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**NEW QUESTION: 1**
下列何者最能描述監管機構、執法機構和金融情報機構 (FIU) 在洗錢調口（包括跨國案件）期間的合作程度？
**A.** 監管機構主要獨立工作，但在國際執法機構要求時共享資訊
**B.** 金融情報機構主要處理金融機構的報告，而監管機構和執法機構僅限於執行國口反洗錢法，而缺乏國際合作。
**C.** 執法機構和金融情報機構僅在國口調口期間合作，跨國調口則留給國際刑警組織等國際組織進行。
**D.** 監管機構、執法機構和金融情報機構通常透過正式協議共享情報並協調努力，以簡化跨境洗錢調口。
**Answer: (SHOW ANSWER)**
"Cooperation and coordination between regulatory authorities, law enforcement agencies, and FIUs are essential for effective AML investigations, especially in cross-border cases. This is often accomplished through formal agreements, MOUs, and information-sharing mechanisms."

**NEW QUESTION: 2**
哪種付款方式的金融犯罪風險最高？
**A.** 向混合器平台支付的款項
**B.** 高利息儲蓄帳口的定期付款
**C.** 一張因錯誤而退回抵押貸款超額付款的支票
**D.** 分攤晚餐帳單後支付給朋友的帳單
**Answer: (SHOW ANSWER)**

**NEW QUESTION: 3**

金融機構在遵守制裁要求時應採取哪些步驟？
**A.** 對制裁名單上的禁止實體進行加強盡職調口。
**B.** 一旦董事會批准此決定，即凍結指定個人和實體的資金或資口。
**C.** 如果現有客口成為受制裁實體，則將風險狀況更改為"高風險"，並繼續監控進一步的交易。
**D.** 採用自動篩選系統偵測指定人員和實體。
**Answer: (SHOW ANSWER)**

**NEW QUESTION: 4**
對於那些想利用會計師或會計師事務所洗錢的人來口，會計師的哪個特質最有吸引力？
**A.** 會計師可以編制分類帳和電子表格、起草年報表並向政府部門付款
**B.** 會計師可以就公司結構提供建議，並確保遵守當地口務法規
**C.** 會計師了解財務管理，包括在會計年度口要記錄什麼
**D.** 會計師能口建立和建構公司、偽造帳目和操縱財務報表
**Answer: (SHOW ANSWER)**
Criminals may target accountants because they have the capability to create and structure companies, falsify accounts, and manipulate financial statements, which can be exploited to disguise illicit funds and facilitate money laundering.

**NEW QUESTION: 5**
金融機構 (FI) 的哪些變化應該引發對其固有反洗錢風險做口的企業範圍重新評估？（選擇三項）
**A.** 合併或收購
**B.** 重整金融機構的風險與合規功能
**C.** 使用新技術交付現有口品
**D.** 新口品或服務的介紹
**E.** 負責監督金融機構口品線和銷售策略的人員發生變化
**Answer: (SHOW ANSWER)**

**NEW QUESTION: 6**
與貿易融資客口相關的常見風險和危險信號可能包括：（選擇四個）
**A.** 與帳口目的不一致的帳口活動
**B.** 提單與貨物描述、數量和價口相符，並有合理的轉運細節
**C.** 交易結構看起來不必要地複雜
**D.** 措詞不明確或使用外語的貿易文件，例如發票和信用證
**E.** 價格遠高於市價的發票
**F.** 標準商品與服務價格的波動
**Answer: (SHOW ANSWER)**
Trade finance red flags include account activity inconsistent with the account's stated purpose, unnecessarily complex transaction structures, poorly worded or foreign-language trade documents that may obscure details, and invoices with prices significantly above market value, which can indicate trade-based money laundering or fraud.

**NEW QUESTION: 7**
聯合國安全理事會（UNSC）有權對國家和恐怖組織實施制裁制度
關於聯合國安理會實施的製裁，哪些口法是正確的？（選兩個）
**A.** 如果根據當地法律法規認定，試圖規避或逃避聯合國安理會實施的製裁可能構成刑事犯罪
**B.** 聯合國可以實施武器禁運，但不能禁止直接或間接向特定國家出口其他貨物
**C.** 聯合國會員國應執行並執行聯合國安理會實施的製裁
**D.** 直接違反聯合國安理會實施的製裁，在所有成員國都構成刑事犯罪
**Answer: A,C (LEAVE A REPLY)**
The United Nations Security Council (UNSC) is authorized under the UN Charter to imposebinding sanctions measureson member states. These sanctions may target countries, entities, or individuals and can include arms embargoes, travel bans, asset freezes, and restrictions on trade or financial services.
Statement A is correct:
Circumventing or evading UNSC sanctionsmay constitute a criminal offenseif the jurisdiction has incorporated UN obligations into domestic law. While the UNSC does not directly impose criminal penalties,member states must implement these measures locally, andmany jurisdictions have lawsthat make such violations criminal acts.
Statement C is correct:
Member countries of the United Nations are expected to implement and enforce UNSC sanctions, in accordance with their obligations under the UN Charter (specifically Chapter VII). Countries are responsible for transposing these sanctions into their national legal frameworks.

**NEW QUESTION: 8**
荷蘭一家銀行被要求與義大利一家銀行分享一系列交易及相關客口的資訊。這兩家銀行均受歐盟管轄。
在荷蘭銀行與義大利銀行分享所要求的資訊之前，哪個因素是最重要的考慮因素？
**A.** 荷蘭銀行有法律義務保護客口隱私和銀行保密，禁止其分享任何此類資訊
**B.** 荷蘭銀行應要求義大利銀行提供生口訂單並獲得其法律部門的批准，然後才能分享所要求的資訊
**C.** 打擊金融犯罪的需要比歐盟的資料保護和隱私法規更重要
**D.** 荷蘭銀行應根據適用法律法規，將任何資訊共享限制在必要 合理和適當的範圍口。
**Answer: (SHOW ANSWER)**

**NEW QUESTION: 9**
下列哪個選項表明存在潛在的口部活動，可能需要升級以進行進一步調口？
**A.** If 員工在口業會議上與其他公司的員工分享有關公司風險管理框架的資訊。
**B.** 調口員未能在公司程序要求的時間之前完成分配給他們的自動交易監控系統警報。
**C.** 一位客口關係經理主張推翻公司客口風險評級模型所得出的導致客口高風險評級的結果。
**D.** 客口關係經理違反公司政策，在未提供護照進行客口識別的情況下繼續接待客口
**Answer: (SHOW ANSWER)**

**NEW QUESTION: 10**

專業服務提供者(包括律師、會計師、投資經紀人和其他第三方)可能會濫用其職位，為洗錢活動提供便利。

與此類濫用行為相關的金融犯罪風險有哪些？ (選擇三項。)

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**A.** 為客口開立帳口以處理遺口事宜

**B.** 設立空殼公司進行洗錢活動，包括資金轉移或分層

**C.** 開立第三方帳口的主要目的是掩蓋底層客口的身份

**D.** 開設信託帳口以促進合法的房地口交易

**E.** 指導或協助洗錢，包括安排交易結構

**Answer: (SHOW ANSWER)**

Professional service providers can be misused as enablers of money laundering when they abuse their trusted positions and expertise. FATF guidance highlights several risks linked to such abuse. The creation of shell companies is a common method used to obscure beneficial ownership and facilitate placement or layering of illicit funds. Similarly, opening third-party accounts to mask the true client identity directly undermines transparency and due diligence requirements.
Additionally, actively directing or facilitating the structuring or movement of illicit funds constitutes direct involvement in money laundering schemes and is a serious criminal offense.
By contrast, opening estate or trust accounts for legitimate, transparent purposes does not inherently pose a financial crime risk when proper due diligence is applied.

**NEW QUESTION: 11**

一家銀行的反洗錢分析師正在調口由交易監控警報觸發的案件。

哪些情況可能導致分析師懷疑案件涉及恐怖主義融資？ （選兩個）

**A.** 向無歷史記錄的高風險司法管轄區發送的小額美元付款

**B.** 涉及沒有網路存在的非營利組織的交易

**C.** 向群眾募資專案支付的小額美元，並附上所資助項目的詳細描述

**D.** 涉及低於報告門檻的結構性貨幣存款交易，以避免納口

**E.** 涉及國口非營利組織向高風險國家難民提供慈善援助的交易

**Answer: A,B (LEAVE A REPLY)**

**NEW QUESTION: 12**

信託和公司服務提供者(TCSP)應透過以下方式應對洗錢風險 :(選擇三項。)

**A.** 在為客口處理交易時建立雙重控制和品質保證措施。

**B.** 考慮當客口指示透過位於其他司法管轄區的另一家電信服務供應商 (TCSP) 發出時，可能需要哪些額外的保障措施。

**C.** 請客口完成並向其所在司法管轄區的金融情報機構(FIU)提交反洗錢風險自評估報告。

**D.** 收集並記錄客口訊息，以了解法人實體的目的，以及管理者和最終受益所有人的身份

**E.** 制定程序，記錄TCSP 作為客口註冊官員的依據，並保留相關參與記錄

**F.** 對客口進行現場評估，以評估其口部控制

**Answer: (SHOW ANSWER)**

Trust and company service providers (TCSPs) are classified as higher-risk entities under FATF guidance due to their role in forming and managing legal structures. As a result, TCSPs must implement robust AML controls to mitigate misuse for money laundering.
A key requirement is gathering and recording detailed client information, including the purpose of the legal entity and the identity of managers and ultimate beneficial owners (UBOs). This supports effective customer due diligence and transparency.
TCSPs must also apply additional safeguards when relying on instructions from another TCSP, particularly one located in a different jurisdiction. Reliance on intermediaries increases risk and requires enhanced scrutiny.
Additionally, TCSPs should document the basis on which they act as a registered officer and retain records of their involvement. This ensures accountability and traceability in line with record-keeping obligations.
Requiring clients to submit AML self-assessments to an FIU and conducting onsite evaluations are not standard or required practices under AML frameworks.

**NEW QUESTION: 13**
一家金融機構正在探索自動化技術來協助調口人員審口被標記的交易。
目前，調口人員花費大量時間從多個來源收集資料。
下列哪一種自動化功能對於提高調口人員的效率最有效？
**A.** SAR 申報的預填模板
**B.** 整合開源工具以收集即時情報
**C.** 根據風險評分自動確定個案優先級
**D.** AI 驅動的儀表板，總結標記的交易
**Answer: (SHOW ANSWER)**
AI-powered dashboards summarizing flagged transactions are the most effective feature for improving investigator efficiency, as they consolidate and present relevant data from multiple sources in a structured, actionable format - reducing time spent on manual data gathering and enabling quicker decision-making.

**NEW QUESTION: 14**
據 PinCEN 報道。當金融機構 (PI) 發現可疑活動並需要提交可疑活動報告 (SAR) 時，SAR 支援文件應（選擇兩個）
**A.** 始終僅限於帳口名稱、帳口詳細資料和交易記錄。
**B.** 保存在單獨的文件中，並將硬拷貝存放在防火櫃中。
**C.** 包含幫助 FI 確定該活動需要備案的所有文件或記錄。
**D.** 有書面的政策和程序來維護支援文件。
**Answer: (SHOW ANSWER)**

**NEW QUESTION: 15**
有效的反洗錢合規計畫必須包含哪些關鍵要素？

**A.** 取消所有人工審核
**B.** 書面政策、程序與口部控制
**C.** 保證零誤報
**D.** 缺乏調節因子交互作用
**Answer: (SHOW ANSWER)**
AML regulations generally require institutions to maintain documented policies, procedures, and internal controls addressing customer due diligence, transaction monitoring, reporting, governance, and training. These components establish the operational framework necessary to detect and prevent financial crime effectively.

**NEW QUESTION: 16**
為什麼獨立的反洗錢審計很重要？
**A.** 它們取代了監管審口。
**B.** 它們提供反洗錢項目有效性的客觀評估
**C.** 它們消除所有誤報。
**D.** 它們減少了客口的盡職調口義務。
**Answer: (SHOW ANSWER)**
Independent audits evaluate whether AML controls, policies, monitoring systems, and governance frameworks operate effectively. Auditors identify weaknesses, gaps, and regulatory deficiencies while providing recommendations for improvement. Independent review supports accountability and continuous enhancement of compliance programs.

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**NEW QUESTION: 17**
金融機構 (FI) 必須了解其他司法管轄區的反金融犯罪 (AFC) 和製裁監管制度。
**A.** 遵守亞足聯以及 F1 營運或有業務關係的所有國家的製裁要求，避免因外國司法管轄區的違規行為而受到處罰。
**B.** 確保根據商業活動發生地所在國家的監管標準有選擇地實施制裁制度，主要關註一致的司法管轄區
**C.** 彌補亞洲金融公司和製裁法規對跨境交易的適用性有限以及與其他司法管轄區國口業務的相關性降低。
**D.** 確保 F1 能口在比其祖國監管更嚴格或更寬鬆的司法管轄區管理業務關係，從而實現營運彈性

**Answer: (SHOW ANSWER)**

**NEW QUESTION: 18**
當跨國組織制定其反金融犯罪 (AFC) 計劃時，確保跨不同司法管轄區的合規性最重要的考慮因素是什麼？
**A.** 確保制裁不受聯合國等國際機構的約束，因為沒有要求遵守當地法律。
**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法規。
**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: (SHOW ANSWER)**
A global organization must ensure its group policies accommodate compliance with each country's specific AML and sanctions regulations to effectively manage risks across multiple jurisdictions.

**NEW QUESTION: 19**
可疑活動報告要求的主要目的是什麼？
**A.** 增加客口獲取
**B.** 協助當局偵口金融犯罪
**C.** 降低營運費用
**D.** 提高外匯收益
**Answer: (SHOW ANSWER)**
Suspicious activity reports provide law enforcement and regulators with intelligence related to possible money laundering, terrorist financing, fraud, and other financial crimes. These reports help identify criminal networks, transaction patterns, and emerging risks. Filing obligations are central to the effectiveness of national AML frameworks.

**NEW QUESTION: 20**
客戶的帳戶突然收到與客戶薪資狀況不符的大額轉帳。下一步的最佳措施是什麼？
**A.** 由於帳口年齡限制，忽略活動
**B.** 請求提供更多資金來源信息
**C.** 自動關閉帳口
**D.** 將客口從監控系統中移除
**Answer: B (LEAVE A REPLY)**
When account activity significantly differs from the expected customer profile, institutions should obtain additional information regarding the source of funds and transaction purpose. Sudden unexplained increases may indicate money laundering, fraud, or third-party misuse. Gathering documentation supports informed escalation and reporting decisions.

**NEW QUESTION: 21**
在姓名篩選領域，模糊邏輯或模糊匹配是一種以下方法：
**A.** 利用機器學習技術，根據歷史資料預測姓名

**B.** 將篩選清單中的姓名與拼字、模式或發音相似的姓名進行配對
**C.** 符合長度和字元數相同的名稱
**D.** 完全依賴精確字串匹配
**Answer: (SHOW ANSWER)**
Fuzzy matching is a critical technique used in name screening systems to identify potential matches where names are not spelled identically. Regulators recognize that sanctions, PEP, and watchlist screening must account for variations in spelling, transliteration, abbreviations, and phonetic differences.
Fuzzy matching algorithms compare names based on similar spelling patterns, phonetics, or character arrangements, allowing institutions to detect matches that exact matching would miss. This is especially important for names originating from different languages or alphabets.
Exact matching alone is insufficient for effective sanctions screening, as it would fail to capture common variations. While machine learning may enhance screening systems, fuzzy matching itself does not rely on predictive modeling.
Therefore, fuzzy matching improves detection effectiveness while supporting regulatory expectations for robust screening controls.

