



# BRINK'S GLOBAL ANTICORRUPTION POLICY

January 2023

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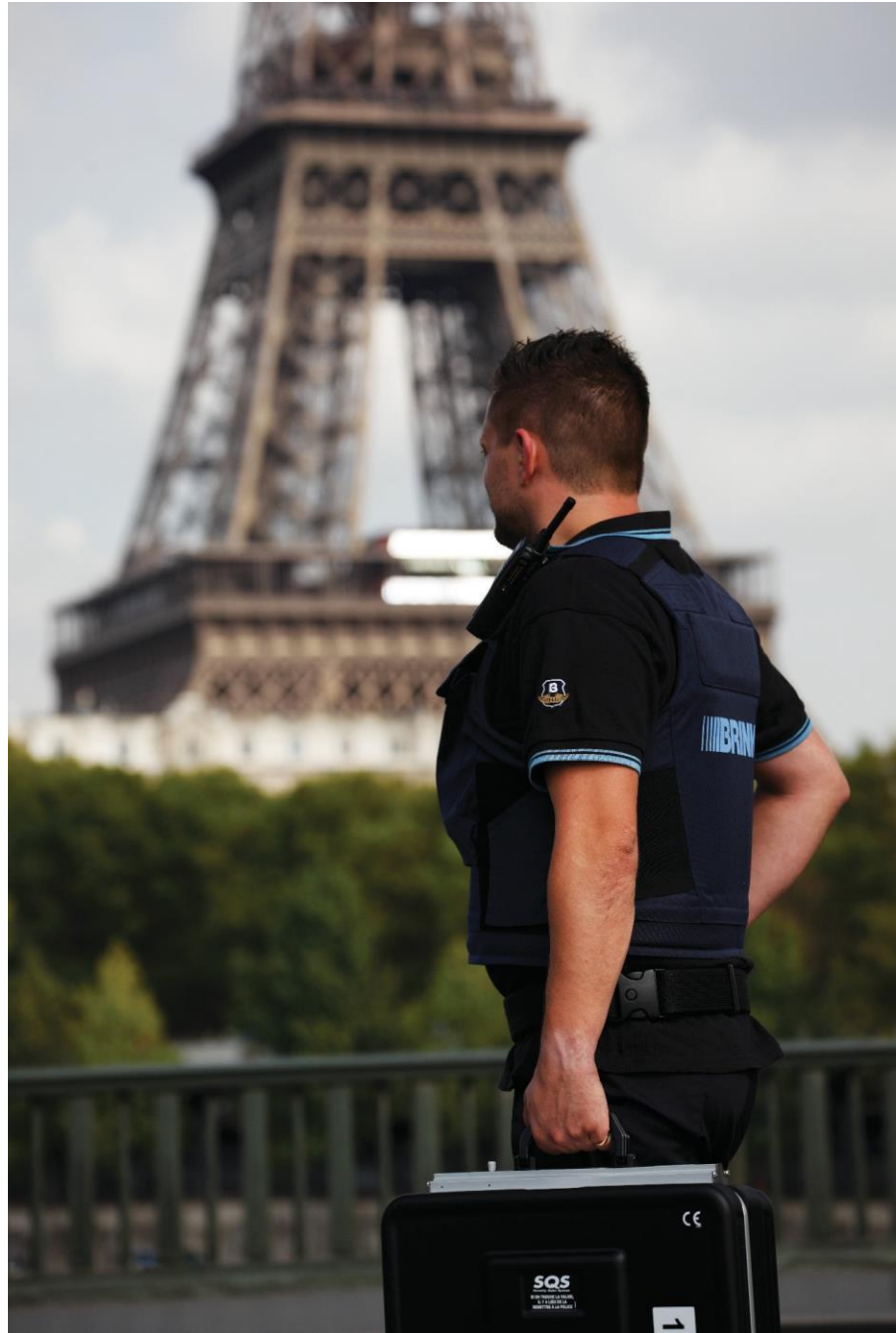
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## PURPOSE & APPLICATION

It is Brink's ("the Company") policy that all business activities comply with applicable laws and regulations. The purpose of this Global Anticorruption Policy ("the Policy") is to ensure compliance by employees and representatives of the Company with the anticorruption laws worldwide.

This policy applies to all regions and divisions of the Company and to all employees and representatives acting for or on behalf of the Company. Strict adherence to this policy is required. To the extent that a more stringent law exists in the country in which you work, those laws shall be deemed to be included into this Policy.

Failure to comply with anticorruption laws reflects a failure of Integrity, one of our core values. It is also time-consuming, expensive, and distracting, and could result in individuals being fined or imprisoned. At Brink's (to the fullest extent allowed by applicable law), a violation of Brink's Global Anticorruption Policy or other policies may result in disciplinary action, including termination.





