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**Exam** : **CAMS7-CN**

**Title** : Certified Anti-Money  
Laundering Specialist  
(CAMS7 the 7th edition)  
(CAMS7中文版)

**Vendor** : ACAMS

**Version** : DEMO

### QUESTION NO: 1

在對保險公司的保單持有人和客戶進行例行定期 KYC

更新時，更新後的商業登記文件強調，保單持有人的業務在去年已更改了五次地址，並且最終受益所有人 (UBO) 在兩週前發生了變化。

應立即採取什麼措施？

**A.**

調查地址變更和最終受益人變更，同時拒絕保單中的付款和提款指示，直到調查完成並商定後續步驟

**B.**

要求客戶經理與保單持有人安排一次會議，以更新他們的地址並以良好的客戶服務的名義提交新的 UBO 的詳細信息

**C.** 調查地址變更、UBO變更，同時凍結客戶的保單

**D.** 提交可疑交易報告，因為保險公司不知道企業的最終受益人 (UBO) 變更

**Answer: A**

Explanation:

The combination of frequent address changes and a recent change in the ultimate beneficial owner raises potential red flags that warrant immediate investigation. To mitigate risk, the insurance company should investigate these changes and temporarily decline any payment or withdrawal instructions until the review is complete and appropriate steps are agreed upon. This ensures both regulatory compliance and protection against potential misuse of the policy.

### QUESTION NO: 2

有三種類型的因素可用於驗證某人的所有權、知識和固有因素。

下列哪些因素屬於固有因素？

**A.** 挑戰-回應

**B.** 指紋

**C.** 安全性令牌

**D.** 密碼

**Answer: B**

Explanation:

Fingerprint is an inherent factor because it is a biometric trait - something the user is. Inherent factors rely on physical or behavioral characteristics such as fingerprints, facial recognition, or voice, which are unique to the individual.

### QUESTION NO: 3

下列哪些是證券業可能存在洗錢活動的常見跡象？

(選兩項。)

**A.** 使用證券帳戶，就像使用存款帳戶一樣

**B.** 配偶過世後，將證券存入現有經紀帳戶

**C.** 允許固定收益證券到期

**D.** 參與涉及代理人或第三方的交易

**Answer: AD**

Explanation:

Using brokerage accounts like deposit accounts (e.g., frequent cash deposits or withdrawals) and conducting transactions through nominees or third parties are common red flags in the securities industry. These behaviors can obscure the origin or ownership of funds and are often used to facilitate money laundering.

#### QUESTION NO: 4

下列哪些是與房地產公司相關的主要金融犯罪風險？（選擇四項。）

- A. 購買房產允許在單筆交易中轉移大量資金
- B. 犯罪網絡可以購買房地產作為供應處或種植、製造或分銷非法毒品的地點
- C. 市場可能會波動，買家可能無法獲得豐厚的投資回報
- D. 實際所有權資訊可能不透明，犯罪者可能會濫用空殼公司和信託等安排
- E. 房地產交易通常涉及金融機構和其他專業看門人
- F. 高價值的房產可能需要多種類型的融資，這可能會使確定資金來源變得更加困難

**Answer:** ABDE

Explanation:

Real estate companies face key financial crime risks due to the ability to move large sums in a single transaction, the use of property by criminal networks for illicit operations, the opacity of beneficial ownership structures, and the involvement of professional gatekeepers - such as lawyers and financial institutions - who may unknowingly facilitate money laundering.

#### QUESTION NO: 5

哪種付款方式的金融犯罪風險最高？

- A. 一張因錯誤而退回抵押貸款超額付款的支票
- B. 向混合器平台支付的款項
- C. 高利息儲蓄帳戶的定期付款
- D. 分攤晚餐帳單後支付給朋友的帳單

**Answer:** B

#### QUESTION NO: 6

一家大型國際銀行正在對其風險管理框架進行全面審查，以確保其有效應對各種金融犯罪風險，包括反洗錢、反恐怖主義融資、制裁、欺詐、反賄賂和腐敗（ABC）以及逃稅。

銀行合規團隊負責評估目前的風險評估流程，發現潛在差距，並提出改進建議，以更好地降低這些風險。在審查過程中，團隊需要考慮不同類型的風險評估，以及如何將評估結果整合到整體風險管理策略中。

