

Code of Conduct



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An Ethical Enterprise

At Brunswick, our values establish the framework for our commitment to doing business with integrity.

We value our differences internally and with and among our business partners and consumers. We treat our colleagues, business partners and consumers with respect, dignity and fairness. We earn their trust by being accountable and delivering on our commitments. We demonstrate the highest business standards and ethical conduct through open and honest communication.

We all must live our values and apply the spirit of the Brunswick Corporation Code of Conduct to our daily actions and business decisions. Please review the Code of Conduct frequently and use it as a resource.

Acting with integrity means making the right choices and holding ourselves to the highest standard of ethical behavior. Integrity requires moral courage. By acting with integrity, we enhance our reputation in the eyes of our shareholders, customers, dealers, business partners, government officials and fellow employees.

Sincerely,



Dusty McCoy

Chairman and CEO
Brunswick Corporation

INTRODUCTION

Integrity is the foundation of our business around the globe. The *Brunswick Corporation Code of Conduct* helps define how we should conduct ourselves as global representatives of Brunswick Corporation. We must all be personally accountable to the principles in the Code of Conduct, to Company policies and to the law. Violations may lead to discipline, up to and including termination of employment.

Because our success is so closely related to our reputation, it is up to all of us to protect that reputation. As we continue to promote a culture of ethics and compliance, we enhance our opportunities for success.

ABOUT THE CODE OF CONDUCT

Use of the term “Brunswick” throughout the Code of Conduct refers to Brunswick Corporation, its divisions, subsidiaries and affiliates worldwide. The Code of Conduct applies to all Brunswick employees and, to the extent applicable, Brunswick’s Board of Directors, vendors, suppliers and agents.

The Code of Conduct is not a contract, and it does not alter the relationship between Brunswick and its employees, nor does it guarantee employment for any definite period of time. The Code of Conduct may be amended or changed by the Company at any time.

The Company is subject to the laws of many countries around the world. Employees must comply with all applicable laws, rules and regulations. If any provision of the Code of Conduct or other policies conflicts with applicable law, the law controls. The Code of Conduct replaces and supersedes *Making the Right Choice: The Brunswick Guide to Conduct in the Workplace* (“the Guide”). Any references to the Guide in Brunswick policies should be considered references to the same topics within this Code of Conduct.

Financial and Product Integrity

Financial Records, Controls and Fraud

Investors, creditors and others have a legitimate interest in the integrity of our financial and accounting information. Brunswick is committed to keeping truthful, complete and accurate financial reports and accounting records, and implementing appropriate control systems.

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

Keeping proper records includes not only records made available to third parties, but also internal records such as records of time worked, expense reports, benefits claim forms and employment application materials. We must never deceive or defraud anyone, or misrepresent facts. Fraudulent activity is not a mistake – it is intentionally misrepresenting or concealing facts. Brunswick has zero tolerance for employees who engage in any scheme to defraud anyone of money or property.

TOOLBOX

Examples of Improper Recording and Controls

- A sales manager estimates that he will not meet his targets for the month. To make up the difference, he rents a warehouse to receive product and then records shipments to the warehouse as sales.
- A billing manager does not review the billings recorded at the end of each accounting month to make sure that the sales have been recorded in the correct period.
- A manager alters an invoice from a prior quarter to make it look like it is to be paid this quarter to match her budget.

Examples of Fraud

- Forging or altering checks.
- A clerk at a bowling center charging a customer for a lane and shoes but pocketing the money rather than ringing it up.
- Falsifying reports.
- An employee using his corporate credit card to charge personal expenses.
- Understating or overstating known liabilities or assets.
- Inflating year-end sales numbers by shipping inventory that is known to be defective or “non-conforming” and will be returned.
- Misrepresenting information on travel and entertainment expense reports.
- 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.
- An engineer copying computer software onto numerous Company computers even though only one license/copy of the software was originally purchased.
- Misappropriating assets or misusing Company property.
- An employee submitting an expense report that includes travel expenses from a personal trip.

Q & A

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?*

A Yes. Our books must be kept in accurate detail and fully reflect all of our transactions. False transactions or misrepresentations about finances violate the Code of Conduct and Brunswick policies, and may violate the law.

Q *I recently combined a business trip with personal travel, and I accidentally used my corporate credit card for a family dinner. What should I do?*

A Corporate credit cards are for business expenses only. If you accidentally bill a personal expense to your corporate card, be sure to accurately record the charge as personal on your expense account and, of course, you will be responsible for timely paying the full amount.

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

A Never sign a business record if you believe it is not complete, accurate and truthful. The Company 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 to the Company through one of the many ways outlined in the Code of Conduct.

Q *I am preparing financial records for the second quarter audit. Our sales team has been working on closing a sale that won't be complete until the first week of the third quarter. Given that I'm certain that the deal will go through, can I accelerate the recording of revenue from this project into second-quarter earnings?*

A No. This is fraud and falsification of financial records, which is against the Code of Conduct and Company policies. All financial information we record must be complete and accurate.

Q *I am up for a promotion and I listed a bachelor's degree on my application, even though I never actually received a degree. I was only a few hours short, though, and I had taken all of the most important courses. Do I need to come clean?*

A Yes. It is fraudulent to claim a degree you never received. You must inform the hiring manager of your actions and the fact that you do not actually have a degree.

