



## 1.0 PURPOSE

This policy sets forth procedures and guidelines concerning notifying Financial Management of tax audits.

## 2.0 SCOPE

This policy applies to all 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.

## 4.0 POLICY

Regional and Corporate financial management shall be informed immediately upon notification by any taxing authority of an upcoming audit.

## 5.0 PROCEDURE

### 5.1 Background

A tax audit is an evaluation of the Brink's business unit's compliance with the relevant tax requirements. In general, tax audits are a routine practice to ensure the validity and reliability of information provided to the tax authority conducting the audit.

Tax audits may be conducted by local, country, or other levels of government depending on the basis or scope of the selected business unit's operations and tax authority.

Brink's may periodically be subject to tax audits by various taxing authorities. Audits may relate to payroll tax, income tax, sales tax, value-added tax (VAT), registration and transfer taxes, transfer pricing, customs duties, goods and services taxes, property and other taxes.

It is Brink's policy to ensure compliance with all tax regulations to the fullest extent possible. All reasonable efforts should be made to ensure smooth progress throughout a tax audit. Management should cooperate fully with auditing authorities.



## 5.2 Internal Notification

Upon notification from any tax authority, the Finance Director shall notify the Regional Finance Director via email. Sufficient information should be provided such as the type of audit, entity, time period under review, and focus and timing of the audit. Updates shall also be provided at least quarterly. In addition, all tax notifications meeting the following criteria must be reviewed by the BCO Controller and BCO Tax Director:

- Potential settlements greater than \$100,000 (gross)
- Any notification involving transfer pricing

## 6.0 **ADVICE AND COUNSEL**

Brink's Management includes accounting, finance and tax 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**

This policy is based on good business practice supported by a system of normal checks and balances. Each tax jurisdiction will typically maintain local tax authority guidance.

## 8.0 **DOCUMENTATION**

Notices from taxing authorities, requests for information, information provided to a taxing authority, communications with Regional and/or Corporate management, and any identified issues with supporting documentation for any adjustments recorded as a result of tax audits must be maintained at the local business unit level for a minimum of 7 years (or longer based on local laws) and may be subject to periodic review.