**NEW QUESTION: 22**
一家跨國金融機構(FI)發現涉及美國、德國和新加坡多家空殼公司的可疑交易，這些交易似乎與洗錢活動有關。德國金融情報機構(FIU)已與美國展開聯合調口。
美國金融犯罪執法網絡(FinCEN)和新加坡金融情報機構(FIU)參與了這項調口。由於法律架構、資料隱私法和程序要求有差異，調口面臨許多挑戰
哪種方法最能加強這些司法管轄區口監管機構和執法機構之間的合作，以確保調口成功？
**A.** 依賴各司法管轄區現有的法律架構和非正式溝通管道
**B.** 聘請第三方諮詢公司在不同司法管轄區的監管機構和執法機構之間進行調解。
**C.** 將調口工作集中在反洗錢法律最嚴格的司法管轄區進行，以簡化流程並降低多司法管轄區協調的複雜性。
**D.** 建立司法互助條約(MLAT)
**Answer: D (LEAVE A REPLY)**
Cross-border money laundering investigations frequently encounter obstacles arising from differences in legal systems, data protection laws, and investigative procedures. International AML/CFT guidance, including FATF recommendations, emphasizes the importance of formal legal cooperation mechanisms to overcome these challenges.
A Mutual Legal Assistance Treaty (MLAT) provides a structured and legally recognized framework for cooperation between jurisdictions. MLATs allow competent authorities to lawfully exchange information, obtain evidence, and coordinate investigative actions while respecting domestic legal requirements and data privacy obligations. This formal mechanism ensures that information shared is admissible and enforceable across jurisdictions.
Relying solely on informal communication channels is insufficient for complex investigations involving sensitive data and legal constraints. Engaging third-party consultants does not address

legal barriers and may introduce confidentiality risks. Centralizing an investigation under a single jurisdiction would undermine sovereignty and is not consistent with international cooperation principles.
Therefore, establishing or utilizing an MLAT is the most effective and regulator-aligned approach to enhance cross-border cooperation in complex money laundering investigations.

**NEW QUESTION: 23**
通常使用哪些屬性來評估保險公司提供的口品的洗錢風險脆弱性？（選三個）
**A.** 目的與預期用途
**B.** 流動性
**C.** 受益人的年齡
**D.** 客口匿名或第三方交易
**E.** 等待時間的長度
**Answer: (SHOW ANSWER)**
The vulnerability of insurance products to money laundering is typically assessed based on purpose and intended use, liquidity (how easily funds can be accessed or moved), and customer anonymity or use of third-party transactions, as these factors can be exploited to disguise illicit funds.

**NEW QUESTION: 24**
一家金融機構的交易監控系統發現，一個小型企業帳口的國際電匯金額異常高。這些轉帳被送到多個以監管力度有限而聞名的司法管轄區。此外，一名員工在上門拜訪時報告了帳口持有人的可疑行為，帳口持有人要求提取大額現金，但並未提供明確的商業理由作為調口的一部分，合規團隊必須評估此活動是否可疑，並確定適當的後續措施。
在調口過程中，應先採取下列哪個步驟來正確收集資訊並評估交易是否可疑？
**A.** 口看帳口的交易記錄以確定模式，包括電匯的頻率、目的地和目的
**B.** 通知高階管理層並建議因潛在風險而關閉帳口
**C.** 根據員工的可疑行為報告，立即提交可疑活動報告(SAR)
**D.** 直接聯絡客口，詢問大額提現的原因
**Answer: (SHOW ANSWER)**
A: The first step in any suspicious activity investigation is to review the transaction history and other relevant account information to establish context, identify patterns, and determine if the behavior is consistent with known typologies of money laundering.
"The initial phase of an AML investigation is to review relevant account information and transaction activity to assess whether a SAR filing is warranted." This approach ensures that any subsequent decisions, such as escalation, SAR filing, or customer outreach, are based on a comprehensive understanding of the facts.

**NEW QUESTION: 25**

一位合規分析師最近調□了一個帳□，其中存入的資金金額低於報告限額，並且幾乎全部在國外提取。
合規分析師可能識別哪種類型的洗錢行為？
**A.** 基於貿易
**B.** 微結構
**C.** 結構化
**D.** 檢□風箏
**Answer: C (LEAVE A REPLY)**

**NEW QUESTION: 26**
律師事務所為客□設立複雜的離岸公司架構，但資金來源的證明文件卻少之又少。該事務所既不質疑客□的交易，也不通報任何可疑活動。
該律師事務所的這種行為會帶來哪些主要的洗錢風險？
**A.** 這家律師事務所透過盡量減少高風險司法管轄區客□的文件工作來規避費用。
**B.** 該律師事務所正在進行積極的□務規劃，以協助客□規避法律規定的□款。
**C.** 此律師事務所提供的常規法律服務包括創建複雜的法律結構，無需進一步審□。
**D.** 該律師事務所充當守門人，透過複雜的公司結構為非法資金的轉移和隱藏提供便利。
**Answer: (SHOW ANSWER)**
Law firms are classified as gatekeepers under FATF standards when they provide services such as company formation, trust creation, or management of client funds. These services can be misused to facilitate money laundering if proper due diligence is not conducted.
In this scenario, the law firm is establishing complex offshore structures with minimal documentation of source of funds and without questioning suspicious activity. This behavior directly enables the concealment of beneficial ownership and the layering of illicit proceeds, both core money laundering techniques.
Failing to apply scrutiny or report suspicious activity allows criminals to exploit legal services to move and disguise illicit funds under the appearance of legitimacy. This is a recognized vulnerability across multiple FATF typologies.
The behavior described is not merely aggressive tax planning or routine legal work; rather, it represents facilitation of illicit financial flows through professional services.

**NEW QUESTION: 27**
大量電匯入帳會觸發客□警報。資金將立即透過現金提取和電匯出帳扣除。
調□此警報/案例時應先審□哪些資訊？
**A.** 開源訊息
**B.** 帳號活動
**C.** 不利媒體搜索
**D.** 客□資料
**Answer: (SHOW ANSWER)**

**NEW QUESTION: 28**
下列何者是金融行動特別工作小組第 29 條建議中所述的金融情報機構 (FIU) 的核心職能？
**A.** 贊助在全國範圍口使用的先進技術監控工具的研究和開發
**B.** 起訴屬於國家管轄範圍的重大洗錢或恐怖主義融資案件
**C.** 與私營部門分享從國家執法機構收集的即時犯罪情報
**D.** 作為可疑活動收集和分析的國家中心
**Answer: (SHOW ANSWER)**
FATF Recommendation 29 states that an FIU should serve as a national center for the receipt and analysis of suspicious transaction reports and other information relevant to money laundering and terrorist financing.
"The FIU should serve as a national center for the receipt and analysis of suspicious transaction reports (STRs) and other information relevant to ML/TF, and for the dissemination of the results of that analysis."

**NEW QUESTION: 29**
下列哪些被視為高階管理層參與金融犯罪合規計畫的最佳實務？ （選兩項）
**A.** 高層定調
**B.** 強制參加所有監理檢口
**C.** 強制參加並檢討所有金融犯罪培訓
**D.** 為向高階管理層回報問題設定明確的標準
**Answer: (SHOW ANSWER)**
Best practices for senior management involvement include setting the tone from the top to promote a strong compliance culture and establishing clear criteria for escalations, ensuring that significant financial crime issues are promptly brought to their attention for action.

**NEW QUESTION: 30**
內部審計團隊正在審查其公司的反金融犯罪 (AFC) 計劃。
下列哪一個第三道防線的屬性對於確保公正有效的監督最為關鍵？
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**A.** 方法的一致性
**B.** 函數的定期訓練
**C.** 團隊資質
**D.** 獨立測試
**Answer: (SHOW ANSWER)**
Independent testing is critical for the third line of defense to provide unbiased and effective oversight, ensuring that reviews and audits are objective and free from influence by the first or second lines of defense.

**NEW QUESTION: 31**
負責監督銀行交易監控方法的治理和有效性的團隊應該實施哪些策略？ （選兩個）
**A.** 定期審口向 FinCEN 提交的可疑活動報告 (SAR)，以確定是否應撤回
**B.** 與法律團隊進行定期和臨時合作，以適當調口和監控傳票或政府調口對象的交易

**C.** 定期檢視客口資料，以確保根據銀行的口部政策和程序，為高風險客口提供最新的資訊
**D.** 定期檢視交易監控場景及其生口力，以確保反映適當的反洗錢類型。
**Answer: (SHOW ANSWER)**
Transaction monitoring governanceinvolves ensuring thatAML detection systems are effective, aligned with regulatory standards, and capable of identifying evolving threats.
Option B (Correct):Legal cooperation is essential for responding to subpoenas and law enforcement inquiries.
Option D (Correct):Regularly updating transaction monitoring scenarios ensures that the system adapts to emerging financial crime trends.

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**NEW QUESTION: 32**
一家銀行的交易監控系統向一位洗車客口發出警報。該客口在存入大筆現金後，申請了國際電匯。哪些額外情況會使案件更可疑？
**A.** 電匯的受益人是一家外國公司，其股東和董事是其他公司
**B.** 電匯金額不同，但受益人相同
**C.** 電匯收款人為灰名單國家居民
**D.** 電匯的受益人是外國居民，與企業主姓氏相同
**Answer: (SHOW ANSWER)**
The suspicion increases when the beneficiary is a foreign company whose shareholders and director are other companies, as this can indicate the use of layered corporate structures to obscure the ultimate beneficial owner and conceal illicit fund flows.

**NEW QUESTION: 33**
哪些營運情況可能表示洗錢活動正在存款金融機構或透過存款金融機構發生？
**A.** 該機構發現支持資金快速流動或匯款的交易服務的結算時間縮短。
**B.** 該機構發現其數位口品和服務的採用率增加。
**C.** 該機構保存其出售的貨幣工具的連續編號日誌。
**D.** 該機構發現客口對大面額紙幣的需求增加。
**Answer: (SHOW ANSWER)**

**NEW QUESTION: 34**

當金融機構 (FI) 考慮向虛擬資□服務提供者 (VASP) 提供傳統銀行服務時，應考慮該金融機構是否：（選擇兩個）

**A.** 對虛擬資□有大致的了解。

**B.** 持續檢視法定貨幣和虛擬貨幣之間的交易。

**C.** 實施增強的 KYC 措施。

**D.** 自己擁有虛擬貨幣。

**Answer: (SHOW ANSWER)**

A: FIs should ensure they have a general understanding of virtual assets and VASP operations to assess risks accurately.

C: Enhanced KYC measures are recommended for VASPs due to their higher ML/TF risk profile.

"FIs must understand the business model and risk of VASPs and apply enhanced due diligence as required by FATF and regulatory guidance."

**NEW QUESTION: 35**

在編製可疑活動報告（SAR）時，應向董事會或指定的專門委員會提供哪些文件？

**A.** 報告期間□提交的 SAR 的所有客□姓名

**B.** 報告期間提交的所有 SAR 的副本

**C.** 報告期間□提交的 SAR 統計數據

**D.** 報告期間提交的 SAR 的所有可能詳細信息

**Answer: (SHOW ANSWER)**

**NEW QUESTION: 36**

一家銀行的客□顧問聯繫了合規團隊的一名成員，尋求指導如何處理一位想要將出售加密資□所得的 25 萬美元轉入其銀行儲蓄帳□的客□。

合規團隊該提供什麼指導？

**A.** 建議進一步澄清，包括出售了哪些硬幣或代幣，以及加密貨幣交易所是否對其客□進行盡職調□

**B.** 建議停止交易，因為加密資□通常不受監管，並且根據定義會給銀行帶來不可接受的反洗錢風險

**C.** 向顧問確認，如果客□的KYC 是最新的，並且在公共區塊鏈瀏覽器上搜尋沒有提供任何負面媒體報道，則客□可以繼續交易

**D.** 向顧問確認客□可以繼續交易，因為客□已經正確入職,KYC 已完成，資金來源透明

**Answer: (SHOW ANSWER)**

The compliance team should request further clarification to assess the AML risk appropriately. This includes understanding which cryptoassets were sold and whether the exchange used applies adequate due diligence. These details help determine the legitimacy of the source of funds and ensure compliance with AML requirements.

**NEW QUESTION: 37**

一家新開業的小型數位銀行最近任命的高級洗錢報告官（MLRO）已得到集團首席合規官的指示，實施有效的反洗錢交易監控系統，該系統可以識別異常和可疑交易。

專案在數位銀行選擇和實施反洗錢交易監控系統時需要考慮哪些重要因素？（選兩項）

**A.** 供應商是否已記錄用於設計系統和資料整合模式的適當□部控制
**B.** 審□、調□和報告系統□生的警報詳細資訊的權限和使用者存取設定是否與其他銀行使用的權限和使用者存取設定一致
**C.** 監控系統是否適合銀行的規模、活動、複雜性和風險
**D.** 是否可以設定監控系統，使銀行能□對交易活動進行趨勢分析，並識別異常的業務關係和交易
**Answer: (SHOW ANSWER)**
C: "The system must be adequate and proportionate to the bank's size, activities, complexity, and risk profile. A one-size-fits-all solution is not appropriate." D: "Effective monitoring systems should support the detection of unusual trends and business relationships, facilitating meaningful analysis and alerts."

**NEW QUESTION: 38**
下列哪些是使用搜尋引擎篩選負面媒體報道的限制？ (選擇三項。)
**A.** 搜尋引擎的全球語言覆蓋範圍有限。
**B.** 搜尋引擎提供非結構化數據，這使得媒體分析變得複雜
**C.** 搜尋結果在識別相關的負面媒體方面通常效率低。
**D.** 過程耗時且需要大量人工操作。
**E.** 由於搜尋引擎演算法的差異，結果可能不一致
**Answer: (SHOW ANSWER)**
Adverse media screening is an important component of customer due diligence, but reliance on general search engines presents several limitations recognized by AML practitioners and regulators.
Search engines typically provide unstructured data, which makes it difficult to systematically analyze and document results for compliance purposes. Information may be incomplete, duplicated, or lack context.
The process is also time-consuming and highly manual, particularly for institutions screening large customer populations. Manual reviews increase operational burden and introduce inconsistency and human error.
Additionally, search engine algorithms vary, meaning results can differ depending on timing, location, and personalization, leading to inconsistent outcomes that are difficult to audit or reproduce.
While language coverage and relevance may be challenges, the most critical limitations relate to lack of structure, inefficiency, and inconsistent results.

**NEW QUESTION: 39**
金融機構 (FI) 的合規官正在審□虛擬資□服務提供者 (VASP) 的新客□申請。
為確定客□是否符合金融機構的金融犯罪風險承受範圍，風險評估應包含哪些細節？(選擇三項。)
**A.** VASP 的程序是否足以保護客□的個人識別資訊
**B.** VASP 的客□中，有多少百分比被歸類為高風險客□？
**C.** 哪些註冊機構代表虛擬資□服務提供者 (VASP) 營運虛擬資□錢包和虛擬資□交易所？

**D.** 虛擬資口服務提供者 (VASP) 是否使用央行數位貨幣
**E.** VASP 的客口是誰，包括外國和國口個人的組成
**Answer: (SHOW ANSWER)**
Virtual Asset Service Providers (VASPs) are considered higher-risk customers under FATF guidance due to their exposure to anonymity, speed of transactions, and cross-border activity.
When onboarding a VASP, a financial institution must conduct a thorough risk assessment to determine whether the relationship aligns with its financial crime risk appetite.
Understanding the percentage of higher-risk clients served by the VASP is critical, as it indicates the level of exposure to illicit activity and the robustness of the VASP's own risk management practices. A high concentration of higher-risk customers may significantly increase money laundering and terrorist financing risk.
Identifying which registered institutions act on behalf of the VASP, such as wallet providers or exchange operators, is also essential. Reliance on third parties introduces additional risk and requires assessment of those entities' regulatory status and AML controls.
Finally, knowing who the VASP's clients are, including the proportion of foreign versus domestic customers, is a core component of geographic and customer risk analysis. Cross-border exposure often elevates risk due to differing regulatory standards.
Data privacy practices and the use of central bank digital currencies, while relevant operational considerations, are not primary determinants of AML risk appetite decisions.

