



## GLOBAL LITIGATION ACCRUAL POLICY

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### I: Objectives

The objectives of this policy are (1) to ensure that Brink's Legal is effectively providing input to Brink's Finance on accruals and other aspects of legal contingencies and (2) to set the finance framework on recording accruals for threatened or pending litigation.

### II: Setting of Accruals

When setting accruals, Finance must ensure compliance with applicable accounting standards. Because the setting of an accrual necessarily requires assessments of legal risks, probability, and exposure, Legal must make an assessment of a matter on the following parameters:

- There is a present obligation as a result of a past event;
- Payment is probable (more likely than not); and
- A reliable estimate can be made of the amount of the obligation.

Legal will provide certified litigation logs to Finance on a quarterly basis that reflect Legal's recommended accruals, per the processes below.

### III. Process for Certification by Regional General Counsels

The Regional General Counsel for each Brink's region (or other Brink's attorney with certification responsibility) ("RGC") must ensure that a Brink's attorney reviews the Litigation Management System ("LMS") fields on the litigation logs at least every quarter for every matter in the countries or functional areas for which they are responsible.

By the 25th day of the last month of the quarter, each RGC must submit a signed certification to the VP - Global Litigation ("VPGL"), stating that to the best of their knowledge, based upon processes and/or delegations that they have implemented as well as review by a Brink's attorney per the previous paragraph, the LMS fields included on the litigation logs for each matter in the countries or functional areas of their responsibility are complete, accurate, and current and that the current quarter accrual for each matter is adequate.

On the last day of the quarter, each RGC must provide the VPGL with confirmation that to the best of his or her knowledge, there have been no material changes to any of the matters in their region or functional area since the certification was provided.

## **IV. Process for Certification by Vice President of Global Litigation**

After receiving the certifications from the RGCs, the VPGL will review the litigation logs for every matter in every country, division, and region, to confirm agreement with the recommended accruals.

On the first business day after the end of a quarter, the VPGL will certify the litigation logs, to the best of his or her knowledge based upon processes and/or delegations he or she has implemented, and send to each RGC and Regional Finance Director (or other Brink's Finance representative with certification responsibility) ("RFD") the litigation logs and certifications for every country in his or her region as Legal's recommended accruals for all litigated matters in that region. The RFD shall distribute the litigation logs to local Finance personnel for their verification as described in Section V, below.

## **V. Finance Confirmation/Acceptance of Accruals**

It is the responsibility of local Finance personnel to review the litigation log produced by Legal and appropriately account for estimated losses. It is the Finance Manager's responsibility to apply accounting rules and appropriate statistical judgment to the accruals recommended by Legal and to decide on the appropriate level of accruals.

If the Finance Manager disagrees with any particular accrual recommended by Legal, he or she shall so notify the RGC. If they are unable to resolve any disagreement, the matter shall be escalated in the first instance to the RFD.

Before the Finance Group's reporting deadline, the RFD shall confirm to the VPGL and the Chief Financial Officer of The Brink's Company ("CFO") that all accruals are booked as per Legal's recommendations or, if the RFD instead confirms the accounting treatment adopted by the local Finance Manager, that there is a difference with the accrual recommended by Legal.

If the VPGL disagrees with a position taken by an RCFO, the matter will be discussed with the CFO until agreement is reached on an appropriate accrual.