合規團隊應優先採用哪種方法來增強銀行識別、評估和減輕已識別風險的能力？

- A. 使用靜態風險評估模型，該模型在重大監管更新之前保持不變，以確保評估過程的一致性
- B. 將風險評估流程委託給各個業務部門獨立進行，並允許針對每個部門的具體活動進行專門的評估
- C. 進行定期的企業範圍風險評估，包括識別固有風險、評估現有控制措施的有效性以及確定剩餘風險
- D. 主要關注反洗錢風險評估，因為這些通常是監管機構最嚴格審查的，而只有在發現問題時才會

### 處理其他金融犯罪風險

**Answer:** C

Explanation:

Conducting a periodic enterprise-wide risk assessment (EWRA) is the most effective approach to identifying, assessing, and mitigating financial crime risks. It ensures all inherent risks across areas like AML, CFT, sanctions, fraud, ABC, and tax evasion are evaluated, existing controls are assessed, and residual risks are identified. This comprehensive view enables a cohesive and proactive risk management strategy aligned with regulatory expectations.

### QUESTION NO: 7

信託和公司服務提供者 (TCSP) 提供的哪些服務會帶來最大的金融犯罪風險？ ( 選擇三項。 )

- A. 提供明確的程序以確保遵守當地稅務法規
- B. 利用信託掩蓋受益所有人的身份
- C. 推廣使用複雜的公司結構
- D. 為所有註冊其服務的客戶維護準確且最新的受益所有權詳細信息
- E. 設立空殼公司持有金融資產

**Answer:** BCE

Explanation:

Trust and Company Service Providers (TCSPs) pose the greatest financial crime risks when they use trusts to obscure beneficial ownership, promote complex corporate structures that make tracing ownership difficult, and establish shell companies that can be used to hold and move illicit funds. These activities can facilitate money laundering, tax evasion, and other financial crimes by concealing the true origin and control of assets.

### QUESTION NO: 8

風險偏好聲明的目的是：

- A. 明確定義金融機構願意承擔的金融犯罪風險敞口水準。
- B. 幫助投資人了解金融機構願意承擔的風險。
- C. 幫助客戶了解哪些金融機構可能願意為其提供銀行業務。
- D. 從金融機構剔除高風險業務類型。

**Answer:** A

Explanation:

A risk appetite statement clearly defines the level and type of financial crime risk a financial institution is willing to accept in pursuit of its objectives. It guides decision-making and ensures consistency in risk-taking across the organization.

### QUESTION NO: 9

不尋常的電匯交易包括： ( 選擇兩個。 )

- A. 同一客戶在不同銀行的帳戶之間進行不同貨幣的電匯。
- B. 第三方電匯入賬，然後以客戶名義購買房地產。
- C. 一筆電匯，隨後將貸款支付給作為客戶業務夥伴的第三方。
- D. 根據 KYC 檔案向與客戶相關的交易對手發送多筆電匯。

**Answer:** AB

Explanation:

Unusual wire transfer transactions may include transfers in different currencies between accounts at different banks for the same client, which can be used to obscure fund flows, and incoming third-party transfers followed by real estate purchases, which may indicate layering and integration stages of money laundering. These patterns deviate from typical financial behavior and warrant closer scrutiny.

**QUESTION NO: 10**

永久 KYC 包括：（選兩個。）

- A. 觸發器可辨識靜態資料變化和基於客戶端行為的即時資料。
- B. 以一年、三年和五年為週期定期更新。
- C. 能夠根據客戶資料而不是僅根據時間表來更好地確定優先順序。
- D. 將客戶劃分為不同風險類別。

**Answer:** AC

Explanation:

Perpetual KYC (pKYC) involves real-time monitoring of data triggers, such as static changes or behavioral anomalies, and prioritization based on client-specific data rather than fixed refresh schedules. This dynamic approach enhances risk management by responding more quickly to changes in client risk profiles.

**QUESTION NO: 11**

雖然遊戲平台通常用於娛樂目的，但它們也可能被用於恐怖主義融資，透過玩家可以進行的遊戲：

- A. 使用虛擬遊戲貨幣購買遊戲內物品。
- B. 與其他玩家交換遊戲內物品。
- C. 與其他玩家交易可兌換法定貨幣的遊戲內物品
- D. 透過執行遊戲內活動來取得遊戲內材料。

**Answer:** C

Explanation:

Terrorist financing can be facilitated on gaming platforms particularly through the trading of in-game items for fiat currency. This mechanism allows for the movement of value outside the formal financial system, potentially evading detection and reporting requirements.