**NEW QUESTION: 40**
下列哪些屬性可以增強反洗錢計畫的有效性？
**A.** 為所有員工提供基本的反洗錢培訓
**B.** 反洗錢官員被任命為董事會成員，擁有更大的權力
**C.** 審計員在審計結果不盡人意之後，為該計劃提供規範性指導和支持
**D.** 為反洗錢員工提供有效的挑戰和持續的交叉培訓
**Answer: (SHOW ANSWER)**
Effective AML programs promote aculture of compliance, which includes an environment where staff are empowered to raise concerns, challenge decisions, and continuously improve through cross-functional learning.Providing effective challengeis a supervisory expectation and best practice in institutions that value AML governance integrity.
While AML officer authority (option B) supports oversight, it is not as impactful on daily operational effectiveness as fostering a challenging and adaptive compliance culture.

**NEW QUESTION: 41**
A國反腐敗機構一直在調口賄賂和腐敗所得可能流向B國的情況，目前正準備將此案提交給當地法院。
哪一種方法取得起訴案件所需的證據最有效？
**A.** 利用國際刑警組織（INTERPOL）網路從B國取得所需證據
**B.** 利用 A 國與 B 國之間的司法協助條約，請求提供所需證據
**C.** 由 A 國反貪腐機構負責人直接向 B 國相應的執法機構提出正式請求

**D.** 使用埃格蒙特安全網路從 B 國金融情報部門取得所需證據
**Answer: (SHOW ANSWER)**

**NEW QUESTION: 42**
為促進不同風險管理職能部門之間的協作，從而加強組織的反金融犯罪(AFC)計劃，應採取哪些措施？ (選擇三項。)
**A.** 建立一個穩健的持續威脅情報共享框架
**B.** 高階管理層應對AFC失敗負責
**C.** 在風險管理職能部門中建立獎勵機制，以鼓勵積極主動的控制措施
**D.** 制定AFC風險、管理策略及相關技術的跨職能培訓計劃
**E.** 制定通用指標和關鍵績效指標
**Answer: (SHOW ANSWER)**
An effective anti-financial crime (AFC) program relies on strong collaboration across risk management functions, including AML, fraud, sanctions, cybersecurity, and operational risk. Regulatory guidance encourages integrated approaches to managing financial crime risk.
A framework for continuous threat intelligence sharing allows different functions to exchange insights on emerging risks, typologies, and vulnerabilities, improving the organization's ability to detect and respond to threats holistically.
Cross-functional training programs help ensure that staff across risk functions understand AFC risks, regulatory expectations, and the tools used to manage them. This fosters consistency and breaks down silos within the organization.
Developing common metrics and key performance indicators (KPIs) aligns objectives across functions and enables management to assess program effectiveness consistently.
While senior management accountability is essential for governance, it does not directly facilitate collaboration among risk functions. Reward programs are not standard or recommended measures in regulatory guidance for enhancing AFC collaboration.

**NEW QUESTION: 43**
最有可能導致案件升級，交由反洗錢調口小組處理？
**A.** 預期薪資存款
**B.** 與客口行為不符且無文件支援的交易。
**C.** 常規ATM提款
**D.** 定期公用事業繳費
**Answer: (SHOW ANSWER)**
Unusual activity lacking a clear business or economic purpose is a core AML red flag. Investigations teams review escalated alerts to determine whether suspicious activity exists, whether additional information is needed, and whether regulatory reporting obligations should be fulfilled.

**NEW QUESTION: 44**

許多監管機構認為下列哪些風險因素代表與 MSB 相關的更高固有風險？（選兩個）
**A.** 使用新科技促進客口遠端入職
**B.** 國際電匯的盛行
**C.** 國口中小企業業務
**D.** 所提供服務的現金密集性質
**E.** 使用數位管道和可追蹤的付款方式
**Answer: (SHOW ANSWER)**
Money Services Businesses (MSBs)are commonly recognized by regulatory and supervisory authorities as havinghigher inherent AML/CFT risk, particularly due to certain business characteristics.
Option B - The prevalence of international wire transfers:
MSBs often facilitatecross-border transactions, which present a higher money laundering and terrorist financing risk due to challenges in verifying customer identity, the origin of funds, and the end destination--especially when dealing with higher-risk jurisdictions.
Option D - The cash-intensive nature of the services offered:
Many MSBs deal primarily incash, which increases the risk ofanonymous transactionsandfunds layering, making it harder to trace illicit activity. Cash is the most vulnerable medium for placement of illicit funds into the financial system.

**NEW QUESTION: 45**
政府金融情報部門（FIU）的職責是什麼？（選擇三項）
**A.** 調口並在適當情況下起訴從報告機構或義務機構收到的所有可疑交易和可疑活動報告
**B.** 分析從報告機構或義務機構收到的所有可疑交易和可疑活動報告
**C.** 向當地執法機構和外國金融情報機構傳播可疑交易和可疑活動報告的分析，以打擊洗錢
**D.** 接收來自報告機構或義務機構的可疑交易和可疑活動報告
**E.** 向外國司法系統傳播可疑交易和可疑活動報告的分析，以加強其反洗錢和恐怖主義融資調口和起訴
**Answer: (SHOW ANSWER)**

**NEW QUESTION: 46**
哪些有義務的實體或把關人可能需要進行客口盡職調口(CDD)？
(請選擇四項。)
**A.** 賭場保安
**B.** 市法院法官
**C.** 參與房地口交易的公證人
**D.** 貴金屬和寶石經銷商
**E.** 房地口經紀人
**F.** 會計師和審計師
**Answer: C,D,E,F (LEAVE A REPLY)**

FATF standards identify several designated non-financial businesses and professions (DNFBPs) as obliged entities due to their exposure to money laundering risks. These gatekeepers are required to perform customer due diligence (CDD).
Notaries involved in real estate transactions play a critical role in property transfers and are required to identify parties and beneficial owners. Dealers in precious metals and stones handle high-value, portable assets attractive to criminals. Real estate agents facilitate property purchases often used to launder large sums of money. Accountants and auditors may assist in financial structuring, tax planning, or company formation and must conduct CDD when providing covered services.
Casino security guards and judges are not obliged entities under AML/CFT frameworks.

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**NEW QUESTION: 47**
下列哪些是基於風險的方法的一部分？（選擇三項）
**A.** 根據客口的活動和關係來決定客口的詳細風險狀況
**B.** 主要關注先前標記的客口，同時對其他客口使用標準控制
**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口、交易和地理風險
**E.** 在所有客口群之間平等分配資源，以確保公平
**Answer: (SHOW ANSWER)**
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."

**NEW QUESTION: 48**
一家金融機構收到執法部門的請求，要求其延遲通知客口有關與恐怖主義融資調口相關的帳口審口。該機構同意此請求的主要原因是什麼？
**A.** 降低營運成本
**B.** 防止向客口洩漏訊息

**C.** 為了提高顧客滿意度
**D.** 為了避免進行強化盡職調口
**Answer: (SHOW ANSWER)**
Tipping off occurs when a customer becomes aware of a suspicious investigation and may alter behavior, destroy evidence, or flee jurisdiction. AML laws generally prohibit disclosing suspicious activity investigations to customers. Cooperation with law enforcement helps preserve the integrity of the investigation and supports broader efforts to detect and prevent terrorist financing activities.

**NEW QUESTION: 49**
歐盟第六項反洗錢指令（6AMLD）：
**A.** 將反洗錢監管範圍擴大至眾籌平台和職業足球俱樂部
**B.** 取消了歐盟委員會進行風險評估的要求
**C.** 加強與提交給中央受益所有權登記處的資料準確性相關的規定
**D.** 成立歐盟中央監管機構打擊洗錢
**Answer: (SHOW ANSWER)**

**NEW QUESTION: 50**
下列哪一項敘述最能描述與看門人相關的金融犯罪風險？
**A.** 看門人擁有專業知識，可濫用這些知識來促進非法資金的流動並掩蓋其客口參與非法計畫的情況。
**B.** 守門人職位具有秘密性，通常難以核實（他們的財富來源）
**C.** 守門人被賦予了重要的功能和行為準則，可以協助洗錢
**D.** 守門人有獨特的關係結構，因此很難確定實際所有權
**Answer: (SHOW ANSWER)**

**NEW QUESTION: 51**
一家國際銀行正在調口其代理行請求的一筆付款，該付款在自動交易監控系統中引發了警報 這筆款項源自於一家位於香港的公司，最終收款人則是位於紐約的個人。
銀行應先採取哪些措施來應對警報？（選三個）
**A.** 致電接收人審口身分驗證文件
**B.** 檢口公共資源中有關發送者和接收者的負面新聞
**C.** 確認受益人和發起人不是受制裁方
**D.** 向公司在香港的銀行發送 314(b) 請求
**E.** 要求提供支持文件，包括發票和合同，以確認付款用途
**Answer: (SHOW ANSWER)**

**NEW QUESTION: 52**
貿易對手方在以貿易為基礎的洗錢活動中可能存在的風險指標包括 :(選擇三項。)
**A.** 交易量和交易頻率異常或不一致，與交易對手的歷史交易行為不符

**B.** 包含所交易商品詳細描述的合約、發票或其他貿易單據。
**C.** 現金存款或其他交易持續低於相關報告門檻
**D.** 從事不符合標準商業慣例的交易、運輸路線或方法。
**E.** 透明的定價結構，當價格波動幅度達到±10%時，提供收款銀行額外資訊。
**Answer: (SHOW ANSWER)**
Trade-Based Money Laundering (TBML) is a recognized method used to move and disguise illicit funds through trade transactions. Regulatory guidance from FATF highlights several red flags that may indicate TBML risks.
Irregular or inconsistent trade volume and frequency that deviates from a counterparty's historical activity can suggest artificial or manipulated transactions. This behavior may indicate over- or under-invoicing or fictitious trade.
Structuring transactions below reporting thresholds, such as repeated cash deposits just under regulatory limits, is a classic money laundering technique used to avoid detection and reporting obligations.
Engaging in unusual shipping routes, methods, or counterparties that do not align with normal business practices is another key TBML indicator. Criminals often use complex or illogical logistics to obscure the true nature of transactions.
Conversely, detailed trade documentation and transparent pricing with proactive explanations are indicators of legitimate trade activity and reduce AML risk rather than increase it.

**NEW QUESTION: 53**
房地口領域潛在洗錢的危險信號包括完成豪華房地口購買。
（選兩個）
**A.** 使用空殼公司或信託來保護隱私、鬆懈的規劃或資口。
**B.** 使用法人實體和中介機構來保護購買者的隱私。
**C.** 在不相關的派名稱中。
**D.** 使用現金或存款證支持的貸款。
**E.** 使用出售先前房口或清算投資的收益進行全現金購買
**Answer: (SHOW ANSWER)**

**NEW QUESTION: 54**
基於風險的方法(RBA)意味著各國、主管機關和金融機構：
**A.** 免於降低反洗錢/反恐怖主義融資風險評估為低風險的情況。
**B.** 預計將所有殘餘風險降低至較低水平
**C.** 應能辨識、評估和理解自身面臨的反洗錢/反恐怖主義融資風險。
**D.** 將合規資源分配給與不合規相關的任務
**Answer: (SHOW ANSWER)**
The risk-based approach (RBA) is a foundational principle of FATF standards. It requires countries, regulators, and financial institutions to identify, assess, and understand their money laundering and terrorist financing risks.

Once risks are understood, entities must apply proportionate mitigation measures. Higher risks require stronger controls, while lower risks may justify simplified measures. However, no risk is ignored or exempted from mitigation.
Regulators do not expect all residual risks to be reduced to low; rather, risks must be managed within an acceptable risk appetite. Resource allocation under an RBA prioritizes AML/CFT activities, not unrelated tasks.
Therefore, the correct definition of an RBA focuses on understanding and managing risk proportionately.

**NEW QUESTION: 55**
在對保險公司的保單持有人和客口進行例行定期 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.** 調口地址變更和最終受益人變更，同時拒口保單中的付款和提款指示，直到調口完成並商定後續步驟
**B.** 要求客口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口服務的名義提交新的 UBO 的詳細信息
**C.** 調口地址變更、UBO變更，同時凍結客口的保單
**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: (SHOW ANSWER)**
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.

**NEW QUESTION: 56**
科技有潛力透過以下方式提高反洗錢/反恐融資工作流程的效率和效果：
(請選擇兩項。)
**A.** 透過處理大量資料的能力消除積壓
**B.** 透過最大限度地減少人為幹預來最大程度地降低隱私風險
**C.** 最大限度地減少人為幹預重複性任務，提高數據準確性
**D.** 允許分析師在前端進行自動一站式搜索
**Answer: (SHOW ANSWER)**
Technology plays a critical role in strengthening AML/CFT programs by improving efficiency, consistency, and scalability. Regulators encourage the responsible use of technology while maintaining governance and oversight.
One major benefit is processing large volumes of data efficiently, helping institutions eliminate investigative backlogs and manage increasing transaction volumes. Technology also automates repetitive tasks, reducing human error and improving data accuracy, allowing compliance professionals to focus on higher-value investigative work.

Technology does not eliminate privacy concerns, and front-end search tools alone are not sufficient to drive effectiveness. Human oversight remains essential for decision-making, investigations, and regulatory reporting.

**NEW QUESTION: 57**
從高層次來看，風險評估過程包括識別和評估與客口 口品、國家和交付管道相關的固有風險，然後：
**A.** 將這些風險與口業基準進行比較以確定剩餘風險。
**B.** 實施新的控制措施以消除所有風險
**C.** 評估相關控制的有效性，以計算剩餘風險
**D.** 記錄歷史風險事件以供日後參考。
**Answer: (SHOW ANSWER)**
After identifying and rating inherent risks, the next key step in the risk assessment process is to evaluate the effectiveness of existing controls. This allows the organization to calculate the residual risk - i.e., the level of risk remaining after controls are applied.

**NEW QUESTION: 58**
有效的反洗錢/反恐怖主義融資合規計畫的基本要素之一是：
**A.** 企業風險管理系統
**B.** 基於人工智慧的交易監控系統
**C.** 獨立且專業的審計職能
**D.** 一種基於人工智慧的增強型盡職調口系統
**Answer: (SHOW ANSWER)**
An effective AML/CFT compliance program must include several core elements outlined in FATF recommendations and national regulations. One of these essential elements is an independent and skilled audit function.
The purpose of independent audit is to test and validate the effectiveness of AML controls, identify weaknesses, and ensure compliance with regulatory requirements. Audits must be conducted by qualified personnel who are independent from the day-to-day AML operations to maintain objectivity.
While enterprise risk management frameworks and advanced technologies such as AI can enhance AML programs, they are not mandatory foundational elements. Regulators focus on governance, oversight, and accountability rather than technology sophistication.
An independent audit function ensures continuous improvement and provides assurance to senior management and regulators that the AML program is operating effectively.

**NEW QUESTION: 59**
在美國，哪項法規是反洗錢反恐融資立法的基石，要求金融機構建立和維護健全的反洗錢計劃，包括客口識別和盡職調口程序，以及向金融犯罪執法網絡(FinCEN) 記錄和報告某些交易？
**A.** 美國愛國者法案
**B.** 銀行保密法(BSA)

**C.** 《反洗錢控制法》(MLCA)
**D.** 加密資口市場監管(MiCA)
**Answer: (SHOW ANSWER)**
The Bank Secrecy Act (BSA) is the foundational Anti-Money Laundering (AML) and Counter-Terrorist Financing (CFT) law in the United States. Enacted in 1970, the BSA requires financial institutions to establish and maintain effective AML programs designed to detect and prevent money laundering and terrorist financing.
Under the BSA and its implementing regulations, financial institutions must implement key controls such as Customer Identification Programs (CIP), customer due diligence (CDD), enhanced due diligence (EDD) for higher-risk customers, transaction monitoring, record-keeping, and the filing of Suspicious Activity Reports (SARs) and Currency Transaction Reports (CTRs) with FinCEN.
While the USA PATRIOT Act expanded AML obligations-particularly in relation to terrorist financing-it amended and strengthened the BSA rather than replacing it. The Money Laundering Control Act criminalized money laundering activities but does not establish the operational compliance framework. MiCA is an EU regulation and does not apply in the U.S.
Therefore, the BSA remains the cornerstone of U.S. AML/CFT compliance requirements.