Q *On a recent business trip, I planned to take a taxi from the airport to the hotel but the hotel provided a free shuttle. Can I include the \$20 I expected to spend on a taxi on my expense report?*

A No. It is fraud to include an item on your expense report that you did not legitimately incur during your Company travel.

Related Policies

Employee Reimbursable Travel and Business Expenses (X.00.02)

Whistleblower Policy (E.02.03)

Anti-Corruption and Anti-Bribery (L.01.03)

Inside Information

To do our jobs effectively, we may sometimes have access to information that is not available to people outside Brunswick. Often, that non-public information or “inside information”—certain financial data, technical materials and future plans, for example—is material, or something that would influence an individual to buy, sell or hold securities.

Anyone who has material inside information about Brunswick, such as an employee, supplier, customer or competitor, must keep it strictly confidential and must not use it for personal gain or provide it to others. Trading in Brunswick securities (such as common stock, options or other marketable securities) or any other company’s securities based on your knowledge of inside information, or sharing inside information with other parties so that they may trade in such securities, is not only unfair and dishonest, it is also illegal. It makes no difference if you share material inside information purposefully or inadvertently, or in what form—face-to-face, written communication, over the Internet or by email (inside or outside the Company). Sharing that information so others may trade in Brunswick securities is unlawful.

Brunswick makes public disclosure of information by issuing a press release and/or by filing reports with the United States Securities and Exchange Commission. Afterwards, the information will be posted on www.brunswick.com. Once properly disclosed, board members, employees and their closely related family and household members must wait one full business day after the public announcement before buying or selling Brunswick securities.

Communicating with the Media and Financial Community

Brunswick employees should not make public statements to the media on behalf of the Company without obtaining prior express approval from senior management. Each Division has employees authorized to handle requests for information about that Division and its products, typically in public relations or marketing, or senior executives. Within certain parameters, only those designated employees are authorized to release information to, and respond to requests for information from, the press, analysts or others outside the Company.

Any requests for information regarding financial information or information that could affect the Company’s stock price must be forwarded to Brunswick’s Corporate and Investor Relations Department.

TOOLBOX

Examples of Material Inside Information

Material information is any information that an investor might consider important in deciding whether to buy, sell or hold securities, including:

- Financial results, forecasts, and projections.
- Management changes.
- Strategic decisions.
- Plans to issue securities.
- Pending acquisitions, mergers or divestitures.
- Knowledge of large sales or purchasing contracts being awarded.
- Significant changes in earnings estimates or dividends.
- Pending or threatened litigation.

- Impending bankruptcy or the existence of severe liquidity problems.
- Loss of key management, dealers or large customers.
- Share repurchases.
- Government investigations.
- Product recalls.
- Changes in significant customers.
- New product designs or strategies.
- Business growth plans.

Examples of Inappropriate Uses 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.
- An employee learns that Brunswick is considering the acquisition of a small, publicly-traded engine company and posts a message on Facebook urging his friends to acquire the stock of the small company.
- As part of her job, an employee learns that a major customer is embarking on a massive expansion and will buy millions of dollars in Brunswick product. The employee immediately purchases the customer's stock.

Examples of 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.
- A plant manager tells a reporter he'll call if he hears about plans to acquire another company.

Q&A

- Q** *I have some information regarding Brunswick's financial performance for the quarter because of my job in finance. I would like to make a change to my investment allocation in my retirement fund, but this fund includes some Brunswick stock and would result in the purchase of more Company stock. Can I proceed?*
- A** No. If you have material, non-public information about Brunswick, U.S. securities laws prohibit you from buying or selling Brunswick securities, including those held in retirement plans. Directors and officers are also subject to additional restrictions on their ability to engage in transactions in Brunswick securities.

Q *If I was already planning to make a trade before I became aware of material information, may I still complete the transaction?*

A No. A person who trades in Company stock while aware of material, non-public information will be deemed to have traded on the basis of that information even though the inside information was not a significant factor in his or her trading decision.

Q *I am in finance and often talk about business with my spouse. That's not a problem is it? I only occasionally reveal non-public information and my spouse knows not to tell anyone.*

A This is a problem that could be costly for both you and the Company. If your spouse were ever to use material, non-public information given by you to buy or sell securities, or shared this information with a neighbor or a friend, both of you could be prosecuted for insider trading. You should not give any non-public information to your spouse or to others outside Brunswick.

Related Policies

Disclosure and Stock Trading (L.01.01)

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

Social Media (H.01.05)

Whistleblower Policy (E.02.03)

Product Safety and Quality

Around the world, consumers choose Brunswick brands for their quality and reliability. It is critical that Brunswick products live up to their high reputation. We will never sell a product we do not believe is high quality and safe when used properly.

Ensuring product safety is the responsibility of every Company employee, no matter where you work. Brunswick expects its employees to take action by reporting any safety-related concern, defect or malfunction of any Company product to local management or in accordance with divisional procedures. Never make a decision that would undermine the trust consumers have in our products. Our continued success depends on exceeding the quality expectations of our customers and standing behind everything we do.