"One of the key ML/TF risks in online gaming is the ability to convert virtual assets or in-game items into real-world (fiat) currency, thereby providing a channel for laundering money or funding terrorist activities."

**QUESTION NO: 12**

採取基於風險的方法對於金融機構了解其面臨的洗錢和恐怖主義融資風險至關重要。制定洗錢和恐怖主義融資風險評估是關鍵的起點。

常用的風險因素包括。（選擇三項。）

- A. 產品風險。
- B. 信用風險。
- C. 地理風險。
- D. 客戶風險。

**E. 流動性風險。**

**Answer:** ACD

Explanation:

The CAMS 6th Edition clearly identifies a risk-based approach as the cornerstone of effective AML/CFT programs. Risk assessments should consider various risk factors that directly influence exposure to ML/TF.

Product risk (A): Certain products or services may present higher ML/TF risks, such as private banking, correspondent banking, or cash-intensive products."Products and services offered, and their inherent risk levels, must be assessed as part of the risk-based approach."

Geographic risk (C): Jurisdictions where the customer operates or where transactions are conducted may present higher or lower risks due to factors such as weak AML regulations or high corruption."Geographic risk considers where a customer is located and/or where transactions occur, referencing countries with increased risk, such as those identified by the FATF."

Customer risk (D): The type of customer, such as PEPs, non-residents, or companies with complex structures, may present higher ML/TF risks."Customer risk assessment is based on the customer's profile, activity, and ownership structure, and is a critical component in risk-based monitoring."

**QUESTION NO: 13**

一個富人正在利用複雜的公司結構來促進非法砍伐，然後非法開採該土地上的資源。正在發生哪一類上游犯罪？

- A. 基於貿易的洗錢
- B. 腐敗
- C. 非法資源貿易
- D. 環境犯罪

**Answer:** D

Explanation:

The CAMS 6th Edition specifically lists environmental crime as a predicate offense for money laundering. Environmental crimes include activities such as illegal logging, illegal mining, and illegal trade in wildlife.

"Environmental crime, including illegal logging and mining, is recognized as a predicate offense to money laundering. Such crimes often involve complex corporate structures to hide the illicit origin of the proceeds."

**QUESTION NO: 14**

使用基於風險的方法分配合規資源的主要優點是什麼？

- A. 它降低了合規計畫的總體成本。
- B. 它消除了對低風險客戶進行定期審計的需要。
- C. 確保專注於高風險領域，同時維持營運效率。
- D. 它標準化了所有地區的合規流程。

**Answer:** C

Explanation:

The CAMS 6th Edition highlights that a risk-based approach enables organizations to efficiently allocate compliance resources, focusing efforts on areas presenting the highest

risk, thereby ensuring both regulatory compliance and operational effectiveness.  
"A risk-based approach allows firms to concentrate resources and controls where the risk of ML/TF is highest, while applying simplified measures to lower-risk areas. This enhances both effectiveness and efficiency."

**QUESTION NO: 15**

聯合國安全理事會在實施制裁方面的主要作用是，它有權：

- A. 實施制裁以維護或恢復國際和平與安全。
- B. 對缺乏反洗錢/反恐怖主義融資控制的國家實施制裁。
- C. 研究分析制裁的影響，以提高制裁制度的有效性。
- D. 對經濟目標實施制裁，以維持或恢復一國的金融穩定。

**Answer: A**

Explanation:

The United Nations Security Council (UNSC) is the only body with the legal authority under international law to impose binding sanctions on countries, entities, or individuals.

"The Security Council's primary function in imposing sanctions is to maintain or restore international peace and security. These sanctions are legally binding on all UN member states."

**QUESTION NO: 16**

根據金融行動特別工作小組 (FATF) 的《基於風險的人壽保險業指南》，下列哪些是與第三方參與人壽保險產品相關的洗錢危險信號？（選兩項。）

- A. 客戶聘請律師就保單的簽發進行諮詢。
- B. 客戶將保單轉移到與原保單簽發機構無關聯的另一家保險公司。
- C. 定期從與保單持有人沒有明顯關係的第三方收到付款。
- D. 客戶指定一個看似無關的第三方為受益人。

**Answer: CD**

Explanation:

FATF and CAMS 6th Edition highlight certain third-party activities as red flags for money laundering in the life insurance sector:

Payments are regularly received from third parties that have no apparent relationship with the policy holder (C): "Red flags include payments made by third parties, especially where there is no apparent connection between the third party and the policy holder." A customer names an apparently unrelated third party as a beneficiary (D): "Another warning sign is when beneficiaries have no apparent relation to the policyholder."