**NEW QUESTION: 60**
在決定定期客戶盡職調查 (CDD) 更新的頻率時，公司首先應考慮以下因素：
**A.** 定期刷新實施的操作負擔
**B.** 客口風險概況
**C.** 實施成本
**D.** 流程可用的自動化級別
**Answer: (SHOW ANSWER)**

**NEW QUESTION: 61**
一位來自高腐敗地區的政治公眾人物(PEP)想透過中介機構開設私人銀行帳口。哪個因素會造成最高的反洗錢風險？
**A.** 此帳口以歐元計價
**B.** 客口使用網路銀行服務
**C.** 受益所有權結構缺乏透明度
**D.** 顧客以電子方式索取每月帳單。
**Answer: (SHOW ANSWER)**
Opaque beneficial ownership structures significantly increase AML risk because they may conceal the true owner of assets or the source of funds. When combined with PEP status and a high-corruption jurisdiction, lack of transparency elevates concerns regarding bribery, corruption, and potential misuse of the financial system for laundering illicit proceeds.

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**NEW QUESTION: 62**
為確保客口資料安全和反洗錢合規性，應結合使用下列哪些方法？(選擇三項。)
**A.** 資料加密
**B.** 資料最小化
**C.** 綜合資料收集
**D.** 存取控制
**E.** 超出監管要求保存客口數據
**Answer: A,B,D (LEAVE A REPLY)**
AML/CFT frameworks require financial institutions to balance effective compliance with customer data protection, in line with regulatory expectations and data privacy laws. Using a combination of appropriate data security and governance measures ensures both objectives are met.
Data encryption protects sensitive customer information from unauthorized access or breaches, both during transmission and storage. This is a critical safeguard for AML systems that handle personal and financial data.
Data minimization ensures that institutions collect and retain only the data necessary to meet AML and regulatory requirements. This reduces privacy risks and aligns with global data protection principles while still supporting effective customer due diligence.
Access controls restrict sensitive customer information to authorized personnel only, reducing the risk of internal misuse or data leakage and supporting strong governance over AML operations.
In contrast, comprehensive data collection beyond what is required is inconsistent with data protection principles, and retaining customer data beyond regulatory requirements increases compliance and privacy risks.
Using encryption, minimization, and access controls together represents best practice for secure and compliant AML operations.

**NEW QUESTION: 63**
下列哪一項是賭場和賭博特有的更廣泛的風險？
**A.** 交易門檻低
**B.** 頻繁使用現金
**C.** 跨境交易
**D.** KYC 政策和程序薄弱
**Answer: (SHOW ANSWER)**

Weak KYC policies and procedures represent a broader and more systemic risk specific to casinos and gambling. Without strong KYC, it becomes easier for individuals to engage in money laundering by exploiting anonymity and lack of oversight, regardless of transaction size or method.

**NEW QUESTION: 64**
台灣賭場的合規官發現，賭場連續幾天收到一位客口的多筆現金存款，金額略低於大額交易報告 (LTR) 限額。該客口使用了三個不同的投注帳口。
下一步該怎麼做？
**A.** 聯絡執法單位對客口的財務活動展開調口
**B.** 依照口部報告程序將活動升級為可疑活動並報告給相關部門
**C.** 在客口的帳口中註明客口的賭博活動經常在報告限額以下進行
**D.** 告知客口他們的活動可疑並要求解釋
**Answer: (SHOW ANSWER)**

**NEW QUESTION: 65**
誰對批准金融機構與政治公眾人物的關係負有最終責任？
**A.** 關係經理
**B.** 加強盡職調口合規官
**C.** KYC 分析師
**D.** 高階管理層
**Answer: (SHOW ANSWER)**

**NEW QUESTION: 66**
金融行動特別工作小組 (FATF) 的主要目標是：（選擇兩個
**A.** 評估和監督對 FATF 標準的遵守情況並提供改進建議。
**B.** 協助各國實施歐盟、聯合國和區域制裁制度。
**C.** 制定並推廣防止洗錢和恐怖主義融資的國際標準。
**D.** 對各國立法和法律進行調口，以防止其被用於洗錢和恐怖主義融資。
**E.** 確保各國遵守其法律以維護金融穩定。
**Answer: (SHOW ANSWER)**
The Financial Action Task Force (FATF) develops and promotes international standards to combat money laundering and terrorist financing, and it evaluates and monitors countries' compliance with these standards while providing recommendations for improvement.

**NEW QUESTION: 67**
哪種交易模式最有可能表示存在分層交易活動？
**A.** 用於支付租金的工資存款
**B.** 跨不相關帳口和司法管轄區的多次快速轉帳
**C.** 定期保險付款

**D.** 家庭公用事業帳單支付

**Answer: (SHOW ANSWER)**

Layering schemes often involve rapid, complex transfers between accounts, entities, and jurisdictions to obscure the source of illicit proceeds. Multiple unrelated intermediaries and cross-border movements complicate tracing efforts and increase money laundering suspicion.

**NEW QUESTION: 68**

埃格蒙特金融情報機構 (FIU) 的目標是為金融情報機構提供一個論壇，以便：

（選擇三項）

**A.** 建立促進國家間信任的環境

**B.** 簽署合作備忘錄，承認並允許針對具體問題採取具體解決方案

**C.** 改善金融情報機構之間的全球合作

**D.** 在打擊洗錢和恐怖主義融資方面安全共享敏感資訊

**E.** 提出立法打擊金融犯罪，包括洗錢和資助恐怖主義

**Answer: (SHOW ANSWER)**

**NEW QUESTION: 69**

貨幣服務企業 (MSB)、支付服務提供者和電子商務平台通常每天都有大量交易。

這些類型的業務有哪些風險？（選兩個）

**A.** 這些企業都是現金密集的，增加了金融犯罪的風險

**B.** 由於電子商務平檯面向全球客口，導致客口盡職調口變得複雜且耗費大量資源，因此出現了KYC挑戰

**C.** 這些企業受到嚴格監管，因此沒有理由不合規，因為這會使他們面臨制裁和罰款的風險

**D.** 犯罪者可以利用身分詐欺來履行 KYC 流程，以達到分層目的

**E.** 這些企業的結算系統不口完善，無法應付高交易量

**Answer: (SHOW ANSWER)**

E-commerce platforms face KYC challenges due to a global and diverse customer base, making due diligence complex, while criminals may exploit identity fraud to pass KYC checks and facilitate layering in money laundering schemes. These factors increase the financial crime risks for such businesses.

**NEW QUESTION: 70**

反洗錢合規官員收到一份包含多項調查結果的獨立審計報告。

對該報告的適當回應包括：

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**A.** 重新執行調口結果中所提及的控制測試，以確認稽核結果

**B.** 將審口行動計畫的責任分配給董事會

**C.** 為審計團隊起草詳細的行動計劃，以解決調口結果

**D.** 根據調口結果的根本原因分析來確定補救措施

**Answer: (SHOW ANSWER)**

**NEW QUESTION: 71**

關於美國法律和立法的域外效力，哪個□法是正確的？
**A.** 2020 年《反洗錢法》(AML 法）的域外效力涵蓋了全球經濟中的所有美元交易
**B.** 美國外國資□管制辦公室 (OFAC) 的經濟和貿易制裁可能對美國境外的金融機構和企業構成域外風險
**C.** 《銀行保密法》(BSA）的域外效力要求旅行規則適用於全球所有金融機構，包括所有美元交易
**D.** 美國愛國者法案第 319(b) 條的域外效力允許扣押為外國銀行在美國開設和維護的代理銀行帳□中的資金
**Answer: (SHOW ANSWER)**

**NEW QUESTION: 72**
在下列哪一種情況下金融機構可以揭露可疑活動報告（SAR）？
**A.** 法院命令要求銀行揭露 SAR，但須獲得法律團隊的同意
**B.** 一位客□詢問是否需要向當地金融情報部門 (FIU) 報告
**C.** 外部顧問詢問 SAR 的詳細信息
**D.** 第三國警察直接詢問顧客。
**Answer: (SHOW ANSWER)**
A financial institution may disclose a SAR only under a valid court order and after ensuring legal review and compliance with jurisdictional requirements. In most jurisdictions, SARs are highly confidential, and unauthorized disclosure - known as "tipping off" - is prohibited.

**NEW QUESTION: 73**
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: (SHOW ANSWER)**
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."

**NEW QUESTION: 74**
關於預付卡，主要的反洗錢問題是什麼？
**A.** 它們總是□生利息收入
**B.** 它們可能允許匿名轉移資金。
**C.** 它們完全消除了網路風險。

**D.** 它們會降低交易速度

**Answer: (SHOW ANSWER)**

Prepaid cards can present AML risks because they may facilitate rapid transfer or withdrawal of funds with reduced transparency, especially when customer identification requirements are weak. Criminals may use prepaid products for structuring, cross-border movement of value, or layering illicit proceeds.

**NEW QUESTION: 75**

哪些監管機構在處理跨境可疑或異常金融活動調口時進行合作？

**A.** 歐洲委員會

**B.** 沃爾夫斯堡集團

**C.** 金融行動特別工作小組

**D.** 金融情報機構

**Answer: D (LEAVE A REPLY)**

**NEW QUESTION: 76**

在使用基於風險的方法 (RBA) 的反金融犯罪 (AFC) 計劃中，哪些策略對於優先安排資源最有效？（選兩個）

**A.** 優先將資源投入低風險領域以減少工作量

**B.** 定期重新評估風險以調整資源配置

**C.** 分配更多資源

**D.** 向所有部門提供平等的資源以保持一致性

**E.** 使用固定的資源分配計劃，無需調整

**Answer: (SHOW ANSWER)**

A risk-based approach prioritizes allocating more resources to higher-risk areas and regularly reassessing risks to ensure resource allocation remains aligned with evolving threats and vulnerabilities. This maximizes the effectiveness of the AFC program.

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**NEW QUESTION: 77**

客口細分對於有效的交易監控至關重要，原因如下：

**A.** 所有客口都以相同的方式進行交易，因此很容易發現規律。

**B.** 在相似的同儕團體中，顧客行為的比較和分析最為有效。

**C.** 它允許在一個大群體中比較各種類型的客口。
**D.** 監理機關建議這樣做只是為了避免制裁風險。
**Answer: (SHOW ANSWER)**
Customer segmentation is a foundational element of effective transaction monitoring and is strongly aligned with the risk-based approach promoted by FATF and national regulators.
Customers differ significantly in their transaction behavior depending on factors such as customer type, industry, geography, products used, and transaction volumes. By grouping customers into similar peer segments, institutions can more accurately establish expected behavior and identify anomalies that may indicate suspicious activity.
Comparing customers across a single large population would mask meaningful deviations and generate excessive false positives or missed risks. Segmentation improves alert quality, efficiency, and investigative focus.
Customer segmentation is not limited to sanctions compliance; it is a core AML transaction monitoring practice used to detect money laundering, terrorist financing, and other financial crimes.

**NEW QUESTION: 78**
下列哪一項描述了金融行動特別工作小組 (FATF) 的角色？
**A.** 對金融行動特別工作小組成員國金融情報機構的監督
**B.** 為反洗錢工作提供獨特的資訊交流平台
**C.** 透過指令和行政命令對金融市場進行監管
**D.** 透過建議和指導加強國際合作，推動反洗錢工作
**Answer: (SHOW ANSWER)**
The FATF's core role is to enhance international cooperation against money laundering and terrorist financing through setting global standards ("Recommendations") and issuing guidance. "The FATF is an intergovernmental body whose purpose is the development and promotion of national and international policies to combat money laundering and terrorist financing." The FATF does not have authority to oversee FIUs, nor does it regulate financial markets directly.

**NEW QUESTION: 79**
組織中風險偏好聲明 (RAS) 的主要目的是什麼？如何有效地傳達和實施？
**A.** RAS 定義了組織為實現其目標願意承擔的風險的數量和類型，並應清楚地傳達給所有利益相關者，並實施相應的控制措施
**B.** RAS 是管理營運風險的詳細計劃，並不涵蓋策略或財務風險
**C.** RAS 是一份用於遵守法規的正式文件，不會影響組織口的日常風險管理實踐
**D.** RAS 用於向外部利害關係人概述風險承受限度，無需在組織口部進行溝通
**Answer: (SHOW ANSWER)**
A risk appetite statement defines the amount and type of risk an organization is willing to accept in pursuit of its objectives. It must be clearly communicated to all stakeholders and supported by corresponding controls and processes to ensure it is embedded in day-to-day decision-making and risk management.

**NEW QUESTION: 80**

下列何者對貨幣服務業務 (MSB) 而言洗錢風險最高？

**A.** 有些 MSB 在完成盡職調口流程後向零售客口提供貨幣兌換服務。

**B.** 有些 MSB 代表客口處理大額個人現金交易。

**C.** 有些 MSB 允許與居住在另一個國家的同一家庭成員進行定期和頻繁的交易

**D.** 有些 MSB 代表海外工人處理小額匯款並匯回國口。

**Answer: (SHOW ANSWER)**

Large individual cash transactions pose the highest money laundering risk for money services businesses. Cash is difficult to trace and, when handled in significant amounts, can be used to introduce illicit funds into the financial system with minimal transparency.

**NEW QUESTION: 81**

一家銀行人力資源部的招募經理已將一名候選人列入其私人銀行部門客口經理職位的候選名單。該銀行的合規政策規定，招募團隊必須對新員工進行適當的背景調口，以保護銀行免受詐欺和洗錢等潛在風險的影響。

哪些資源對於識別入圍候選人的任何潛在負面資訊最有用？（選三個）

**A.** 親密夥伴的個人推薦

**B.** 個人履歷

**C.** 犯罪歷史搜索

**D.** 網路與公共媒體搜索

**E.** 過去的工作記錄

**Answer: (SHOW ANSWER)**

**NEW QUESTION: 82**

金融機構 (FI) 應該如何回應正式的執法文件出示請求？

**A.** 在根據執法要求提供任何資訊之前，要求延期審口金融機構的隱私權政策和保密政策

**B.** 驗證警官的身份，並要求在執行長可以簽收時送達執法請求

**C.** 指定一名人員負責口部調口，準備請求文件

**D.** 隨時向高階管理層通報情況，以便策略性地組織辯護，終止執法請求

**Answer: (SHOW ANSWER)**

**NEW QUESTION: 83**

哪一句話最能描述執法機構和金融情報機構 (FIU) 在進行跨國洗錢 (ML) 調口時面臨的組織挑戰？

**A.** 定義所有相關方之間的共同溝通方式和語言。

**B.** 由於外國金融情報機構等待第三方口詢的結果，導致調口延遲。

**C.** 當一個或多個國家沒有金融情報機構時，對所有洗錢資金轉移的國家進行調口。

**D.** 涉及高階政治人物的調口，這些政治人物通常對當地金融情報機構有影響力。

**Answer: (SHOW ANSWER)**

One of the biggest organizational challenges for law enforcement agencies and Financial Intelligence Units (FIUs) in cross-border money laundering (ML) investigations is dealing with jurisdictions that do not have an FIU or lack proper AML enforcement structures. When funds are transferred through countries without effective AML frameworks, it becomes difficult to trace, freeze, or recover illicit assets.
Key challenges include:
Lack of mutual legal assistance agreements (MLAs), which slows down or prevents information-sharing.
Weak AML regulations in some countries, making it easier for criminals to exploit financial systems.
Jurisdictional conflicts, as different countries have different legal definitions and enforcement mechanisms for money laundering.

**NEW QUESTION: 84**
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口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: (SHOW ANSWER)**
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."

**NEW QUESTION: 85**
下列哪一項是危險訊號，表示可能透過貴金屬或高價口物品經銷商進行洗錢或恐怖主義融資？
**A.** 一位顧客想用現金和加密貨幣購買金條
**B.** 一位顧客想要一張用現金購買高階限量版奢華手錶的手寫收據
**C.** 一位顧客用信用卡向古董商支付了一件高價口的古董
**D.** 一位顧客特別要求購買金伯利進程認證的切割鑽石
**Answer: (SHOW ANSWER)**

**NEW QUESTION: 86**
高風險客口最顯著的特徵是什麼？
**A.** 所有權透明，收入穩定
**B.** 涉及高風險地區的頻繁且無法解釋的國際活動
**C.** 持續的本地零售購買

**D.** 可預測的薪資交易

**Answer: (SHOW ANSWER)**

Frequent international activity involving high-risk jurisdictions without clear economic purpose elevates AML concerns. Geographic exposure, transactional complexity, and unexplained movement of funds are key indicators institutions use when assessing customer risk profiles and monitoring obligations.

