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The CGSS certification exam covers a range of topics related to sanctions compliance, including the legal and regulatory frameworks governing sanctions, risk assessment and management, compliance program design and implementation, and sanctions enforcement. CGSS exam also tests a candidate's understanding of the different types of sanctions, such as financial sanctions, trade sanctions, and targeted sanctions. CGSS Exam is designed to ensure that candidates have a comprehensive understanding of the complex and evolving landscape of sanctions compliance.

ACAMS Certified Global Sanctions Specialist Sample Questions (Q98-Q103):

NEW QUESTION # 98

The actions of the US President on sanctions differ according to the sort of nation he is sanctioning. All three types of nations have different decision calculations, and the calculation changes from the decision to apply to the decision to amend sanctions. Specifically, the President penalizes non-Latin American and non-Communist countries for:

- A. Domestic reasons
- B. Economic reasons
- C. Personal reasons
- D. International causes

Answer: A,D

NEW QUESTION # 99

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

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

Answer: A,B

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 # 100

Why threatening to change the exchange pattern in an existing economic relationship is often insufficient to guarantee the power of negotiation between states?

- A. The sender can derive political leverage from the target's dependence on the gains from a trading relationship
- B. It will domestically impact the sender economy
- C. If an exchange is taking place between two rational economic actors, then the terms of exchange can be assumed to be Pareto optimal
- D. It may impact the raw material needed for manufacturing products.
- E. The sender must be willing to sacrifice some of its gains from trade

Answer: A,C,E

NEW QUESTION # 101

A compliance analyst at a UK-based company is reviewing a transaction alert for Entity A. A representative provided documentation that a UK Asset Freeze individual reduced their stake in Entity A from 70% to 30% shortly after they became subject to sanctions. Which steps should the analyst recommend first?

- A. Reject the transaction and report it to the competent authority.
- **B. Conduct enhanced due diligence on Entity A to verify the provided documentation regarding the reduction of ownership by a sanctioned individual.**
- C. Allow the transaction to proceed and thoroughly document the provided information verifying the reduction in ownership by a sanctioned individual.
- D. Allow the transaction to proceed and remove Entity A from the screening filters.

Answer: B

Explanation:

Under UK OFSI rules, entities owned or controlled by a designated person remain subject to asset freeze restrictions. A reduction in ownership from above 50% to below 50%, particularly when occurring immediately after designation, requires enhanced due diligence to determine whether the divestment is genuine or merely an attempt to evade sanctions.

Sanctions and Compliance Domains emphasize the need for verification when documentation claims ownership reduction. Institutions must confirm authenticity, timing, beneficiaries of the transfer, and any continuing control influence by the designated person.

Approving the transaction before verification, removing screening, or rejecting without confirming details contradicts UK sanctions compliance expectations. Enhanced due diligence is the required first step.

Reference from Sanctions and Compliance Domains:

OFSI ownership and control criteria, including obligations when ownership reductions occur post-designation.

Requirements for enhanced due diligence to confirm legitimacy of divestment or restructuring.

Risk indicators of sanctions evasion through rapid ownership structure changes.

NEW QUESTION # 102

What type of sanctions are imposed against indicated persons operating in targeted field(s) of a country's economy?

- **A. Sectoral sanctions**
- B. Individual sanctions
- C. Comprehensive sanctions
- D. Corporate sanctions

Answer: A

Explanation:

Sectoral sanctions target specific sectors of a foreign country's economy, such as defense, energy, mining, or financial services. These sanctions apply to persons or entities operating within those sectors and often restrict specific types of transactions (e.g., certain financing or technology transfers).

Comprehensive sanctions cover entire jurisdictions. Individual or corporate sanctions apply to specific persons or companies but are not sector-based.

Reference:

Definition of sectoral sanctions using economic sector targeting.

Distinction between sectoral and comprehensive sanctions.

NEW QUESTION # 103

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