

BRINKS ETHICS & COMPLIANCE

ETHICS & COMPLIANCE CHAMPIONS NETWORK GUIDELINES

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SCOPE

This guideline defines responsibilities within Brink’s Ethics & Compliance Champions Network to support the Brink’s Code of Ethics and Ethics & Compliance policies.

The Ethics & Compliance Group is responsible for ensuring there is an effective Ethics & Compliance Champions Network in place, as well as sufficient local resources to ensure the proper implementation of the Global Brink’s Ethics & Compliance program. The program includes relevant training, communications and investigations related to Brink’s Ethics & Compliance obligations.

ETHICS & COMPLIANCE CHAMPIONS

Ethics & Compliance Champions (“ECCs”) are selected by the Ethics & Compliance Group in consultation with local management. Selection is based on several factors, including identification of employees serving in key roles within the business, leadership and seniority, and commitment to Brink’s core values. Ethics & Compliance Champions’ ongoing participation will be periodically reviewed based on the Ethics & Compliance Group’s priorities and business needs.

For Ethics & Compliance related matters, the ECCs work at the direction of the Regional Compliance Directors based in APAC, EMEA, LATAM, and NORTAM. The ECCs are accountable for ensuring effective implementation of Brink’s Ethics & Compliance program and provide support and direction to their local business organization related to ethics matters.

The ECCs support the Global Ethics & Compliance Group in the performance of its duties. At the direction of their Regional Compliance Director, this may include training, Annual Conduct Questionnaire support, communications, investigations, overseeing disciplinary measures, implementing processes and procedures, and other activities where necessary or requested.

Responsibilities

Ethics & Compliance Champions are responsible for:

Program Support	Encouraging employee engagement with and participation in the Global Ethics & Compliance program
	Overseeing deployment of Global Ethics & Compliance policies and related compliance efforts at the local level.
	Supporting Code of Ethics awareness and training, including ensuring that required Ethics & Compliance training is completed in a timely fashion
	Supporting the Ethics & Compliance Group’s risk profiling and mitigation efforts
	Ensuring that Ethics & Compliance reporting tools, like the Hotline, are locally available and working properly

Investigations	Overseeing and managing the quality and consistency of local investigations of alleged breaches of the Brink's Code of Ethics and Ethics & Compliance policies assigned by the Ethics & Compliance Group
	Supporting corrective measures, including disciplinary actions and asset recovery efforts, as appropriate
	Protecting individuals who report breaches of the Code of Ethics from retaliation
Engagement with the Ethics & Compliance Group	Escalating matters to the Brink's Global Ethics & Compliance Group due to their significance or potential to affect Brink's reputation
	Participating in periodic meetings, whether virtual or in person, with Regional Compliance Directors to provide updates on local matters and to align local priorities with the Global Ethics & Compliance program
	Coordinating implementation of additional standards or procedures relating to Code of Ethics compliance that are needed in the local context

Investigations and Discipline Measures

At the direction of Regional Compliance Directors, ECCs are accountable for fully investigating or supervising the investigation of alleged or suspected breaches of the Brink's Code of Ethics and policies. They ensure that investigations are conducted in a fair, confidential and objective manner.

Any proposed disciplinary measure resulting from a substantiated Ethics & Compliance investigation must be confirmed by the Regional Compliance Director to ensure a fair and balanced approach across all locations. No Ethics & Compliance investigation can be formally concluded without the written approval of the Regional Compliance Director.¹

It is expected that Brink's ECCs will always protect the company's interests to the fullest extent possible and pursue the recovery of any assets lost as a consequence of a breach of the Code of Ethics or Ethics & Compliance policies.

Recording and Tracing of Investigations and Issues

The ECCs must accurately record all ethics and compliance allegations and investigations. The Ethics Hotline global case management tool is available online and is the required repository for all complaints.

All reported or identified issues that may constitute a breach of the Code of Ethics or Ethics & Compliance policies must be recorded, even if they appear to be relatively minor. This includes but is not limited to allegations and complaints that expressly refer to the Code of Ethics or where an employee reasonably believes an actual or potential breach of the Code of Ethics or Ethics & Compliance policies may have occurred.

¹ Investigations into employee relations matters referred to Human Resources for investigation and disposition do not require approval from the Regional Compliance Director to be concluded.