



Introduction and Purpose

Association of Certified Anti-Money Laundering Specialists LLC (together with its subsidiaries and affiliates, collectively, “ACAMS” or the “Company”) serves as a world leading membership organization for Anti-Financial Crime professionals. It aims to support the individuals and organizations that it serves as well as the communities in which it operates. Thus, all of the activities of ACAMS shall be performed with integrity, candor, and with a focus on supporting the interests of the Company’s employees, customers, and the communities in which it operates.

ACAMS has adopted this Code of Business Ethics and Conduct (this “Code”) to support these principles and to accomplish its objectives. This Code includes provisions based on existing law and standard requirements, as well as more specific provisions and principles based on the nature of ACAMS’ business and the requirements of the contracts it is bound by. Each employee of the Company is expected to read and abide by the terms of this Code, and to notify their manager, the Chief Human Resources Officer or Vice President of Legal of any non-compliance.

This Code shall apply to the Company and its employees. It also shall flow down to and apply to its subcontractors. This Code also shall flow-down to independent contractors in their capacity of working on behalf of ACAMS. The GC/CCO/other position, involving as necessary legal counsel, shall be responsible for implementation and Compliance with this Code. Violations of this Code are cause for appropriate corrective action, including discipline up to and including termination of employment.

The Company is committed to fostering an environment where integrity, honesty and good citizenship is valued and is used as the driving force behind all decisions. The Company provides that this Code is made accessible to all those subject to its provisions. The Company will maintain a culture that encourages all employees and subcontractors to become familiar with this Code and to feel comfortable and encouraged to report any suspected violations of it to their manager, the Chief Human Resources Officer or Vice President of Legal.



Message from ACAMS CEO

Dear Colleagues,

As an organization that is mission-driven and that deeply prides itself on our core values of Purpose, Integrity and Partnership, living by our values enables us to make a profound impact within our global communities each and every day.

In an effort to equip you with the right resources to do so, we have implemented a Code of Conduct to provide clear guidelines on our standards of professional behaviors and to empower you in your day-to-day decision making that upholds our core values.

Your understanding, support and compliance with our code of conduct enables ACAMS to lead with the highest levels of integrity and best serve our customers, members, partners and each other at all times. If you have any questions, please contact ethics@acams.org.

Thank you for your steadfast support and for making ACAMS the dynamic mission-driven organization it is.

Best,

Neil



About Our Code of Conduct

Compliance with laws, rules and regulations, Company policy, and with this Code. ACAMS and its employees shall follow both the letter and the spirit of laws and regulations that govern the Company. This includes compliance with the laws, rules, and regulations of each of the jurisdiction in which the Company operates (except to the extent inconsistent with U.S. Law). Should any issue arise, employees should seek advice from the Vice President of Legal or their designee. Moreover, the provisions of the Handbook also inform the Company's policies and procedures. Several policies within this Code are described in further detail in the Company Handbook.

Amendments. Amendments to this Code require the written approval of the Vice President of Legal.

Employee and contractor responsibilities. Employees and contractors have the responsibility to ask questions, seek guidance, report suspected violations, and express concerns regarding compliance with this Code and all related policies and procedures. Employees of the Company are considered to be persons employed by ACAMS, in part or full time capacity. While consultants and subcontractors performing services for ACAMS are not employees of ACAMS, they are obligated when performing work for the Company to follow these policies as described within this Code. A subcontractor under this Code follows the definition of U.S. Federal Acquisition Regulations ("FAR") 3.502-1 of "any person, other than the prime contractor, who offers to furnish or furnishes any supplies, materials, equipment, or services of any kind under a prime contract or a subcontract entered into in connection with such prime contract; and... any person who offers to furnish or furnishes general supplies to the prime contractor or a higher tier subcontractor." This Code is applicable to persons who work in any capacity for ACAMS, whether or not they are considered to be a government contractor. A few helpful examples and reminders can be found at the end of this Code of Conduct.

Management responsibilities. Managers shall promote the Company values and standards of conduct both in letter and spirit of laws, as summarized in the Code and regulated by the Company. Management shall lead by example and model the highest standards of ethical business conduct and company values. This includes knowledge of such so that management can efficiently and effectively assist the Company and its employees in resolving questions and concerns. Management shall also create an environment that encourages open communication and reporting regarding ethics, business conduct, and legal issues. Management shall report any such information regarding potential violations of this Code in a timely manner to the Vice President of Legal or their designee.

