ANTI-CORRUPTION AND ANTI-BRIBERY POLICY

1. Purpose, Application, and Definitions

A. Purpose. This Policy sets forth expectations for ethical business conduct by Brunswick in business dealings, and to ensure compliance with the anti-corruption, anti-bribery, and record-keeping laws of any countries with jurisdiction over the Company, including, but not limited to, the U.S. Foreign Corrupt Practices Act of 1977 ("FCPA") and the U.K. Bribery Act 2010.

In short, we never bribe anyone, anywhere, anytime, for any reason. We do not offer bribes, accept bribes, or let others bribe on our behalf. We expect Brunswick, all our employees, and all our business partners to comply with this simple rule – even in challenging environments.

This Policy should be read in combination with other applicable Brunswick policies, including those found in Brunswick's Integrity Playbook (the "Integrity Playbook") and Brunswick's Supplier Code of Conduct, both of which are available by visiting www.brunswick.com. Employees can also obtain a copy of the Integrity Playbook by contacting their local Ethics Counselor, the Ethics Office, or by visiting the Ethics Program page on Brunswick Connect, Brunswick's intranet website.

B. Applicability. This Policy applies to Brunswick Corporation, its divisions and subsidiaries worldwide ("Brunswick" or the "Company") and all of its employees, officers, directors, and third parties working on its behalf. The Policy also extends to all of Brunswick's financial record-keeping activities and is integrated with the obligations to which Brunswick is already subject by virtue of the U.S. Securities and Exchange Act of 1934, Sarbanes-Oxley Act of 2002, New York Stock Exchange Listed Company Manual and other applicable laws and regulations.

C. Definitions.

Bribe: Any illegal Payment given or promised in order to improperly influence the decision or conduct of another to award or continue to do business or grant an improper business advantage.

Business Expenses: Expenses incurred for food, lodging, travel, and entertainment that are related to the visit of a prospective or existing customer to Brunswick's facilities for purposes of demonstrating Brunswick's products or services.

Facilitation Payment: A Payment made directly or indirectly to a Foreign Official to secure or expedite the performance of routine, non-discretionary Government action. Examples of Facilitation Payments include, but are not limited to, payments made to an official to obtain a routine permit, expedite a shipment, or process a visa.

Foreign Official: An officer, employee, or person acting on behalf of a foreign Government, a public international organization, or any department or agency thereof, or any person acting in an official capacity. The definition includes, without limitation, any person who:

- **i.** Is an employee of a foreign government-owned company or state-owned enterprise, regardless of seniority;
- **ii.** Holds an elected or appointed legislative, administrative or judicial office in a national or local Government organization in a foreign country;
- **iii.** Exercises a public function, either for a Government or private enterprise, regardless of seniority (e.g., local tax authority employees, customs officials, etc.);
- **iv.** Is an official or agent of a public international organization;
- **v.** Is an officer or agent of a foreign political party; or
- **vi.** Is a candidate for political office.

Government: Any agency, subdivision or other body of any national, state or local government, including regulatory agencies or government-controlled businesses, corporations, companies or societies, or facilities operated by such entities.

Payment: Anything of value, including, but not limited to, money, the transfer of stock, bonds or other property, the payment of expenses, entertainment, the providing of services of any type, work opportunities, the assumption or forgiveness of any indebtedness or any other transfer of goods, services, donations, political contributions, and any other tangibles or intangibles that accrue to the benefit of the ultimate recipient or promotes his or her interest or the interests of his or her associates or relatives.

2. Policy Guidelines

A. Bribery Prohibited. While doing business anywhere in the world, Brunswick, its employees, officers, and directors are prohibited from influencing others, either directly or indirectly, by offering, promising, accepting, or paying Bribes, or by any other measure that is unlawful, unethical or that will tarnish Brunswick's reputation for honesty and integrity. Even the appearance of such conduct must be avoided. No employee will be penalized for any delay or loss of business resulting from refusal to participate in offering, paying, or accepting a Bribe, as long as it is appropriately reported pursuant to the procedures in this Policy.

B. Applicability to Third Parties. This Policy prohibits partners, intermediary agents, joint ventures, dealers, distributors, suppliers, or third-party agents affiliated with, or acting on behalf of or in concert with, Brunswick (collectively, "Agents") from making Bribes on behalf of Brunswick, and also prohibits Brunswick, its employees, officers, and directors from using, contracting, or working through Agents to make or receive Bribes.