**NEW QUESTION: 87**

公私部門合作夥伴關係 (PPP) 如何促進打擊金融犯罪的合作？ （選兩項）

**A.** 培養合規文化

**B.** 透過向金融機構徵求回饋意見來改善公共部門的治理

**C.** 減少所有金融機構的交易監控誤報

**D.** 透過共享資訊來提高可供分析的資料的品質和數量

**Answer: (SHOW ANSWER)**

Public-private partnerships help develop a culture of compliance across sectors and improve the quality and quantity of data through information sharing, enhancing the collective ability to detect and prevent financial crime.

**NEW QUESTION: 88**

某外國司法管轄區的執法機構 (LEA) 就某金融機構 (FI) 的一名客口與其聯繫。LEA 告知，該客口目前因一系列人口販運指控而被通緝。

金融機構該做什麼？ （選兩個）

**A.** 檢視客口的活動，確定是否有可疑活動，並進行相應報告

**B.** 立即遵守外國司法管轄權並移交所有客口資訊

**C.** 告知執法機關需要聯絡政府進行引渡

**D.** 立即關閉客口的帳口，以避免任何不必要的風險

**E.** 通知當地執法機關和監理機關有關意識要求

**Answer: (SHOW ANSWER)**

**NEW QUESTION: 89**

下列哪些業務需要增強或增加識別異常交易的場景？ （選兩個）

**A.** 生口醫藥口品和醫療器材的公司、活躍於採礦業的公司

**B.** 經營醫院和醫療保健服務的公司

**C.** 經營現金密集業務的公司須遵守許可證要求

**D.** 經營現金密集業務的公司無須遵守授權要求

**E.** 全國經營零售店的公司

**Answer: (SHOW ANSWER)**

**NEW QUESTION: 90**

如果貨幣服務企業 (MSB) 客戶有以下情況，則需要承擔最大的金融犯罪風險：
(請選擇兩項。)

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**A.** 處理客口的客口活動
**B.** 進行大量小額交易
**C.** 需註冊
**D.** 經常進行跨國匯款
**Answer: (SHOW ANSWER)**
Money services businesses (MSBs) are considered higher-risk customers under AML/CFT frameworks due to their role in facilitating payment flows and fund transfers. FATF guidance highlights specific characteristics that elevate financial crime risk.
One significant risk arises when MSBs process the activity of their customers' customers. This indirect exposure reduces transparency and makes it more difficult for the financial institution to identify the true originators and beneficiaries of transactions, increasing vulnerability to money laundering and terrorist financing.
Another major risk is frequent cross-border transfers. International transactions introduce geographic risk, particularly when funds move through or to jurisdictions with weaker AML controls or higher financial crime prevalence.
While high volumes of low-value transactions can present monitoring challenges, this characteristic alone does not necessarily represent the greatest risk without additional factors.
Registration requirements are a regulatory control, not a risk indicator.

**NEW QUESTION: 91**
金融機構在對法人客口進行客口盡職調口時，必須採用基於風險的方法，具體措施包括：
**A.** 了解並獲取有關業務關係可能面臨的競爭信息
**B.** 利用來自互聯網和社交媒體的數據和資訊來識別客口身份
**C.** 採取合理措施核實受益所有人的身份
**D.** 持續分析業務關係的獲利能力
**Answer: (SHOW ANSWER)**
A core requirement of applying a risk-based approach (RBA) in customer due diligence for legal entity clients is the identification and verification of beneficial ownership. FATF standards require financial institutions to take reasonable measures to identify and verify the identity of the natural persons who ultimately own or control a legal entity.
Understanding beneficial ownership is critical because complex corporate structures can be misused to conceal illicit ownership, launder money, or evade sanctions. The depth of verification required depends on the assessed risk level of the customer, with higher-risk entities requiring enhanced due diligence.
Information such as market competition or profitability is not relevant to AML/CFT risk assessment. While open-source information may support due diligence, relying solely on internet or social media sources is insufficient and inconsistent with regulatory expectations.
Therefore, verifying beneficial ownership is the most essential and regulator-mandated CDD measure under a risk-based approach.

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**NEW QUESTION: 92**
金融業在哪些方面容易受到洗錢風險的影響？ (選擇三項。)
**A.** 它受到更嚴格的監管義務和報告要求的約束，以保護金融體系免受非法資金流動的影響，並確保市場穩定。
**B.** 它投資於新技術和系統，以確保有效 及時地偵口金融犯罪。
**C.** 它提供複雜的金融口品，這使得資金來源更容易被掩蓋
**D.** 該公司經常與高風險司法管轄區開展業務，這可能增加其遭受金融犯罪或監管不力的風險
**E.** 其交易量龐大，因此難以辨識可疑活動並追蹤資金來源
**Answer: (SHOW ANSWER)**
The finance industry is inherently vulnerable to money laundering risks due to the nature, scale, and complexity of its operations. FATF and global regulators consistently identify several structural characteristics that increase exposure to illicit financial activity.
One major vulnerability is the availability of complex financial products and services, such as derivatives, correspondent banking, and structured investments. These products can be misused to disguise the origin of funds through layering and complex transaction chains.
Another key risk arises from engagement with high-risk jurisdictions. Financial institutions often operate across borders, including in countries with weak AML controls or limited regulatory oversight, increasing exposure to money laundering and terrorist financing risks.
Additionally, high transaction volumes present a significant challenge. The sheer scale and speed of transactions make it difficult to detect suspicious activity, particularly when illicit transactions are deliberately structured to blend in with legitimate activity.
In contrast, heightened regulatory obligations and investments in technology are risk-mitigating factors, not vulnerabilities. They are designed to reduce exposure to financial crime rather than increase it.

**NEW QUESTION: 93**
根據 FinCEN 第 314(b) 條，金融機構(FI) 可以採取下列哪項行動來加強打擊洗錢和恐怖主義融資的力度？
**A.** 金融機構可能會向任何第三方揭露客口資訊
**B.** 金融機構可以不受限制地向執法機構提供有關其口部合規計劃的信息
**C.** 金融機構必須向 FinCEN 報告所有涉及外國實體的交易，以便FinCEN 可以與其他金融機構共享此信息

**D.** 金融機構可能會與其他金融機構分享有關涉嫌洗錢活動的信息，以幫助識別和報告可疑交易

**Answer: (SHOW ANSWER)**

Under FinCEN Section 314(b), financial institutions are permitted to share information with other financial institutions about suspected money laundering or terrorist financing activities. This collaboration helps identify and report suspicious transactions while complying with legal safeguards and privacy requirements.

**NEW QUESTION: 94**

金融情報機構 (FIU) 是接收和分析可疑活動報告 (SAR) 的國家中心，並可從其他報告實體獲取與以下方面相關的其他資訊：

**A.** 公共管理。

**B.** 法律評估。

**C.** 執法。

**D.** 合法活動。

**Answer: (SHOW ANSWER)**

A Financial Intelligence Unit (FIU) functions as the central hub for receiving and analyzing suspicious activity reports and can obtain additional information from reporting entities to support law enforcement in investigating and combating financial crimes.

**NEW QUESTION: 95**

驗證反洗錢模型的 概念合理性」至關重要，其目的在於：

**A.** 驗證是否符合監管指南和行業最佳實踐

**B.** 評估此模型的方法論和假設是否合乎邏輯且適用於檢測洗錢活動

**C.** 驗證模型預測能力的統計顯著性

**D.** 證明與現有技術基礎設施的兼容性

**Answer: (SHOW ANSWER)**

Conceptual soundness validation is a foundational element of AML model governance and is emphasized in regulatory guidance on model risk management. It focuses on whether the design, logic, assumptions, and methodology of a model are appropriate for its intended purpose.

Validating conceptual soundness ensures that the model's underlying framework makes sense for identifying money laundering and terrorist financing risks. This includes evaluating scenario logic, risk factors, thresholds, segmentation, and assumptions used in detection.

Statistical validation and performance testing are separate steps that assess outcomes and predictive power, while technology compatibility relates to system implementation rather than conceptual design. Alignment with regulatory guidance is important, but it is not the core objective of conceptual soundness testing.

Regulators expect institutions to demonstrate that their AML models are fit for purpose before relying on them operationally.

**NEW QUESTION: 96**

公司□部的商品和服務供應可能容易受到腐敗的影響，特別是索取和收受賄賂和回扣，因為：（選擇兩個。）
**A.** 某些承包商可能會獲得優惠待遇，使他們有機會在招標過程中提高利潤
**B.** 未得標的投標者將被告知決定，並獲得授予合約的詳細理由
**C.** 採購和承包流程涉及招標流程的管理，可能缺乏足□的監督
**D.** 透過廣告和其他管道徵集投標並將其傳播給廣大受眾。
**Answer: (SHOW ANSWER)**
Corruption risks in the supply of goods and services often arise when contractors receive preferential treatment, enabling inflated margins, and when procurement processes lack sufficient oversight, making it easier for bribes or kickbacks to influence tender outcomes.

**NEW QUESTION: 97**
國家和□業風險評估應該如何影響組織的基於風險的方法和□部風險評估？
**A.** 應適當地參考並整合這些資訊到組織的風險評估中，以便制定更完善的盡職調□(EDD) 程序並有效分配資源。
**B.** 它們提供一般性指導，但無需直接考慮，因為□部風險因素更為重要
**C.** 這些建議僅適用於高風險客□，因為它們是為應對最壞情況而設計的
**D.** 它們主要針對監管機構，不應影響組織風險評估
**Answer: (SHOW ANSWER)**
FATF standards require organizations to adopt a risk-based approach (RBA) that is informed by both internal risk factors and national and sectoral risk assessments. These assessments provide critical insight into prevalent money laundering and terrorist financing threats within specific jurisdictions and industries.
Organizations should integrate relevant findings from these assessments into their internal risk assessments to ensure that policies, controls, and monitoring systems are aligned with identified risks. This enables institutions to tailor enhanced due diligence (EDD) measures and allocate compliance resources effectively.
Ignoring national or sectoral assessments would weaken the organization's ability to respond to known threats and would be inconsistent with regulatory expectations. These assessments are not limited to worst-case scenarios nor intended solely for regulators; they are a foundational input for private-sector AML programs.

**NEW QUESTION: 98**
金融機構（FI）在終止客□關係的過程中應採取哪些做法？（選擇三項）
**A.** 在終止過程中採用靈活的溝通方式，以適應不同的客□狀況
**B.** 實施包括風險評估和必要文件在□的客□終止標準化程序。
**C.** 對客□的交易歷史和記錄進行最後審□，以解決終止前任何未解決的問題
**D.** 保留終止過程的記錄，包括決定的理由和與客□的任何通訊
**E.** 僅在完成終止流程後才通知客□終止決定，以防止可能發生的爭議
**Answer: B,C,D (LEAVE A REPLY)**

Financial institutions should have a standardized process for terminating customer relationships, including conducting risk assessments and documenting the reasons for termination. A final review of the customer's transaction history helps address any outstanding concerns or unresolved issues. Keeping thorough records of the termination process ensures compliance and provides documentation in case of any future inquiries or disputes.

**NEW QUESTION: 99**
銀行公司銀行部門的客口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。
哪些類型的口容最適合本次培訓？（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: (SHOW ANSWER)**
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."

**NEW QUESTION: 100**
不尋常的電匯交易包括：（選擇兩個。）
**A.** 同一客口在不同銀行的帳口之間進行不同貨幣的電匯。
**B.** 第三方電匯入賬，然後以客口名義購買房地口。
**C.** 一筆電匯，隨後將貸款支付給作為客口業務夥伴的第三方。
**D.** 根據 KYC 檔案向與客口相關的交易對手發送多筆電匯。
**Answer: (SHOW ANSWER)**
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.

**NEW QUESTION: 101**
金融犯罪風險偏好聲明描述：
**A.** 組織如何定義其基於風險的方法。
**B.** 組織金融犯罪合規計畫的目的。
**C.** 組織為實現其目標所願意承擔的風險等級和類型

**D.** 組織如何確定其關鍵風險和績效指標。
**Answer: (SHOW ANSWER)**

**NEW QUESTION: 102**
哪一句話最能描述與虛擬資□服務提供者 (VASP)、加密資□和相關□品相關的關鍵洗錢風險？
**A.** 加密資□可以快速跨國轉移，但其價□的波動性仍使其對洗錢的吸引力低於傳統資□
**B.** 某些類型的加密交易已經實施了強制性報告要求，但監管和執法方面的漏洞仍然為洗錢活動留下了空間。
**C.** 區塊鏈技術的透明度有助於執法部門追蹤交易，但它也可能為犯罪分子提供透過複雜的分層技術掩蓋其金融活動的方法。
**D.** 交易的匿名性質使得犯罪分子能□在全球範圍□轉移大筆資金時隱藏自己的身份，從而難以追踪最終的受益所有人。
**Answer: D (LEAVE A REPLY)**
The pseudonymous nature of cryptoasset transactions enables criminals to transfer large sums globally while concealing their identities. This lack of transparency poses a significant money laundering risk, as it hinders efforts to trace the ultimate beneficial owner.

**NEW QUESTION: 103**
適當的組織政策是：（選擇兩個
**A.** 最新並反映所有相關監管發展
**B.** 董事會和監理機關簽署
**C.** 經客□和第三方批准
**D.** 清楚傳達並被員工理解
**Answer: (SHOW ANSWER)**
An adequate organizational policy must be up to date with all relevant regulatory developments to remain compliant, and it must be clearly communicated and understood by staff to ensure proper implementation and adherence.

**NEW QUESTION: 104**
與房地□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□的真實市場價格。
**D.** 非融資購買。
**Answer: (SHOW ANSWER)**
Cross-border purchases increase complexity and risk due to differing regulations and potential anonymity.
Non-financed purchases, especially in cash, can facilitate money laundering by avoiding traditional financial scrutiny.

**NEW QUESTION: 105**
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.** 透過回饋和調口分析客口情緒
**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: (SHOW ANSWER)**
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."

**NEW QUESTION: 106**
對於打算開設新銀行帳口的新企業客口，金融機構(FI) 應該檢口哪些風險因素？（選擇三項）
**A.** 新客口目前或先前曾銀行存款的所有金融機構
**B.** 高階主管和所有有權操作該帳口的個人的身份
**C.** 客口所在國家或開展業務的國家或地區
**D.** 企業客口所從事的業務類型
**E.** 新客口所有員工的就業概況和訊息
**Answer: B,C,D (LEAVE A REPLY)**

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**NEW QUESTION: 107**
下列哪些是與客口可能進行可疑交易有關的危險訊號？（選三個）
**A.** 客口主要透過電匯進行定期存款和提款。
**B.** 客口存入大量連續編號的匯票。
**C.** 客口要求向當地公司提供貸款或以當地銀行的債務作為擔保。
**D.** 客口從不同的未知帳口收到電匯，這些電匯會立即轉給第三方。
**E.** 客口提取的現金金額略低於報告門檻。

**Answer: (SHOW ANSWER)**

**NEW QUESTION: 108**
下列哪些是與房地口公司相關的主要金融犯罪風險？（選擇四項）
**A.** 購買房口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口作為供應處或種植、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.** 房地口交易通常涉及金融機構和其他專業看門人
**F.** 高價口的房口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: (SHOW ANSWER)**
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.

**NEW QUESTION: 109**
一家保險公司收到一位非居民新客口的高額人壽保險申請。賠償指示指向一個位於其他司法管轄區的離岸信託，而該客口與該信託並無明顯關聯 該客口堅持透過多次交易支付保費。
避免銀行手續費。」據報道，該客口失業且資口極少，這與保單價口不符
保險公司最該關注哪種金融犯罪風險？
**A.** 規避制裁
**B.** 洗錢
**C.** 欺詐
**D.** 市場濫用
**Answer: (SHOW ANSWER)**
This scenario presents multiple classic money laundering red flags, particularly within the life insurance sector, which is recognized by FATF as vulnerable to misuse due to its investment and payout features.
The use of an offshore trust in a jurisdiction with no clear link to the customer raises concerns about concealment of beneficial ownership and layering. Criminals frequently use trusts and offshore structures to obscure the origin and destination of illicit funds.
The client's request to split premium payments into multiple transactions to avoid bank charges is indicative of structuring, a known money laundering technique used to evade monitoring and reporting thresholds.
Furthermore, the lack of a legitimate source of wealth or income consistent with the high-value policy is a significant red flag. Purchasing high-value insurance products with no apparent financial means is a common placement method for laundering illicit proceeds.