Compliance Program and Reporting Compliance Violations.

Ethics and Business Conduct Program. ACAMS shall maintain a comprehensive Compliance Program to ensure continued compliance with applicable Federal and State laws and regulations, including those provided in this Code. This Compliance Program shall be modeled off of the Federal Sentencing Guidelines, Department of Justice Evaluation of Corporate Compliance Programs, and other published



guidance for establishing and maintaining an effective Compliance Program. All employees, as defined above, are expected to be familiar with and comply with the Company's policies, procedures, and this Code. The Company shall establish criteria for ethics education and awareness in accordance with the Company's culture of open communication and integrity. The Company shall respond to employee questions about ethical conduct and compliance and encourage such inquiries.

Training of Employees. All employees are to participate in a formal ethics training session as soon as practicable after joining the Company and at least annually thereafter. This applies to all Company employees unless expressly exempted by the Vice President of Legal in writing. Employees are also to receive privacy training in accordance with FAR 52.224-3. To the extent applicable, this training shall be conducted as soon as practicable upon an employee's hire and again annually thereafter.

Obligations to Report Violations of this Code. FAR 52.203-13 (under 73 Fed. Reg. 67064) requires government contractors, such as ACAMS, to disclose to the Inspector General of the relevant government agency holding its contract any credible evidence of violation of federal criminal laws in violation of Title 18 or the civil False Claims Act. Note that additional laws and policies may apply locally. In such case, please refer to such local law or policy. In order for the Company to accurately make disclosures, it is essential that employees report all violations or suspected violations of the Code, applicable law, or a contract provision, to the Vice President of Legal. Failure to report may itself be a violation of this Code or applicable law.

Reports may be made to the Vice President of Legal or their designee directly at ethics@acams.org or anonymously through a hotline. Whether contacting the Vice President of Legal or their designee or using the Company Compliance Hotline, an employee need not provide his or her name. If a name is provided, it will not be disclosed without the permission of the employee except as needed to conduct an investigation, implement corrective action, or notify law enforcement authorities.

In addition to reporting violations, employees are encouraged to contact the Vice President of Legal or their designee to discuss any ethics concerns or questions about this Code.

To report a violation, employees shall use any of the below methods:

- **Phone:** +1 410 209 0102
- **Email:** ethics@acams.org

In addition, an employee may report violations of this Code or applicable law to the Company Compliance Hotline by the following methods:

- **Website:** <https://www.lighthouse-services.com/acams>
- **Anonymous Reporting App:** Keyword: acams
 - o Detailed app instructions download [here](#)



- Toll-Free Telephone:
 - o **English-speaking USA and Canada: 833-203-6447**
 - o **Spanish-speaking USA and Canada: 800-216-1288**
 - o **Spanish-speaking Mexico: 01-800-681-5340**
 - o **French-speaking Canada: 855-725-0002**
- **E-mail:** reports@lighthouse-services.com (please be sure to include “ACAMS” in the subject line and body of your report)
- **Fax:** 215-689-3885 (must include company name with report)

*Should you need international dialing instructions, please refer to the instructions found at <https://www.acams.org/codeofconductinternationaldial>

No Retaliation. Employees who report a violation or suspected violation of this Code or applicable law are not subject to penalty so long as such report was reasonable and made in good faith. The Company will not tolerate retaliation against anyone who makes a reasonable, good faith report, even if the report is ultimately mistaken. The Company will similarly not tolerate retaliation against anyone who, in good faith, participates in an investigation or reports misconduct. An employee who makes a report will not be fired, demoted, suspended, threatened, or subject to any adverse treatment in the course of employment because of any report, including reports made to the government.

Ethics Process and responding to investigations. The Company shall provide, where practicable, confidential assistance to employees making reports. The Company commits to reviewing and investigating each report in a timely manner. Appropriate management will be involved as necessary. All documents and communications related to reports shall be maintained in compliance with applicable laws regarding document conservation and protection of personal data. If applicable law does not specify a maintenance period, the maintenance period shall be 3 years. Measures shall be taken to maintain confidentiality and protect anonymity.

Relations with Third Parties

Business activities and relations with customers and suppliers. All communications and representations to prospective customers, suppliers, and partners shall be accurate and truthful.



Business partners are expected to follow the spirit of this Code, as well as any applicable contractual provisions, when working on behalf of the Company.

