1.0 PURPOSE

The purpose of the policy is to

- Have strong internal controls during the transfer of financial data from entity general ledgers to the consolidation system.
- Ensure that the account balances for entities included in the consolidated Brink's financial statements are consistently classified and grouped for financial statement presentation.
- Prevent other inaccuracies in Brink's consolidated financial statements.

2.0 SUMMARY

This policy establishes standards for how Brink's subsidiaries are to load financial data into the Brink's financial consolidation application (Oracle's Hyperion Financial Management system ("HFM")). More specifically, the policy

- Establishes a requirement that financial data should be recorded in a general ledger to facilitate the automated loading of financial data into HFM.
- Governs the methods used to extract the financial data from the general ledger to be used to submit the data into HFM.
- Limits access to the extracted financial data to be loaded into HFM.
- Requires strong segregation of duties involved in the data transfer process by defining the approvals needed for topside adjustments.
- Governs the methods of consolidating U.S. GAAP financial data.

Accounting systems and processes that are not in compliance with this policy require a formal Policy Exception Request be approved.

Planning note for subsidiary finance teams: We expect to make changes to our HFM consolidation application in the future to further improve our internal controls. As a result, we expect we will revise this accounting policy in the future to (among other things) require a standard set of general ledger segments or dimensions. For example, we intend to standardize GL coding for the nature of account, cost centers, locations, etc.

3.0 SCOPE

This policy applies to all entities directly or indirectly owned or otherwise controlled by The Brink's Company.

4.0 POLICY

4.1 Financial Data Required to be in General Ledger

- All routine financial transactions, journal entries and account balances must be maintained in a general ledger ("GL") system, including any adjustments required to convert local GAAP statements to U.S. GAAP.
- See Sections 4.3 and 4.4 for restrictions on the use of adjustments outside of the GL.
- Financial records must be kept in the entity's local currency unless the functional currency is another currency. The use of a functional currency other than the local currency requires approval by the Assistant Corporate Controller.
- The use of Excel spreadsheets is prohibited in any intermediate steps in the transfer of financial data from the GL to HFM. Among other things, this prohibits using spreadsheets to record U.S. GAAP adjustments or realign GL accounts before being loaded into HFM.

4.2 Extraction of Financial Data from GL and Submission to HFM

Summary
Loading data into HFM using an extract file which has been directly generated from the local GL system eliminates the risk associated with modifying or adjusting financial data in Excel spreadsheets or in other non-GL systems.

Also, a direct path from the local chart of accounts ("COA") to HFM allows traceability from HFM back to the transactional source. A direct path helps:

- Ensure mapping is correct.
- Facilitate data validation and reconciliation between GL and HFM.
- "Drill down" to local detailed account level when performing financial variance analysis.
- Ensure local GL balances reconciled in BlackLine can be traced to HFM.

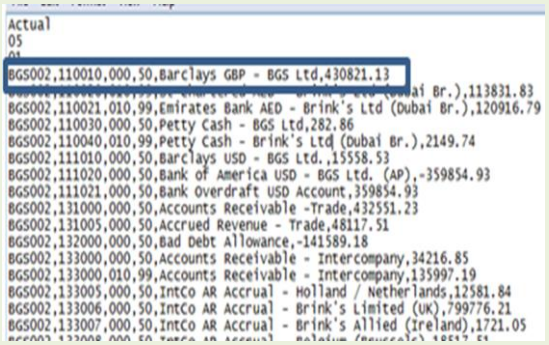
Required internal controls related to extracting data from GL

- Every entity's trial balance extract file must be generated directly by the entity's GL system.
- The information in the extract file shall not be altered from that contained in the general ledger, manually or otherwise, in any form prior to loading to Oracle Hyperion Financial Data Quality Management system ("FDM").
- The extract file then must be directly loaded into HFM through FDM.
- Spreadsheets may not be used to upload data into FDM.