TOOLBOX

Examples of Proper Reporting of Product Safety and Quality Concerns

- 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.
- An engineer notices that a design enhancement he is developing may create a safety hazard if customers are not adequately informed of the change from the prior version of the product. The engineer contacts his supervisor to discuss the issue.
- A production employee notices that a hose from a new supplier does not fasten securely on the Company's product. She suspects that motor vibration may shake the hose loose and informs her supervisor of the need to investigate the new part more thoroughly.

Examples of Failure to Take Responsibility for Product Safety

- 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.
- Several employees tell their shipping supervisor that product packing is poorly designed, and the product could be damaged in shipping and cause problems later. In order not to cause shipping delays, the supervisor simply tells the employees to do the best they can with the shipping materials they've been given.
- 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.

Q & A

Q *The Company started using a new warning label and I noticed that the wording washes off with our cleaning chemicals in production. Are these labels okay to use?*

A No. Providing warning statements to our customers is important. You must report this immediately to local management for corrective action.

Q *I have noticed coworkers taking shortcuts when drafting engineering documents. I am concerned this will impact manufacturing. What should I do?*

A You should report this issue. It is important that design drawings are accurate and complete.

Q *I noticed a component was not installed according to the documented process. I checked other products and found them all installed correctly. Should I just fix the incorrect one and go on?*

A No, you should notify your supervisor or lead person so that they can review the issue. Understanding how the error occurred is as important as fixing the installation.

Business Practices

Anti-Corruption and Anti-Bribery

Brunswick maintains the highest level of integrity when dealing with government officials and the private sector. You are strictly prohibited from offering, authorizing, giving or promising any form of a bribe or kickback, regardless of global location. In addition, false, inaccurate, incomplete or misleading statements or records can result in legal penalties and are also a violation of Brunswick policies.

We demonstrate integrity by refusing to give gifts or make payments that are intended to influence, or could appear to influence, business decisions. Many countries, including the United States, prohibit improper payments to government officials or bribes of any kind. The sanctions for violating these laws can be severe, including significant individual and corporate fines and even imprisonment.

Brunswick will not hire or use a third party that will offer or give a bribe while acting on our behalf or in our name. Our suppliers, contractors, consultants and other business partners are held to the same standards as we are. If you are responsible for selecting or supervising third parties, make sure you follow the Company due diligence process before commencing any business relationship with them.

TOOLKIT

Examples of Violations of the Anti-Bribery and Anti-Corruption Policy

- A city council is voting on a major purchase, and is considering using Life Fitness products. A Company manager offers a council member a treadmill in exchange for a favorable vote.
- A project manager pays an official on the local zoning board a cash payment to award the Company certain boat contracts.
- A vendor bidding on a Company contract offers a procurement employee a “fee” to provide it with information not available to other bidders, including the lowest bid received so far.

Examples of Inaccurate Books and Records That Violate the Anti-Bribery and Anti-Corruption Policy

- Making records appear as though payments were made to one person when, in fact, they were made to another.
- Submitting expense reports that do not accurately reflect the true nature of the expense, such as falsely identifying guests (who were not in attendance) on an expense report to make an expensive meal look modest.
- Backdating a sales invoice to record a sale in a previous quarter.

Q & A

Q *Who is a government official?*

A 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 *What kinds of things may be considered bribes or kickbacks?*

A A prohibited bribe or kickback could be anything that might have value including cash, shares of stock, lavish personal gifts or entertainment, vacations, future job offers or political contributions. There is no monetary threshold; any amount could be construed as a bribe or kickback.

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?*

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

Q *We are considering a new plant in one of our markets. The local government may give us incentives to locate the plant in its country. The government has requested we fly its representatives to our plant in another country to review our business and operations. May we pay for this trip?*

A First, consult the Law Department. Any such trip must be approved in advance. Careful scrutiny is required of the trip's cost, the officials involved, who will be traveling and if there is any other purpose for the trip.

Related Policies

Anti-Corruption & Anti-Bribery Policy and Pre-Approval Form (L.01.03)

Employee Reimbursable Travel and Business Expenses (X.00.02)

Conflicts of Interest and Gifts

We must not engage in activities that create, or even appear to create, conflicts of interest. A conflict of interest arises when your personal or family interests interfere – or appear to interfere – with your ability to make sound business decisions on behalf of Brunswick. Conflicts may result from a number of issues, including outside employment, an interest in a competing company or family relationships.

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.

Keep in mind that not all potential conflicts between your interests and Brunswick's interests are harmful or prohibited. Some conflicts of interest are permissible if they are disclosed and approved. Even if a conflict has been previously disclosed and approved, if you are required to complete an annual conflict of interest disclosure questionnaire, you must disclose the conflict each year it remains in existence.

Gifts, Meals and Entertainment

Gifts, meals and entertainment must support Brunswick's legitimate business interests, must be infrequent and must comply with all applicable laws and Company policies. Entertainment may only take place in a setting consistent with our commitment to mutual respect. Gifts offered to or received from anyone should never include cash or cash equivalents (such as gift cards).

If, as part of legitimate business practices, you would like to offer or receive a gift greater than \$100 in value, other than business meals, you must disclose the gift on a Gift Reporting Form, and the gift must be approved by your manager and the Ethics Office prior to the offer, receipt or acceptance of the gift.

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.