- **Supplier diversity.** The Company recognizes the importance and benefits of a diverse supplier base, and will work to identify qualified minority-owned and woman-owned businesses, as well as small and local businesses capable of providing ACAMS with products and services.
- **Hiring or Contracting with Ineligible or Excluded Individuals or Entities.** The Company shall conduct appropriate due diligence before engaging any third-party that will be marketing or utilizing Company products and services outside of the United States.

Political contributions and involvement. The Company does not support political parties or engage in prohibited lobbying activities. Employees have a right to voluntarily participate in the political process, and such individual actions shall be done in the employees own name and on their own time—remaining separate from Company activities. Employees shall consult with the Legal department before interacting with government officials in a manner that might be interpreted as a lobbying activity. Employees shall also be careful to ensure that their personal political views, contributions, and activities are not viewed as those of the company.

Correspondence with the public. Only authorized persons may speak on behalf of the Company. The Company shall provide accurate and consistent information regarding operations, products, and services to the public. Employees shall obtain approval from the Communications department before making public statements when being identified as an employee of ACAMS. Employees shall be careful to avoid the appearance that they are speaking on behalf of the Company in any personal capacity.

Doing business lawfully and ethically outside of the United States. Anything of value (including any gift, invitation, payment, service or any type advantage), if offered, given, or received in order to obtain an improper business advantage, may be considered bribes. Company employees must consult with the Legal department prior to offering, giving, or receiving anything of value to Foreign Officials, customers, suppliers and any third-party with the exception of nominal or *de minimis* gifts.

Charitable contributions to any Foreign Entities cannot be made by or on behalf of the Company unless reviewed and approved by the Legal department. Foreign Entities include non-U.S. governmental, semi-governmental or judicial entity or authority, independent or otherwise, including any provincial government, local-level government, and any statutory or public body established under a law; (ii) any political party; (iii) any entity or business that is owned or controlled by any of those bodies listed in subcategory (i) or (ii); or (iv) any international organization, such as the United Nations or the World Bank. Foreign Officials include (i) any director, officer, employee, agent, or representative (including anyone elected, nominated, or appointed to be a director, officer, employee, agent, or representative) of any Foreign Entity, or anyone otherwise acting in an official capacity on behalf of a Foreign Entity; (ii) any political party, political party official, or political party employee; (iii) any candidate for public or political office; (iv) any royal or ruling family member; or (v) any agent or representative of any of those persons listed in subcategories (i) through (iv).



Relations with press and mass media. Employees shall not disclose information about the Company, its customers, or its employees to the media or any outside entity unless the employee has written authorization to do so. Any employee who receives a media inquiry shall not engage with the media, and shall instead pass the information to the Communications department.

Gifts, Gratuities, and Other Business Courtesies. The Company shall ensure that any business courtesy offered or accepted is permitted by law and policy and will not provide a competitive advantage. The Company shall also avoid a perception that favorable treatment is being sought, received, or given in exchange for business courtesies. ACAMS employees shall be aware that complex rules and monetary rules apply when dealing with government employees. ACAMS employees involved in making purchases on behalf of the Company shall not solicit any gifts or business courtesies, nor shall they accept gifts from suppliers of more than nominal value.

Compliance with Laws

Conflicts of Interest. The Company shall remain fair and impartial in all business dealings, including by avoiding actual conflicts of interest as well as activities that create the appearance of a conflict of interest. Employees and those acting on behalf of the Company should avoid situations that might force choosing between personal interests and the interests of the Company. Employees shall be familiar with what is considered a conflict of interest and are tasked with providing written disclosure of actual or potential conflicts as soon as they become aware of them.

- **Examples of Conflicts of Interest.** While it is not possible to describe or anticipate all circumstances amounting to a conflict of interest, such conflicts shall be avoided to the extent practicable. For instance, conflicts with current and former government employees shall be avoided, as should organizational conflicts of interest (e.g. conflicts that provide an unfair competitive advantage or that might impair objectivity). Other examples of conflicts include familial conflicts, relationships with customers, suppliers, and competitors, and influencing terms of a future opportunity in which the Company might have an interest in bidding. If the employee is uncertain about an interest interfering with the employee's objectivity, they shall contact the Vice President of Legal or their designee for review and a conflict of interest determination.

