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ACAMS Certified Global Sanctions Specialist Sample Questions (Q11-Q16):

NEW QUESTION # 11

A sanctions analyst conducts a review of a bill of lading document. Which is considered a red flag?

- A. There is an unwillingness to offer information on the goods' expiration date.
- B. The product is compatible with the technical level of the country.
- C. **There is a reluctance to offer information on the end use of the item**
- D. The payment is received after the goods are shipped.

Answer: C

Explanation:

A key sanctions-evasion red flag in trade documents is reluctance or refusal to disclose end-use or end-user information. This may indicate diversion to a sanctioned jurisdiction, entity, or prohibited program (e.g., proliferation).

Expiration dates (D) are irrelevant to sanctions. Payment timing and product suitability (A, B) are normal commercial behaviors and not sanctions red flags.

Reference:

Trade-based sanctions-evasion indicators (concealed end-user/end-use).

Red flags involving incomplete or intentionally vague documentation.

NEW QUESTION # 12

According to OFSI, financial sanctions can be imposed with the following purposes, except:

- A. Protect the value of assets that have been misappropriated from a country until these assets can be repatriated
- B. Signal disapproval, stigmatizing and potentially isolating a regime or individual
- C. **Increase the value of assets that have been misappropriated from a country until these assets can be repatriated**
- D. Coerce a regime, or individuals within a regime, into changing their behavior
- E. Constrain a target by denying them access to key resources needed to continue their offending behavior

Answer: C

NEW QUESTION # 13

All of the following are functions of the HM Treasury (Office of Financial Sanctions Implementation) except?

- A. Negotiates all international sanctions
- B. **UK's competent authority for implementing financial sanctions**
- C. Can impose monetary penalties
- D. **Makes designations under UK domestic regimes**

Answer: B,C,D

NEW QUESTION # 14

What element should be included in an effective export compliance program to address sanctions risk?

- A. Collecting of vouchers
- B. **Conducting payment screening according to formalized procedures**
- C. Implementing letters of credit containing prohibited boycott terms or conditions
- D. Outsourcing to freight forwarders who have excellent expertise and guidance

Answer: B

Explanation:

An effective export compliance program must include formalized and documented screening procedures, including payment

screening, trade documentation screening, and counterparty checks. This ensures compliance with sanctions, export restrictions, and embargo requirements.

Freight forwarders may assist but do not replace internal compliance responsibilities. Boycott-related terms must be avoided, and collecting vouchers is not an export controls safeguard.

Reference:

Export controls compliance requirements for systematic sanctions screening.

Internal control expectations for export transactions.

NEW QUESTION # 15

Which action is an acceptable strategy for a financial institution's payment sanctions screening process?

- A. The institution uses internally managed whitelists and calibrates the threshold to reduce false positives.
- B. The institution uses software that does not account for alternative spellings of prohibited countries or parties.
- C. The institution excludes incoming SWIFT transfers from sanction screening, instead relying on the controls of the sending/respondent bank.
- D. The institution incorporates updates to sanction listings into its automated screening tool on a monthly basis.

Answer: A

Explanation:

Sanctions and Compliance Domains outline that institutions must maintain effective and reliable sanctions screening systems. This includes screening all incoming and outgoing payment messages, and institutions may not rely solely on correspondent banks for sanctions controls. Screening tools must also be capable of detecting alternative spellings, transliterations, and name variations of sanctioned parties.

Sanctions list updates must be incorporated immediately or as soon as practicable after publication. Monthly updates would be considered insufficient.

The use of controlled internal whitelists, combined with proper governance, periodic review, and controlled threshold calibration, is an accepted method used to reduce false positives while maintaining compliance integrity. Threshold adjustments must always follow documented validation, testing, and oversight procedures.

Reference from Sanctions and Compliance Domains:

Requirements for screening all payment messages, including incoming SWIFT transfers.

System expectations for matching name variations and alternative spellings.

Regulatory expectations for timely list updates.

Recognition of whitelist use and threshold calibration as acceptable screening optimization methods.

NEW QUESTION # 16

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