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Global Technology Policy Manual Principles

Document Classification: Internal Use Only

Policy No: GITP-001
Version: 3.1

Last Publish Date:
09/22/2022

1. Purpose and Scope

The purpose of this policy is to document the basic principles and policies that are fundamental to Brink's Global Technology in accordance with industry best practices. These policies provide the basic boundaries for more detailed procedures and standards. In the event of a conflict between these policies and applicable law, applicable law will take precedent.

This policy applies globally to all Brink's legal entities, employees, contractors, and vendors doing business on behalf of Brink's.

2. Policy Statement

2.1. Policy Framework

2.1.1. Policy statements included in Brink's IT Global Policies must align with the following frameworks, standards and regulations:
  o PCAOB Audit Standard No. 5 / Sarbanes-Oxley / SOX
  o SSAE 18
  o NIST CSF
  o GDPR, where applicable

2.2. Accountability

2.2.1. Global Technology Governance, Risk and Compliance (GRC) is accountable for ensuring policies are published in a secure location, accessible to all employees.

2.2.2. Company management is responsible for reviewing and understanding policies as well as ensuring compliance within their areas of responsibility.

2.2.3. Policy owners must communicate major changes in policy, standards and process to GRC.

2.2.4. GRC must communicate out major changes in policy to IT personnel.

2.3. Review and Approval

2.3.1. Review

2.3.1.1. All policies must be reviewed by the Policy and Process Owner(s) at least annually.

2.3.1.2. Changes in the threat landscape, control frameworks, regulatory requirements, or organizational environment may prompt updates to policies outside of regular review cycles. Policy and Process Owner(s) are responsible for monitoring such changes and updating applicable policies accordingly.

2.3.2. Approval

2.3.2.1. All policies must be reviewed and approved by the following stakeholders:

2.3.2.1.1. Policy / Process Responsible Owner

2.3.2.1.2. Policy / Process Accountable Owner

2.3.2.1.3. Governance, Risk, and Compliance (GRC) Leader

2.3.2.1.4. Legal Counsel

2.3.2.1.5. CIO or designated personnel

2.3.3. All approved policies must be stored in a policy library accessible by all employees.

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2.4. Communication and Compliance
2.4.1. Policies must be maintained in a library accessible to all employees.
2.4.2. Policies are monitored through Brink's Compliance Programs and Practiced. Violations are communicated to IT Management.

2.5. Exceptions and Escalation

2.5.1. Any exceptions to IT policies must be documented through the IT Policy Exception Process and authorized by relevant IT and Business Risk Owners.
2.5.2. Any incident of policy non-compliance must be reported to GRC for appropriate action. Continued non-compliance, without formal exception, is reported to the CIO, legal and human resources, as applicable.

3. Roles and Responsibilities

3.1. All employees are responsible for reviewing, understanding, and adhering to the policies.

3.2. All Technology services must be compliant with all Global Technology policies.

3.3. GRC and IT Management is responsible for compliance monitoring (GRC) and enforcement (IT Management).

3.4. The Policy and Process Owner(s) must communicate major changes in policy, standards and process to GRC.

3.5. Compliance: All employees, contractors and consultants are required to comply with Brink's Global IT policies. An employee found to have violated any Brink's policy may be subject to disciplinary action, up to and including termination of employment. If a contractor or vendor violates a Brink's policy, Brink's may pursue its remedies under the contract, including without limitation, termination of the contract. Management should seek guidance from HR and the Legal Department on these issues.

4. References

4.1. Brink's Common Controls can be found on the Brink's Resource Library.
Applicable Control #: 50

5. Definitions
5.1. Not Applicable

6. Appendices
6.1. Not Applicable

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7. Authorization

This policy is authorized by:

Greg Osgood
Vice President Global IT & Shared Services

Policy Owners: Mark Armour, Global IT Governance, Risk, and Compliance

Additional Stakeholders:

8. Change History

Original Issue/Publish Date: 08/16/2016

Revision	Date	Author	Revision History
2.0	08/16/2016	Gustavo D. Menani	No changes
2.1	08/11/2017	Huan Do	Changed template.
2.2	01/29/2019	Mustapha Kebbeh	Added GDPR Framework
2.3	12/19/2019	Diomedes Gutierrez	Added CIS Benchmarks
3.0	05/28/2020	Carrie Rogers	Updated to align with Policy Governance
3.0	02/11/2021	Melissa Morogiello & Carrie Rogers	Review, update to policy owner, minor verbiage updates
3.0	03/08/2021	Greg Osgood	Review/Approve
3.0	04/12/2021	Legal Department	Review/Approve
3.1	08/12/2022	Mark Armour	Review
3.1	08/16/2022	Carrie Rogers	GRC review
3.1	08/19/2022	Greg Osgood	Review/Approve
3.1	09/06/2022	Legal Review	Review/Approve