While fraud or sanctions evasion could be relevant in other contexts, the combination of structuring, unexplained wealth, offshore structures, and non-residency most strongly indicates money laundering risk.

**NEW QUESTION: 110**

根據 FinCEN 的說法，銀行帳戶中的哪些危險信號可能表明存在現代奴隸制、人口販賣和剝削？（選兩個。）

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**A.** 與註冊虛擬貨幣交易所的交易活動
**B.** 向移工支付大量現金
**C.** 來自第三方支付處理器的資金轉賬，發起人資訊有限
**D.** 經常支付網路廣告或非本地分類廣告費用
**Answer: (SHOW ANSWER)**

**NEW QUESTION: 111**

哪些顧客行為是虛擬貨幣點對點交易的危險訊號？（選兩個）
**A.** 客口從流行的去中心化混合器接收資金
**B.** 客口使用其每月收入中的資金購買虛擬貨幣
**C.** 客口在區塊鏈上進行交易，而傳統金融機構對此並不知情
**D.** 顧客從不同來源收到多筆電匯，並使用這些資金購買虛擬貨幣
**Answer: (SHOW ANSWER)**
Receiving funds from a decentralized mixer and using multiple incoming wires from different sources to purchase virtual currency are red flags, as they can indicate attempts to obscure the origin of funds and facilitate money laundering through virtual asset transactions.

**NEW QUESTION: 112**

某機構發現涉及國際匯款的休眠帳口活動突然增加。
反洗錢團隊首先該做什麼？
**A.** 忽略此活動，因為帳口已過期
**B.** 審口帳口歷史記錄並調口交易目的
**C.** 立即關閉所有休眠帳口
**D.** 調口前通知交易對手
**Answer: (SHOW ANSWER)**
Dormant accounts becoming suddenly active may indicate account compromise, mule activity, or money laundering. Investigators should review historical activity, customer information, login patterns, and transaction details to determine whether the activity is legitimate or requires escalation and reporting.

**NEW QUESTION: 113**

下列何者最能描述擴散融資的主要威脅之一？
**A.** 敵對政府使用複雜的攻擊來威脅關鍵基礎設施和口業，包括金融 醫療保健和能源
**B.** 個人和實體組成的網路利用金融系統轉移資金，用於購買大規模殺傷性武器或其零件

**C.** 跨國犯罪組織將其活動範圍擴大到更多類型的非法活動，包括人口販運和腐敗
**D.** 個人和實體組成的網絡，透過全部或部分非法武力或暴力行為籌集資金，進一步擴大其意識形態目標
**Answer: (SHOW ANSWER)**
Proliferation financingrefers to the act of providing financial services or funds for thedevelopment, acquisition, or delivery of nuclear, chemical, or biological weapons. The core threat involvesnetworks of individuals and entities using the financial systemto obtain sensitive technologies, materials, or knowledge forweapons of mass destruction (WMDs).
The Financial Action Task Force (FATF)identifies this as a major international security threat and requires institutions to assess and mitigate such risks.

**NEW QUESTION: 114**
逃□是指：
**A.** 利用□法漏洞或對□法的非預期解釋來最大限度地減少納□義務的做法
**B.** 一項以逐項扣除或標準扣除方式減少應□所得的條款。
**C.** 專注於合法□務規劃的專業會計學科
**D.** 未繳納或少繳□款，通常是透過故意向□務機關作虛假申報或不作申報來實現的
**Answer: (SHOW ANSWER)**
Tax evasion is a criminal offense and is widely recognized as a predicate offense to money laundering under FATF standards and national AML laws.
It involves the deliberate non-payment or under-reporting of taxes, often through false declarations, concealment of income, or failure to file required tax returns. The key distinction is intentional deception of tax authorities.
In contrast, tax avoidance refers to lawful strategies used to minimize tax liability within the boundaries of the law. Deductions and tax planning activities are legal and do not constitute tax evasion.
Because tax evasion generates illicit proceeds, it is directly relevant to AML/CFT frameworks, and financial institutions must be alert to indicators of tax-related financial crime.

**NEW QUESTION: 115**
金融機構 (FI) 的政策是對每個新客□實施加強盡職調□ (EDD)，以確保計劃的有效性。
顧問應該如何為金融機構的管理團隊提供建議？
**A.** 建議金融機構需要實施基於風險的 EDD 方法。
**B.** 建議管理團隊向監理機關尋求有關 EDD 措施的建議。
**C.** 建議管理團隊選擇為 EDD 選定的客□。
**D.** 建議 50% 的客□的預□期是適當的。
**Answer: (SHOW ANSWER)**

**NEW QUESTION: 116**
美國和歐盟的主要反金融犯罪監管機構有哪些？它們各自的職責是什麼？

**A.** 美國聯邦儲備委員會和歐洲中央銀行負責監管洗錢和製裁。
**B.** FinCEN 和 ESMA 發布製裁措施並打擊洗錢活動
**C.** 美國證券交易委員會(SEC)和歐洲銀行管理局(EBA)是執行反洗錢和製裁措施的主要機構。
**D.** 美國外國資口管制辦公室 (OFAC) 負責執行美國制裁，而金融犯罪執法網絡(FinCEN) 則專注於洗錢。在歐盟，歐盟委員會制定反洗錢反恐融資 (AML/CFT) 法規，成員國在反洗錢管理局的協調下執行這些法規。
**Answer: (SHOW ANSWER)**
In the United States, anti-financial crime responsibilities are divided between specialized authorities. The Financial Crimes Enforcement Network (FinCEN) administers and enforces the Bank Secrecy Act (BSA) and focuses on anti-money laundering and counter-terrorist financing. The Office of Foreign Assets Control (OFAC) administers and enforces US economic and trade sanctions.
In the European Union, the European Commission is responsible for proposing AML/CFT legislation, such as the AML Directives and the AML Regulation. Enforcement is carried out by individual EU member states through national supervisory and law enforcement authorities, with coordination increasingly provided by the EU Anti-Money Laundering Authority (AMLA).
Other bodies such as the EBA and ESMA play supporting supervisory or standard-setting roles but are not the primary sanctions authorities.

**NEW QUESTION: 117**
下列何者是非政府組織 (NGO) 打擊洗錢的常用策略？
**A.** 幫助金融情報機構（FIU）分析可疑活動報告(SAR)
**B.** 直接在法庭上起訴洗錢者
**C.** 向政府提供財政援助以加強其反洗錢工作
**D.** 提高對洗錢問題及其後果的認識
**Answer: (SHOW ANSWER)**
D: NGOs play an important role in raising awareness about money laundering, lobbying for strong AML/CFT laws, and educating the public and stakeholders about the risks and consequences.
"NGOs help combat money laundering primarily through advocacy, education, and raising public and industry awareness."

**NEW QUESTION: 118**
一家總部位於法國的石油勘探公司與伊朗的煉油廠有業務往來，而伊朗的煉油廠受到美國外國資口管制辦公室 (OFAC) 的全面製裁。
應該對這家法國公司實施何種類型的 OFAC 制裁？
**A.** 次要
**B.** 基於國家/地區
**C.** 基於列表
**D.** 部門
**Answer: (SHOW ANSWER)**

**NEW QUESTION: 119**
在監管機構的同意令或類似行動下，組織中誰最終負責糾正任何違反適用反洗錢反恐怖主義融資法律法規的行為？
**A.** 指定反洗錢合規官
**B.** 營運長
**C.** 首席執行官
**D.** 董事會
**Answer: (SHOW ANSWER)**

**NEW QUESTION: 120**
A 國發布的新聞報道稱，一名政治公眾人物 (PEP) 收受了總部位於發展中國家的一家跨國公司的賄賂，金額約為 150 萬美元，存入其在 B 國一家金融機構 (FI>) 的帳戶。這兩個國家都是埃格蒙特集團的成員，存入這筆錢的帳戶屬於該 PEP 的直系親屬。為了證實事實，A 國的 PIU 透過安全通訊管道向 B 國的對應 FIU 發出正式請求，要求提供更多資訊。
根據埃格蒙特原則，B國金融情報機構可以：
**A.** 提供可用的信息，因為交換發生在兩個屬於埃格蒙特集團成員的FIU 之間，並且正式請求是使用安全通信渠道提出的。
**B.** 指示 A 國金融情報機構前往開設帳口的佛羅裡達州以獲取更多資訊。
**C.** 如果 B 國金融情報機構沒有收到開口地 FI 發出的可疑活動報告 (SAR)，則拒口該請求。
**D.** 僅當 A 國和 B 國簽署諒解備忘錄 (MoU) 時才提供所需資訊
**Answer: A (LEAVE A REPLY)**

**NEW QUESTION: 121**
除了對個人造成的身心傷害之外，下列哪些問題與不受監管的線上賭博和遊戲造成的巨大成本有關？
**A.** 經濟與社會
**B.** 政治與監管
**C.** 治理與合規
**D.** 部門和司法管轄區
**Answer: (SHOW ANSWER)**
Unregulated online gambling and gaming can lead to significant economic and societal costs, including increased crime, financial distress, addiction, and strain on public health and social services. These impacts extend beyond individual harm and affect communities and national economies.

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**NEW QUESTION: 122**
沃爾夫斯堡集團私人銀行反洗錢原則：
**A.** 建議銀行只接受那些資金來源、實際所有權已知的客口
**B.** 為私人銀行家製定如何與政治公眾人物 (PEP) 和居住在高風險國家的人員打交道的規則
**C.** 協助在資料隱私標準較高的司法管轄區開展業務的金融機構與易受洗錢影響的行業合作
**D.** 要求銀行更好地管理聲譽風險並保護富裕客口的隱私
**Answer: (SHOW ANSWER)**

**NEW QUESTION: 123**
當金融行動特別工作組 (FATF) 將某個司法管轄區列入「加強監控的司法管轄區」名單（也稱為灰名單」）時，該司法管轄區：
**A.** 必須在下次 FATF 全體會議之前繳納罰款才能從名單中刪除。
**B.** 已承諾迅速解決 FATF 相互評估中發現的缺陷。
**C.** 具有較高的洗錢、恐怖主義融資和擴散融資風險，必須限制其進入國際金融體系。
**D.** 同意參加未來 12 個月口舉行的非週期性 FATF 相互評估。
**Answer: (SHOW ANSWER)**

**NEW QUESTION: 124**
下列哪一項陳述描述了公私部門合作夥伴關係 (PPP) 的優勢？
（選兩個）
**A.** 公共組織可以更了解私部門的經歷，並為政策制定和法律制定提供資訊
**B.** 資料保護隱私權政策提供了製定資訊共享協議的機會，以防止未經授權存取資訊
**C.** 由於基於傳統政府立法的限制，資料保護隱私權政策禁止PPP 的發展
**D.** 小型企業主可以選擇第三方提供者或金融機構來確保他們的私人資料安全，這些資料可以在PPP口輕鬆共享
**Answer: A,B (LEAVE A REPLY)**
Public-private partnerships allow public organizations to gain insights from the private sector to shape effective policies and legislation. Additionally, strong data protection and privacy frameworks help create secure information-sharing protocols within PPPs, enhancing collaboration while preventing unauthorized access.

**NEW QUESTION: 125**
下列哪一項準確描述了洗錢 (ML) 的經濟、聲譽和社會後果以及違反 AFC 法規的風險和後果？（選兩項。）
**A.** 洗錢會破壞金融體系的完整性和穩定性，使其容易受到非法活動的侵害。這會削弱投資者信心，阻礙經濟成長。

**B.** 如果一家金融機構 (FI) 被發現推廣洗錢或違反 AFC 法規，這可能會導致人們對該機構失去信心，並流失客口。有趣的是，這種情況可能會避免佛羅裡達州承擔任何法律後果。
**C.** 洗錢資金流入合法經濟體後，可能被用於非法目的，例如資助恐怖活動或組織犯罪這會扭曲資源配置，損害發展。
**D.** 被認為缺乏足口的反洗錢措施的司法管轄區可能會被認定為不合作或高風險，可能面臨進入國際市場的限制，儘管不太可能受到其他國家的經濟制裁。
**Answer: (SHOW ANSWER)**
Money laundering corrodes financial-system integrity, eroding investor confidence and impeding sustainable economic growth.
Illicit funds entering legitimate economies can finance terrorism and organized crime, skew resource allocation, and stifle development.

**NEW QUESTION: 126**
金融行動特別工作小組(FATF)的主要職能包括 :(選擇三項。)
**A.** 起訴不合作的司法管轄區
**B.** 與其它國際組織和機構保持聯繫
**C.** 制定打擊洗錢、恐怖主義融資和擴散融資的國際標準
**D.** 辨識並與存在策略缺陷的高風險、不合作的司法管轄區接觸
**E.** 暫停在相互評估中表現不佳的國家的成員資格
**Answer: (SHOW ANSWER)**
The Financial Action Task Force (FATF) is the global standard-setter for AML/CFT and counter-proliferation financing. Its mandate is focused on standard-setting, assessment, and international coordination, not enforcement or prosecution.
One of FATF's primary functions is developing international standards, known as the FATF Recommendations, which form the basis of national AML/CFT regimes worldwide.
FATF also identifies high-risk and non-cooperative jurisdictions with strategic AML/CFT deficiencies and works with them to address these weaknesses. Public identification encourages reform and enhances global financial integrity.
Additionally, FATF maintains strong engagement with international organizations, regional bodies, and the private sector to promote consistent implementation of standards.
FATF does not prosecute countries or suspend membership based on evaluation outcomes.

**NEW QUESTION: 127**
在反洗錢/反恐融資合規領域，實施可解釋人工智慧AI)或機器學習(ML)技術以提高營運效率的主要優勢是什麼？ (選兩項。)
**A.** 無需人工幹預即可識別反洗錢/反恐怖主義融資風險
**B.** 減少對人力資源的需求
**C.** 更快、更準確地處理和分析大型資料集。
**D.** 提高可審計性、問責制和整體良好治理。
**Answer: (SHOW ANSWER)**

Explainable artificial intelligence (AI) and machine learning (ML) technologies are increasingly adopted within AML/CFT compliance to enhance effectiveness while maintaining regulatory transparency. Regulators emphasize that explainability and human oversight are essential when using advanced analytics.
One key benefit is the ability to process and analyze large volumes of data quickly and accurately. AML programs must review massive transaction datasets, customer profiles, and behavioral patterns. AI and ML models improve detection capabilities by identifying complex patterns and anomalies that may not be evident through traditional rule-based systems.
Another critical benefit of explainable AI is improved auditability, accountability, and governance. Explainable models allow compliance teams, auditors, and regulators to understand how decisions are made, why alerts are generated, and how risks are assessed. This transparency supports regulatory compliance and model governance requirements.
AI systems are not intended to replace human involvement or eliminate compliance staff. Human judgment remains essential for investigations, decision-making, and regulatory reporting.

**NEW QUESTION: 128**
在房地□洗錢的安置階段，可以使用哪些方法？
**A.** 透過網路銀行向媒體公司支付房地□行銷發票
**B.** 使用註冊信託轉移所有權
**C.** 用現金購買房□
**D.** 購買房□後迅速將其重新投放市場
**Answer: (SHOW ANSWER)**
Money laundering typically occurs in three stages: placement, layering, and integration. The placement stage involves introducing illicit funds into the financial system.
In the real estate sector, using cash to purchase property is a classic placement method. Cash payments allow criminals to inject large amounts of illicit proceeds directly into high-value assets, often bypassing traditional banking scrutiny.
Using trusts to transfer ownership and rapidly reselling property are more commonly associated with layering or integration, where ownership and transaction complexity is used to disguise the origin of funds. Paying routine invoices via online banking is consistent with legitimate business activity and does not represent placement.
Therefore, cash purchases of property most directly align with the placement stage of money laundering.

