BRUNSWICK'S CONFLICT OF INTEREST POLICY

1. **Purpose, Application, and Definitions**

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

   B. Application. All Brunswick employees.

   C. 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.

2. **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.

3. **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.

4. **Exceptions.** Not applicable

5. **Related Documents**
   a. Brunswick's Integrity Playbook – available on Brunswick Connect
   b. Code of Ethics for Senior Financial Officers and Managers – E.02.02
   c. Employment of Relatives – H.02.04
   d. Outside Employment – H.02.05
   e. Gifts and Entertainment Policy – E.02.09
   f. Gift & Entertainment Disclosure Form – available at www.bcethics.com
   g. Conflict of Interest Disclosure Report Form – available at www.bcethics.com

Exceptions:
Not applicable

Policy Owner:
Brunswick's Ethics Office

Who to Contact:
Associate General Counsel – Labor & Compliance

Date of Issue:
February 2025