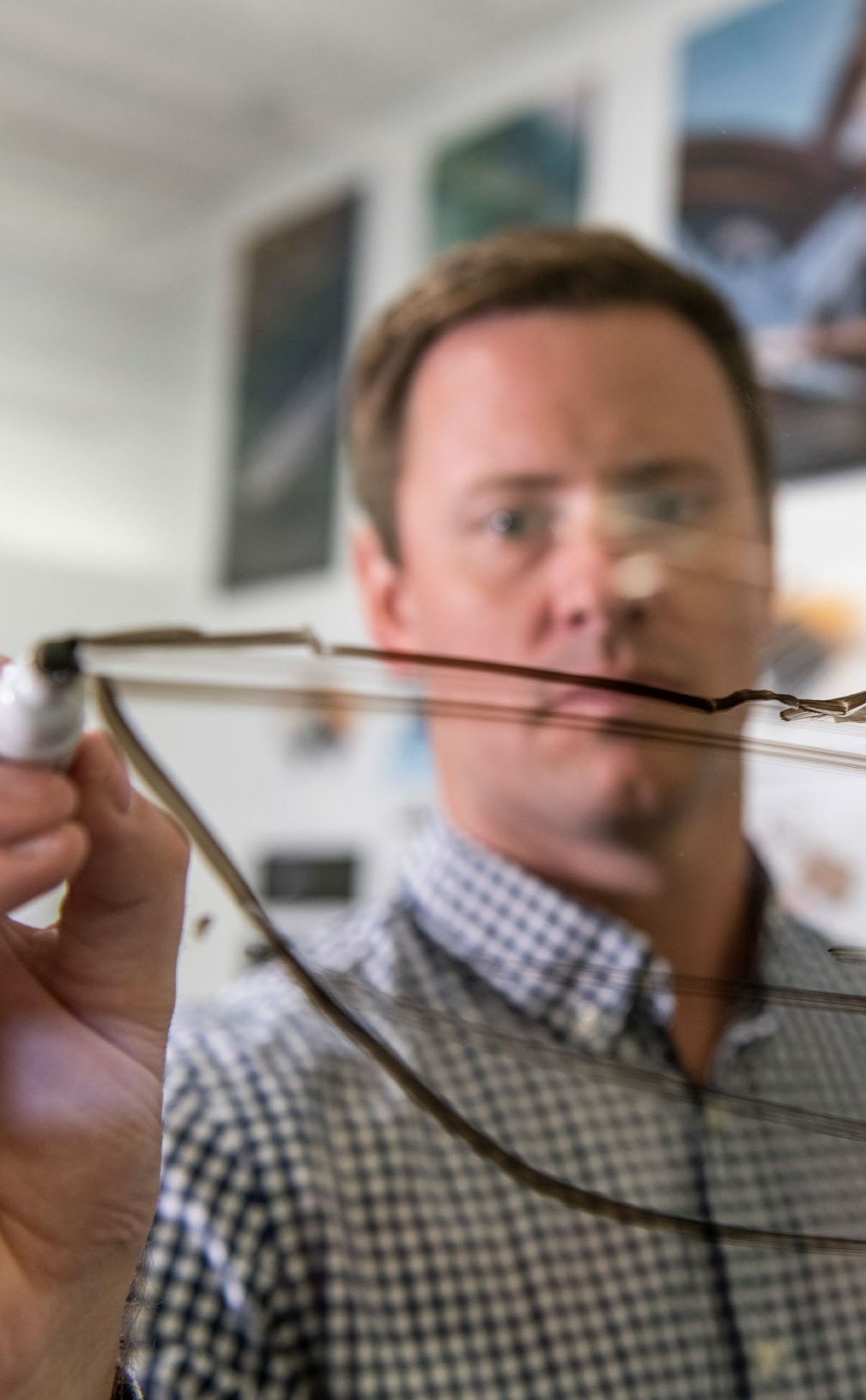


- A sales representative is told by a customer that he had to stop buying from the Company because "people keep getting hurt by your products." The representative considers this complaint too vague and fails to report it to her supervisor.
- An employee notices a significant increase in warranty claims dealing with a failed component. He realizes that a failure of this component could create a safety hazard. However, since he's busy, he ignores the problem.