## CORRUPTION & BRIBERY

Corruption is illegal and undermines fair trade which is why Brink's prohibits all forms of bribery and corruption. We do not give or receive anything of value that could even appear to improperly influence a decision by us or someone else. We are committed to being honest and straightforward with our customers, suppliers, vendors and regulators. We comply with the anticorruption laws that apply to our business and adhere to international principles on anticorruption, most notably the United States Foreign Corrupt Practices Act ("FCPA") and the UK Bribery Act, and other applicable anticorruption laws. It is especially important for Brink's to comply with these laws because we may do business in countries in which:

- Government officials are involved in commercial and financial activities;
- Corruption and related problems are common; and
- Legal standards and enforcement policies vary and may have different implications.

The anticorruption laws in most countries prohibit improper payments to government officials, but our policy goes beyond that and prohibits improper payments to ANY person or entity even if this may result in Brink's losing business.

For the sake of clarity, corruption is the abuse of entrusted power for private gain. Bribery refers to the offering, giving, soliciting, or receiving of any item of any value (directly or indirectly) to improperly influence actions.

Bribes can include money, gifts, hospitality, expenses, reciprocal favors, business or employment opportunities, political or charitable contributions, or any other direct or indirect benefit or consideration to improperly influence actions.



# GOVERNMENT OFFICIALS

Brink's prohibits any offer, payment or promise of money or anything of value (directly or indirectly) to ANYONE, including a "government official" to improperly influence actions. A "government official" means:

- employees of state-owned or state controlled commercial enterprises;
- any officer or employee of a foreign, national, local or municipal government whether elected or appointed;
- any person acting in an official capacity or exercising a public function for or on behalf of any government or its instrumentality;
- any officer or employee of a public international organization, such as the UN or the World Bank;
- a member of a legislative branch, judge, customs official, or taxing official; or political parties, their officials, and candidates for public office.

If you are any of the following type of government official, **you must notify the Ethics & Compliance Group by completing the Government Official Notification Form** (select your language – [Arabic](#), [Chinese \(Simplified\)](#), [Chinese \(Traditional\)](#), [Czech](#), [Dutch](#), [English](#), [Estonian](#), [French](#), [German](#), [Greek](#), [Hebrew](#), [Hindi](#), [Indonesian](#), [Japanese](#), [Latvian](#), [Lithuanian](#), [Malay](#), [Mongolian](#), [Portuguese](#), [Romanian](#), [Russian](#), [Spanish](#), [Thai](#) and [Turkish](#)) to ensure appropriate steps are taken to avoid activities that might appear improper:

- an elected official of any kind (current or in the last 5 years);
- a government official of any kind for an entity that is a customer of Brink's or an agency who has direct regulatory oversight (for example, a licensing agency or other authority) over Brink's; or
- a close relative (parent, child, sibling) of someone that meets the above criteria.

If you have any questions please contact [Compliance@brinkscompany.com](mailto:Compliance@brinkscompany.com).



## IMPROPER ADVANTAGE

"Improper advantage" includes payments intended to wrongfully:

- Influence a decision by an official, including a failure to perform his or her official functions;
- Induce an official to use his or her influence to affect a decision by someone else in his or her government; and
- Induce an official to use his or her influence to affect or influence any act or decision.

In addition to obtaining or retaining business, "improper advantage" includes reducing taxes or duties, "looking the other way" at minor code or rule violations, and any form of preferential treatment.

## FACILITATION PAYMENTS

A facilitation payment is an unofficial payment made in return for services that the payer is legally entitled to receive without a payment. It is normally a minor payment made to a government official (or person with a certifying function) in order to secure or expedite the performance of a necessary action (for example, the issuing of a visa, work permit, or customs clearance). It does not include a discretionary decision by a government official (such as a decision to award business or to avoid inspection). In this case, payment would not be considered facilitation, but rather a bribe.

Brink's generally prohibits facilitation payments. Any requests for exceptions to this policy must be approved by the General Counsel of The Brink's Company and accurately disclosed in Brink's books and records.



## CONFLICT OF INTEREST

We must act in the best interest of the Company and avoid even the appearance of wrongdoing. Conflicts of interest occur if your personal, social, financial or political activities interfere with your duty or obligation to Brink's. Even the appearance of a conflict can have negative effects. **You must notify the Ethics & Compliance Group of any potential conflict of interest by completing the Conflict of Interest Declaration Form** (select your language – [Arabic](#), [Chinese \(Simplified\)](#), [Chinese \(Traditional\)](#), [Czech](#), [Dutch](#), [English](#), [Estonian](#), [French](#), [German](#), [Greek](#), [Hebrew](#), [Hindi](#), [Indonesian](#), [Japanese](#), [Latvian](#), [Lithuanian](#), [Malay](#), [Mongolian](#), [Portuguese](#), [Romanian](#), [Russian](#), [Spanish](#), [Thai](#) and [Turkish](#)). The situation will be reviewed to determine if a true or perceived conflict exists and you will be notified of the outcome. If you have any questions, contact [Compliance@brinkscompany.com](mailto:Compliance@brinkscompany.com) for help. For more information on Conflicts of Interest, please refer to our Code of Ethics.



