

BRINKS LEGAL

REGULATION FD POLICY
JANUARY 2024

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A. Introduction

The Brink's Company (the "Company") is committed, consistent with legal and regulatory requirements, to maintaining an active and open dialogue with its shareholders and potential investors by providing fair access to timely, clear and meaningful information to the investment community.

The Securities and Exchange Commission's ("SEC") Regulation FD prohibits the selective disclosure of material non-public information. The SEC adopted Regulation FD to prevent a company (and its spokespersons) from disclosing material non-public information (such as earnings warnings) to securities analysts or selected institutional investors, before disclosing the information to the general public.

Regulation FD requires that, whenever the Company or a person acting on its behalf intentionally discloses material non-public information to certain persons (including broker-dealers, analysts and shareholders), the Company must simultaneously disseminate the information to the public.

The Company and its spokespersons must take care to comply with Regulation FD in all of its communications; however, specific examples of communications covered by this Regulation FD Policy (this "Policy") include:

- earnings releases and related conference calls;
- speeches, interviews, and conferences;
- responding to market rumors;
- providing "guidance" as to the Company's performance or results;
- reviewing analyst reports and similar materials;
- referring to or distributing analyst reports on the Company;
- analyst and investor visits and discussions, including, but not limited to, telephonic, written or electronic communications;
- postings on the Company's website; and
- social media communications, including through corporate blogs, employee blogs, chat boards, Twitter, Facebook, LinkedIn, YouTube, and any other non-traditional means of communication.

This Policy applies to directors, officers, employees and independent contractors at all levels of the Company and its subsidiaries, and complements the Company's Insider Trading Policy.

B. Administration of this Policy

The General Counsel will oversee compliance with this Policy and has the authority to interpret and enforce this Policy. All questions about this Policy should be directed to the General Counsel. The General Counsel must approve any deviation from the policies and procedures outlined in this Policy. At any time and from time to time, the General Counsel may designate one or more persons to assist with the performance of the General Counsel's functions hereunder.

C. Authorized Spokesperson

1. The only persons authorized to speak on behalf of the Company to securities analysts, broker-dealers, shareholders and any other Enumerated Persons (as described in Section D. below) are the Company's (i) Chief Executive Officer, (ii) Chief Financial Officer, and (iii) VP - Investor Relations ("IR Director"), or other persons specifically designated by them to speak with respect to a particular topic or purpose (each an "Authorized Spokesperson").

2. To the extent practicable, Authorized Spokespersons (other than Authorized Spokespersons who are representatives of the Investor Relations Department) should contact an appropriate person in the Investor Relations Department and/or Legal Department before having conversations with any Enumerated Person in order to review as much of the substance of the intended communication as possible, including slides and other prepared materials. In addition, to the extent practicable, all Authorized Spokespersons (other than Authorized Spokespersons who are representatives of the Investor Relations Department) should be accompanied by a representative of the Investor Relations Department at such conversations.

3. If a director of the Company is designated as an Authorized Spokesperson and plans on speaking privately with one or more of the Company's shareholders, the director must notify the Chief Executive Officer, IR Director or the General Counsel (or a designee appointed by any of them). Alternatively, the Chief Executive Officer (or his or her designee) or the IR Director should participate in any meeting with such shareholder(s).

D. "Enumerated Persons" Subject to Regulation FD Disclosure Requirements

1. Regulation FD prohibits selective disclosure to certain specified persons, including (i) (A) broker-dealers and investment analysts and other persons associated with them, (B) investment advisers, certain institutional investment managers and their associated persons and (C) investment companies, hedge funds and affiliated persons, and (ii) any shareholder under circumstances in which it is reasonably foreseeable that the shareholder would purchase or sell securities on the basis of the information (collectively, "Enumerated Persons").

2. Communications in the ordinary course of business with merchants, consumers, suppliers, or strategic partners, as well as communications with the press or news organizations, rating agencies, financial institutions (other than of the type described in Section D.1. above), or the government are not covered by Regulation FD. Please see Section M “Media Communications” below for additional guidance on communications with the media.