Ethics in Action

Q: One of the tests that we perform on a product is repeated further down the production line. Why not skip the first test—wouldn't that help speed up delivery?

No. Skipping a required test is never okay. If you have ideas for improving efficiency, it's great to share them. But unless the process is evaluated and modified, it's critical to complete every step, as required, to ensure our commitment to delivering safe, high-quality products all the time.



We Never Bribe

The Brunswick Connection creates and supports a corrupt and bribe free zone. This rule is quite simple—do not bribe anyone, anywhere, anytime, for any reason. Don't offer bribes, accept bribes or let others bribe for you.

This rule equally applies to our suppliers and third parties acting on our behalf. We expect all our business partners to comply with our Playbook, as well as our Supplier Code of Conduct, even in challenging environments. Where you are selecting or supervising third parties, make sure you follow Brunswick's due diligence process before commencing any business relationship.

The laws in some countries impose bigger penalties for bribing government officials, but for us, the rules remain the same—do not bribe anyone, anywhere, anytime, for any reason.



What is a Bribe?

- Gifts
- Vacations
- Favors
- Job offers
- Donations
- Political contributions
- Sponsorships
- Hospitality gestures
- Awards
- Product offerings
- Shares of stock



What is Money Laundering?

Just as we do not tolerate bribery; we do not tolerate money-laundering. No sale or business relationship is worth compromising our Brunswick Connection. By following our processes and controls for vendor and customer selection, including the third-party due diligence process, we confirm our commitment to complying with anti-money laundering laws and upholding the Brunswick Connection. Be sure to contact the Corporate Law Department if you are aware of suspicious transactions or activity.

Ethics in Action

Q: Who is a government official?

An officer and employee of a government, department or agency; any person acting in an official capacity for or on behalf of a government department or agency; political parties, political party officials and candidates for public office; officers and employees of government-owned enterprises; and officers and employees of public international organizations. It is your responsibility to understand whether someone you deal with is a government official. When in doubt, consult the Law Department.

Q: A consultant we use to assist with government relations recently asked us for a large increase in commission. I suspect the consultant may intend to pass this money on to local officials. What should I do?

Report your suspicions to the Law Department. No such payments should be made to the consultant until the Company has investigated your concerns.

Find Out More

[Anti-Corruption & Anti-Bribery Policy and Foreign Official Travel](#)

[Expenditure Pre-Approval Form](#) (L.01.03)

[Employee Reimbursable Travel and Business Expenses](#) (X.00.02)



We Avoid Conflicts of Interest

The Brunswick Connection requires us to act in the best interest of Brunswick and refrain from engaging in activities that create, or even appear to create, conflicts of interest. Even the appearance of a conflict can be problematic. Therefore, we ask that you disclose any possible conflict of interest and always use good judgment to protect your ability to make independent decisions. Not all conflicts are prohibited, but all conflicts must be disclosed and reviewed. You can disclose any potential conflicts during our annual certification process or at www.bcethics.com.

When considering a course of action:

Does it create an incentive for me?

Does it create the appearance of incentive?

Does it benefit your friends or family?

Does it benefit a business associate?

Is the decision at the expense of Brunswick?

YES?

- You are creating a conflict of interest situation
- You should avoid it or disclose it

What is a conflict of interest?

A conflict of interest arises when your personal life or interests interfere—or appear to interfere—with the decisions you make at work. Conflicts may result from a number of issues, including outside employment, an interest in a competing company or family relationships.

Examples of Conflicts of Interest



- Working at an outside job that interferes with your position at Brunswick or using Brunswick property, equipment, information or other resources to complete work at an outside position.
- You or your family member having an ownership interest (other than ownership of a minimal amount of stock—less than \$50,000 market value in shares of a publicly-traded company) in another company that does business with or competes with Brunswick.
- A purchasing employee selecting her father's vending machine company to provide vending machines, but failing to disclose to anyone that her father owns the vending machine company.
- Employing relatives who report directly to you.
- Having a romantic relationship with an employee that you supervise in a direct or functional capacity.