C. Due Diligence. Employees, officers, and directors of the Company are expected to be familiar with and, in partnership with the Legal Department, conduct appropriate due

diligence on Agents to promote compliance with the principles outlined in this Policy. All Agent relationships must be established directly with the Agent, and contracts and agreements with Agents must include provisions consistent with the principles set forth in this Policy. For additional information on our due diligence process, please refer to the policy on Third Party Due Diligence. If you have any questions about any existing or prospective relationships, please contact the Legal Department.

D. Record Keeping. All Payments to third parties, including commissions, reimbursements, and compensation, must be reasonable and customary for the services provided. These Payments must be accurately documented in Brunswick's books and records. Payments in cash or to bank accounts not in the third-party's name are prohibited unless pre-approved by the Legal Department.

E. Foreign Official Travel Approvals. No Payments or reimbursements for Business Expenses incurred in connection with travel of Foreign Officials to Company facilities for product or service demonstration purposes should be made, either on behalf of or for the benefit of any Foreign Official, unless such payment or reimbursement is: (i) in connection with reasonable and bona fide expenses directly related to the promotion, demonstration, or explanation of products and services, or in exchange for bona fide services actually rendered or products actually received; (ii) reasonable based upon then-prevailing market rates; (iii) authorized under the local law of the Foreign Official's home country; and (iv) documented, recorded and approved, in advance, in writing, by the Legal Department and appropriate management by submitting a Foreign Official Travel Expenditure Pre-Approval Form, a copy of which is available on Brunswick Connect. In no event shall Payments for Business Expenses be made in connection with travel of a family member or relative of a Foreign Official. Following any Payment made under this section, the requestor and divisional accounting must maintain copies of applicable receipts and Travel and Expense Reports and make them available to the Legal Department, if requested. In no event will Brunswick reimburse Business Expenses that have not been preapproved by the Legal Department and authorized management and accurately documented.

F. Facilitation Payments. Generally, Facilitation Payments are prohibited by this Policy, except for a very limited set of circumstances for which pre-approval from the Legal Department is required.

G. Gifts, Meals & Entertainment. Brunswick recognizes that under some circumstances and in some cultures, gift giving is customary. Any gifts offered or received must be in strict conformity with Brunswick's Gifts & Entertainment Policy and the Gifts, Meals and Entertainment Related to Government Officials and Use of New Accounts Guidelines. Prior to providing any gift or entertainment to a Government or Foreign Official, the requestor must submit a Gifts and Entertainment Disclosure on www.bcethics.com for review and pre-approval by the Legal Department.

H. Political and Charitable Contributions. Brunswick employees are prohibited from providing a political contribution or donation to improperly influence a government official, or to reward the improper performance of any activity.

3. Consequences for Non-Compliance. Employees, officers, directors, or Agents who violate anti-corruption laws may face severe civil and criminal penalties, including jail time, and may expose the Company to severe civil and criminal penalties and reputational harm. Violations of this Policy may also lead to disciplinary action, up to and including termination of employment.

4. Mandatory Reporting. Potential violations of this Policy by the Company or any third party must be reported. Reports of suspected violations can be made to Human Resources, a local Ethics Counselor, the Ethics Office by e-mailing ethics.advisory@brunswick.com, or can be submitted through the Ethics Hotline by opening a case at www.bcethics.com or calling the U.S. toll-free number at (877) 684-5252. International toll-free numbers can be found by using the web portal at www.bcethics.com and selecting "Report by Phone." The Ethics Hotline is a confidential, third-party service set up to receive reports of possible violations of the law, this Policy, or other Company policies online or by phone. The hotline is staffed 24 hours per day and calls can be accepted in any language. 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.

As permitted by law, an employee's failure to report known or suspected wrongdoing of which the employee has knowledge may, by itself, subject that employee to disciplinary action. The Company will not permit retaliation of any kind against any employee who in good faith reports suspected misconduct.

5. Related Documents

A. Code of Ethics for Senior Financial Officers
B. Ethics in Action: Brunswick's Integrity Playbook
C. Whistleblower Policy
D. Brunswick Supplier Code of Conduct

Exceptions:
Not applicable

Policy Owner:
Brunswick's Ethics Office

Who to Contact:
Executive Vice President, General Counsel, Secretary & Chief Compliance Officer

Date of Issue:
April 2024