Format of extract

- The trial balance extract must contain the entity's local general ledger COA, which is then mapped to the current HFM COA in FDM.
- The extract file should be a delimited flat text file with separators such as: comma, semi-colon or colon.
- Depending on GL system capabilities, flat CSV delimited files can also be accepted.
- The header and columns of data in the file should contain the following information:
    - Scenario (header)
    - Period (header)
    - Legal entity name/code
    - Natural account number
    - Account description
    - Cost center
    - Line of business
    - Intercompany partner
    - Roll forward
    - Any other segments (also known as "dimensions") of the GL COA code block not currently used by HFM
    - Period's year-to-date account balance.
- The order of the columns of data may be different as FDM is able to accommodate different orders.
- Segments of local GL COA not currently used are encouraged as they can be used in future HFM/Essbase solution.
- For each column of data included – there has to be a value from top to bottom of column without any blank spaces.

Example of an Extract Text File



```
Actual
05
BGS002,110010,000,50,Barclays GBP - BGS Ltd,430821.13
BGS002,110021,010,99,Emirates Bank AED - Brink's Ltd (Dubai Br.),120916.79
BGS002,110030,000,50,Petty Cash - BGS Ltd,282.86
BGS002,110040,010,99,Petty Cash - Brink's Ltd (Dubai Br.),2149.74
BGS002,111010,000,50,Barclays USD - BGS Ltd.,15558.53
BGS002,111020,000,50,Bank of America USD - BGS Ltd. (AP),-359854.93
BGS002,111021,000,50,Bank Overdraft USD Account,359854.93
BGS002,131000,000,50,Accounts Receivable -Trade,432551.23
BGS002,131005,000,50,Accrued Revenue - Trade,48117.51
BGS002,132000,000,50,Bad Debt Allowance,-141589.18
BGS002,133000,000,50,Accounts Receivable - Intercompany,34216.85
BGS002,133000,010,99,Accounts Receivable - Intercompany,135997.19
BGS002,133005,000,50,IntCo AR Accrual - Holland / Netherlands,12581.84
BGS002,133006,000,50,IntCo AR Accrual - Brink's Limited (UK),799776.21
BGS002,133007,000,50,IntCo AR Accrual - Brink's Allied (Ireland),1721.05
```

Secondary mapping is not allowed
Presently some entities use a secondary mapping in FDM. For example, they map from the GL to HFM as follows:

1) First, from the GL COA to the old Hyperion Enterprise COA,
2) Then, from the old Hyperion Enterprise to the current HFM COA.

This is not acceptable because it may prevent accurate mapping of the detail in the GL into the current HFM classifications. Also, in many cases the second mapping is accomplished by using Excel spreadsheets to manually create a file that can be loaded into FDM, which is also not allowed by this policy.

FDM mapping process and review
Each entity is responsible for its own FDM mapping.

- As new accounts are added in the local GL COA, it is the responsibility of the FDM loader to update the local COA to HFM mapping tables in FDM, so that the monthly text file can be successfully loaded to FDM.
- Annually the FDM loader should export each HFM dimension mapping table into Excel for review. The dimensions include: entity, account, ICP - intercompany partner, Custom1 – LOB/Cost Center and Custom2 – Roll forward.
- Custom3 - Stats and Custom4 - HR Stats are no longer used in HFM and they should always be mapped to HFM "[NONE]".
- The Excel mapping tables should be reviewed by someone other than the FDM loader to ensure accurate mapping from local COA to HFM COA.
- The reviewer should be a member of the entity's Finance team with sufficient familiarity with the local GL and HFM COAs.
- For reference - the HFM COA and roll forward descriptions and definitions are available on Brink's World on the Global Finance site.

4.3 Adjustments on Appropriate Legal Entity GL

- All adjustments, including U.S. GAAP adjustments, shall be recorded in a single GL on the appropriate legal entity, unless:
  - The current GL system does not allow separate reporting of U.S. GAAP and Statutory financial results if recorded on the same legal entity GL, or
  - Local law prohibits recording U.S. GAAP adjustments on the local GL legal entity.

