

## WHISTLEBLOWER POLICY

### **Purpose**

Brunswick Corporation is committed to conducting its business in accordance with high ethical standards, promoting integrity among its employees, and complying with applicable laws, rules, and regulations. This Policy sets forth the Company's expectations regarding the reporting of illegal or unethical behavior within the Company.

### **Applicability**

This Policy applies to all of the Company's Directors and Employees.

### **Definitions**

- A. Company: Brunswick Corporation and its subsidiaries
- B. Director: Any member of the Company's Board of Directors
- C. Employee: Any Company officer or employee
- D. Audit and Finance Committee: The Audit and Finance Committee of the Company's Board of Directors
- E. Reportable Activity: Activity by any Director, Employee, or independent contractor that, to the reporter's knowledge, constitutes or may constitute:
  - 1. Corporate, accounting, or financial fraud;
  - 2. Unethical business conduct in violation of any Company policy, including the Brunswick Corporation code of conduct, *Ethics in Action: Brunswick's Integrity Playbook*;
  - 3. Violations of federal, state, local, or international law;
  - 4. Questionable audit matters or weak financial controls; or
  - 5. Substantial and specific danger to public health and safety.

### **Policy**

#### A. Reporting Responsibilities

- 1. Directors and Employees must report any and all Reportable Activity or evidence of Reportable Activity.
- 2. In most cases, an Employee's supervisor is in the best position to address a concern regarding Reportable Activity. However, if an Employee is not comfortable speaking with his or her supervisor, or is not satisfied with the supervisor's response, the Employee or any Director is encouraged to make a report using any of the following options:
  - a. Complete the Report Form attached as **EXHIBIT A**, and submit it to Brunswick's Ethics Office or the Audit and Finance Committee;
  - b. Call the Company's toll-free U.S. (877.684.5252) Ethics Line;
  - c. Speak with a local Ethics Counselor;
  - d. Make a report online at [www.bcethics.com](http://www.bcethics.com);
  - e. Contact the Ethics Office in person, by mail (26125 N. Riverwoods Blvd., Suite 500, Mettawa, IL 60045), telephone (847.735.4318), or email ([ethics.advisory@brunswick.com](mailto:ethics.advisory@brunswick.com)) ; or

f. Contact the Company's Office of General Counsel at [corporate.secretary@brunswick.com](mailto:corporate.secretary@brunswick.com).

3. Supervisors and managers must notify the Ethics Office if they receive any report of Reportable Activity.

**B. No Retaliation**

1. This Policy is intended to encourage and enable Directors, Employees, and others to raise serious concerns within the Company. The Company prohibits retaliation, including harassment, termination, other adverse action, or the threat of adverse action, for reporting Reportable Activity in good faith.
2. Employees must act in good faith and have reasonable grounds for believing the information they report under this Policy is accurate. Any allegations not made in good faith will be viewed as conduct warranting discipline, up to and including termination of employment.

**C. Federal Anti-Fraud and Securities Laws**

The Company further prohibits retaliation for good faith filing, testifying, participating in, providing information, or otherwise assisting in a proceeding or investigation related to Reportable Activity, including but not limited to, those conducted by:

1. A federal regulatory authority (such as the Securities and Exchange Commission) or law enforcement agency (such as the FBI);
2. Any member or committee of Congress;
3. Any person with supervisory authority over an Employee; or
4. Any person with authority to investigate, discover, or terminate Company conduct that the reporter believes constitutes Reportable Activity.

**D. Confidentiality of Reports**

The Company will treat all reports made under this Policy as confidential to the extent possible, consistent with the need for a full and fair investigation and, if necessary, corrective action, unless there is an overriding reason for identifying the reporter, or disclosure of the reporter's identity is required by law.

**E. Investigation and Resolution of Reports**

1. Brunswick's Ethics Office is generally responsible for investigating and resolving or overseeing investigation and resolution of reports made under this Policy, as appropriate, and shall advise Company management and/or the Audit and Finance Committee of complaint(s) and the results of any such related investigation(s).
2. The Ethics Office has direct access to the Audit and Finance Committee and shall periodically advise the Committee regarding investigation and resolution of reports of Reportable Activity.

All Employees are bound by the requirements and standards set forth in this Policy, and any violation of this Policy may subject Employees to disciplinary action, up to and including termination of employment.

**Exceptions**

N/A

**Related Documents**

- A. *Ethics in Action: Brunswick's Integrity Playbook*
- B. Zero Retaliation Policy, E.02.10

**Exhibits**

Exhibit A (Whistleblower Policy Report Form) attached

**EXHIBIT A**

**BRUNSWICK CORPORATION**

**WHISTLEBLOWER POLICY  
REPORT FORM**

Your Name: \_\_\_\_\_  
(Reports may be made  
anonymously)  
Division/Department: \_\_\_\_\_  
Supervisor: \_\_\_\_\_  
Telephone: \_\_\_\_\_  
E-mail: \_\_\_\_\_

Describe Reportable Activity: \_\_\_\_\_  
\_\_\_\_\_

Date you became aware of Reportable Activity: \_\_\_\_\_, 20\_\_

Reportable Activity is: \_\_\_\_\_ Ongoing \_\_\_\_\_ Completed \_\_\_\_\_ Unclear whether ongoing  
or completed

Division/Department suspected of Reportable Activity: \_\_\_\_\_

Individual(s) suspected of Reportable Activity: \_\_\_\_\_  
\_\_\_\_\_

How did you become aware of the Reportable Activity? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Describe any steps you took prior to completing this Report Form (e.g., informed supervisor): \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Who, if anyone, may be harmed or affected by the Reportable Activity? \_\_\_\_\_  
\_\_\_\_\_

If possible, estimate the amount of loss to the Company as a result of the Reportable Activity:

Actual: \_\_\_\_\_ Potential: \_\_\_\_\_

Please provide any suggestions for remedying the Reportable Activity: \_\_\_\_\_  
\_\_\_\_\_

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Do you wish to be contacted by the Ethics Office regarding the status of the investigation?

\_\_\_\_\_ Yes

\_\_\_\_\_ No

Once completed, this form should be returned to the Brunswick Ethics Office in person or via email at [ethicsadvisory@brunswick.com](mailto:ethicsadvisory@brunswick.com) or the Audit and Finance Committee via email at [corporate.secretary@brunswick.com](mailto:corporate.secretary@brunswick.com)