Insider Trading. The Company shall not engage in insider trading. It shall comply with all applicable securities laws and provisions, as well as avoid even the appearance of impropriety. The Company and its employees shall not trade, or provide any information or trade advice, on the Company's securities, or that of any company it works with or represents. Employees shall not tip another person, including a relative or another employee, regarding material non-public information that could enable that person to trade securities. The Company and its employees shall know that any important information learned during the course of employment may be considered material nonpublic information, and thus shall not disclose such information to others, even if the employee does not themselves trade any securities based on the information.



Adherence to antitrust laws. The Company shall not knowingly enter into business arrangements that eliminate or discourage competition or provide ACAMS with an improper competitive advantage. Such activities include, but are not limited to, disparaging a competitor, price fixing, boycotting suppliers or customers, blocking market entry, colluding with other business to fix prices, and conditioning the sale of a product/service on the sale of another product/service. Employees shall consult with the Vice President of Legal if they are unsure whether a proposed activity complies with antitrust laws.

Export/import controls and compliance. The Company shall comply with all applicable export and import laws and regulations. These laws and regulations include both those of the United States and each foreign country in which the Company conducts business. The Company shall obtain government approvals prior to exporting and importing products and technology controlled by the Government.

Compliance with Anti-Corruption laws. The Company shall have zero tolerance for bribery and corruption. The Company shall comply with the laws and regulations of the United States, particularly the provisions of the Foreign Corrupt Practices Act ("FCPA"), 15. U.S.C. § 78dd-1, et seq., as well as the anti-corruption and anti-bribery laws and regulations of each foreign country in which the Company operates. The prohibition includes attempts to corrupt, which are illegal acts in themselves.

Compliance with the Anti-Kickback Act/Statute. The Company shall not offer, give, solicit or receive any form of bribe or kickback, in compliance with the Anti-Kickback Act of 1986 (Title 41, U.S. Code §§ 51–58). The Anti-Kickback Act prohibits requesting, receiving, offering, or paying anything of value, in cash or in kind, to an employee of a prime U.S. government contractor or higher tier subcontractor in order to obtain or reward favorable treatment.

Compliance with US anti-boycott laws. The Company shall not participate in or promote boycotts that the United States does not support. Employees are responsible for reviewing all transactional documents for any language that may constitute a boycott request.

Compliance with the Service Contract Act. The Company shall comply with all provisions of the Service Contract Labor Standards, including minimum wages and fringe benefits determined by the Secretary of Labor or authorized representative, as prescribed at FAR 52.222-41. The Company shall also comply with Exemptions from Application of the SCA Standards as prescribed in FAR 52.222-51 and FAR 52.222-53.

Trade agreements and restrictions on certain foreign purchases. The Company shall adhere to FAR 52.225-5 and FAR 52.225-13, which define trade agreements and place restrictions on certain foreign purchases, respectively.

Contracting with the U.S. Government and Truth in Negotiations Act.

- **Timekeeping.** It is the responsibility of all Company employees who charge time to a U.S. Government contract to comply with the requirements of the Company's timekeeping system. All employees shall be aware of the rules that govern the recording, allocating, and charging of costs to the U.S. Government. Employees shall ensure that no improper or false entries are made to company records and that no improper amounts are charged to U.S. Government



contracts. Additional details about employee timekeeping expectations can be found in the Employee Handbook.

- **Proposals.** Employees involved in the preparation or submission of proposals must ensure that all proposals are in compliance with applicable cost accounting standards and the FAR cost principles. Employees shall ensure that all data is current, accurate, and complete as required by law. They shall similarly insure that all contractual, regulatory, and statutory requirements are complied with, or will be complied with, before contract award.
- **Subcontractors.** The Company shall ensure that all subcontracts are awarded to qualified subcontractors and that the terms of the prime contract are complied with. The Company must also incorporate applicable U.S. Government flow-down provisions into all subcontracts.

Accounts and records

Financial and accounting books and records of the Company / Accounting and Recordkeeping. The Company shall honestly and accurately prepare all business and financial records in accordance with established finance and accounting procedures and applicable laws and regulations. All records shall be stored in a secure location for the period of time required by law or policy, whichever is longer. Records that are no longer needed shall be properly disposed of in accordance with applicable document retention policies. The Company shall make accurate public disclosures. The Company shall not misrepresent facts or falsify records. If an employee learns of or suspects inaccurate or false records or reporting, or is instructed to make an inaccurate record or report, the employee shall communicate their concerns to the Vice President of Legal or their designee.