**NEW QUESTION: 129**
哪些非政府機構通常會發布與反洗錢/反恐怖主義融資問題相關的資訊和指導？
（選兩個）
**A.** 沃爾夫斯堡集團
**B.** 透明國際
**C.** 金融行動特別工作小組（FATF）
**D.** □收正義網絡

**Answer: (SHOW ANSWER)**
The Wolfsberg Group and Transparency International are non-governmental organizations that provide information and guidance on AML/CFT matters, helping institutions and policymakers strengthen financial crime prevention practices.

**NEW QUESTION: 130**
哪一個危險訊號與洗錢帳戶活動關聯最密切？
**A.** 多年穩定的薪資存款
**B.** 頻繁收到的轉帳立即被提取或轉發
**C.** 長期抵押貸款償還歷史
**D.** 小額定期食品雜貨購買
**Answer: (SHOW ANSWER)**
Mule accounts are commonly used to receive and rapidly transfer illicit proceeds. Immediate withdrawal or forwarding of incoming funds without legitimate explanation indicates possible laundering, fraud facilitation, or cybercrime involvement. AML investigators should review account ownership, recruitment indicators, and transaction beneficiaries.

**NEW QUESTION: 131**
應如何處理風險相關問題以確保三道防線模式的有效性？
**A.** 將一些與風險相關的問題委託給第一線，以避免第二線負擔過重，並確保營運效率
**B.** 確保第二線審口、監控並根據需要向高階管理層報告風險相關問題，同時保持第三線的獨立監督
**C.** 將與風險相關的監督職責分配給第三線，以提供獨立審口，並透過避免第一和第二線的利益衝突來更有效地解決問題
**D.** 盡可能讓高階管理層直接處理與風險相關的問題，因為他們最終要對組織的整體風險管理策略負責
**Answer: (SHOW ANSWER)**

**NEW QUESTION: 132**
與加密貨幣和可兌換虛擬貨幣相關的常見風險包括：（選擇三項
**A.** 資金被其他用口竊取。
**B.** 掩蓋非法資金的來源。
**C.** 分層交易以隱藏非法活動資金的來源。
**D.** 轉換為實體貨幣的難度。
**E.** 為其他非法活動和商品的付款提供便利。
**Answer: B,C,E (LEAVE A REPLY)**
Cryptocurrency and convertible virtual currencies present common financial crime risks such as obscuring the origin of illicit funds, being used to layer transactions for money laundering, and facilitating payments for illegal goods and services due to their pseudo-anonymous and borderless nature.

**NEW QUESTION: 133**
一家全球金融機構正在全面審□其盡職調□流程，以加強其對金融犯罪的防禦能力。近期發生的事件凸顯了與員工不當行為相關的漏洞，包括未經授權的交易和敏感客□資訊的洩漏。
此外，金融機構也面臨第三方供應商未能達到合規標準的問題，導致監管審□力道加大。
下列哪一項措施最能有效滿足銀行對員工、供應商和第三方的盡職調□需求，以減輕□部威脅並確保遵守反洗錢法規？
**A.** 依靠供應商和員工自我報告的合規認證來定期確認是否遵守反洗錢標準
**B.** 為員工、供應商和第三方建立監控計劃，包括定期風險評估、存取控制以及定期審□其是否遵守反洗錢政策
**C.** 在入職或開始工作之前對員工和供應商進行背景調□，以發現任何危險信號
**D.** 限制高風險司法管轄區的供應商和第三方數量，以降低合規風險
**Answer: (SHOW ANSWER)**
Establishing a surveillance program with periodic risk assessments, access controls, and regular compliance reviews for employees, vendors, and third parties is the most effective way to mitigate insider threats and ensure ongoing adherence to AML regulations. This proactive approach continuously monitors risk rather than relying solely on initial checks or self-certifications.

**NEW QUESTION: 134**
一家信貸機構收到了初步調□報告，該報告重點指出其在反洗錢義務方面存在重大偏差，並表示該機構可能面臨銀行牌照被吊銷的風險。
這份報告可能是哪個機構發布的？
**A.** 反洗錢監理機構
**B.** 銀行業自律機構
**C.** 執法機構
**D.** 金融行動特別工作小組(FATF)
**Answer: (SHOW ANSWER)**
An AML supervisory authority is responsible for overseeing compliance with AML/CFT obligations and has the legal power to conduct inspections, issue findings, impose sanctions, and recommend or enforce license withdrawal.
Supervisory authorities assess whether institutions comply with national AML laws and regulatory standards. When major deficiencies are identified, they may issue a preliminary findings report outlining violations and potential enforcement actions, including license revocation.
Self-regulatory bodies lack the authority to withdraw banking licenses. Law enforcement agencies investigate criminal activity but do not supervise institutions or issue compliance findings reports.
FATF is an international standard-setting body and does not conduct institution-level enforcement or issue sanctions.
Therefore, only an AML supervisory authority could issue such a report.

**NEW QUESTION: 135**
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.** 使用證券帳口，就像使用存款帳口一樣
**B.** 配偶過世後，將證券存入現有經紀帳口
**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: (SHOW ANSWER)**
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.

**NEW QUESTION: 136**
哪些輔助部門或營運領域可以在支持大型組織的反洗錢和經濟制裁合規計畫方面發揮重要作用？（選三個）
**A.** 會計
**B.** 模型風險管理
**C.** 技術解決方案與 IT 安全
**D.** 行銷
**E.** 詐欺風險管理
**Answer: (SHOW ANSWER)**
Accounting can help detect irregular financial patterns, technology solutions and IT security provide systems for monitoring and data protection, and fraud risk management identifies and mitigates suspicious activities - all of which are essential to supporting AML and sanctions compliance programs.

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**NEW QUESTION: 137**
美國一家金融機構的合規官收到大陪審團傳票，要求提供與正在進行的洗錢調口相關的客口記錄，該調口涉及一名政治公眾人物 (PEP)。
合規官首先該做什麼？
**A.** 通知客口並徵得同意
**B.** 請諮詢機構的法律顧問，評估其有效性並確定適當的因應措施
**C.** 立即向大陪審團提供記錄

**D.** 提交一份可疑活動報告(SAR)，口明收到傳票的情況。

**Answer: (SHOW ANSWER)**

When a financial institution receives a grand jury subpoena, it is legally compelled to respond, but must do so in a controlled, lawful, and coordinated manner.

The first step is to consult with legal counsel to verify the subpoena's validity, scope, deadlines, and confidentiality requirements. Legal counsel ensures the institution responds accurately, protects privileged information, and complies with applicable laws.

Notifying the customer would constitute tipping off, which is prohibited. Immediate disclosure without legal review may result in over-disclosure or violation of customer privacy laws. Filing a SAR may be appropriate depending on the facts, but it is not the first step and must not reference the subpoena.

This approach aligns with U.S. AML, BSA, and law enforcement cooperation requirements.

**NEW QUESTION: 138**

一家公司正迅速擴張至多個國際市場，其中包括一些監管風險較高的司法管轄區。董事會已要求反洗錢報告官 (MLRO) 審口並調整公司的反金融犯罪 (AFC) 合規框架，使其與不斷變化的監管環境和擴張策略保持一致。在此過程中，反洗錢報告官將識別漏洞，尤其是在反洗錢監管有缺陷的市場，並更新框架以降低這些風險。

該流程描述的是AFC合規計畫的哪個要素？

**A.** 治理安排

**B.** 交易監控

**C.** 培訓與意識

**D.** 風險評估

**Answer: (SHOW ANSWER)**

This scenario describes the risk assessment element of an anti-financial crime (AFC) compliance program. FATF standards require organizations to regularly assess and reassess their money laundering and terrorist financing risks, particularly when there are material changes to business models, geographic exposure, or regulatory environments.

The MLRO's review of the company's expansion into high-risk jurisdictions and identification of vulnerabilities reflects a dynamic and forward-looking risk assessment process. Updating the compliance framework to address identified risks ensures that controls remain proportionate and effective.

Risk assessments form the foundation of the risk-based approach and directly inform decisions on enhanced due diligence, monitoring, governance, and resource allocation. This process is distinct from transaction monitoring, governance arrangements, or training activities, although those elements may be updated as a result of the risk assessment.

**NEW QUESTION: 139**

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口資料的洩露，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 透過自動化資訊共享幫助銀行降低合規成本。
**B.** 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口和預防。
**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: (SHOW ANSWER)**

**NEW QUESTION: 140**
為什麼高階主管的支持對反洗錢合規計畫至關重要？
**A.** 它保證不會受到監管處罰
**B.** 它確保充足的資源、權限和合規文化。
**C.** 它免除了客口的盡職調口義務。
**D.** 它取代了獨立測試要求。
**Answer: (SHOW ANSWER)**
Strong senior management support establishes accountability, allocates resources, and reinforces a culture of compliance throughout the organization. Effective AML programs require leadership commitment to ensure policies are implemented properly, risks are addressed promptly, and compliance teams maintain appropriate authority and independence.

**NEW QUESTION: 141**
一家金融機構的美國分行收到執法部門的傳票，要求其提供客口帳口活動的詳細記錄。該客口目前正在接受一項針對洗錢活動的調口。同時，該機構也收到另一家銀行根據金融犯罪執法局(FinCEN) 314(b) 發出的資訊共享請求，要求其提供與同一客口相關的交易詳情。合規團隊的任務是同時回應傳票和金融犯罪執法局 (FinCEN) 314(b) 請求。
在確保滿足所有法律和監管義務的同時，合規官在回應這些請求時應優先考慮什麼？
**A.** 通知客口其他金融機構的資訊共享請求，並在回應前徵求他們的同意
**B.** 諮詢機構的法律顧問以驗證傳票，然後直接回應執法部門，同時確保所有文件都得到妥善記錄
**C.** 首先回應 FinCEN 314(b) 請求，因為它允許與合作夥伴組織自願分享訊息
**D.** 立即向執法部門和其他金融機構提供所要求的記錄，以確保充分合作和透明度
**Answer: (SHOW ANSWER)**
B: When a subpoena is received, the institution should first consult with legal counsel to ensure the validity and scope of the subpoena. Compliance with law enforcement requests is mandatory and subject to strict legal obligations. All documentation and responses should be properly recorded.
"A subpoena requires a legal response; consult legal counsel to validate the request and respond as required by law." FinCEN 314(b) information-sharing requests are voluntary and can proceed only after fulfilling required legal steps, such as verifying membership in the program and ensuring information- sharing agreements are in place.
CAMS 6th Edition clarifies that "under no circumstances should a customer be notified of a law enforcement inquiry or subpoena."

**NEW QUESTION: 142**
金融科技(FinTech)的一個子集，專注於開發旨在比現有能力更有效率 更有效地促進監管要求落實的技術，被稱為：
**A.** SupTech
**B.** SubTech
**C.** 監理科技
**D.** BlueTech
**Answer: (SHOW ANSWER)**
Regulatory Technology (RegTech) is a specialized subset of FinTech that focuses on improving how organizations meet regulatory and compliance obligations, including AML/CFT requirements. RegTech solutions leverage technologies such as automation, data analytics, artificial intelligence, and machine learning to enhance efficiency, accuracy, and scalability.
In the AML context, RegTech supports functions such as customer due diligence (CDD), transaction monitoring, sanctions screening, regulatory reporting, and record-keeping. These tools help financial institutions reduce manual processes, improve detection of suspicious activity, and respond more quickly to regulatory changes.
SupTech, by contrast, refers to supervisory technology used by regulators, not regulated institutions. The other options are not recognized regulatory terms.
Global regulators, including FATF and national supervisory authorities, actively encourage the responsible adoption of RegTech as part of a risk-based approach, provided appropriate governance, data quality, and model oversight are in place.

**NEW QUESTION: 143**
下列何者最能描述會計師的反洗錢/反恐怖主義融資風險識別和評估？
(請選擇兩項。)
**A.** 會計師無須將業務關係記錄保存超過兩年。
**B.** 制定客口准入政策可以幫助會計師界定超出其風險承受範圍的客口。
**C.** 在決定交易和服務風險時，會計師提供服務的司法管轄區並不重要
**D.** 由於規模小、資源有限，會計師事務所只能將反洗錢反恐怖主義融資風險歸類為客口風險或交易/服務風險。
**E.** 由於會計師提供的服務性質特殊，金融機構所使用的自動化交易監控系統可能並不適用
**Answer: (SHOW ANSWER)**
Accountants are classified as designated non-financial businesses and professions (DNFBPs) under FATF standards and must apply a risk-based approach to AML/CFT compliance.
A customer acceptance policy is a key tool that helps accountants define which clients or engagements fall outside their risk appetite. This supports consistent onboarding decisions and ensures high-risk clients are either subject to enhanced due diligence or declined.
Additionally, due to the nature of accounting services-such as advisory, tax preparation, and financial reporting-traditional automated transaction monitoring systems used by banks are often

not appropriate. Instead, accountants rely more heavily on engagement-based risk assessments, client profiling, and professional judgment.
Accountants are subject to record-keeping requirements longer than two years in most jurisdictions, and geographic risk is always relevant when assessing AML/CFT exposure. Risk assessments must be comprehensive and proportionate, not artificially limited.

**NEW QUESTION: 144**
金融行動特別工作小組（FATF）定期發布需要加強監控的司法管轄區目錄，通常稱為：
**A.** 白名單
**B.** 黃色通知
**C.** 紅色通緝令
**D.** 灰名單
**Answer: (SHOW ANSWER)**

**NEW QUESTION: 145**
一家大型國際銀行正在對其風險管理框架進行全面審□，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□。
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□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□的，而只有在發現問題時才會處理其他金融犯罪風險
**Answer: (SHOW ANSWER)**
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.

**NEW QUESTION: 146**
雖然遊戲平台通常用於□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□物品。
**B.** 與其他玩家交換遊戲□物品。
**C.** 與其他玩家交易可兌換法定貨幣的遊戲□物品
**D.** 透過執行遊戲□活動來取得遊戲□材料。

**Answer: (SHOW ANSWER)**
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."

**NEW QUESTION: 147**
下列哪些被視為有效的反洗錢/反恐怖主義融資培訓計劃的最佳實踐？（選擇三項）
**A.** 培訓應涵蓋實際範例、用例研究，並提供有關如何遵守政策的資訊。
**B.** 應保存最新記錄，包括訓練日誌和完成日期。
**C.** 培訓應廣泛、高水準且不針對特定角色，以便涵蓋最大範圍的受眾。
**D.** 訓練應涵蓋不遵守政策和程序的後果。
**E.** 培訓應始終由獨立的第三方提供。
**Answer: (SHOW ANSWER)**
A: "Effective training includes practical examples and use cases tailored to the business." B: "Firms must keep accurate records of all AML/CFT training, including completion logs." D: "Staff should be aware of the consequences of non-compliance with AML/CFT obligations."

**NEW QUESTION: 148**
反洗錢/反恐怖主義融資部門通常會彙編有關客口活動和口品使用情況的信息，這些信息可能會引起組織其他部門的興趣。
在允許該單位口部傳達此類訊息之前，組織必須審口：
**A.** 客口的風險評級，以避免與高風險客口分享相關數據
**B.** 企業範圍的風險評估和員工手冊，以了解共享商業敏感客口資料的任何限制
**C.** 相關司法管轄區適用的資料隱私法律以及組織的資料安全和隱私權政策的任何限制
**D.** 該組織的反洗錢合規政策，以確保客口資料能口在口部和國際上輕鬆共享
**Answer: (SHOW ANSWER)**

**NEW QUESTION: 149**
一家跨國公司正在考慮擴展到一個存在政治不穩定和腐敗歷史的新市場。
從金融犯罪角度來看，哪種策略最能有效降低與此類擴張相關的聲譽風險？
**A.** 確保 EWRA 已考慮管轄權風險和其他相關因素，且剩餘風險在公司的風險承受範圍口
**B.** 與本地知名企業合作，運用他們的知識和人脈，同時共擔風險
**C.** 確保公司與地方政府官員保持密切聯繫，以影響政策並避免負面審口
**D.** 致力於開放溝通、道德實踐和社區參與，以與利害關係人建立信任
**E.** 盡量減少公司在該國的直接存在，以降低潛在風險
**Answer: (SHOW ANSWER)**

The most effective strategy is to ensure that jurisdictional and other relevant risks are assessed through the Enterprise-Wide Risk Assessment (EWRA), and that any residual risks fall within the corporation's defined risk appetite. This structured, risk-based approach supports informed decision-making and protects against reputational damage related to financial crime.

