



## **Brink's Supplier Code of Conduct**

Brink's and its respective divisions, subsidiaries and affiliates worldwide (collectively, "Brink's") is committed to conducting its business with the utmost integrity and in compliance with all applicable laws, rules and regulations and to partner with businesses that share that commitment.

This code of conduct applies to everyone – suppliers, vendors, contractors, licensees and agents (collectively, "Suppliers") - that supply products and/or services to Brink's. This code defines our minimum expectations.

### **Compliance with Laws**

All Brink's suppliers (including subcontractors) must, comply with all applicable international, national, state and local laws and regulations; including, but not limited to, those related to labor, immigration, health and safety and the environment. Non-compliance, with this code or any applicable law or regulation, will result in the immediate termination of the business relationship.

### **Human Rights Compliance**

As a member of the UN Global Compact, Brink's is committed to supporting the UN's principles regarding Human Rights. We expect our commitment to these principles to be reflected in the operations of all our supplier partners.

Suppliers must comply (and ensure that each of their subcontractors also complies) with all applicable human rights laws, statutes, regulations and codes including but not limited to the UK Modern Slavery Acts 2015.

Suppliers will implement due diligence procedures with their own suppliers, subcontractors and other participants in their supply chains to ensure there are no human rights violations including, but not limited to slavery, child labor or human trafficking in their supply chain. If a vendor becomes aware of any violations within their supply chain, they must notify Brink's immediately.

### **Child Labor and Forced Labor**

Brink's does not tolerate the use of underage or forced labor and will not knowingly work with any supplier that uses either of these groups as workers. Suppliers must only employ workers who meet the applicable minimum legal age requirement as well as complying with all other applicable child labor laws. Brink's supports the guiding principles of the UN Global Compact including the effective abolition of child and forced labor and expects its suppliers to adhere to those principles as well.

Suppliers must ensure that employees work in compliance with applicable laws pertaining to regular working hours and overtime hours; this includes breaks, holiday, and maternity and paternity leaves.

### **Freedom of Association**

We seek suppliers who productively engage workers and value them as critical assets to sustainable business success. Suppliers must respect their workers' rights to associate together regarding working conditions, and to join unions, form work councils and engage in labor negotiations, including collective bargaining. Suppliers will not intimidate or harass any worker who participates in such associations.

### **Workplace Health and Safety**

Suppliers must provide a safe and healthy working environment, in accordance with local laws, for all employees that seeks to minimize occupational safety hazards by including appropriate safety controls, and procedures, preventative maintenance, and protective equipment.

### **Anti-Discrimination**

At Brink's we respect individual and cultural differences and do not tolerate discrimination.

Suppliers are expected to maintain a discrimination-free workplace and to employ legally-eligible workers based upon on their abilities, rather than their race, color, sex, pregnancy status, gender identity, marital status, political opinions, religion, age, disability, sexual orientation, social origin, national origin or any other characteristics unrelated to an individual's ability to perform the work required by the job.

At Brink's one of our core values is diversity and inclusion. We expect our suppliers will engage in sourcing processes that promote equal opportunities.

### **Environment**

Brink's expects its suppliers to ensure that facilities comply with environmental laws, including all laws related to waste disposal, air emissions, discharges, toxic substances and hazardous waste disposal. Suppliers must validate that all input materials and components were obtained from permissible sources consistent with international treaties and protocols in addition to local laws and regulations. Additionally, suppliers are expected to continually look for ways to minimize waste, emissions and discharge in their operations, products and services and to establish and maintain programs that encourage continuous improvement.

### **Conflicts of Interest**

Employees of Brink's are required to always act in the best interest of the company. Accordingly, employees should not have relationships, financial or otherwise, with any supplier that might conflict, or appear to conflict, with the employee's obligation to act in the best interest of Brink's.

Suppliers are required to avoid actions that may result in conflicts of interest, which include offering, providing, or reimbursing personal gifts, favors, personal travel expenses, lodging, or other housing, services of any kind, excessive meals or entertainment (see details below), or any other thing of value to Brink's employees with the intent to influence business decisions.

### **Gifts, Meals and Entertainment**

Employees of Brink's are prohibited from accepting anything more than modest gifts, meals and entertainment from Suppliers. Gifts of cash, or cash equivalents, such as gift cards, are never allowed. Supplier's employees are subject to the same limits described in this section when offered gifts, meals or entertainment by Brink's employees, customers, or other business partners.