TOOLBOX

Examples of Conflicts of Interest

- Working at an outside job that interferes with your position at the Company or using Company property, equipment, information or other resources to complete work at an outside position.
- A plant manager accepting frequent expensive bottles of wine from a supplier, and failing to disclose the gifts on a Gift Reporting Form.
- 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 at Brunswick, but failing to disclose to anyone that her father owns the vending machine company.
- Using information you learn at the Company for your own personal gain, to benefit a family member or to benefit another company in which you have an economic interest.
- A senior executive, who is also on the board of directors of a corporation that supplies services and products to Brunswick, revealing part of Brunswick's confidential strategic plan to this outside company to increase that company's chances of being given a contract.

- Participating in a business transaction to your personal advantage based on confidential information developed as a Company employee.
- Employing relatives who report directly to you.
- Having a romantic relationship with an employee that you supervise in a direct or functional capacity.
- Offering or accepting gifts of greater than nominal value.
- 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.

Q&A

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

A 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?*

A 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.

Q *I own a small business as a side project. When my work day is slow, can I work on my personal business matters? And can I make a few copies with Brunswick's office equipment?*

A No. It is never appropriate to conduct outside business during working hours or using Company property. In addition, your other job may not interfere with your ability to do your job at Brunswick. Nor may you compete with Brunswick, or be a vendor or supplier to Brunswick. You must always disclose such outside employment before it arises and on the annual conflict of interest disclosure questionnaire if your position requires you to complete the questionnaire.

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?*

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

Q *Can I accept a gift card to my favorite restaurant from a vendor?*

A No. No matter what the amount, Brunswick does not permit giving or receiving gifts in the form of cash or cash equivalents like gift cards or checks.

Q *The Company just signed a multi-year, million dollar contract with a vendor who I recommended. In order to showcase their upcoming products, the vendor has invited my family to a World Series game, including airfare, hotel and a nice dinner at which the vendor will present its new products. Since the contract with the vendor has been signed, can I accept?*

A The gifts being offered by this vendor are excessive and not appropriate under the circumstances. This gift may be intended to unfairly influence business decisions, or have the appearance to others of improper influence. In addition, the amount of the gift offered is of excessive value. This offer must be disclosed in advance to your manager and the Ethics Office. It is likely that you will be directed that you may not accept this offer, in whole or in part.

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

A 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.

Related Policies

Conflicts of Interest Disclosure Certification - Manual Form

Conflict of Interest Certification (E.02.06)

Employment of Relatives and Significant Others (H.02.04)

Gift Reporting Form (E.02.05)

Outside Employment (H.02.05)

Anti-Corruption and Anti-Bribery (L.01.03)

Fair and Legal Competition (Antitrust)

Brunswick competes in global markets on the bases of our superior products, services and employees. We never compete by using improper actions intended to injure another company, force it from a market or prevent it from entering a market.

We are committed to complying with applicable competition laws in all of our locations. Although antitrust law (as it is known in the U.S.) is extremely complex, in general it is illegal to make any agreement with a competitor that unreasonably restricts competition, including, although not limited to, the following topics:

- > Pricing (including payment terms and discounts)
- > Products and services
- > Business practices
- > Territories
- > Distribution channels
- > Customer lists

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.

TOOLBOX

Collecting Information About Competitors

Gathering information about our competitors—competitive intelligence—is a legitimate business practice and helps us stay competitive in the marketplace. Obtaining information from public sources, such as newspapers, the internet or public filings is appropriate and encouraged, as is gathering non-confidential information from customers, business partners, brokers and suppliers. However, you may not engage in illegal activity to obtain competitive information, nor may you accept, disclose or use competitive information you know was disclosed in breach of a confidentiality agreement between one of our competitors and a third party. Brunswick prohibits misrepresenting your identity or material facts, and trespassing, wiretapping, espionage, concealment or computer hacking to gain competitive intelligence, or collecting competitive intelligence in any other manner that could violate laws or the Code of Conduct.

Examples of Unfair Competition

- Two competitors agree to “boycott” a business partner or supplier in an effort to gain a competitive advantage.
- Two competitive companies confer and agree to set prices they will charge customers or pay suppliers.
- In a casual phone conversation, sales representatives from two companies agree to split customers or a market territory: “You stay off our turf, and we’ll stay off yours.”
- An employee seeks confidential information from a new employee who formerly worked for a competitor.
- A sales representative makes inaccurate or misleading statements about competitors in a presentation to potential customers.
- An employee hacks a competitor’s email system to get competitive information.

Q & A

Q *A friend of mine works for a Brunswick competitor. He recently told me his company is submitting bids on two projects on which Brunswick is also submitting a bid. He suggested that if he put in a high price on one bid, Brunswick could do the same with the other, and then we would both win a contract. What should I do?*

A You should never discuss dividing customers or prices of bids with a competitor. Making any agreement with a competitor that restricts competition is in direct violation of our policies and the law. If a situation like this arises in a public place, make your disapproval of the suggestion loud and clear. You should notify your Division or Corporate Law Department or the Ethics Office immediately.

Q *I have heard about a competitor's meeting at a tradeshow. I'd like to attend, but I'm afraid they won't let me in if they know I'm from Brunswick. May I attend if I keep my identity secret?*

A No. It is never appropriate to disguise your identity to gain information about a competitor. You should consult your Division or Corporate Law Department before attending any meeting with a competitor.