## GIFTS & ENTERTAINMENT

To avoid corruption and bribery, be careful about the gifts and entertainment (including sponsorships) given or received by or on behalf of the Company. Reasonable, good-faith gifts and entertainment are generally an acceptable part of doing business. However, there are several ways that gifts and entertainment can present problems for Brink's, our customers, vendors and suppliers if we are not careful. Extravagant, lavish, and frequent gifts and entertainment are often little more than poorly disguised bribes and are prohibited. What constitutes extravagant or excessive depends on several factors, including your geographic location or your position in the Company. If you are in doubt about whether a gift is extravagant, please discuss with your manager.

At Brink's, we compete for and award business solely based on merit. All decisions should be made with Brink's best interests in mind, not any personal benefits we receive. Do not be influenced by gifts, entertainment, or benefits of any kind from current or potential customers, suppliers or vendors. And never ask for a gift from anyone for yourself, your friends, or your family.

Reasonable, infrequent gifts and entertainment of nominal value are acceptable within the framework listed below. However, they cannot be given or received in exchange for business benefits, with corrupt intent, or with the appearance of doing so.



Guidance on gifts and entertainment (excluding business meals) both for giving and receiving are as set forth below. Amounts may be decreased at the country level for cultural and monetary considerations:

- Infrequent gifts and entertainment of US \$50 or less per customer over the course of a year are acceptable and no approval is needed;
- Any gift or entertainment with an estimated value of more than US \$50 must be submitted for approval by your supervisor. Anything with an estimated value of US \$100 or more must be approved by Ethics & Compliance Group;
- Do not exchange gifts and entertainment of any value with government officials without prior approval from the Ethics & Compliance Group;
- Do not pay for any other party's hotel, airfare or other substantial travel costs, or accept payment by any other party for your travel costs, without advance approval by Ethics & Compliance Group; and
- Do not give or accept cash or cash equivalents, like pre-paid cards or traveler's checks, in any amount. Gift cards or gift certificates for a designated purpose (such as a meal at a specified restaurant, a specified product, or the like) may be accepted subject to the other restrictions in this policy. If you receive a gift of cash or cash equivalent, return it immediately and notify the Ethics & Compliance Group of the situation.



Business meals can help to build strong partner relationships. It is important when engaging in these hospitality events to follow common sense boundaries to avoid even the appearance of impropriety while being consistent with local customs and avoiding extravagant costs. Seek direction from your manager if you are in doubt about whether a meal is extravagant.

All requests for approval for gifts received must be made within one business day of receipt. All requests for approval for gifts given must be made and approved in advance.

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**A Gift & Entertainment Approval Form must be submitted BEFORE giving, or WITHIN ONE BUSINESS DAY of receiving, gifts and entertainment (including sponsorships) with an estimated value over US \$100, or gifts to/from government officials of any value** (select your language - [Arabic](#), [Chinese \(Simplified\)](#), [Chinese \(Traditional\)](#), [Czech](#), [Dutch](#), [English](#), [Estonian](#), [French](#), [German](#), [Greek](#), [Hebrew](#), [Hindi](#), [Indonesian](#), [Japanese](#), [Latvian](#), [Lithuanian](#), [Malay](#), [Mongolian](#), [Portuguese](#), [Romanian](#), [Russian](#), [Spanish](#), [Thai](#) and [Turkish](#)).

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## POLITICAL CONTRIBUTIONS

Brink's does not make contributions to candidates for political office, in the US or any other country, unless preapproved in writing by the Chief Executive Officer and General Counsel of Brink's. Employees and Representatives may not make political contributions, in cash or otherwise, on behalf of the company without the prior authorization noted above.



## CHARITABLE CONTRIBUTIONS

Brink's is committed to the communities in which it does business and permits reasonable donations to charities. Employees and representatives must ensure that donations are given only to bona fide charities and are only used for proper charitable purposes and not otherwise misapplied in violation of this Policy, the FCPA, or local law.

