

THE TJX COMPANIES, INC.

ANTI-MONEY LAUNDERING POLICY FOR U.S. DIVISIONS

POLICY STATEMENT

The TJX Companies, Inc. (“TJX”) is committed to doing business in accordance with the highest ethical standards and in compliance with the law. Accordingly, TJX has adopted this Anti-Money Laundering (“AML”) Policy in an effort to detect, prevent, and report potential money laundering and other unusual or suspicious activity during customer transactions.

All TJX associates in the United States who conduct or directly supervise in-store transactions at point-of-sale (“Covered Persons”) must understand and comply with this policy. Any Covered Person found to be in violation of this policy shall be subject to appropriate corrective action, up to and including termination of employment or services and/or legal action.

TJX has designated its Chief Compliance Officer (“CCO”) to serve as its AML Compliance Officer. In consultation with the Legal Department, the CCO is responsible for coordinating TJX’s overall compliance strategy and monitoring day-to-day operations and internal controls under this policy.

WHAT IS MONEY LAUNDERING?

Money laundering can be defined as activity intended to conceal the true origins of proceeds obtained through criminal conduct, such that the proceeds appear to have been obtained through legitimate conduct. Money laundering is punishable by fines and/or imprisonment.

WHAT DOES THIS POLICY REQUIRE?

1. Reporting Cash Transactions Over \$10,000

To detect potential money laundering activity in the United States, all Covered Persons are required to ensure that any customer making an in-store **cash** purchase totaling **more than \$10,000**, or a series of **related cash** purchases totaling **more than \$10,000**, complete the IRS/FinCEN Form 8300 (“Form 8300”) at point-of-sale. The Form 8300 has been attached to this policy.

What does “cash” mean?

In this context, “cash” includes not only currency (such as paper money and coins), but also cashier’s checks, traveler’s checks, and money orders. Cash does not include personal checks or payments made by credit, debit, or gift card.

What types of goods count towards the total purchase amount?

All goods sold by TJX qualify towards the total purchase amount. The total purchase can be comprised of either a single good or multiple goods.

What does it mean for cash purchases to be “related”?

Cash purchases are “related” when: 1) a customer engages in multiple in-store transactions that *together* total more than \$10,000 within a 24-hour period; or 2) the Covered Person knows or has reason to know that a series of transactions are connected, even if they occur more than 24 hours apart. Like single cash purchases, “related” cash purchases must be reported on the Form 8300.

What should I do after the customer completes the Form 8300?

Immediately following the transaction, the Covered Person should provide the completed Form 8300 to his or her direct supervisor, who is then responsible for transmitting the completed form to the Chief Compliance Officer within two business days. The CCO is responsible for filing the Form 8300 with the IRS/FinCEN within 15 days of the cash transaction. The CCO is also responsible for maintaining copies of any forms submitted to the authorities for five years from the date of filing.

2. Internal Reporting of Other Unusual or Suspicious Activity

All Covered Persons also must be alert for other **unusual or suspicious activity** that raises potential money laundering concerns. Any such activity **must be reported** to the Covered Person's direct supervisor, who in turn should contact the CCO for further inquiry. Examples of potential unusual or suspicious activity include, but are not limited to:

- attempts by a single individual to purchase large volumes of goods that are inconsistent with ordinary needs;
- multiple cash transactions at the same retail location that approach, but do not exceed, the \$10,000 reporting threshold; and
- a customer's refusal to provide the information required on the Form 8300.

WHAT SHOULD I DO IF I HAVE QUESTIONS OR CONCERNS?

Any Covered Person who has questions about whether a particular transaction constitutes a reportable event under this policy should raise the issue with his or her direct supervisor. The TJX Helpline is an additional resource for Covered Persons to raise concerns regarding potential money laundering activity. Reports through the TJX Helpline may be made anonymously (except where prohibited by local law). For North America, the TJX Helpline number is **1-800-TJX-6488**.

ANNUAL REVIEW OF POLICY

On an annual basis, TJX shall conduct a review to evaluate its adherence to AML regulatory requirements and the procedures outlined in this policy. The review may be conducted internally, provided that it is not conducted by the CCO or any person involved in the operation of this policy. The annual review will:

- confirm the integrity and accuracy of TJX's procedures for reporting large cash transactions;
- include a review of forms filed with authorities;
- confirm adherence to TJX's internal reporting procedures;
- confirm that Covered Persons were made aware of and received training regarding this policy;
- confirm that this policy incorporates any revisions required as a result of new legislation or regulation; and
- confirm the integrity and accuracy of TJX's recordkeeping and retention policies.

The results of the annual review shall appear in a summary report, which will be presented to the General Counsel. The CCO shall maintain a copy of all annual summary reports for a period of five years.