Workplace Environment

Equal Employment Opportunity

Brunswick values diversity. Brunswick does not tolerate discrimination in the workplace – whether for race, color, religion, sex, age, national origin, citizenship status, disability, sexual orientation, veteran status or any other status protected by applicable laws.

We offer equal employment opportunity and make employment decisions based on merit. This extends to all aspects of the employment relationship, including recruiting, hiring, transfers, promotions, assignments, training, termination, working conditions, compensation and other terms and conditions of employment. Brunswick strictly prohibits retaliation against any individual who makes a good faith complaint of discrimination.

TOOLBOX

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.
- A manufacturing employee is fired because his supervisor believes that those who share his faith may be violent.
- A company consistently hires employees from one ethnic group, justifying this practice with the rationale that “people of other races just can’t relate to our customer base.”

Q&A

- 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?*
- A** If you believe you experienced discrimination, report this to your supervisor, the Ethics Hotline, your local Ethics counselor or through one of the other options outlined in the Code of Conduct. The issue will be promptly investigated, as appropriate. You will not be subjected to retaliation for making a good faith complaint.
- Q** *I am a hiring manager and I have a number of good candidates from very different backgrounds. Although she lacks important skills some of the other candidates possess, I'd like to hire a candidate who shares my race and religious background. I feel like we'll work best together because we share the same values. Is there anything wrong with that?*
- A** It is important to always hire the best candidate for the job based on merit. You must make employment decisions on the basis of experience, job skills, qualifications and other work-related criteria. It is not appropriate to make a hiring decision because you assume you will communicate better or share the same values as someone from your same background. You may well find that additional diversity – besides the required job skills – contributes to outstanding work by your team.

Related Policies

Equal Employment Opportunity and Affirmative Action (H.01.01)

Americans with Disabilities (ADA) (H.01.03)

Electronic Communication and Internet Usage (E.02.07)

Social Media (H.01.05)

Anti-Harassment

The full value of each individual's contribution can be realized only when we treat one another with the respect, trust and dignity we ourselves expect. Brunswick insists on a work environment free of intimidation and harassment by anyone, including supervisors, coworkers, vendors, clients, customers or other third parties.

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 include telling 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. Brunswick will not tolerate harassment, regardless of whether you are on Company premises or engaged in off-hours or off-site business-related functions, such as holiday parties or business travel. Such conduct is strictly prohibited, even if it does not rise to the level that would be a violation of the law.

If you have experienced, witnessed or know about conduct in violation of the Company's Harassment Policy, you must report it as outlined in the Code of Conduct or the Harassment Policy. Appropriate investigations will be prompt and as confidential as possible. You will not experience retaliation as a result of any good faith report of a violation or good faith participation in an investigation.

TOOLBOX

Examples of Violations of the Harassment Policy

- 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.
- Visiting pornographic web sites on a Company computer or at work or work events.

Q&A

- 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?*
- A** Even though the representative is not an employee, you should report the situation. Brunswick 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 *As part of my religious beliefs, I always cover my hair while working. At first, my coworkers were curious and asked me about my religion, but more recently they have started making fun of me and saying my religion is “stupid.” Is there anything I can do?*

A You should immediately report these incidents according to the procedures listed in the Harassment Policy or the Code of Conduct. Harassment under our policies can include teasing and insults due to an individual's religion. If you make a report in good faith, you will not be subjected to retaliation, and the Company can promptly resolve the issue.

Q *I tell a lot of jokes in the workplace. One of my coworkers told me she thinks some of them are offensive, but I think she is overreacting. When I asked my other coworkers, they told me my jokes don't bother them. I haven't violated the Code of Conduct have I?*

A You should always take care that your conduct is not unwelcome and does not create an intimidating, hostile or offensive work environment for any coworkers. Even if your other coworkers are not offended, at least one of them has told you she is. You should stop telling jokes that may create a hostile environment for her or any other colleagues.

Q *My supervisor has posted racist comments about my coworkers on Facebook. Is this harassment under our policies?*

A Creating a hostile work environment on the basis of one's race is prohibited under our policies, even if such conduct occurs on social media sites. You should tell your supervisor, contact the Ethics Office or use any of the other reporting avenues listed in the Code of Conduct.

Related Policies

Harassment (H.01.02)

Electronic Communication and Internet Usage (E.02.07)

Social Media (H.01.05)

Health, Safety and the Environment

Brunswick believes that the health, safety and well-being of its employees are crucial to its continued success. Brunswick is committed to providing products and experiences in a manner that minimizes the Company's impact to the environment and ensures the environmental sustainability of its business operations.

We actively promote the health and safety of our employees through policies and programs that help individuals safeguard themselves and their coworkers. We must all follow safe working procedures and actively work to prevent accidents. If you become aware of any threat to the safety of a team member or other third party connected to our business, report it through local management or in accordance with the reporting procedures in the Code of Conduct. In addition, you must promptly report any workplace illness or injury in accordance with local guidelines.

Remember, safety always comes first. While at work we each must remain free from the influence of drugs, alcohol or any other substance that may impair our ability to work safely and effectively. Brunswick 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.

Brunswick strictly prohibits workplace violence or the threat of workplace violence. Team members who engage in such behavior will be subject to disciplinary action, up to and including termination of employment.

