

BRINKS ETHICS & COMPLIANCE

ETHICS & COMPLIANCE PROGRAM CHARTER

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I: Introduction

The Brink's Company ("Brink's" or the "Company") Code of Ethics (the "Code") and other applicable policies set forth the corporate commitment of Brink's and its subsidiaries and affiliates to lawful and ethical business conduct. Brink's has established this Ethics & Compliance Program Charter (the "Charter") to support the implementation and enforcement of those standards of conduct.

The Company expects employees to have a working understanding of the rules that apply to their activities, to be sensitive to legal and ethical issues and to know enough to ask questions before engaging in questionable conduct. In addition, employees must report suspected noncompliance with the Code, Company policy, or applicable law. Reports should be directed, as appropriate, to the Ethics & Compliance Group, the Legal department, the HR department, the employee's manager, or the Ethics Hotline at <https://brinkshotline.ethicspoint.com> (available in over 30 languages) to make an online report or obtain a local hotline number, where available. Regardless of the initial reporting channel, all reports of suspected violations will be overseen by the Ethics & Compliance Group.

The Company will not tolerate retaliation or reprisals against any employee for reporting, in good faith, suspected or potential noncompliance. Any employee may raise any suspected or potential noncompliance. The Ethics & Compliance Group along with other appropriate departments will investigate and address alleged retaliation or reprisals.

II: Ethics & Compliance Roles

A. The CEO Principle

Brink's adopts the "CEO Principle" for purposes of assigning responsibility for ethics and compliance in its business globally. Day-to-day accountability for following the Code and embedding a culture of doing business with integrity rests with the head of each region, which includes all business and functional activities within that region. Senior management of all functions must fully support the efforts of the Ethics & Compliance Group. The Ethics & Compliance standards and procedures apply to all employees, including senior leaders and executives at all levels of the Company. Managers are responsible for creating and maintaining an ethical culture, which embraces the Company's values and compliance with the Code. This includes leading by example, monitoring the activities of their employees to ensure compliance, supporting the work of the Ethics & Compliance Group, and promoting the training and education of their employees with respect to the requirements of the Code and related policies and applicable legal requirements.

B. Chief Ethics & Compliance Officer

The Chief Ethics & Compliance Officer ("CECO") will have operational responsibility for the Company's Ethics & Compliance Program, including development, implementation and continuous improvement of the various policies, procedures and activities that form part of the Company's program, including these governance procedures. The CECO will collaborate with and provide compliance oversight into key operational compliance risk areas that could result in fines or penalties assessed against the Company or a finding of significant noncompliance. The CECO will provide direction to leaders, their teams and operations, covering the full implementation of the Code provisions and the Ethics & Compliance Program at an operational level. The CECO will act as the Chairman of the Global Ethics & Compliance Council and is responsible for reporting on a regular basis to the Audit & Ethics Committee of the Board of Directors and more frequently as necessitated by circumstances. To ensure independence, the CECO reports directly to the Chairman of the Audit & Ethics Committee of the Board of Directors. The CECO may delegate some or all responsibilities of the position to a senior member of the Ethics & Compliance Group.

C. Ethics & Compliance Council

The Ethics & Compliance Council supports the CECO in the development, implementation and continuous improvement of Brink's Ethics & Compliance Program, designed to ensure that Brink's continues to operate according to the highest ethical business standards and in accordance with applicable laws and regulations.

The members of the Ethics & Compliance Council shall be selected by the CECO and shall be comprised of senior members of the Company representing diverse functions and regions.

The Ethics & Compliance Council shall:

- Ensure procedures are in place to allow Brink's employees to report suspected violations of law or Brink's policy, including the Code, without fear of retaliation, and that reports of suspected violations are appropriately investigated;
- Review Ethics & Compliance policies annually;
- Promote an organizational culture that encourages law abiding and ethical conduct;
- Consider and resolve any issues of interpretation regarding any aspect of the Code, its policies and standards, and the management of the Ethics & Compliance Program; and
- Review Ethics & Compliance data, advise on sensitive Code cases including potential conflicts of interest with the Ethics & Compliance Group, verify and assist with remediation plans, and make recommendations for the enhancement of Brink's Ethics & Compliance Program.

D. Ethics & Compliance Champions

The Ethics & Compliance Champions (ECC) assist in the execution of Ethics & Compliance training and awareness programs, and may play a role in investigating sensitive legal or regulatory issues. The ECC may also provide specialized experience in areas of conduct governed by the Code and its policies. They shall provide advice and support as needed to the Ethics & Compliance Group and to local teams and operations. The Ethics & Compliance Group collaborates with the ECC to ensure a seamless approach to supporting Brink's management team in the implementation of the Ethics & Compliance program.

III. Ethics & Compliance Responsibilities

The four pillars of the Ethics & Compliance Program are Prevent, Detect, Respond and Report. Below are a few key responsibilities of each pillar:

A. Prevent

- Policies and Procedures
Ensure that Brink's maintains, periodically reviews and updates written policies, procedures, guidelines and standards in support of an effective Ethics & Compliance Program, including the Code.
- Training and Communication
Support increased employee, and as appropriate, agent, supplier and shareholder, awareness of Ethics & Compliance related policies and procedures through training, distribution of policies, notifications regarding methods for reporting suspected non-compliance and other Ethics & Compliance communications.
- Incentive and Reward Systems
Oversee, as appropriate, systems that provide incentives for promoting the Ethics & Compliance Program and complying with applicable laws, regulations and Brink's policy.

- Application of Program to Third Parties
Evaluate the extent to which the Brink's Ethics & Compliance Program will apply to affiliated entities and third parties such as agents, suppliers and contractors.

B. Detect

- Risk Assessment
Actively assist in and support the assessment of the risks of non-compliance with applicable laws or regulations and of unethical conduct by employees and third parties, including suppliers and contractors.
- Investigations
Ensure prompt and appropriate investigations occur for suspected violations of the law or Brink's policies in accordance with applicable laws, regulations and Brink's policy.
- Auditing and Monitoring
Ensure that Brink's audits and monitors adherence to the Ethics & Compliance related policies and procedures, including conducting targeted audits and reviewing audit reports to ensure compliance and to monitor and assess management action plans to address non-compliance.

C. Respond

- Corrective Action / Discipline for Violations
Manage and oversee implementation of investigation conclusions including the following:
 - Review results of investigations of suspected violations and related discipline to ensure appropriateness of the investigation and discipline, and to maintain consistency.
 - Advise on corrective actions taken or proposed by Brink's in response to identified misconduct, and to better detect and prevent recurrence of misconduct.
 - Assist Legal Department with efforts at asset recovery and compensation for losses due to Code breaches.
- Disclosure of Violations
Assess and consult with the Legal Department in determining whether to report violations of laws, regulations, Company policies or procedures to appropriate governmental officials, the Ethics & Compliance Council or the Board of Directors.

D. Report

- Overall Progress
Report periodically, and at least annually, on the progress of the Ethics & Compliance Program, the development of the culture of doing business with integrity and related issues to the CEO and the Board of Directors.