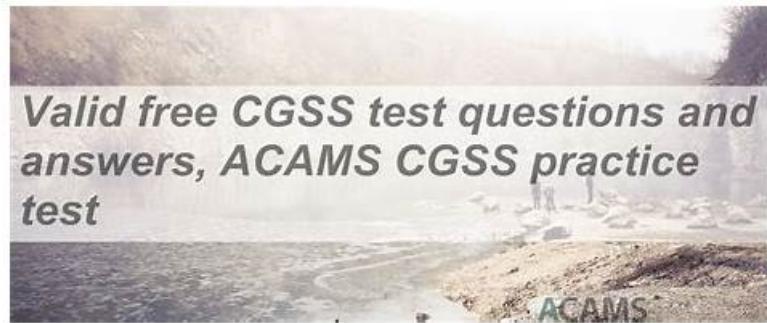


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ACAMS Certified Global Sanctions Specialist Sample Questions (Q89-Q94):

NEW QUESTION # 89

What caused the de-risking of banks for humanitarian sanctions?

- A. Civil not allowing imports to their country
- B. Insurance and safety
- C. UNs disapproval
- D. Hurdle during online payments
- E. United States disapproval

Answer: B,D

NEW QUESTION # 90

The EU-Iran Instrument in Support of Trade Exchange (INSTEX), which allowed EU purchases of Iranian oil after 2018, is an example of:

- A. a general license.
- B. a special purpose vehicle.
- C. a blocking statute.
- D. sanctions evasion.

Answer: B

Explanation:

INSTEX was established by EU member states as an operational mechanism designed to facilitate limited and compliant trade with Iran after the re-imposition of U.S. secondary sanctions in 2018. According to the Sanctions and Compliance Domains, INSTEX is categorized as a special purpose vehicle, created specifically to permit trade transactions without reliance on traditional cross-border payment routes exposed to U.S. sanctions risk.

Special purpose vehicles are defined within sanctions frameworks as structured entities created to conduct or support specific categories of trade or payments where direct financial transfers are restricted or exposed to sanctions risk. INSTEX was designed to match European exporters and importers with Iranian counterparts through a barter-style internal clearing arrangement, avoiding external USD payment flows.

It is not a general license, nor is it a blocking statute. It also does not constitute sanctions evasion because it was formally established, publicly announced, and structured within EU legal parameters. Its purpose was to ensure compliance while maintaining limited humanitarian and permitted trade channels.

Reference from Sanctions and Compliance Domains:

Definitions and characteristics of special purpose vehicles in sanctions environments.

Description of EU mechanisms facilitating compliant trade with sanctioned jurisdictions.

Distinction between SPVs, blocking statutes, and licensing frameworks.

Regulatory context regarding INSTEX as an EU-created structured trade mechanism.

NEW QUESTION # 91

Which of the following is called Organized unilateral sanctions?

- A. By a group of States through intragovernmental cooperation.
- B. **By a group of States through intergovernmental cooperation.**
- C. National organizations
- D. By Non-profit organizations for human rights.
- E. By a state through intragovernmental cooperation.

Answer: B**NEW QUESTION # 92**

According to the Office of Foreign Assets Control 2015 Guidelines, internal lists must be reviewed periodically and: (Select Two.)

- A. when changes are made to at least 25% of a customer's information.
- B. **when there is an update of enhanced restrictions imposed.**
- C. at least monthly if regulatory sanction programs are updated.
- D. at least daily if an update of the screening application is installed.
- E. **when changes are made to existing sanctions target listing information.**

Answer: B,E

Explanation:

OFAC's 2015 Guidelines indicate that internal sanctions lists must be updated:

* when changes occur to sanctions target listing information, and

* when enhanced restrictions or new requirements are imposed, including new Executive Orders, program changes, or sector restrictions.

OFAC does not mandate monthly reviews, daily reviews following system upgrades, or reviews based on percentage changes in customer data. Updates must correspond to regulatory changes, not arbitrary timelines.

Reference:

OFAC guidance on internal list maintenance and update triggers.

Requirements linked to regulatory modifications and sanctions program developments.

NEW QUESTION # 93

Which product categories are generally considered dual-use goods? (Select Two.)

- A. Precious metals and gems
- B. Luxury goods
- C. Electronics
- D. Aerospace and propulsion
- E. Food and agriculture

Answer: C,D

Explanation:

Dual-use goods are items that can serve both civilian and military or weapons-related applications. Typical dual-use categories include:

* Aerospace and propulsion technologies - used in civilian aircraft but also missile or defense applications.

* Electronics - circuits, sensors, microchips, hardware with potential military, surveillance, or weapons applications.

Luxury goods and food products are not dual-use categories. Precious metals may be highly regulated but are not dual-use under standard export-control classification.

Reference:

Dual-use technology categories under export controls (EU Dual-Use Regulation, Wassenaar Arrangement).

Examples of electronics and aerospace technologies as dual-use.

NEW QUESTION # 94

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