TOOLBOX

Examples of Inappropriate Behavior Related to Health, Safety and the Environment

- In a plant area where heavy machinery operates at high decibel levels requiring hearing protection, employees fail to use the necessary protective equipment.
- A plant manager tries to save the Company money by dumping contaminated waste on a vacant lot next to the plant, rather than disposing of it in accordance with applicable laws and Company policies.
- To increase production, a manufacturing employee removes the safety guard from a machine to avoid having to adjust it.

Q&A

Q *I noticed a safety guard is broken on a machine. It will take time to fix, and we have a tight production schedule. What should I do?*

A If a guard on a machine that you have been trained to operate is broken, it should be reported immediately, and the machine should not be operated until corrective action is performed to address the broken guard. It is everyone's job to ensure a safe environment. Employee safety is a Brunswick priority.

Q *I suspect a coworker is occasionally coming to work intoxicated and may even be drinking on the job. I'm concerned for her health and safety. What can I do?*

A You should immediately consult your supervisor, who will take appropriate steps to address the concern. Remember that safety comes first, for both you and your coworkers.

Q *I am unsure what to do with unused paint and chemicals sitting around the plant. Should I just throw them out?*

A No, you should consult with your local environmental health and safety representative for information about how to safely dispose of unused paints and chemicals.

Related Policies

Drug and Substance-Free Workplace (H.05.01)

Workplace Safety (H.05.03)

Workplace Violence Prevention (H.05.04)

Confidential Information and Data Security

Confidential information includes information about Brunswick's business, operations, employees, customers, business partners, product strategies and trade secrets. Protecting the Company's confidential information is everyone's responsibility. Confidential information includes any information not known to outsiders that has value to Brunswick or whose premature disclosure would help competitors or be harmful to the Company.

Confidential information also includes personal information about employees, business partners and customers, including personally identifiable health, financial or other information the Company may legitimately maintain. Brunswick is committed to maintaining the privacy and security of all personal information and handling it in compliance with applicable privacy laws. We must collect, use and process personal data only for legitimate business purposes, limit access to those who have a legitimate business purpose for using the information, and take care to prevent unauthorized disclosure. We do not permit disclosure to third parties except as allowed by our policies.

Be sure to follow all appropriate security procedures and safeguards when handling confidential information. Be cautious and thoughtful when sharing confidential information in writing—including emails—and during private conversations. Consider your surroundings when talking on a cell phone or in a public place. Your obligation to maintain the privacy and security of confidential information continues even after your employment ends.

Retain or discard confidential records in accordance with records management and data security policies. Certain records relevant to litigation, audits or investigations may need to be kept beyond the standard requirements. Follow legal hold guidelines to ensure you do not destroy or misplace important information.

TOOLBOX

Protecting Our Brand

We are each responsible for maintaining and building 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 Marketing Department at that division.

In addition, you may sometimes create materials or develop processes in the course of your work, and these creations belong to Brunswick. This 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.

Examples of 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.
- 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.

Examples of Appropriate Protection of 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.
- A human resources manager keeps sensitive personnel information in a locked cabinet.
- A procurement employee obtains a signed confidentiality agreement from a prospective business partner before providing confidential information about Brunswick.

Examples of Inappropriate Protection of Confidential Information

- An employee is organizing a bowling tournament to benefit her son's scout troop and copies a Brunswick Zone logo onto the flyer, implying Company sponsorship.
- 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.
- A marketing manager is excited about a new boat concept and shares details with family and friends before it is released.

Q&A

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.*

A 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 frequently travel for work and take my laptop everywhere. I am visiting a customer and, after a day of meetings, the customer invited me to dinner. Should I bring my laptop into the restaurant, or keep it in the trunk of my rental car?*

A You should carry the laptop in your case with you into the restaurant to ensure maximum data security. Even if you locked up the laptop in the car, someone could break in and steal the laptop or steal the car itself. Choose to be proactive and mindful of confidential information by keeping your laptop under your direct supervision and protection.

Q *I created a new boat design for Brunswick that was never used. I am leaving the Company to start my own business. Can I use that design?*

A No. The designs you created while employed by the Company belong to the Company as "intellectual property." When you leave Brunswick, you must return any and all of Brunswick's intellectual property. Keeping or using any such property without proper authorization may be a violation of copyright laws and the Code of Conduct.

Q *I am a new Brunswick sales representative. I have a listing of new product cost and customer preferential pricing for customers of my former employer and feel like using that for my work at Brunswick would be helpful. Is this a problem?*

A Yes. Brunswick respects the confidential and proprietary information of our competitors. Just as we protect our own sensitive information, we also must safeguard such information of competitors, customers and business partners.

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

A No. You have no business reason to have this information, which is personal to other employees. You should immediately return the document to Human Resources or, if appropriate, dispose of it according to our records management and data security policies.

Q *I received an email from my friend, who works for a Brunswick competitor. His email included an attachment detailing his company's promotional strategies, and it was marked "confidential." I know he mistakenly sent me the email, but since I have the information, can I use it?*

A No. Your friend divulged this information inadvertently, and it is clearly marked confidential. You should therefore not use it and should either return it or destroy it immediately.