**QUESTION NO: 17**

銀行公司銀行部門的客戶經理需要接受針對該部門最可能遇到的風險的專門反洗錢培訓。哪些類型的內容最適合本次培訓？（選兩個。）

- A. 適用於貨幣工具報告的洗錢類型
- B. 適用的反洗錢法規
- C. 監管考試最佳實踐
- D. 適用於公司貸款的洗錢類型

**Answer:** BD

Explanation:

Specialized AML training must be relevant to the specific risks the corporate banking team faces, including legal/regulatory expectations and the ML/TF typologies applicable to their products and customer base.

Applicable AML laws and regulations (B): "Staff must be aware of the applicable AML/CFT laws and regulatory requirements relevant to their business area." Money laundering typologies applicable to corporate loans (D): "Training should include typologies and red flags that are most relevant to the risks present in the specific business line, such as corporate lending."

### QUESTION NO: 18

關於外國資產管制辦公室 (OFAC) 制裁，下列哪一項敘述是正確的？

( 選兩個。 )

A. 制裁只能針對 OFAC 指定的外國特定個人

B. 凍結的資金必須存入金融機構帳簿上的有利息的帳戶

C.

制裁可以是全面的，也可以是選擇性的，透過凍結資產和限制貿易來實現外交政策和國家安全目標

D. 除非國會續簽，否則 OFAC 制裁將在五年後自動失效

**Answer:** BC

Explanation:

OFAC sanctions are a key element of the U.S. AML/CFT framework. According to the CAMS 6th Edition and OFAC regulations:

Blocked funds must be placed into an interest-bearing account on a financial institution's books (B): "Blocked property must be held in a separate interest-bearing account on the books of the U.S. financial institution." Sanctions can be either comprehensive or selective using the blocking of assets and trade restrictions (C): "OFAC administers both comprehensive and targeted (selective) sanctions programs to fulfill U.S. foreign policy and national security goals."

### QUESTION NO: 19

與房地產交易相關的風險包括 ( 選擇兩個。 )

A. 跨境購買。

B. 以自然人之名購買。

C. 支付房產的真實市場價格。

D. 非融資購買。

**Answer:** AD

Explanation:

Real estate transactions are vulnerable to ML/TF risks, particularly when there is limited transparency or unusual payment methods:

Cross-border purchases (A): "Purchases by foreign buyers, especially from high-risk jurisdictions, are a red flag for money laundering in the real estate sector." Non-financed purchases (D): "Non-financed (all-cash) purchases can indicate the introduction of illicit funds"

into the financial system, bypassing the controls of mortgage lenders."

**QUESTION NO: 20**

參考資料篩選包括哪些類型資料集的篩選？（選兩個。）

- A. 付款訊息的類型
- B. 客戶
- C. 第三方服務供應商
- D. 顧客配偶

**Answer:** BC

Explanation:

Reference data screening is a core element of AML/CFT programs and typically covers: Customers (B):"All customers must be screened against sanctions, PEP, and adverse media lists as part of onboarding and ongoing due diligence." Third-party service providers (C):"Screening should extend to relevant third parties, such as agents and service providers, to prevent indirect exposure to sanctioned entities."

**QUESTION NO: 21**

一家公司對犯罪組織的吸引力程度受（選擇兩項）影響。

- A. 與該司法管轄區相關的年度費用金額。
- B. 允許發行不記名股票。
- C. 管轄區內實際所有權揭露的規則。
- D. 前往管轄區的便利程度。

**Answer:** BC

Explanation:

The susceptibility of a company or jurisdiction to ML/TF abuse is significantly increased by: Permissibility of bearer shares (B):"Bearer shares make it easy to hide ownership and control, presenting a major risk for misuse by criminals." Rules governing the disclosure of beneficial ownership by the jurisdiction (C):"Weak requirements or loopholes in beneficial ownership disclosure are frequently exploited to conceal criminal involvement in corporate structures."