E. Day-to-Day Communications

1. The Company responds to analyst or investor inquiries in the form of phone conversations, one-on-one meetings with the IR Director and other members of the senior management team, and meetings with groups of analysts and investors. The Company will not selectively disclose material non-public information in these meetings.

2. Inquiries from analysts, shareholders, and other Enumerated Persons received by any Company employee should be forwarded to the IR Director or, in his or her absence, another Authorized Spokesperson as expressly defined above. Under no circumstances should any attempt be made to respond to these inquiries without prior authorization from the IR Director or, in his or her absence, another Authorized Spokesperson.

3. To the extent practicable, planned conversations with analysts, shareholders, and other Enumerated Persons should include the IR Director.

F. Public Disclosure of Significant Company Information

1. Any time an Authorized Spokesperson determines to disclose or discuss non-public Company information with anyone who is or might be an Enumerated Person, and there is a question as to the significance of such information, the Authorized Spokesperson must consult with the General Counsel to evaluate whether the information is material.

2. “Material information” is information concerning the Company or its securities as to which there is a substantial likelihood that a reasonable investor would consider the information to be important in making an investment decision or to have altered the “total mix” of material information available. Both positive and negative information can be material. Examples of information that could be considered material include, but are not limited to:

- projections of future earnings or losses, or other earnings guidance;
- changes to previously announced earnings guidance, or the decision to suspend earnings guidance;
- a pending or proposed merger or acquisition;
- a pending or proposed acquisition or divestiture of a significant business or asset;
- a change in dividend policy, the declaration of a stock split, or an offering of additional securities;
- changes in the Company’s strategy;
- bank borrowings or other financing transactions out of the ordinary course;
- the establishment of a repurchase program for Company securities;
- significant customer or supplier wins or losses;
- management changes involving the Company’s executive officers;

- a change in auditors or notification that the auditor's reports may no longer be relied upon;
- a significant cybersecurity incident; and
- actual, pending or threatened significant litigation or investigation developments.

3. If, after consultation with the General Counsel, it is determined that the information to be disclosed is material, the information must be disclosed in a manner reasonably designed to provide broad, non-exclusionary distribution to the public (e.g., a press release or Current Report on Form 8-K ("Form 8-K")) before or at the same time that the information is disclosed to the Enumerated Person. The public disclosure may either disclose the material information or, if it is issued prior to disclosure to the Enumerated Person, may disclose that a conference call and/or webcast will be held to disclose the information. The public must be given adequate advance notice of any conference call and/or webcast and the means of accessing it.

G. Unintentional or Inadvertent Disclosure of Material Information

If anyone subject to this Policy believes he or she may have unintentionally disclosed material non-public information, he or she should immediately consult both the IR Director and the General Counsel. If the Company learns that it or someone subject to this Policy has unintentionally disclosed material non-public information, the Company must disseminate the information promptly by the issuance of a press release, the filing or "furnishing" of a report on a Form 8-K or other means reasonably designed to provide broad, non-exclusionary distribution of the information to the public, but in no event after the later of 24 hours or the commencement of the next day's trading on the New York Stock Exchange.

H. Earnings Calls

1. Adequate advance public notice will be given of any quarterly earnings conference calls and/or webcasts. Notice will include a press release issued to major news wires and a posting on the Company's website with information about the call or webcast, including the date, time, telephone number and webcast URL for the earnings call. The press release also will state the period for which a replay of the webcast will be available.

2. A quarterly earnings conference call and/or webcast must be open to analysts, media representatives, and the general public. Any such conference call must be recorded and an electronic recording of the call must be maintained by the Company for at least 12 months. Web replay of such a call must be available for at least seven days after the conference call. All electronic recordings, web replays, and transcripts are to be considered time-dated material and not a current representation of the Company's views or forecasts.

3. If the Company discusses any non-GAAP information in the call, the release will provide the location on the Company's website where the required reconciled information will be available.

