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ACAMS Certified Global Sanctions Specialist Sample Questions (Q71-Q76):

NEW QUESTION # 71

Which of the following schemes demonstrates unilateral coercive measures that have a negative effect on the basic means of survival?

- A. Impact of international human rights law.
- B. Human rights objectives.
- C. Immunity of ESC-rights to economic sanctions.
- D. The friction of international law.
- E. The right to impose financial sanctions.

Answer: A,C

NEW QUESTION # 72

The Council noted that, in order to ensure that Iraq did not increase its capacity to re-arm, states were required to continue to prevent the sale, supply, or provision to Iraq.

Which of the following items is NOT included in this?

- A. nuclear weapons and activities such as nuclear testing
- B. arms and related material
- C. personnel or training or technical support services relating to arms and related material, chemical and biological weapons, ballistic missiles with a range greater than 150km, and nuclear weapons
- D. items relating to chemical and biological weapons, ballistic missiles with a range greater than 150km, and nuclear weapons
- E. technology relating to arms and related material, chemical and biological weapons, ballistic missiles with a range greater than 150km, and nuclear weapons

Answer: A

NEW QUESTION # 73

According to the 2019 Wolfsberg Guidance on Sanctions Screening, which is related to the fundamental pillars of sanctions screening programs?

- A. External reporting
- B. Risk assessment
- C. External audit
- D. Risk management

Answer: B

Explanation:

The Wolfsberg 2019 Guidance identifies risk assessment as a foundational component of sanctions screening programs. Screening systems, list management, and alert handling must reflect the institution's assessed sanctions risk exposure.

External audit and reporting are relevant compliance functions but are not listed as fundamental pillars of screening programs in the Wolfsberg framework. Risk management is a broader corporate discipline, while screening specifically starts with a clear sanctions risk assessment.

Reference:

Wolfsberg 2019 Guidance on Sanctions Screening fundamentals.

Requirement that screening be risk-based and aligned with sanctions risk assessment outcomes.

NEW QUESTION # 74

Which steps demonstrate a sound governance framework? (Select Two.)

- A. The human resources department places a notation in the employee files and accounts for it during performance

evaluations.

- B. The compliance officer reports to senior management on the sufficiency of the bank's governance framework as confirmed by the lack of penalty.
- C. Senior management provides the compliance officer access to resources to investigate the underlying cause of a violation.
- D. The compliance officer updates the sanctions risk assessment to account for any underlying root cause of a sanctions violation.
- E. Senior management reinforces its zero-tolerance for sanctions violations and that it will hold officers directly accountable for any future violations.

Answer: C,D

Explanation:

A sound governance framework, according to Sanctions and Compliance Domains, includes:

- * Senior management ensuring adequate resources to investigate violations, identify weaknesses, and remediate control gaps.
- * Updating the sanctions risk assessment to incorporate findings and root causes from prior incidents.

Human resources actions (A) are not a primary governance function. Reporting based on "lack of penalty" (D) is not a risk-based governance indicator. Zero-tolerance statements (E) do not constitute governance processes and may conflict with risk-based management expectations.

Reference:

Governance expectations under OFAC Framework for Compliance Commitments.

Requirements for resource allocation and risk assessment updates.

NEW QUESTION # 75

A bank is offering a credit line for a trade transaction to a commercial client that is based in a country that shares its border with a sanctioned country. To which should a financial institution apply enhanced due diligence? (Select Two.)

- A. The pricing of the goods to see if they are reasonably in line with market value, determined through publicly available sources.
- B. Public domain searches of the client to confirm the client's industry.
- C. The commercial terms of the credit to ensure the terms are not prohibited under Sectoral Sanctions' extension of debit or credit arrangements.
- D. The shipment details because there are countries subject to international sanctions in the client's region.
- E. The ultimate beneficial owners of the exporter and importer.

Answer: D,E

Explanation:

Enhanced due diligence is required when trade transactions involve jurisdictions near sanctioned countries due to the increased risk of transshipment, diversion, and sanctions evasion.

Sanctions and Compliance Domains highlight two core focus areas:

- * verifying the identities and ultimate beneficial owners of all involved parties, and
- * validating the shipment details, including routing, goods description, and movement patterns.

These elements are critical where geographic proximity raises sanctions exposure. While reviewing commercial terms and pricing may be part of general trade finance due diligence, the primary sanctions-specific EDD requirements focus on beneficial ownership and shipment details.

Reference from Sanctions and Compliance Domains:

Enhanced due diligence expectations for trade involving high-risk regions.

Requirements to verify UBOs to detect potential sanctioned ownership.

Importance of shipment route verification to detect diversion to sanctioned jurisdictions.

NEW QUESTION # 76

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