- If a legal entity requires a separate GL for U.S. GAAP adjustments, the following example provides the preferred solution.
  - France has multiple legal entities, one of which is Evolution, SARL:
    - "EV" GL – contains Evolution, SARL legal entity statutory balances.
    - "EV US GAAP" GL – contains US GAAP adjustments related to Evolution, SARL legal entity only.

- It is not appropriate to record aggregate adjustments relating to multiple legal entities on one designated entity's GL, such as "U.S. GAAP Adjustments – All France".

- Every legal entity with financial information needs its own US GAAP general ledger with a full income statement and balance sheet.

- The availability of distinctive U.S. GAAP and statutory GL data will facilitate the U.S. GAAP and statutory reporting in the existing and future HFM data structure.

4.4 Legal Entity Topside Adjustments Outside the GL

- It may be acceptable in some cases to adjust financial information outside of a GL (a "Topside" adjustment).
- These cases should be very rare and limited to unresolved accounting issues – see examples on the right. As defined in Section 4.3, adjustments should be usually recorded on the appropriate legal entity GL.
- Topside adjustments should be made for only non-routine matters. Topside adjustments should be recorded in the GL in the month following recognition in HFM (if still needed).
- Topside adjustments prior to the submission deadline are subject to approval by a Regional Controller before they are posted to HFM.
- Topside adjustments after the submission deadline can only be posted by BCO consolidation team on behalf of the legal entity subject to Assistant Corporate Controller approval.

Examples of Topside Adjustments Requiring Approval

1. In spite of earnest and reasonable effort, the resolution of a particular accounting issue cannot be finalized by the due date when the entity's results are due for HFM submission.
2. A material error in the GL is identified after the deadline to load GL information into HFM.

Topside adjustments are required to be posted with HFM Journal Entries, not FDM Journals

Topside adjustments should only be made using HFM Journal Entry module and should not be made using FDM Journals.

- FDM Journals are not allowed at Brink's because this does not provide an adequate level of internal controls (FDM Journals allow the use of Excel spreadsheets to post journals, which prevents strong controls because access is not able to be restricted and segregation of duties cannot be enforced).
- Using the HFM Journal Entry module retains separate audit trails in HFM of GL data that has been loaded and HFM Journal Entry that have been recorded. FDM Journals do not provide an adequate audit trail.

Approvals and segregation of duties

Special care for topside adjustments is needed because these balances may not be subject to reconciliation and other controls performed for GL balances. Proper segregation of duties is required:

- Preparers of topside adjustments are allowed to create the adjustments but are not allowed to approve or post adjustments to HFM.
- Either a Regional Controller or the Assistant Corporate Controller must approve a topside adjustment before it is posted to HFM.

4.5 Consolidation of Financial Information

The US GAAP consolidation of financial information contained in general ledgers shall be performed in HFM, including

- the translation of local currency amounts into reporting currencies,
- recording the necessary consolidation and eliminations adjustments, and
- reclassifying noncontrolling interests.

Spreadsheets may not be used to consolidate financial information to produce consolidated financial statements.

5.0 NONCOMPLIANCE

Accounting systems and processes that are not in compliance with this policy require a formal Policy Exception Request be approved along with an agreed upon action plan with the BCO Controller, including a due date by which compliance will be achieved (see Policy Exception Request policy).

Noncompliance instances requiring Policy Exception Request include:

- Not having financial data extract file directly generated from the local GL system.
- Lack of direct HFM mapping from local GL COA to current HFM COA.
- Transition period needed to "push down" to GL large number of existing routine topside adjustments made directly in HFM.
- Not recording and reporting U.S. GAAP basis by legal entity.
- Use of Excel spreadsheets in any intermediate steps in the transfer of financial data from the GL to HFM (e.g. FDM Journals).

6.0 EFFECTIVE DATE

This policy is effective January 1, 2014. Early adoption is strongly encouraged.