1.0 PURPOSE

This policy establishes a standard for recording and reporting adjusting journal entries in periods subsequent to the transaction or event date (out of period adjustments).

2.0 SCOPE

This policy applies to all Brink's, Inc. (Brink's) Corporate, regional, and country level business units.

3.0 RESPONSIBILITY

Overall responsibility for the policy lies with the BCO Controller. Continued compliance, successful implementation, and maintenance of financial records is the responsibility of business unit management. Corporate and Regional management are responsible for on-going monitoring of compliance with the policy.

Business unit management responsible for reporting financial results to Brink's Corporate Finance must have a complete understanding of this policy.

4.0 POLICY

The accounting entry for every transaction or event should be recorded in accordance with U.S. Generally Accepted Accounting Principles (U.S. GAAP) to ensure timely and accurate financial reporting. Accounting entries related to an earlier accounting period must be recorded as soon as local management becomes aware of the out of period adjustment. Senior Financial Management at the local, regional, or global levels must be notified timely of the out of period adjustment in accordance with certain reporting thresholds as outlined in **section 5.4**.

4.1 Objectives

Transactions recorded in the general ledger must be properly measured based on the underlying event in accordance with U.S. GAAP. All transactions occurring during the reporting period and current balances must be completely reflected in the general ledger. Only assets and liabilities for which Brink's has the rights of ownership or responsibility for should be recorded in the general ledger. Transactions should be recorded only when they exist as supported by an underlying event. All amounts should be classified and disclosed to allow for accurate presentation of financial information. Management should ensure that all transactions and adjustments are appropriately authorized for recording to the general ledger.

5.0 PROCEDURE

5.1 Background

An out of period adjustment is a change to balances reported in financial statements of an earlier period due to the correction of an error. Corrections of abnormal, nonrecurring errors that may have been caused, for example, by the improper interpretation of an accounting principle, policy, mathematical mistake, etc. are out of period adjustments. Normal, recurring adjustments, which occur from the use of estimates in accounting practice and are a result of changes in facts and circumstances, are not considered out of period adjustments.

Treatment and reporting of an out of period adjustment in the current financial statements is dependent upon materiality, the period in which it occurred, and financial statement presentation (periods presented).

U.S. GAAP requires reporting out of period items along with their potential tax effect; therefore, out of period adjustments may affect the amount of income taxes owed by Brink's. The impact of out of period adjustments on the financial statements made available to the public will be assessed by Brink's Corporate and BCO management.

5.2 When to Record an Out of Period Adjustment

An out of period adjustment at the individual business unit level is appropriate immediately when an error, or the aggregate sum of errors, made in a prior period is discovered and validated. Business unit management should not wait until the quarter or month-end reporting process to record an out of period adjustment. Prior period financial results should not be changed unless authorized by the BCO Controller.

5.3 Reporting an Out of Period Adjustment Internally

Regardless of whether an out of period adjustment impacts a balance sheet or income statement account, all out of period adjustments over certain thresholds must be reported timely using the templates provided at **Exhibit A**, *Out of Period Adjustment Analysis Form – Adjustments less than $250,000 USD*, or **Exhibit B**, *Out of Period Adjustment Analysis Form – Adjustments greater than $250,000 USD*. Out of period adjustments greater than $250,000 USD are considered *significant* and must be analyzed to understand potential contributing factors in an effort to maintain sufficient internal controls over financial reporting.

The information required for these analyses is outlined in the guidance provided at **Exhibits A** and **B** to this policy.

Out of period adjustment information should be sufficient to ensure that Brink's Corporate Finance has complete information for external reporting, if necessary, and should be sufficiently comprehensive to support an audit.

Disclosure of out of period adjustments should also be included in the applicable representation letter coordinated through Brink's Corporate Finance.

5.4 Reporting Thresholds

Countries will adhere to the following table when reporting out of period adjustments to Brink's Regional and Corporate Finance Management.

Annual Revenue	Adjustment Amount
Greater than $100 million USD	$150,000 USD and above
$50 million - $100 million USD	$100,000 USD and above
Less than $50 million USD	$25,000 USD and above

In addition to the table above, out of period adjustments occurring during the same month shall be combined to evaluate reporting requirements to Brink's Corporate Finance. The absolute value of adjustments should be added together (debits and credits will not be netted).