Use of Confidential Information. All employees and those acting on behalf of the Company who have access to confidential information must not misuse, disclose, or disseminate this information to any individual, including other employees or external parties, without authorization. The Company and its employees shall obtain proper authorization before disclosing or receiving any sensitive information, including information about the Company or its customers. Any information provided to employees during their employment shall remain confidential beyond the course of such employment. Employees are prohibited from using any Company information or property for personal gain or to compete with the Company directly or indirectly.

- **Prohibition on Requiring Certain Internal Confidentiality Agreements or Statements.** The Company shall comply with FAR 52.203-19. This means that the Company shall “not require its employees or subcontractors to sign or comply with internal confidentiality agreements or statements prohibiting or otherwise restricting such employees or subcontractors from lawfully reporting waste, fraud, or abuse related to the performance of a Government contract to a designated investigative or law enforcement representative of a Federal department or agency authorized to receive such information.” The Company shall encourage such reports.

Use of Company Assets and Property. Because the Company is responsible for properly using customers’ property and assets, neither the Company nor its employees shall waste or abuse Company



and customer assets. This includes a prohibition on unauthorized use of company assets, third party information, and the handling of sensitive information on a personal device.

Network/Computer Use. Company information technology, including but not limited to email, computers, and mobile devices, shall only be used for authorized, business purposes. Such information technology may not be used to view, download, or communicate inappropriate, unprofessional, copyrighted, or illegal content. Personal use of such technology is discouraged and shall not adversely affect productivity or the work environment. The Company reserves the right to review all information technology usage. Employees shall report any suspicions of misuse of company assets.

Privacy. All employees who have access to personal information related to employees and other individuals are obligated to protect the information and exercise caution before disclosing it to others. This includes medical information and any other personally identifiable information.

- **Contractors Performing Private Security Functions Outside the US.** The Company shall adhere to FAR 52.225-26, which requires, among other things, the registration of military vehicles and personnel performing private security functions, as well as the report of incidents involving personnel performing private security functions.

Workplace Behavior/Human Resources

The Company is committed to maintaining a drug-free, safe, and courteous work environment, free from violence, harassment, intimidation, and discrimination. These policies have been fully described in the ACAMS Employee Handbook, and are briefly summarized here.

Harassment/safety and environment. The Company prohibits verbal or physical conduct that offends, abuses, intimidates, or threatens another person. This includes sexual harassment conducts by or against its employees or third-parties. The Company shall maintain an environment free of physical, psychological, and verbal harassment or abuse. This includes prohibition on harassment via forms of electronic communications and harassment taking place by employees outside the workplace.

Diversity and Non-Discrimination. There is zero tolerance for discrimination. The Company shall maintain an inclusive and diverse work environment free from discrimination and harassment. The Company values different ideas, opinions, and experiences and is committed to sustaining a culture that promotes these values. The Company shall not discriminate against employees on the basis of characteristics protected by applicable law or ACAMS policy. The Company shall follow all policies and laws, including but not limited to non-discrimination, related to recruitment, selection, compensation, termination, disciplinary action, and all other aspects of employment. Protected characteristics include, but are not limited to: Race, ethnicity, religion, sex, age, veteran status, disability, sexual orientation, gender identity or expression, mental or physical disability, and any other legally protected characteristic.



Equal opportunity. The Company shall provide equal opportunity to all applicants and employees regardless of any characteristic protected by law, including but not limited to: Race, religion, sex, age, veteran status, handicap, physical or mental disability, or genetic information. The Company shall follow a written Affirmative Action Plan ("AAP"), developed in accordance with the provisions of U.S. federal law, to support and implement the principles of equal employment and to promote the employment and advancement of persons specifically identified by statute and regulation including minorities, women, qualified disabled persons and veterans. Management and employees are responsible for actively supporting the Company's commitment to equal opportunity, and management is responsible for taking appropriate actions to prevent violations of this policy.

Workplace Violence. The Company prohibits employees from engaging in workplace violence while on Company property, conducting Company business, attending a Company sponsored event or function, or representing the Company.

Drugs/Alcohol. Employees are prohibited from being under the influence of illegal drugs or alcohol in the workplace or in the performance of company business. ACAMS shall not knowingly hire or rehire individuals involved in the possession, use, sale, manufacture, traffic, or transfer of illegal drugs. The Company shall comply with the Drug-Free Workplace Act of 1988 and other laws and regulations concerning violations of drugs in the workplace.

