

FAQS – LEGAL SERVICES POLICY

Q: What should I do if I am unsure whether an activity or decision has legal implications?

A: When in doubt, contact Legal to confirm. If you are unsure who to contact for Legal approval, contact your Country Counsel or Regional General Counsel for your region. You can find their contact details [here](#).

Q: What does the Legal Services Policy mean by “Government/Regulatory Authority”?

A: By “Government” or “Regulatory” Authority, the Legal Services Policy refers to any Federal, Regional, State, or local authority that has jurisdiction over the Company’s operations and/or services. Examples include a country antitrust agency or a state or regional licensing agency.

Q: I have received a notice or e-mail from a governmental agency. What do I do?

A: You MUST immediately contact Legal if you receive a notice or inquiry from a Government or Regulatory Authority. Notices of violations and/or requests for information may come from any of the following sources: law enforcement authorities, antitrust authorities, and/or anti-money laundering authorities – and may be in the form of formal written correspondence or by email. You should not attempt to answer questions from a Regulatory Authority – even if you know the answers. If you are unsure if the governmental agency contacting you is a Regulatory Authority, contact Legal for guidance.

Q: As a member of the Global Security Department, do I need approval from Legal to talk to a Regulatory Authority?

A: The Global Security Department is NOT REQUIRED to consult Legal before discussing security regulations and/or security protocols with a Regulatory Authority, to advocate the Company’s position, or seek clarification on applicable law.

The Global Security Department IS REQUIRED to consult Legal for all other discussions with a Regulatory Authority.

Q: I plan to submit a routine submission to a Regulatory Authority. Does Legal need to approve?

A: No. For information filings, reports, or other submissions regularly required pursuant to the rules of a Regulatory Authority, you do NOT NEED Legal approval.

For all inquiries, investigations, or audits, you DO NEED Legal approval.

FAQS – LEGAL SERVICES POLICY

Q: What if I am currently working directly with an external lawyer?

A: You must contact a member of the Legal Department to discuss whether and how to continue to engage the external firm or lawyer.

Q: I need to enter into a contract with a new vendor/supplier. Does Legal need to review?

A: Except as set out in Section 4.1 of the Legal Services Policy, Legal MUST [Examples of contracts and agreements](#) **include:**

Asset or Stock Sale Agreements	Letters of Intent/Indications of Interest/Memoranda of Understanding
Asset or Stock Purchase Agreements	License/Subscription agreements
Asset Management Agreements	Non-Disclosure/Confidentiality Agreements
Assignments and Novations	Participation/Sponsorship Agreements
Bills of Sale	Pre-contract Documents (e.g., customer bids, term sheets)
Consulting Agreements and Engagement Letter	Purchase Orders
Credit Agreements	Releases or Waivers
Customer Agreement Templates	Settlement Agreements
Guarantees	Services/Sales Agreements
Indemnification Agreements	Statements of Work
Intercompany Agreements	Vendor/Supplier Agreements
Lease/Rental Agreements	

Q: Are there any exceptions to what contracts Legal must approve?

A: Yes. Legal does NOT need to be involved in previously-approved, standard form contracts—such as unmodified, standard Company – or industry-approved form contracts or agreements—as long as the form contract was obtained directly from Legal or from an established Company repository.

Q: I plan to modify or amend a form contract according to pre-approved guidelines.

A: Legal may need to approve. Only select individuals have authorization from Legal to modify or amend form contracts according to pre-established guidelines. If you are unsure whether you have such authority, consult your Country Counsel or Regional General Counsel.

Q: I am required by law to immediately disclose a [safety or cyber] incident. Do I still need to contact Legal?

A: Yes. Even if immediate disclosure to a Regulator is required by law, you must attempt to contact Legal in advance of the disclosure.

Q: I am a member of the IT organization or working with a member of the IT organization to develop an Artificial Intelligence (AI) solution for the business. Do I need to contact Legal?

A: Yes. Any use of AI (whether developed by Legal or by a third party) must be reviewed by Legal for potential data protection, privacy, and confidentiality issues.

Q: I plan to put a new Brink's product or service on the market. Does Legal need to approve?

A: Yes. Legal **MUST** approve any advertisement, offer, or sale of a new product or service. Legal must also approve any advertisement, offer, or sale of an existing product or service in a new country or territory. To be clear, the Legal and Ethics & Compliance teams should be involved from the very beginning of any new product or service initiatives to ensure regulatory feasibility, privacy by design, availability of a brand or technology, etc.

Q: I plan to terminate a key employee and/or amend an employee agreement. Does Legal need to approve?

A: Yes. Legal **MUST** be notified of any planned termination of key employees—including members of a country's or region's leadership team—to advise on employment and compensation issues, unless employment counsel (if any) reports to HR (not Legal) in your country. Legal must also review any proposed changes to benefit plans and forms of employee agreements, unless employment counsel reports to HR (not Legal) in your country.

Q: I plan to have a public-facing discussion about the Company. Does Legal need to approve?

A: Yes. Legal **MUST** approve in advance any proposed public disclosure or public discussion of matters related to, but not limited to:

- Litigation;
- Regulatory proceedings;
- Governmental inquiries or investigations;
- Contingent liabilities;
- Contract disputes; or

FAQS – LEGAL SERVICES POLICY

- Proposed corporate transactions (mergers, acquisitions, similar).

Q: I am going to present at a trade association event. Does Legal need to approve?

A: Yes, presentations to industry groups, trade associations, and other third parties as well as press releases and other public statements in which Brink's personnel are quoted or used as reference or endorsement MUST be reviewed and approved by Legal. Trade association participation must also be disclosed to Ethics & Compliance ([Microsoft Users](#) & [G-Suite Users](#)).

Q: I think we have experienced a significant cyber incident. Who do I contact?

A: You MUST follow the Company's Cyber Security Incident Response Plan (CSIRP) and notify the Global Security Operations Center. You must also immediately contact Legal if you know of or suspect a cybersecurity incident.

Q: I want to help the HR organization with organizing current employee and candidate personal information. Should I contact Legal?

A: Yes, this may have privacy implications and Legal MUST be involved.

Q: I work in the United States, and someone has tried to serve legal documents, directed to the Company, on me personally. What should I do next?

A: In the U.S., in general, no employee may accept or waive service of legal documents directed to the Company. If someone attempts to serve such a document to you, refer them to Legal and immediately notify Legal of the attempt. Such legal documents may include litigation process, notices of arbitration, bankruptcy filings, subpoenas, petitions and citations, summonses, and complaints.

Q: Are there any exceptions to the rule above regarding service of process?

A: Yes. If a member of Legal has authorized you to waive service of process, you may do so, but you must still immediately notify Legal of the waiver. If state or local law authorizes you to accept service of process as a Company Officer, you may do so, but still immediately notify Legal of the service. If you are individually named in a lawsuit, you may accept service of process for yourself, but still immediately notify Legal of the service.