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## **ACAMS Certified Global Sanctions Specialist Sample Questions (Q28-Q33):**

### **NEW QUESTION # 28**

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

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

**Answer: C,D**

### **NEW QUESTION # 29**

Which action should an institution take after freezing funds for a customer who became an EU-sanctioned subject?

- A. Inform the applicable authorities about the freezing.
- B. Freeze accounts of the customer's family members that have accounts within the same financial institution.
- C. Notify the customer about the freezing.
- D. Transfer the funds to another financial institution where the customer has another account.

**Answer: A**

Explanation:

EU sanctions require financial institutions to immediately freeze the funds or economic resources of designated persons and promptly report the freeze to the competent national authority. Reporting is mandatory to ensure oversight and enforcement.

Banks must not transfer frozen funds, and they must not freeze accounts of family members unless those individuals are also designated or otherwise meet ownership/control criteria. Institutions also do not notify the customer directly, as doing so may undermine regulatory requirements.

Reference:

EU asset-freeze reporting obligations to competent authorities.

Prohibitions on transferring frozen assets or applying freezes to non-designated persons.

### **NEW QUESTION # 30**

A compliance officer at a US company discovers one of its European subsidiaries was altering the end-user's location information for certain dual-use goods ultimately being sent to Iran. Which should be the next step?

- A. Inform management that there would be no issue since the foreign affiliated subsidiary attested that sanctions due diligence was performed.
- B. Advise the subsidiary to conduct this activity through another non-US financial institution to avoid sanctions violations in the future.
- C. Cease shipments of goods from the US to sanctioned jurisdiction and implement a more robust sanctions compliance program.
- D. Identify the purchase of dual-use goods as permissible since it involved a non-US subsidiary and shipped to non-US person.

**Answer: C**

Explanation:

US sanctions and export-control laws apply to US companies and their owned or controlled foreign subsidiaries. Shipping dual-use items to Iran and falsifying end-user location information constitutes a serious sanctions violation and potential export-control breach.

Sanctions and Compliance Domains emphasize that upon discovery of such activity, the company must immediately cease the shipment of goods to sanctioned destinations and strengthen its sanctions compliance program. This must include enhanced oversight, stricter internal controls, and remediation of misconduct.

Reliance on subsidiary attestations or attempts to route transactions through non-US institutions does not eliminate US sanctions liability.

Reference:

US sanctions applicability to foreign subsidiaries of US companies.

Requirements for ceasing prohibited exports and implementing remediation.

Export-control restrictions on dual-use goods and falsification of end-use information.

### NEW QUESTION # 31

In terms of exemptions from comprehensive sanctions, there are classes of items that have been exempted by the Council. Which of the following are included in this?

- A. government
- B. educational need for the children
- C. needs of military forces
- D. materials and supplies essential for civilian need
- E. commodities and products for essential humanitarian need

**Answer: D,E**

### NEW QUESTION # 32

The screening process identifies that a wire payment is received from a shipping company registered in a high-risk jurisdiction, and the funds are temporarily held. An invoice forwarded via the intermediary bank indicates that the payment was made on behalf of an apparent shell company. Which action would be most appropriate from a sanctions risk standpoint?

- A. Proceed with the payment if the originator, shell company, and beneficiary are not present on a sanctions list.
- B. Report the payment to the appropriate governmental authority due to sanctions concerns.
- C. Freeze/block the payment.
- D. Request further information regarding the payment, shell company, and beneficiary before proceeding.

**Answer: D**

Explanation:

Sanctions and Compliance Domains specify that when a transaction presents multiple risk indicators-such as a high-risk jurisdiction, shell company involvement, and unclear payment purpose-the appropriate response is to seek additional information before releasing or rejecting funds.

Financial institutions are required to conduct deeper review when the transaction indicators suggest possible sanctions exposure, even if the names involved do not appear on sanctions lists. Obtaining supporting documentation helps determine whether the payment involves sanctioned parties, prohibited shipping routes, disguised ownership, or goods subject to restrictions.

Freezing/blocking is only appropriate when the institution has identified a match to a designated party or prohibited conduct.

Reporting to authorities must follow a confirmed sanctions nexus, not preliminary suspicion.

Reference from Sanctions and Compliance Domains:

Requirements to obtain underlying documents when shell companies or high-risk jurisdictions appear in a payment.

Investigation obligations prior to rejecting or blocking a payment.

Risk-based approach to suspicious or unclear maritime/shipping transactions.

### NEW QUESTION # 33

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