## THIRD-PARTY RELATIONSHIPS

The use of third-parties or representatives like agents, consultants or joint venture partners is an essential element of doing business. It is important that we choose reputable third-parties with high integrity and ethics who are engaged in legitimate business activities. Third-parties are retained by the Company for the expertise and services they are able to provide, but we must be careful to avoid situations involving third-parties that might lead to any violation of anticorruption laws. Brink's prohibits authorizing a third-party to pay any money or give anything of value to anyone to improperly influence actions.



Please review our [Know Your Customer Policy](#), which set out guidelines for conducting due diligence on third-parties to help ensure the company engages with reputable parties. Also refer to the [Global Anti-Money Laundering Compliance Policy](#) which helps to ensure we are working with third-parties whose business activities are derived from legitimate sources.

## ACCOUNTING REQUIREMENTS

All books and records of Brink's must be maintained in reasonable detail and fairly reflect all transactions. This will ensure the Company fairly presents in all material respects our financial results and condition to our shareholders and other stakeholders. Brink's prohibits any:

- mischaracterization or omission of material transactions;
- false or misleading entries;
- employees and/or third-parties from engaging in any arrangements that would result in misleading entries; and
- undisclosed or unrecorded funds/assets to be established.

If you are aware of or suspect false or misleading entries, records or reports, you must report them to the Ethics & Compliance Group at [Compliance@brinkscompany.com](mailto:Compliance@brinkscompany.com) or contact the Ethics Hotline.



## REPORTING & QUESTIONS

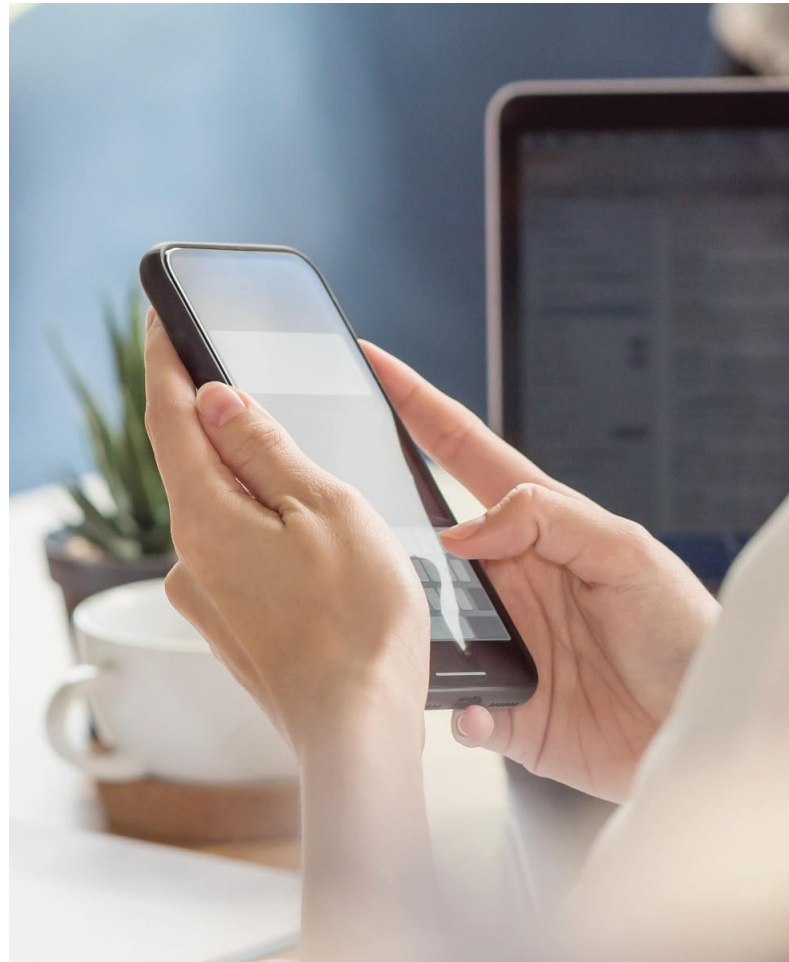
Some anticorruption situations can be subtle, complicated, or confusing. When you are in doubt, please seek guidance from the Ethics & Compliance Group at [Compliance@brinkscorporation.com](mailto:Compliance@brinkscorporation.com) before making any decisions.

We expect and encourage all of our employees to report violations and suspected violations and to cooperate with the Company in addressing them. In fact, where allowed by law, we *require* employees to do that.

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If you become aware of a violation (or suspected violation) of this policy, anticorruption laws that apply to our business, or international principles on anticorruption, you must report it immediately to your manager, the Ethics & Compliance Group 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.

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## GOOD FAITH & NON-RETALIATION

Brink's will not allow any retaliation against any Brink's employee who acts in good faith in reporting any violation of this Policy. Brink's will investigate reported violations and will determine an appropriate response, including corrective action and preventative measures. All reports will be treated confidentially to the extent possible.