Selecting and/or Managing Suppliers

Take particular care if you are responsible for selecting or managing a supplier on behalf of Brunswick. Your personal interests and relationships must not interfere, or appear to interfere, with your ability to make decisions in the best interest of the Company. When selecting suppliers, always follow applicable procurement guidelines.

Ethics in Action

Q: I am the hiring manager for a new position. My cousin is well-qualified and looking for work. Can I hire her?

Although your cousin may be well-qualified, you must disclose this conflict to your manager before proceeding to fill the job or even conducting interviews with your cousin. If it is determined that your cousin will be interviewed for the position, you will likely not be allowed to participate in the interview or hiring decision.

Q: I have learned that my department is negotiating a contract that will make my wife's company a major Brunswick supplier. Could this create a conflict of interest?

Yes. A conflict of interest, or the appearance of a conflict of interest, might certainly arise in this situation, as you may appear biased toward your wife's company. You should complete a conflict of interest disclosure form and, if appropriate, you will be removed from the decision-making process. By doing this, you can avoid a situation that may improperly influence, or appear to improperly influence, your ability to make sound, objective business decisions.

Find Out More

[Conflicts of Interest and Certification](#) (E.02.06)

[Employment of Relatives](#) (H.02.04)

[Outside Employment](#) (H.02.05)

[Anti-Corruption and Anti-Bribery](#) (L.01.03)

A couple is relaxing on a pontoon boat at night. The boat is illuminated with blue LED lights, and the water is dark. The couple is sitting on a cushioned seat, and the boat has a steering console and a grill. The text "Spotlight —" is overlaid on the image.

Spotlight —

Know the Rules About Gifts & Entertainment

Accepting gifts, entertainment or other business courtesies can easily create the appearance of a conflict of interest, especially where the value of the item is significant. The Brunswick Connection requires us to accept or give gifts, entertainment or meals within certain boundaries, including:

1. The activity must support a reasonable business purpose.
2. It must be infrequent.
3. It must comply with all applicable laws and Company policies.
4. It must be an inexpensive, non-cash gift—generally, less than \$100 in value.

Activities greater than \$100 in value must be disclosed on a Gift Reporting Form found at www.bcethics.com, which will be reviewed by your manager and the Ethics Office prior to the offer, receipt or acceptance of the gift.

Improper Gifts



- A plant manager accepting frequent expensive bottles of wine from a supplier, and failing to disclose the gifts.
- A sales manager taking members of his team and some customers to a local gentlemen's club for adult entertainment.
- A purchasing manager going on an all-expenses-paid ski trip provided by a vendor.



Separate Note on Gifts — Government Officials

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. If you have any question about whether a gift, meal or entertainment to or from a government official is allowable, contact the Law Department.

Ethics in Action

Q: I want to send gifts to large customers at the start of the New Year to thank them for their business. Can I send each a gift basket of fruit valued at \$50?

This is probably a reasonable and appropriate business gift which adheres to the Brunswick Connection. Unless this would put customers in a position in which they may appear biased or pressured to make a business decision, this infrequent annual gift is likely acceptable.

Q: I will be attending a boating awards ceremony with a representative from the Coast Guard. I would like to give him a Company logo shirt or hat. Is this acceptable?

Yes, this gift of nominal value (under \$100) may be given, as long as it is given openly and transparently, properly recorded in the Company's books and records and is acceptable under local law. If you have any question about whether you should give this gift or how to record it, contact the Law Department.

Gifts offered to or received from anyone should **NEVER** include cash or cash equivalents (such as gift cards).



We Compete Fairly

The Brunswick Connection supports fair and legal competition. This means that we win by complying with all competition laws (also called “antitrust” laws) of the countries in which we do business by selling innovative, high-quality products at competitive prices. We never compete by using improper actions or making improper agreements to injure another company, force it from a market or prevent it from entering a market. Our Brunswick Connection prohibits us from making any agreement with a competitor that unreasonably restricts competition related to pricing, products and services, business practices, territories, distribution channels and/or customer lists.

The Brunswick Connection also requires that we use competitive information fairly and honestly. We should never engage in illegal activity to obtain competitive information, nor should we accept, disclose or use competitive information that was disclosed in breach of a confidentiality agreement. Similarly, competitively sensitive information should not be exchanged with competitors, whether directly or indirectly, such as through third parties or public statements. When you talk with customers, provide only truthful information about the quality, features and availability of our products, and do not make disparaging remarks about our competitors.