### **Bribery**

Integrity is one of Brink's core values and we expect our supplier partners to adhere to the highest ethical standards in their business practices. Suppliers acting on behalf of Brink's must comply with the U.S. Foreign Corrupt Practices Act and the UK Bribery Act, as well as all local laws dealing with bribery of government officials. Suppliers may not transfer anything of value, directly or indirectly, to any government official, employees of a government, or political party, in order to influence or obtain any improper benefit or advantage in connection with any transaction that involves Brink's.

Suppliers may not give anything of value to a government official on behalf of Brink's (or in the course of interacting with the government on behalf of Brink's) without prior written approval from Brink's legal counsel, which may be obtained through the supplier's primary contact/relationship manager at Brink's.

Brink's also prohibits commercial bribery. Suppliers must keep a written accounting of all payments (including any gifts, meals, entertainment or anything else of value) made on behalf of Brink's. Suppliers must furnish a copy of this accounting to Brink's upon request.

### **Anti-Money Laundering**

At Brink's, we are committed to strictly complying with all applicable Anti-Money Laundering ("AML") laws and regulations. While acting on behalf of Brink's, suppliers must not knowingly engage or attempt to engage in any transaction involving proceeds derived from unlawful activity, must perform applicable AML, and other regulatory responsibilities, in utmost good faith and immediately report to us any matter suspected to be related to unlawful activity. We require our suppliers not have dealings with designated individuals and entities (such as suspected terrorists or narcotics traffickers) who are subject to international economic sanctions.

### **Business and Financial Records**

Both the supplier and Brink's must keep accurate records of all matters related to the supplier's business with Brink's. This includes the proper recording of all expenses and payments. If Brink's is being

charged for a supplier's employee's time, time records must be complete and accurate. Suppliers should not delay sending an invoice or otherwise enable the shifting of an expense to a different accounting period.

### **Antitrust compliance and fair competition practices**

Suppliers shall conduct their business in full compliance with antitrust and fair competition laws that govern the jurisdictions in which they conduct business. Suppliers must uphold standards of fair business and competition practices and refrain from agreements that may lead to a restriction or prevention of competition. Specifically, suppliers are prohibited from making arrangements with competitors regarding prices, pricing, tendering, capacities, terms of business, or market share (including the allocation of customers or sales territories between competitors), technologies, anti-competition boycotts and the unlawful exchange of competitively sensitive information with competitors.

### **Protecting Information**

Suppliers must protect the confidential information of Brink's. Suppliers who have been given access to confidential information as part of the business relationship should not share this information with anyone unless explicitly authorized to do so by Brink's. We expect our suppliers to comply with applicable security and privacy laws, regulations and retention requirements and to ensure that appropriate technical and security controls are in place to protect our confidential information.

Confidential information encompasses all non-public Brink's data, including: business plans, pricing strategies, marketing plans, employee personal information, customer information and intellectual property. Suppliers may not outsource, disclose, share or use this information outside the requirements defined in their contract and/or within their non-disclosure agreement with the company.

Suppliers are prohibited from trading in Brink's securities, based on confidential information received while providing services to or acting on behalf of Brink's. If a supplier believes it has been given access to Brink's or any other third party's confidential information in error, the supplier should immediately notify its contact at Brink's and refrain from further distribution of the information.

### **Personal Data Protection**

In addition to the above confidentiality, any supplier handling personal information from Brink's employees or third parties in the performance of services on Brink's behalf must ensure that such information is collected on a lawful basis, is protected against improper access, use and disclosure, is appropriately processed, and, that any applicable or appropriate filings have been completed by the supplier with the relevant authority.

## **Reporting Misconduct**

Suppliers who believe that an employee of Brink's, or anyone acting on behalf of Brink's, has engaged in illegal or otherwise improper conduct, should immediately report the matter to Brink's.

To report a concern, suppliers can contact Brink's using any of the methods below:

- Directly contact the employee's manager
- Report a concern via the Brink's Ethics Line website (<https://brinkshotline.ethicspoint.com>),
- Call the Brink's Ethics hotline (877-275-4585 within the U.S.) or +1-804-289-9611 (outside the U.S.).

A supplier's relationship with Brink's will not be affected by an honest report of potential misconduct.