I. Guidance, Quiet Period, and Analyst Reports

1. Whenever the Company issues earnings guidance (which will ordinarily be issued through a press release and the furnishing of a Form 8-K), no employee may comment on those projections to any outside party. In response to any question about the earnings projections, Authorized Spokespersons will say only that it is the Company's policy not to comment on projections. The Company will not comment on its intention to update these materials other than through the issuance of a press release or furnishing a Form 8-K.

2. No Authorized Spokesperson will provide "comfort" with respect to an earnings estimate or otherwise "walk the Street" up or down (*i.e.*, suggest adjustments to an analyst's estimates). If an analyst inquires as to the reliability of a previously, publicly disseminated projection, the Authorized Spokesperson should follow the "no comment" policy and can direct the person to the Company's prior statements.

3. The Company will observe a "quiet period" during which the Company will not comment on its prospective financial results. The quiet period will begin 15 days prior to the end of the quarter and continue until the Company's earnings information for the applicable period is made public. During the quiet period, the Company may participate in investor phone calls, meetings or conferences but will not discuss current operations or results of the business.

4. Analyst reports and earnings models will only be reviewed to correct errors that can be corrected by referring to publicly available, historical, factual information or to correct any mathematical errors. No other analyst feedback or guidance on earnings models may be communicated to an analyst. A written record should be kept by the IR Director of any comments provided on an analyst's report.

J. Conferences/Roadshows

This Policy applies to communications between Authorized Spokespersons and Enumerated Persons at conferences and roadshows (other than roadshows undertaken in connection with an offering of the Company's securities that is not subject to Regulation FD). Accordingly, prior to the conference or roadshow, the Company will disclose either through a press release, filing or furnishing a Form 8-K, an open conference call or a webcast, or any combination of these methods, any material information that is not already public and which may be discussed or presented at the conference or the roadshow. In addition, all written materials presented at the conference or roadshow will be published on the Company's website.

K. Use of the Company's Website/Social Networks

The use of the Company's website and social networks, including corporate blogs, employee blogs, chat boards, Facebook, LinkedIn, Twitter, YouTube, and any other non-traditional means of communication, to disclose material non-public information is considered selective disclosure and would violate this Policy.

L. Press Release Policy

The IR Director should review all press releases, including press releases to be issued by a third party, concerning the Company before they are distributed. Additionally, the General Counsel should review all press releases that may be material to the Company before they are distributed, including any press releases containing financial information, earnings guidance, forward-looking statements, information about material transactions or other information material to the Company's shareholders ("Material Releases").

M. Rumors; No Comment Policy

The Company will not comment on market rumors in the normal course of business. When it is learned that rumors about the Company are circulating, Authorized Spokespersons should state that it is Company general policy to not comment on rumors. If the source of the rumor is found to be internal, the General Counsel should be consulted to determine the appropriate response.

N. Presentations Containing Financial Information

Any presentation made by any employee of the Company that contains Company financial information, whether or not such presentation is to an Enumerated Person covered by Regulation FD, must be approved in advance by the General Counsel.

O. Media Communications

Although the Company recognizes that Regulation FD does not apply to communications with the media, it is the Company's policy to publicly disclose material information before any discussion with individuals representing the media.

Requests for interview or comment or other inquiries from representatives of the media, including trade publications, received by anyone subject to this Policy other than an Authorized Spokesperson should be forwarded to the IR Director or, in his or her absence, another Authorized Spokesperson. If practicable, planned conversations should include the IR Director.

P. Violation of this Policy

Violations of Regulation FD are subject to SEC enforcement action, which may include an administrative action seeking a cease-and-desist order, a civil action against the Company or an individual seeking an injunction and/or civil money penalties. Any violation of this Policy by a person subject to this Policy will be brought to the attention of the General Counsel and may result in discipline, including termination.

Q. Further Information About Regulation FD or this Policy

All inquiries regarding the provisions or procedures of this policy or Regulation FD generally should be addressed to the General Counsel.