**QUESTION NO: 22**

房地產行業固有的哪些風險具有最高的反洗錢/反恐怖主義融資風險？（選兩個。）

- A. 使用現金購買房產
- B. 無牌房地產經紀人充當幌子公司
- C. 使用註冊信託購買財產
- D. 使用公司購買房產
- E. 操作屬性的值

**Answer:** AD

Explanation:

Real estate ML/TF risk is highest where transparency is low or the origin of funds is obscured:

Use of cash to purchase property (A):"All-cash transactions in real estate present a high ML risk, as they bypass traditional financial scrutiny and facilitate the placement of illicit funds."

Use of a company for the purchase of property (D): "Purchasing property through companies, especially shell companies, can conceal the beneficial owner and the true source of funds."

**QUESTION NO: 23**

下列哪一項是人壽保險公司相關的洗錢危險訊號？（選兩項。）

- A. 提前幾年支付保費並提前終止以獲得退款
- B. 擁有多份保單的自然人
- C. 提供高額賠償的高保費人壽保險
- D. 定期切換政策並接受處罰
- E. 向老年人支付的受益人款項

**Answer:** AD

Explanation:

Paying premium several years in advance and terminating early for a refund (A): "A typical red flag is when a policyholder pays large premiums up front and then seeks early termination to receive a refund. This can be used to launder illicit funds by integrating them into the financial system and then retrieving 'clean' money." Regularly switching policies and accepting penalties (D): "Frequent changes in insurance policies or products, even at a financial loss, are considered suspicious. This may indicate an attempt to obscure the money trail or integrate illicit proceeds."

**QUESTION NO: 24**

電子商務平台固有哪些金融犯罪風險？（選擇四項。）

- A. 電子商務平台被利用來轉移犯罪利益
- B. 使用被盜銀行卡進行網路購物
- C. 電子商務平台易受詐欺行為影響
- D. 電子商務平台被用作非法交易的幌子
- E. 電子商務平台鼓勵不受監管的點對點借貸
- F. 用外幣掩蓋犯罪所得

**Answer:** ABCD

Explanation:

A, B, C, D are all identified by CAMS 6th Edition and FATF as primary financial crime risks for e-commerce platforms:

A: Platforms can be exploited to launder money by processing the movement of criminal proceeds under the guise of legitimate sales.

B: Use of stolen credit/debit cards for online purchases is a common fraud and ML technique.

C: Fraud schemes (such as chargebacks or fake listings) are widespread on e-commerce platforms.

D: E-commerce platforms can serve as fronts for illicit goods or services, masking the true nature of transactions.

**QUESTION NO: 25**

濫用信託和資產管理服務會帶來哪些洗錢風險？（選三項）

- A. 隱瞞資金來源
- B. 允許第三人保管資金

- C. 為交易增加一層匿名性
- D. 隱瞞真正的合法及實際受益所有人
- E. 為房地產交易建立託管帳戶

**Answer:** ACD

Explanation:

"Trust and asset management services can facilitate the concealment of the source of funds (A), provide a layer of anonymity to transactions (C), and obscure the true legal and beneficial owners (D). These are well-established ML/TF risks in the private wealth sector."

#### QUESTION NO: 26

一位居住在 A 國 ( 歐盟高風險第三國司法管轄區名單上 ) 的富人的代理人，聯繫了歐盟 B 國的一位公證人。代理人希望透過離岸公司完成對富人最近在拍賣會上獲得的資產的處置。代理人亦持有由 C

國 ( 也是歐盟國家 ) 一家知名律師事務所所開立的代表離岸公司行事的授權書。代理人要求公證人盡快進行處置，而無需特別關注此交易的相關費用或稅金。公證人注意到預期的轉讓價格明顯低於拍賣會上記錄的價格，但代理人不願討論此事，並聲稱這不在授權書的範圍內。

公證員應考慮哪些危險訊號？ ( 選兩個 )

- A. 代理商要求以低於最近收購的價格處置資產。
- B. 透過拍賣獲得的資產被放在一家離岸公司的名下
- C. 代理人代表居住在歐盟高風險管轄區名單上的國家/地區的個人行事
- D. 該授權書是由交易發生地點以外的歐盟國家的律師事務所簽發的。

**Answer:** AC

Explanation:

A: Selling assets at a significant loss, especially shortly after purchase, is a classic red flag for asset laundering and value manipulation, which can be used to disguise the true nature of proceeds.