6.0 ADVICE AND COUNSEL

Brink's Management includes accounting and finance professionals who are available to provide assistance and guidance to ensure compliance with this policy. Interpretation of guidance provided in this policy is the responsibility of the BCO Controller. Questions about this policy should first be directed to Regional Finance Management.

7.0 RELEVANT PROFESSIONAL LITERATURE

Relevant professional literature for this policy includes U.S. GAAP guidance, SEC guidance, and other relevant U.S. laws and regulations that define accounting and reporting requirements for companies publicly owned and traded within the U.S. All Standards, Interpretations, Staff Positions, and Technical Bulletins issued by the U.S. Financial Accounting Standards Board (FASB) and applicable U.S. laws and regulations are considered in the preparation of this policy.

Specific U.S. GAAP pronouncements governing the accounting for out of period adjustments include:

FAS 5	Accounting for Contingencies
FAS 16	Prior Period Adjustments
FAS 109	Accounting for Income Taxes
FAS 154	Accounting Changes and Error Corrections

8.0 DOCUMENTATION

All documentation described in this policy relating to out of period adjustments must be maintained at the local business unit level and may be subject to periodic review.

Brink's, Incorporated
Policies and Procedures
Out of Period Adjustments (G-PA-00-9999-1)
Exhibit A
Out of Period Adjustment Analysis Form - Adjustments less than $250,000 USD

I. Objective: Analyze adjustments recorded outside of the intended period. Understand opportunities for improvement.

II. Instructions: Please complete all information in the "Form" tab. Specific instructions are provided next to each section. One analysis should be prepared for each adjustment. Do not net adjustments. **This worksheet must be filled out each time there is an out of period adjustment less than $250,000 USD.** The worksheet should be submitted timely for Regional and Corporate Management review. Do not wait until month-end or quarter-end to complete this form. Questions should be directed to Regional Management.

Brink's, Incorporated
Policies and Procedures
Out of Period Adjustments (G-PA-00-9999-1)
Exhibit A
Out of Period Adjustment Analysis Form - Adjustments less than $250,000 USD

Section 1 -Background			Instructions
	Country:		*Name of the country*
	Company		*Name of the company where the adjustment is recorded (if applicable)*
	Preparer:		*Name of finance contact most familiar with the adjustment*
	Date Prepared:		*Date of analysis*
	Accounting Period Recorded:		*Period the entry was recorded*
	Accounting Period Intended:		*Period entry should have been recorded*

Section 2 -Adjustment		HFM Account Number	Account Description	Amount dr (cr) $USD	Instructions
	Actual Adjustment:				*Enter the actual adjustment as it was recorded.*

Section 3 - Nature			Instructions
	Nature of the Adjustment		*Provide a brief discussion of the main reason for the adjustment. I.e., "Adjusted an employee retirement liability subsequent to re-interpretation of a union agreement."*

Section 4 - Accounting Background			Instructions
	Accounting Background		*Provide a discussion of the related normal procedures and approach used to account for the area associated with the adjustment. I.e., "Brink's Antarctica does not have a formal pension plan. Employee retirement benefits are based primarily on a union agreement which stipulates future payments. Amounts to be paid are based on years of service. An actuarial firm is used to calculate estimated retirement benefits based on underlying assumptions which are adjusted each quarter."*

Section 5 - Adjustment Background			Instructions
	Adjustment Background		*Provide a discussion of the adjustment. Please address **who** noted (management, external auditors, internal auditors, etc), **what** research was done to get comfortable with the adjustment needed including management review, **when** the potential need to record the adjustment was noted, **where** the adjustment is recorded (a particular branch, a particular TB, etc.), **how** the adjustment was recorded (i.e., to a summary or holding account, through a top-side adjustment, directly within a customer account, done to a contra account, etc).*

Brink's, Incorporated
Policies and Procedures
Out of Period Adjustments (G-PA-00-9999-1)
Exhibit B
Out of Period Adjustment Analysis Form - Adjustments greater than $250,000 USD

I. Objective: Analyze significant adjustments recorded outside of the intended period. Understand opportunities for improvement. Determine any potential impact on internal controls over financial reporting or disclosure controls. A significant adjustment is considered as $250,000 USD or above, regardless of whether it impacts the balance sheet or income statement.