Related Policies

Privacy of Protected Health Information (H.04.13)

Safe Harbor Privacy Policy for Employees (P.01.01)

Classification of Controlled Data Policy (P.01.02)

Records Management (L.03.01)

Corporate Identity Guidelines Document (Communications/Brunswick Templates and Style Guides/Corporate Identity)

Electronic Information Systems

Electronic information technology plays a vital role in how we conduct business. Brunswick's electronic information systems, including Internet, email, telephones, fax machines, voicemail, mobile devices and instant messaging, are provided to help you do your job and, therefore, should be used primarily for business purposes. Use for personal purposes is permissible only within reasonable limits, and personal use must never interfere with your job duties.

Brunswick's electronic information systems are Company property and any messages composed, sent, or received on them are Company property as well. The Company reserves the right to monitor use of its electronic systems, whether such use is business or personal, and to block or intercept content, messages or files, where allowed by applicable law. Such monitoring is performed to conduct internal investigations, protect Brunswick's legal rights and ensure compliance with our policies and applicable laws. Brunswick's policies and the principles outlined in the Code of Conduct apply equally to use of the Company's electronic information systems and whether that use is for business or personal reasons. Remember that electronic messages—including email, instant messages and texts—must be composed with the same care and professionalism you take in composing other Brunswick letters and correspondence.

When using Social Media websites to post information, engage in discussions or otherwise communicate about the Company, whether or not you are using Company systems, you must clearly and conspicuously disclose your employment relationship with the Company. In addition, information posted on behalf of Brunswick must include only true and substantiated facts. You should never misrepresent yourself or Brunswick.

TOOLBOX

Examples of Improper Use of Company Electronic Information Systems

- An employee sends his friend outside the Company 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.
- An analyst uses the Company's information systems for personal reasons excessively, such as sending out frequent emails through his work computer promoting a home-based business.
- An employee uses a social media website to make racially derogatory comments about his coworkers.
- An employee posts anonymous comments praising a Brunswick product without disclosing that he works at Brunswick.

Q & A

- Q** *A team member sent me an email that stereotypes and is derogatory of men. I want to send it to a friend outside the Company who I know will think it is funny. Can I forward it since my friend doesn't work here?*
- A** No. You should never use Brunswick electronic information systems to send potentially offensive material to anyone in or outside of Brunswick. Sending such materials may violate the Harassment policy, the Code of Conduct and the law. You should delete the email immediately and inform the IT department that you received it.
-
- Q** *I write a blog, and I want to talk about Brunswick's great products. Is that acceptable?*
- A** If you want to write about the Company's products, you must make it very clear that you are a Brunswick employee, and you should be sure that you are posting only true and substantiated facts about our products.

Related Policies

- Electronic Communication and Internet Usage (E.02.07)
- Social Media (H.01.05)
- Workplace Searches (H.05.05)

Protecting Company Assets

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.

Protect Brunswick's assets and use them in the intended manner. Do not use Company assets for your personal benefit or the benefit of anyone other than the Company. Do not use Company computers or equipment for illegal or unethical activities such as gambling or pornography. Theft of Company assets may result in not only termination but criminal prosecution. Inappropriate or illegal use of Brunswick property hurts us all.

TOOLBOX

Examples of Company Assets

- Company money or products.
- Employees' time at work.
- Computer systems and software.
- Telephones.
- Photocopiers.
- Company vehicles.
- Company trademarks.

Q&A

Q *I have a small business creating wedding invitations and am designing invitations for a coworker. Can I use my Company computer for this purpose, if it only takes a few days?*

A No. This use is more than the incidental personal use permitted by Brunswick policies.

Q *My manager has asked me to take care of his personal business on Company time, such as picking up his dry cleaning and shopping for personal gifts. Is this a problem?*

A Yes, your manager has misused your work time, which is a Company asset. You should report the incident as described in the Code of Conduct, so it may be resolved.

Related Policies

Electronic Communication and Internet Usage (E.02.07)

Social Media (H.01.05)

Political Activities

Brunswick respects your right to participate in political activities on your own behalf or on behalf of any cause or candidate you favor, but asks that you refrain from engaging in political activities at work. “Political activities,” for purposes of this policy, means activities in which there is no direct connection to a specifically identified employment concern.

You must be careful not to use Brunswick’s name, property or other resources to support your personal political activities, and you should exercise discretion in discussing your personal political views with third-party business contacts. Employees are not reimbursed by the Company for personal political contributions, and employee compensation will not be increased or otherwise adjusted to reflect political contributions made. You are encouraged to participate in civic and political activities as long as such activities are on your own time and at your own expense, and are in compliance with applicable laws. You may not suggest or imply that your donation of time, resources or money is from or endorsed by Brunswick. You will never be favored or punished for making or not making a personal contribution.

TOOLBOX

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 plant associate 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.

Q & A

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

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

Q *My wife is running for state representative. Can I use Brunswick computers and photocopiers to make her pamphlets and posters?*

A No. You should not use Company resources to support personal political activities.

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?*

A 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 Harassment Policy, you have an obligation to report it so it can be investigated as appropriate.

Related Policies

Harassment (H.01.02)

REPORTING PROCEDURES

If you know of a violation of the Code of Conduct or any Brunswick policy, you must promptly report it using one of the following methods. Reports may be made anonymously and translators are available for the toll-free Ethics Line. Reports will be kept confidential to the extent consistent with conducting a fair and thorough investigation.