Smoking/Tobacco: The use of tobacco products, e-cigarettes, and any other inhalant producing smoke or vapor is prohibited in Company facilities, during Company-sponsored activities, or in the regular course of business. Smoking is only authorized during approved applicable break and meal periods, and after the normal work schedule. No additional breaks are allowed for employees who smoke.

Human rights/human trafficking. The Company shall recognize and adhere to internationally recognized human rights provisions in all locations where they operate, regardless of local business customs. The Company is also committed to providing safe and secure conditions for those working on ACAMS' behalf. The Company will not knowingly work with business partners who employ children or forced labor. This includes adherence to FAR 52.222-50, Combatting Trafficking in Persons. Employees are expected to report any credible information on suspected human rights or human trafficking related violations to the CO and the agency IG.

Prohibitions on Contracting

Prohibition on Contracting for Hardware, Software, and Services Developed or Provided by Kaspersky Lab and Other Covered Entities. The Company shall adhere to FAR 52.204-23, including its reporting requirement. The Company shall insert the substance of FAR 52.204-23 into all subcontracts.

Prohibition on Contracting for Certain Telecommunications and Video Surveillance Services or Equipment. The Company shall adhere to FAR 52.204-25, including its reporting requirement. The Company shall insert the substance of FAR 52.204-25 into all subcontracts.



Effects of Violations

Whistleblower Policy. All employees of the Company have an obligation to report their concerns to the Company as soon as possible if they have any reason to believe that there have been violations of this Code, contract provisions, or applicable laws. As stated previously in this Code, employees who report a violation or suspected violation of this Code or applicable law are not subject to penalty so long as such report was reasonable and made in good faith. The Company will not tolerate retaliation against anyone who makes a reasonable, good faith report, even if the report is ultimately mistaken.

Deviations and Exceptions to this Code. Any deviation or exception to this Code requires prior written approval of the Vice President of Legal. Deviations or exceptions will not be granted if the requests violate applicable U.S. or foreign law.

Effective Date of Code. This Code is effective November 1, 2022 and applies to conduct occurring (or disclosure required) on or after November 1, 2022.



Code of Conduct Examples

ACAMS recognizes that all fact patterns are unique and encourages anyone to whom this Code of Conduct applies to contact the ACAMS Legal Department with any questions, comments, or concerns about the Code of Conduct or how it may apply to a certain fact or fact pattern. If you prefer, you may also use the hotline, or other reporting methods listed in the Code of Conduct.

As a reminder, you should be particularly careful in any instance where a potential improper payment or improper benefit (e.g., competitive advantage) is even conceivable. You can help reduce risk by conducting proper counterparty diligence and being particularly cautious in any instances involving governmental entities and government officials.

Below are a few examples of Potentially Risky or Prohibited Behaviors as well as Proper Behaviors.

Potentially Risky Behaviors	Permissible Behaviors
Offering lavish gifts, entertainment, or travel to public officials or clients to influence decisions	Engaging in negotiations where all terms are documented and approved through proper channels
Accepting personal favors or benefits from suppliers beyond nominal value	Using official company procurement processes for vendor selection and payment
Making small unofficial payments to expedite routine government actions (facilitation payments)	Accepting or offering low-value, customary gifts (e.g., branded stationery) that comply with internal thresholds and are properly logged
Participating in decisions involving relatives or personal business interests without disclosure	Business meals that are reasonable and directly related to legitimate business discussions
Holding undisclosed financial stakes in vendors or partners	Conducting documented risk assessments and background checks before onboarding suppliers or intermediaries
Approving charitable contributions or sponsorships without verifying legitimacy or alignment with company policy	Using approved tools (e.g., LexisNexis) for screening and maintaining audit trails
Using ACAMS supported sponsorships as a channel for indirect influence	Promptly reporting suspected misconduct through internal whistleblowing channels



Creating false invoices or misclassifying expenses to conceal improper payments	Participating in mandatory compliance training and acknowledging the Code of Conduct
Using “miscellaneous” accounting codes to hide transactions	
Providing meals, entertainment, or gifts to any governmental official, unless consistent with ACAMS policy and/or with the prior approval of the ACAMS compliance department.	