C: Transactions involving individuals from high-risk jurisdictions, as identified by the EU and FATF, warrant heightened scrutiny due to increased ML/TF risk.

#### QUESTION NO: 27

一家銀行加入了公私合作夥伴關係

(PPP)，與執法部門和監管機構合作打擊金融犯罪。然而，該銀行的資料保護官擔心敏感客戶資料的洩露，而合規官則擔心從政府獲取有用資訊可能會出現延誤。

下列何者最能描述 PPP 在打擊金融犯罪的優勢？

- A. PPP 透過在銀行和執法部門之間共享情報來改善金融犯罪的偵查和預防。
- B. PPP 透過自動化資訊共享幫助銀行降低合規成本。
- C. PPP 允許銀行管理自己的可疑活動報告 (SAR) 歸檔流程，而無需金融情報部門 (FIU) 的參與。
- D. PPP 透過提供來自執法部門的即時情報，最大限度地提高銀行合規計畫的效率。

**Answer:** D

#### QUESTION NO: 28

下列哪一種情況會導致政治公眾人物 (PEP) 比典型的高風險銀行客戶帶來更大的風險？ ( 選兩個。 )

- A. 政治敏感人物的家庭成員和親密夥伴可能參與非法活動。
- B. 根據國際銀行法規，政治公眾人物享有無限信貸和金融豁免權。
- C. 政治人物可能會利用大使館活動來掩蓋賄賂和腐敗交易。
- D. 政治公眾人物可能擁有不合法的資金來源，但受到法律保護，不會因超出銀行風險承受能力的活動而被關閉帳戶。

**Answer:** AC

Explanation:

PEPs are recognized by CAMS 6th Edition and FATF as posing elevated risk due to:  
A). The family members and close associates of PEPs may be involved in illicit activities:"The risks extend beyond the PEP to family members and close associates, who may be used to conceal the movement of illicit funds." C). PEPs may exploit embassy activities to conceal bribery and corruption transactions:"PEPs may use their position or diplomatic privileges, such as embassy operations, to disguise or facilitate the movement of illicit funds."

#### QUESTION NO: 29

在一家大型美國銀行中，由一個人領導團隊，負責監督銀行交易監控方法的治理和有效性。團隊應該實施哪些策略？（選兩個。）

- A. 與法律團隊定期和臨時合作，以適當調查和監控傳票或政府調查對象的交易
- B. 定期檢視客戶資料，確保高風險客戶檔案中的資訊符合銀行內部政策和程序的最新水平
- C. 定期審查向 FinCEN 提交的可疑活動報告 (SAR)，以確定是否應撤回任何報告
- D. 定期檢視交易監控場景及其生產力，以確保反映適當的反洗錢類型

**Answer:** BD

Explanation:

Effective oversight of transaction monitoring includes:  
Periodic review of client profiles to ensure up-to-date information for high-risk clients (B):"Reviewing and updating customer profiles is essential to ensure that monitoring scenarios are based on current risk data." Periodic review of transaction monitoring scenarios and productivity to ensure appropriate AML typologies are reflected (D):"Firms should periodically review the parameters and output of transaction monitoring systems to ensure they continue to identify relevant ML/TF risks and typologies."

#### QUESTION NO: 30

下列哪一項是全球組織在管理跨多個司法管轄區的 AFC 和製裁合規性時需要考慮的關鍵因素？

- A. 僅依賴聯合國等國際機構來確保遵守制裁，因為不需要遵守當地法律
- B. 確保集團政策和程序優先遵守美國法規，因為它們是全球最具影響力的
- C. 應用全球 AFC 和製裁政策以確保一致性，而無需適應當地法規
- D. 確保集團政策符合每個國家特定的反洗錢和製裁法規

**Answer:** D

Explanation:

Global organizations must ensure their policies and procedures comply with local laws and regulations in each country where they operate, even when maintaining group-wide consistency.

Relying solely on international or U.S. standards does not ensure compliance with all local requirements, which may be more stringent or specific.

"A global group-wide program should ensure adherence to local AML and sanctions laws and regulations in every jurisdiction in which it operates. Local adaptation of policies is essential to address jurisdiction-specific risks and legal requirements."