- Tell your supervisor;
- Contact an Ethics Counselor at your location (in person, by phone, by letter or by email);
- Call the U.S. toll-free Ethics Line (877.684.5252) or an international toll-free Ethics Line (numbers listed at the end of the Code of Conduct);
- Use the web-based process: <https://www.compliancehelpline.com/BCEthicsReporting.jsp>;
- Contact the Ethics Office in person, by mail (1 N. Field Court, Lake Forest, IL 60045), telephone (847-735-4318), email (ethics.advisory@brunswick.com) or fax (847.735.4388); or
- Send a letter to the Company's General Counsel.

The Ethics Line is staffed by an outside company and is available 24 hours a day, seven days a week. You can report anonymously if you prefer, although maintaining anonymity may limit our ability to effectively investigate your concerns. Brunswick will promptly investigate reports as appropriate, and will take appropriate action. We each have an obligation to comply with any investigations and share information openly and honestly. We will make every reasonable effort to communicate back to you once the investigation is complete.

ZERO TOLERANCE FOR RETALIATION

If you make a report in good faith, using any of the procedures described in the Code of Conduct, you will not be subjected to retaliation for doing so. Any employee who retaliates because of such a report, or who interferes with an investigation based on such a report, will be subject to disciplinary action, up to and including termination. If you believe someone has retaliated against you, promptly make a report using one of the methods described above.

It is a violation of the Code of Conduct 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.

TOOLBOX**Q&A****Q** *Will my career be damaged if I make a report?*

A No, Brunswick management is committed to maintaining an open environment where ethics and compliance issues can be raised in good faith without negative consequences to the reporter due to the report. Brunswick will respond to all reported instances of retaliation and take prompt corrective action. Retaliatory behavior by any employee will not be tolerated.

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

A Yes, you are responsible for immediately reporting possible violations of the Code of Conduct. 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.

Q *What happens if someone makes a report in bad faith in order to get me into trouble?*

A All investigations are handled professionally and objectively. Intentionally making a report in "bad faith" is a serious violation and may lead to disciplinary action, up to and including termination of employment.

Related Policies

Procedure for Processing Accounting. & Financial Matter Complaints (E.02.01)

Whistleblower Policy (E.02.03)

Harassment Policy (H.01.02)

Acknowledgment:

Your Personal Commitment to Making the Right Choice

I acknowledge that I have read and understand the information in the Brunswick Corporation Code of Conduct and agree to follow the Code of Conduct and other Brunswick policies.

Employee Name

Date

Employee Signature

Date

ETHICS TOLL-FREE HELP LINE NUMBERS

COUNTRY	SERVICE	AT&T ACCESS CODE	HELP LINE	COUNTRY	SERVICE	AT&T ACCESS CODE	HELP LINE
Australia	<i>Optus</i>	1.800.551.155	800.556.2803	Mexico		01.800.288.2872	888.802.9416
	<i>Telstra</i>	1.800.881.011			<i>Alternative</i>	01.800.462.4240	
Belgium		0.800.100.10	888.507.5629		<i>Por Cobrar Espanol</i>	01.800.112.2020	
Brazil		0800.890.0288 or 0800.8888.288	888.649.9011	Netherlands		0800.022.9111	888.802.9418
Canada		--	877.684.5252	New Zealand		000.911	800.721.0942
China	<i>Beijing vicinity</i>	108.888	888.649.9014	Norway		800.190.11	888.802.9432
	<i>Shanghai vicinity</i>	108.11		Poland		--	0.0.800.111.1717
Denmark		8001.0010	888.649.9026	Portugal		800.800.128	800.569.9578
France		0800.99.0011 or 0805.701.288	888.649.9047	Russia		8^10.800.110.1011	888.802.9441
Germany		0.800.2255.288	888.649.9048	<i>Moscow</i>		363.2400	
Hong Kong	<i>Hong Kong Telephone</i>	800.96.1111	888.649.9054	<i>Outside Moscow</i>		8^495.363.2400	
	<i>New World Telephone</i>	800.93.2266		<i>St. Petersburg</i>		363.2400	
Hungary		06.800.01111	888.649.9057	<i>Outside St. Petersburg</i>		8^812.363.2400	
Italy		800.172.444	888.649.9058	Singapore	<i>Sing Tel</i>	800.0111.111	888.802.9451
Japan	<i>KDDI</i>	00.539.111	888.649.9059	<i>StarHub</i>		80.0001.0001	
	<i>NTT</i>	0034.811.001		Sweden		020.799.111	888.802.9454
	<i>Softbank Telecom</i>	00.663.5111		Switzerland		0.800.890011	888.802.9458
Korea	<i>DACOM</i>	0030.911	888.649.9062	Thailand		1.800.0001.33 or 001.999.111.11	888.802.9459
	<i>DACOM US Military</i>	550.2872		United Kingdom	<i>BT</i>	0800.89.0011	800.569.9578
	<i>Korea Telecom</i>	0072.911		<i>C&W</i>	0500.89.0011		
	<i>Korea Telecom US Military</i>	550.4663		United States		--	877.684.5252
	<i>ONSE</i>	0036.911					