II. Overview: Out of period adjustments can indicate a weakness in internal controls. In accordance with PCAOB and SEC guidance, weaknesses must be assessed as to their importance. Brink's is required to assess the underlying factors contributing to out of period adjustments. Weaknesses must also be assessed to determine if additional reporting to senior management, the Board of Directors, or the public is required. This tool is designed to compile information to allow management to assess the importance of adjustments and underlying factors.

III. Instructions: Please complete all information in the "Form" tab. Specific instructions are provided next to each section. One analysis should be prepared for each significant adjustment. Do not net significant adjustments. This worksheet must be filled out each time there is a significant adjustment. The worksheet should be submitted timely for Regional and Corporate Management review. Do not wait until month-end or quarter-end to complete this form. Questions should be directed to Regional Management.

Brink's, Incorporated
Policies and Procedures
Out of Period Adjustments (G-PA-00-9999-1)
Exhibit B
Out of Period Adjustment Analysis Form - Adjustments greater than $250,000 USD

Section 1 -Background			Instructions
	Country:		*Name of the country*
	Company		*Name of the company where the adjustment is recorded (if applicable)*
	Preparer:		*Name of finance contact most familiar with the adjustment*
	Date Prepared:		*Date of analysis*
	Accounting Period Recorded:		*Period the entry was recorded*
	Accounting Period Intended:		*Period entry should have been recorded*

Section 2 -Adjustment		HFM Account Number	Account Description	Amount dr (cr) $USD
	Actual Adjustment:			

Instructions

Enter the actual adjustment as it was recorded.

Section 3 - Nature		
	Nature of the Adjustment	

Instructions

Provide a brief discussion of the main reason for the adjustment. I.e., "Adjusted an employee retirement liability subsequent to re-interpretation of a union agreement."

Section 4 - Accounting Background		
	Accounting Background	

Instructions

Provide a discussion of the related normal procedures and approach used to account for the area associated with the adjustment. I.e., "Brink's Antarctica does not have a formal pension plan. Employee retirement benefits are based primarily on a union agreement which stipulates future payments. Amounts to be paid are based on years of service. An actuarial firm is used to calculate estimated retirement benefits based on underlying assumptions which are adjusted each quarter."

Section 5 - Adjustment Background		
	Adjustment Background	

Instructions

*Provide a discussion of the adjustment. Please address **who** noted (management, external auditors, internal auditors, etc), **what** research was done to get comfortable with the adjustment needed including management review, **when** the potential need to record the adjustment was noted, **where** the adjustment is recorded (a particular branch, a particular TB, etc.), **how** the adjustment was recorded (i.e., to a summary or holding account, through a top-side adjustment, directly within a customer account, done to a contra account, etc). Indicate if the out of period adjustment related to perhaps the timeliness of the execution of a control or a procedure in place or is it a procedure or control that is missing or improperly designed.*

Section 6 - How Identified	**How was need for Adjustment Identified?**	

Instructions

Provide a discussion of the circumstances and sequence of events leading to discovery of the need to record the adjustment. Please be specific to the events leading to the adjustment, including internal controls or management review which may have contributed to discovery.

Section 7 - Related Controls	**Related Controls**	**Significant Process**	**Control Description**	**Control Breakdown (yes/no)**

Instructions

List all key controls associated with the adjustment. Conclude whether it appears if each control was operating effectively or not (considered a breakdown in controls). If a control is found not to be operating effectively, an issue should be created in Risk Navigator immediately.

Section 9 - Additional Controls	**Additional Recommended Controls**	**Significant Process**	**Describe Recommended Additional Control if needed**

Instructions

If additional controls would contribute to detecting or preventing the out of period adjustment, add them here. Please also add them to the associated processes in Risk Navigator. If considered key, testing should be performed after future control execution.

Section 10 - Management Actions	**Actions taken to remediate weakness (if any) and actions taken to prevent/detect occurrence in future**	

Instructions

Discuss the action plan management is implementing to address any weakness in control. If no weakens in control is noted, state so and discuss management actions to prevent or detect accounting irregularities to ensure proper accounting within the targeted period (so no further out of period adjustments would be necessary).

Section 11 - Conclusion	**Management Conclusion**	Requires significant or material change to ICOFR: (Yes/No)	
		Disclosure controls impacted IAW Section 302: (Yes/No)	
		Management Analysis	
		Management Conclusion:	

Instructions

This section is completed by Brink's, Inc. Corporate management.