Tips to Uphold the Brunswick Connection



- Deal fairly with our customers, suppliers and competitors.
- Do not talk about our business strategies and plans with competitors.
- Never enter into any agreement or understanding, whether formal or informal, with a competitor or supplier to:
 - Raise, set or hold prices on our products.
 - Divide territories or markets.
 - Refuse to deal with a customer or supplier.
 - Restrict production, sales or output.
- Be fair, factual and complete in our advertising, sales and promotional materials.



Illegal Agreements

Illegal agreements do not have to be signed contracts; they may be verbal “understandings” between parties. This conduct can place both you and Brunswick at serious risk. Immediately leave any meeting or information gathering at which competitors are present and anti-competitive behavior is exhibited. Report any discussions or behavior that might be a violation of this policy and do not discuss any of these items with any competitor, regulatory agency or outside attorney without first consulting your Division Law Department or the Corporate Law Department.

Ethics in Action

Q: I ran into an old college friend at a trade show who works for one of our competitors. She asked me how business was going. What should I do?

There is no problem with responding in a general, non-specific way to say that all is well, but keep your conversation high-level and be aware that simply having a conversation with a competitor can give the appearance to others of something improper.

Q: What is considered competitively sensitive information?

- Prices and related elements (discounts, rebates, allowances, terms).
- Non-price areas of competition (warranties, quality and performance).
- Selling and marketing plans (promotions, advertising and product positioning).
- Rates for services we buy including salaries/benefits for employees.

We Safeguard
our Assets and
Information



We Appropriately Use and Protect Company Assets

Our Brunswick Connection requires us to protect and use our resources with integrity and efficiency. Our facilities, equipment, materials, property, technology, information and brand have been acquired through the hard work of a lot of people. We owe it to each other, our customers, shareholders and business partners to safeguard Brunswick property against theft, loss, waste or damage.

Although occasional personal use of some Company assets is reasonable, we never use Company resources for personal gain, share them with anyone outside of Brunswick, or remove them from Company facilities without proper authorization. Do not use Company computers or equipment for illegal or unethical activities such as gambling or pornography. Theft of Company assets is never tolerated and can result in criminal prosecution, in addition to the termination of your employment.

What is a company asset?

Company money or products

Employees' time at work

Computer systems, software

Telephones, photocopiers

Company vehicles

Company trademarks / intellectual property

Spotlight —

Know the Rules About Proper Use of Your Electronic Information Systems

An important part of the way we work and how we conduct business is the access to and use of electronic information technology. Our Brunswick Connection requires us to use our electronic technology primarily for business purposes. Personal use of electronic technology should be reasonable, and it must never interfere with your job duties.

Keep in mind that electronic technology is Company property and all messages composed, sent or received are considered Company property as well. This means that the Company can monitor the use of its electronic technology, whether the use is business or personal, and where allowed by applicable law. We may need to perform monitoring related to an Ethics or other investigation, to protect the Company's legal rights and to ensure compliance with our policies and applicable laws.

Examples of improper use of company electronic information systems:

An employee uses his Company email address to send his friend outside the Company an email containing a joke that is offensive to a religious group.

An employee uses his Company computer to access pornographic material.

A marketing manager sends confidential new product development information outside the Company without appropriate authorization.

What is an electronic information system?

- Email
- Mobile devices
- Fax machine
- Telephone
- Instant messaging
- Voicemail
- Internet



We Safeguard Confidential Information

Our Brunswick Connection requires us to protect and manage information appropriately.

This obligation includes:

- Taking reasonable and necessary precautions to protect confidential information and that of our consumers, suppliers, business partners or other third parties, even after your employment ends;
- Reporting when you learn that Company information has been stolen, lost, released to an unauthorized third party, or otherwise mishandled;
- Handling confidential information appropriately, not only in accordance with our policies and procedures, but also in compliance with applicable privacy laws; and
- Retaining or discarding confidential records in line with our record retention policy and data security policies.

What is Confidential Information?



