## **Anti-Money Laundering Policies & Procedures**

Transactions Over \$10,000 in Cash or Cash Equivalents (cash, money order, cashier's check, travelers check)

When a customer purchases items totaling more than \$10,000 and seeks to pay in <u>cash</u>, <u>cashier check(s)</u>, <u>traveler's check(s)</u> or <u>money order(s)</u>, the customer must fill out a "Form 8300" at point of sale.

If this occurs, the Cashier must take the following step:

• Call a member of management

The member of management takes the following steps:

- Ask the customer to fill out Part I and if applicable, Part II of Form 8300
  - Note: the taxpayer identification number in Part I is a social security number
- Ask the customer for a driver's license or ID to verify the information in Part I and if applicable, Part II
- Fill out Part III

The completed Form 8300 must be returned to the Chief Compliance Officer within two (2) business days via FedEx. Address: Corporate Compliance Department, The TJX Companies Inc., 300 Value Way, Marlborough, MA 01752, ATTN: Paul Kangas, Chief Compliance Officer.

*Note: The completed Form 8300 should be placed in a confidential envelope and kept in the safe prior to shipment.* 

If a customer refuses to fill out the form:

- The Cashier must void the transaction.
- If the customer then wishes to make the purchase using a credit or debit card, re-ring the transaction as a credit/debit transaction.
- Cashier must notify a member of management of this suspicious activity even though the cashier may not have the customer's name. The cashier simply should report that such an event occurred and describe the interaction as best he or she can.
- A member of management must then report this event to the Chief Compliance Officer. Call Paul Kangas, Chief Compliance Officer, at (774) 308-3651.

## **Suspicious Activity**

Cashiers must report any suspicious activity by customers that raises potential money laundering concerns to a member of store management. Such activities include:

- Attempts by individuals to purchase large volumes of goods inconsistent with ordinary needs
- Multiple high dollar cash transactions at the same

location

- Refusal to fill out a Form 8300 if a cash transaction is over \$10,000.
- Store management is responsible for reporting any such events to the Chief Compliance Officer within two (2) business days. Call Paul Kangas, Chief Compliance Officer, at (774) 308-3651.