**QUESTION NO: 31**

根據巴塞爾銀行監理委員會發布的有關銀行公司治理原則的指引，董事會在處理機構反洗錢監督和治理方面發揮什麼作用？

**A.**

董事會應負責監督銀行合規風險管理，但不參與制定合規政策，並解釋在整個組織中識別和管理合規風險的流程。

**B.** 董事會應建立合規職能部門並批准銀行識別、評估、監控、報告和建議合規風險的政策。

**C.**

合規職能部門必須擁有足夠的權力、地位、獨立性和資源才能獨立發揮作用，且不應進入董事會。

**D.**

合規職能部門應直接向執行長報告銀行遵守適用法律、規則和標準的情況，並且僅在需要時向董事會通報銀行在管理合規風險方面所做的努力。

**Answer: B**

Explanation:

The Basel Committee on Banking Supervision (BCBS) requires that the board of directors establish and oversee the compliance function and approve the bank's AML/CTF compliance policies and procedures, including processes for identifying, assessing, monitoring, and reporting compliance risks.

"The board of directors should establish a compliance function and approve compliance policies and processes for identifying, assessing, monitoring, and reporting compliance risks throughout the organization."

**QUESTION NO: 32**

評估金融領域產品相關的洗錢風險包括評估：

( 選兩個。 )

**A.** 治理安排

**B.** 產品的複雜性

**C.** 上次審計的結果

**D.** 企業財務狀況

**Answer: AB**

Explanation:

Governance arrangements (A): "Sound governance and risk management arrangements are fundamental to assessing and managing ML/TF risk in products and services." Complexity of the products (B): "Complexity increases risk--products that are highly complex, opaque, or allow for multiple layers or jurisdictions are more vulnerable to misuse for ML/TF."

**QUESTION NO: 33**

在金融行動特別工作組 (FATF)

為評估各司法管轄區反洗錢控制品質而進行的相互評估和後續跟進過程中，FATF 採取了以下措施：

- A. 對反洗錢控制鬆懈的司法管轄區實施經濟制裁，迫使其加強控制。
- B. 對反洗錢控制鬆懈的司法管轄區的金融機構進行現場檢查，以發現缺陷並提出改進建議。
- C. 發布年度報告，根據所有成員轄區對反洗錢控制的自我評估對其進行排名。
- D. 進行同儕審查流程，成員國據此評估其他司法管轄區的反洗錢控制措施並提出改進建議。

**Answer:** D

Explanation:

The FATF conducts mutual evaluations--a peer review process--whereby member countries assess each other's AML/CFT systems. This includes on-site visits and reviews by international experts, with public reports containing recommendations for improvement. The process is not punitive and does not impose sanctions.

"FATF mutual evaluations are peer reviews in which experts from member countries assess another member's AML/CFT system and provide recommendations."

#### QUESTION NO: 34

下列哪些是基於風險的方法的一部分？（選擇三項。）

- A. 根據客戶的活動和關係來決定客戶的詳細風險狀況
- B. 主要關注先前標記的客戶，同時對其他客戶使用標準控制
- C. 選擇並應用與已確定的風險等級相符的有效控制措施
- D. 進行全面的風險評估以識別客戶、交易和地理風險
- E. 在所有客戶群之間平等分配資源，以確保公平

**Answer:** ACD

Explanation:

A risk-based approach is central to AML/CFT programs and includes:

A: Creating detailed risk profiles for customers based on their behaviors and connections.

C: Applying controls that are tailored to the actual risk (not a one-size-fits-all approach).

D: Performing a thorough risk assessment, considering customer, transaction, and geographic factors.

"A risk-based approach involves risk profiling, tailored controls, and comprehensive risk assessment across key risk factors."

#### QUESTION NO: 35

哪些活動屬於負面媒體篩選負面新聞和聲譽風險的一部分？（選擇三項。）

- A. 透過回饋和調查分析客戶情緒
- B. 辨識與犯罪活動或製裁有關的個人或實體
- C. 定期監控相關實體的監管更新和執法行動
- D. 掃描公開的新聞文章和監管警報
- E. 監控個人或實體信用評分的變化

**Answer:** BCD

Explanation:

Adverse media screening seeks to identify reputational or financial crime risk by:

B: Identifying links to criminal activity or sanctions.

C: Monitoring regulatory actions and updates for risk associations.

D: Regularly scanning news and public records for negative information.

"Adverse media screening involves collecting and reviewing publicly available information, news, and regulatory actions to detect links to criminal activity or reputational risks."