- Written or oral agreements between Brunswick and employees, agents, strategic partners and/or other third parties.
- Intellectual property—such as trademarks, patents, copyrights and trade secrets owned by the Company.
- Marketing plans, pricing information, and technical specifications.
- Personal employee information, such as home addresses, phone numbers, social security numbers, bank accounts or benefits information.
- Customer personal or financial information.
- Company financial information (e.g., invoice registers, payroll records, financial statements, accounts payable summaries, vendor listings, price and cost information, etc.).
- Financial and other business information about potential acquisitions and/or new product launches.
- Engineering drawings for current or potential new products.
- Customer lists and agreements, market share data, supplier agreements, strategic plans, etc.

Ethics in Action

Q: I received a call from someone in Human Resources at another company. She is working on a benchmarking project and wants all my employees' start dates, titles and base salaries. I'm not sure what to do.

Information about our employees is confidential and should only be given to those who are authorized to have this information. Never provide this type of information unless you are certain that it is appropriate. In this situation, seek guidance from Human Resources and the Privacy Office.

Q: I found a document with the salaries of several other employees in my department. Can I share it with others?

No. Where you have no business reason to have this information, which is personal to other employees, the Brunswick Connection requires you to immediately return the document to Human Resources.

Find Out More

[Privacy of Protected Health Information](#) (H.04.13)

[Brunswick Enterprise Data Classification Policy](#) (P.01.02)

[Brunswick Corporate Records Management Policy](#) (L.03.01)



NOT Protecting Confidential Information

- ✗ An employee's cousin is starting a business and asks for a list of customers and colleagues so she can contact them about her new business. The employee complies.
- ✗ An engineer sells information to a competitor about a proprietary metal molding technology that the Company has developed.

Protecting Confidential Information

- ✓ A product design and engineering employee ensures he puts sensitive product drawings in a locked drawer before going to lunch.
- ✓ An accountant always initiates password protection on his computer before leaving the office.

An aerial photograph of a boat moving through deep blue water, leaving a large, circular, white wake. The wake is composed of concentric rings of white foam and churning water, creating a target-like pattern. The boat itself is a small, white vessel with a cabin, visible in the center of the innermost ring of the wake. The surrounding water is a deep, vibrant blue.

Spotlight —

We Protect Our Brand

The Brunswick Connection makes each of us responsible for maintaining and building one of Brunswick's greatest asset—our brand. We all have an obligation to strengthen and protect Brunswick's trademarks, copyrights, patents and other intellectual property. Our logos and our name are examples of trademarks recognized globally that should not be misused. You should check with the Law Department before using any Brunswick logos on promotional and other materials and use of divisional logos must be pre-approved by the divisional Marketing Department.

In addition, you may sometimes create materials or develop processes in the course of your work, and those creations belong to Brunswick. That intellectual property is among the most valuable of Brunswick's assets. When you leave Brunswick, you must return all intellectual property and other work products in your possession, including any copies. Never allow our intellectual property to be used or shared with people outside the Company without appropriate legal documents in place.

A man in a blue shirt and khaki shorts is fishing from a boat. The boat is on a body of water, and the sky is a mix of blue and orange from the setting or rising sun. The man is holding a fishing rod that is bent, indicating he has caught something. The boat has a motor at the back.

Spotlight —

Personal information can include an individual's:

Home address, date of birth, age, race, religion

Political affiliation, sexual orientation

Identification or financial account numbers

Medical information

Anything you wish not to share publicly

We Respect Privacy

Our Brunswick Connection requires us to work hard to protect any personal information shared with us. Where we do collect personal information, we should remember the following principles:

1. Legitimate purpose: Data collected, used or processed must be done so for legitimate business or legal purposes only. Data should be used for the purpose intended and communicated.
2. Limit access: Where we do have a legitimate business purpose to collect, use or process data, access should be limited to those who need it to do their job.
3. No leakage: Data should be disclosed to third parties or others in accordance with our policies and procedures. Be cautious and thoughtful when sharing information in writing (including emails) and during private conversations.



We Appropriately Use and Communicate Information

When we have access to non-public material information (also known as “inside” information), our Brunswick Connection requires us to use and keep that information confidential and not to use it for an improper purpose. This means that inside information should never be disclosed to others and it should never be used for personal gain. Importantly, inside information should never be used to buy or sell stock, or to pass it along to others so that they may do so. Trading on inside information is against the law.

Examples of Inappropriate Use of Material Inside Information



- Over lunch, a plant manager learns of a potential acquisition that will improve Brunswick's market share and future profitability. She returns to her office and calls her broker to purchase additional Company stock.
- One week before a public announcement by the Company of lower-than-expected profits, a finance associate calls his father and encourages him to sell his Brunswick stock.

What is Material Non-Public Information?



Information that an investor may consider significant in deciding to buy or sell Company stock, such as financial results, an important new product introduction, or major management changes.

Ethics in Action

Q: I learned some information in a meeting with one of our suppliers that could affect some stock trades my sister is considering. Can I share what I know since it won't benefit me personally?

No. The law not only prohibits you from buying or selling stock based on material inside information, it also prohibits you from tipping off your sister (or anyone else) in order to trade.

Find Out More

[Electronic Communication and Internet Usage](#) (E.02.07)

[Social Media](#) (H.01.05)

[Insider Trading Policy](#) (L.01.01)



We Represent the Company Properly

Our Brunswick Connection requires us to follow proper protocols regarding who may speak and act on behalf of Brunswick. Only authorized employees can speak or act on behalf of Brunswick, including speaking with the media, coordinating facility tours or signing agreements.

Tips to Uphold the Brunswick Connection



- Do not speak or act on behalf of Brunswick, unless specifically authorized to do so.
- Understand our policies and procedures for approving and signing agreements.
- If you are ever contacted by the media, immediately refer them to the Corporate Communications Department.
- Engage responsibly with social media. Do not speak for Brunswick unless authorized to do so and clearly state when you are sharing your personal views.

Improper Responses to Requests for Information



- A financial analyst asks a Brunswick marketing manager about the Company's market share, and the manager provides information about current and future marketing plans and share projections.
- An R&D engineer describes his team's new product development processes to a trade magazine without having first received authorization to speak with the reporter.

Ethics in Action

Q: I post on blogs related to my professional expertise. Should I let people know about my connection to Brunswick?

Yes. In the online world, being transparent about company connections is good etiquette and consistent with this the Brunswick Connection. Depending on where you are, it also may be required by law. It is important that you tell people that you work for Brunswick, and add this line to your blog, chat or other online entries: "The opinions expressed are my own and do not represent the views of Brunswick."

Find Out More

[Insider Trading and Unauthorized Disclosures](#) (L.01.01)

[Disclosure to the Media and Financial Community](#) (C.02.03)

[Social Media](#) (H.01.05)

[Whistleblower Policy](#) (E.02.03)

You should NEVER misrepresent yourself or Brunswick.

Stuck with a tough decision?

Here's how to use the Brunswick Connection to think it through



Does your manager think it's a good idea?



Are you comfortable with other coworkers finding out about it?



Would you be comfortable if your actions went viral?



Have you confirmed that none of our policies prohibit it?



Do the principles in this Playbook support what you want to do?



Slow Down

Get in touch with the Ethics Program through any of the reporting avenues discussed in this Playbook and talk through your options.

Go For It

Everything looks good here—but if you're still not absolutely sure, reach out to the Ethics Program and talk it through.



Transforming experiences — on the water and beyond

Brunswick is a global leader in marine recreation, delivering innovation that transforms experiences on the water and beyond. Our unique, technology-driven solutions are informed and inspired by deep consumer insights and powered by our belief that “Next Never Rests™”. Brunswick’s portfolio of industry-leading brands spans across the entire boating experience, from award-winning products to unique business models that expand boater access and participation. With expertise in boat design, marine propulsion and technologies, Brunswick is uniquely positioned to leverage unrivaled synergies and ecosystems to challenge conventions and define the future of marine recreation.

READ OUR SUSTAINABILITY REPORT

brunswick.com/corporate-responsibility/sustainability

READ OUR PROXY REPORT

brunswick.com/investors/sec-filings

VISIT OUR INVESTOR RELATIONS WEBSITE

brunswick.com/investors