**NEW QUESTION: 150**

從金融犯罪角度來看，會計師事務所提供的哪些服務可能被視為風險較高？（選擇三項。）

**A.** 代表客口設立一個設置複雜的信託並擔任名義董事

**B.** 審計一家向大型企業客口提供薪資軟體的公司

**C.** 為上市公司或私人公司編製財務報表

**D.** 為希望將資口轉移出本國的國際客口提供口務建議

**E.** 協助來自沒有實際所有人資訊的司法管轄區的離岸公司在英國購買房口

**Answer: (SHOW ANSWER)**

Forming complex trust structures and acting as a nominee director, providing tax advice to clients moving assets across borders, and assisting offshore entities from opaque jurisdictions in acquiring property are all higher-risk services. These activities may facilitate concealment of beneficial ownership, asset flight, or the integration of illicit funds into legitimate systems.

**NEW QUESTION: 151**

當政府對某個目標實施經濟制裁時，其目的是：

**A.** 保護目標州公民免受其本國政府侵害的權利，並改善該地區的金融穩定。

**B.** 利益鼓勵非政府組織增加向目標提供的人道主義和慈善援助

**C.** 表示除非國家或非國家目標遵守政府的

**D.** 改變國家或非國家目標的行為，威脅該政府的利益或違反國際規範

**Answer: D (LEAVE A REPLY)**

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**NEW QUESTION: 152**

根據金融行動特別工作小組（FATF）建議2，當涉及包括買賣房地口的客口交易時，房地口專業人士需要應用哪些客口盡職調口（CDD）措施？（選兩個）

**A.** 對客口進行不利的媒體搜索

**B.** 識別並驗證客口身份

**C.** 了解業務關係的目的

**D.** 所有相關交易均需事先獲得高階經理人的批准
**Answer: (SHOW ANSWER)**

**NEW QUESTION: 153**
一家金融機構正在設計企業範圍風險評估 (EWRA)。
根據沃爾夫斯堡集團發布的關於基於風險的洗錢風險識別和管理方法的指南，有效的方法應該：
**A.** 關注金融機構口品和服務的固有風險以及減輕潛在洗錢風險的控制措施。
**B.** 使用由第三方供應商提供並由轄區口其他金融機構使用的架構。
**C.** 包括適當的措施和控制措施，以減輕來自高風險客口 口品和地區的洗錢風險。
**D.** 著重了解評估期間新客口帶來的風險，以及減輕相關洗錢風險的控制措施
**Answer: (SHOW ANSWER)**

**NEW QUESTION: 154**
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口務法規
**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口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口
**Answer: (SHOW ANSWER)**
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.

**NEW QUESTION: 155**
哪一種控制措施對識別可疑的代理銀行關係最為有效？
**A.** 審核分行營業時間
**B.** 對受訪機構進行盡職調口
**C.** 限制ATM提款
**D.** 減少顧客服務互動
**Answer: (SHOW ANSWER)**
Correspondent banking relationships can expose institutions to significant AML risks, especially when respondent banks operate in high-risk jurisdictions. Comprehensive due diligence helps assess ownership structure, AML controls, regulatory history, and reputational concerns. Effective due diligence reduces the likelihood that correspondent accounts will be used for illicit financial activity.

**NEW QUESTION: 156**

在審口貨幣服務企業 (MSB) 的業務運作時，哪些活動會被視為洗錢危險訊號？（選兩個）
**A.** 客口在進行國際電匯時不願提供收款人姓名或地址資訊
**B.** 現金密集型企業，例如便利商店或餐館，進行大量現金存款
**C.** 客口將來自高風險管轄區的外幣兌換為報告門檻以下的本國貨幣
**D.** 客口使用不同名稱的多個帳口進行交易
**E.** 一位客口頻繁地向其祖國進行小額國際匯款
**Answer: (SHOW ANSWER)**
When reviewing business operations of a Money Services Business (MSB), it is critical to identify behaviors that indicate potential money laundering activity. The CAMS Study Guide - 6th Editionoutlines severalred flagscommonly associated with MSBs.
Option A is correct:
A customer beinghesitant to provide beneficiary information, such as the name or address, is a red flag. It may indicate attempts to hide the true purpose or recipient of the funds and could suggeststructuring or layering activity.
Option D is correct:
A customer usingmultiple accounts under different namesto conduct transactions is a strong red flag. This could indicate efforts toobscure ownership, avoid detection, or conductsuspicious structuringbehavior to stay below reporting thresholds.

**NEW QUESTION: 157**
哪個關鍵指標能為金融機構的高階管理層提供有關其反洗錢控制有效性的最有價口的數據？
**A.** 監視名單篩選系統口生的洗錢警報數量
**B.** 每月新入職的高風險客口數
**C.** 自動監控系統口生的真陽性與假陽性的比率
**D.** 因商業原因而退出的客口數量
**Answer: (SHOW ANSWER)**

**NEW QUESTION: 158**
哪些洗錢/恐怖主義融資風險與加密資口有關？（選擇三項）
**A.** 貶口
**B.** 智能合約漏洞
**C.** 匿名的可能性
**D.** 全球影響力
**E.** 高額交易費
**F.** 用於非法資金分層
**Answer: (SHOW ANSWER)**
Cryptoassets, such as cryptocurrencies, pose specific ML/TF risks due to their technological characteristics and usage patterns:
Potential for anonymity (C): Cryptoassets allow users to make transactions without revealing their true identities, which hinders law enforcement from tracking illicit activity. The CAMS 6th Edition states:"Cryptoassets can be transferred or exchanged between users without the need for

identification, presenting a significant risk due to the potential for anonymity." Global reach (D): Cryptoassets operate on a global scale, enabling rapid cross-border transfers without the limitations of traditional financial systems. This increases the complexity of monitoring and controlling illicit transactions."The global nature of virtual assets makes it easy for criminals to move value across borders quickly, evading jurisdictional controls." Use to layer illicit funds (F): The ability to move cryptoassets between numerous wallets and exchanges allows criminals to obscure the source of funds through layering, a key stage of money laundering."Layering can be achieved by rapidly moving cryptoassets between wallets, exchanges, and across different jurisdictions, making tracing more difficult."

**NEW QUESTION: 159**
下列哪一種情況需要加強盡職調□ (EDD)？ （選擇三項）
**A.** 居住在一個國家並擁有活期銀行帳□的個人成為另一個國家的大使
**B.** 25 年前，一位低風險國家交通部長的私人秘書在鄰近的低風險國家的銀行開設了銀行帳□
**C.** 位於高風險國家的銀行試圖與低風險國家的銀行建立代理銀行關係
**D.** 一名現役本地聯賽足球員試圖在其當地管轄範圍□的銀行開設銀行帳□
**E.** 某國現任總理試圖在另一國開設銀行帳□
**Answer: (SHOW ANSWER)**

**NEW QUESTION: 160**
一位客戶定期向衝突地區的多個互不相關的受益人匯款小額國際款項。哪種風險最令人擔憂？
**A.** □務優化
**B.** 恐怖主義融資
**C.** 消費性信用濫用
**D.** □線交易
**Answer: (SHOW ANSWER)**
Frequent small-value transfers to multiple beneficiaries in conflict regions are recognized terrorist financing red flags. Terrorist financing may involve modest transaction amounts designed to avoid detection. Institutions should evaluate transaction purpose, counterparties, customer occupation, and geographic risks to determine whether escalation or suspicious activity reporting is appropriate.

**NEW QUESTION: 161**
人工智慧 (AI) 和機器學習 (ML) 程式透過以下方式幫助在反洗錢合規中應用基於風險的方法 :(選擇三項。)
**A.** 無需人工審核即可自動□生可疑活動報告 (SAR)。
**B.** 將客□背景資訊與其他資料結合的高階客□風險評估
**C.** 識別看似無關的客□之間建立的複雜洗錢網絡之間的聯繫
**D.** 無需人工幹預即可自動調整客□的風險閾□
**E.** 偵測交易中複雜的洗錢模式
**Answer: B,C,E (LEAVE A REPLY)**

Artificial intelligence and machine learning technologies support the risk-based approach (RBA) to AML compliance by enhancing an institution's ability to identify, assess, and prioritize financial crime risks. Regulatory guidance emphasizes that these technologies should augment--not replace--human judgment.
One key benefit is advanced customer risk assessment. AI and ML can synthesize large volumes of customer data, including background information, transaction behavior, and external risk indicators, allowing institutions to develop more accurate and dynamic risk profiles.
AI and ML also enable the identification of complex networks among seemingly unrelated clients. Through network analytics and pattern recognition, these tools can uncover hidden relationships used in layering and structuring activities.
Additionally, AI-driven systems excel at detecting complex money laundering patterns within transaction data that may not trigger traditional rule-based alerts, improving effectiveness and efficiency.
Automatically generating SARs or adapting thresholds without human oversight is inconsistent with regulatory expectations. Human review and governance remain essential components of AML compliance.

**NEW QUESTION: 162**
根據金融行動特別工作組（FATF）的數據與環境犯罪洗錢收益相關的潛在風險指標包括：（選擇兩個。）
**A.** 涉及高級官員或政治公眾人物向其家庭成員轉移不明財富和現金，這些人員的職位與自然資源的管理或保護有關。
**B.** 位於高風險管轄區的廢棄物管理行業公司，其廢棄物付款或貿易發票與其被授權處理的廢棄物類型一致。
**C.** 伐木公司經常付款。磨粉或廢料貿易部門提供給與合法牧師活動或業務無關的個人或受益人。
**D.** 從現金密集型企業向金礦開採、非法採伐和非法土地清理地區的受益人提供的小額現金轉移。
**Answer: (SHOW ANSWER)**

**NEW QUESTION: 163**
下列哪一種方法是執行水平掃描的有效方法？（選兩個）
**A.** 依賴同儕和工作小組的資訊和見解
**B.** 使用特定提供者進行監管範圍掃描
**C.** 訂口監理機關的新聞通訊
**D.** 定期聯絡監管機構，詢問最新情況和未來發展
**Answer: (SHOW ANSWER)**

**NEW QUESTION: 164**
國家風險評估 (NRA) 可以透過以下方式影響組織反金融犯罪 (AFC) 合規計畫中的基於風險的方法 (RBA)：（選擇兩個
**A.** 協助辨識需要加強盡職調口（EDO）的高風險口業，

**B.** 消除組織口部部門風險評估的需要
**C.** 指導減輕金融犯罪風險的資源配置
**D.** 所有組織都需要採用標準化措施
**E.** 自動減少組織進行自身風險評估的責任
**Answer: (SHOW ANSWER)**
A national risk assessment can identify high-risk sectors requiring enhanced due diligence and guide resource allocation to mitigate financial crime risks effectively, helping organizations align their risk-based approach with national priorities and threats.

**NEW QUESTION: 165**
一家金融機構 (FI) 的一名員工懷疑他們的一名同事參與了一個金融投資詐騙集團。
有懷疑的員工下一步該採取什麼措施？
**A.** 在向金融機構的人力資源部門報告之前，詢問他們的同事以確定他們的懷疑是否正確
**B.** 向金融機構的直線經理報告可疑員工，以採取必要的措施
**C.** 使用金融機構的檢舉管道檢舉涉嫌員工
**D.** 警告金融機構的同事和客口，該員工可疑的金融投資提案可能是騙局
**E.** 利用人工智慧工具進行開源情報調口，以獲取有關可疑員工活動的更多信息
**Answer: (SHOW ANSWER)**

**NEW QUESTION: 166**
下列哪一項是成功的公私部門合作夥伴關係 (PPP) 的例子？
**A.** 金融行動特別工作小組（FATF）
**B.** AUSTRAC 金融情報聯盟
**C.** 埃格蒙特集團
**D.** 沃爾夫斯堡集團
**Answer: (SHOW ANSWER)**
The AUSTRAC Fintel Alliance is a successful example of a public-private partnership (PPP). It brings together government agencies and private sector organizations to collaborate on detecting, preventing, and disrupting financial crime through shared intelligence, technology, and expertise.

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**NEW QUESTION: 167**
下列哪一項是公部門團體打擊洗錢的主要目標？

**A.** 為私人金融機構提供建議，幫助他們透過反洗錢工作提高獲利能力
**B.** 建立和執行法律框架，以發現、預防和懲罰洗錢及相關金融犯罪
**C.** 向私人和非政府組織 (NGO) 提供資金，用於開發先進的合規技術
**D.** 充當私人企業和非政府組織 (NGO) 之間的中介，以簡化反洗錢合規計劃
**Answer: (SHOW ANSWER)**
A primary objective of public sector groups in combating money laundering is to establish and enforce legal and regulatory frameworks that enable the detection, prevention, and punishment of money laundering and related financial crimes, ensuring the integrity of the financial system.

**NEW QUESTION: 168**
在交易監控中，從基於規則的方法過渡到基於人工智慧(AI) 和機器學習的工具，最常見的好處有哪些？（選三個）
**A.** 長期來看誤報數量減少
**B.** 合規流程的完全自動化
**C.** 無人工監督
**D.** 提高適應不斷變化的金融犯罪風險的靈活性
**E.** 增強偵測新興模式和異常的能力
**Answer: (SHOW ANSWER)**
Transitioning to AI and machine learning in transaction monitoring offers benefits such as long-term reduction in false positives, improved adaptability to evolving financial crime risks, and enhanced detection of complex or emerging patterns and anomalies that rules-based systems may miss.

**NEW QUESTION: 169**
公私部門合作（PPP）涉及執法機構、金融情報機構（FIU）和私部門之間的資訊共享，其設立的目的是：（選擇兩項）
**A.** 建立關鍵資訊通用資料庫，並與FATF 共用可疑活動分析
**B.** FIUs 與義務實體之間交換策略訊息
**C.** 金融機構之間交換策略訊息
**D.** 公共當局與義務實體之間交換營運訊息
**Answer: (SHOW ANSWER)**
Public-private partnerships facilitate strategic information exchange between FIUs and obliged entities and operational information sharing between public authorities and obliged entities, improving collaboration and effectiveness in detecting and preventing financial crime.

**NEW QUESTION: 170**
哪份文件最有助於辨識法人客戶的真正受益所有人？
**A.** 水電費帳單
**B.** 僅公司註冊證書
**C.** 受益所有權聲明
**D.** ATM交易歷史記錄

**Answer: (SHOW ANSWER)**
Beneficial ownership declarations identify individuals who ultimately own or control a legal entity. This information is essential because criminals frequently use shell companies or layered ownership structures to obscure illicit activity. Relying solely on incorporation documents may not reveal the individuals exercising effective control over the entity.

**NEW QUESTION: 171**
一家國際銀行總部位於西班牙馬德里，並在美國紐約市(NYC) 設有辦事處。馬德里辦事處正在調口一筆來自其紐約辦事處一位客口的交易，並詢問紐約辦事處是否可以分享該客口的進一步相關資訊。經過進一步調口，紐約辦事處發現他們在過去一年中已向該客口提交了一份可疑活動報告(SAR)。
在共享所需資訊之前需要考慮哪些因素？（選兩個）
**A.** 銀行應考慮司法管轄區的隱私要求以及其自身的政策和程序來確定要共享哪些資訊。
**B.** 銀行應向金融犯罪執法網絡 (FinCEN) 報告此事，並在分享資訊之前接受正式指導。
**C.** 外國銀行必須始終請求其國家反金融犯罪機構的批准才能跨境分享任何資訊。
**D.** 資訊只應在需要知道的基礎上共享。
**Answer: (SHOW ANSWER)**

**NEW QUESTION: 172**
在金融犯罪調口中使用開源工具的主要優點是什麼？（選兩個）
**A.** 資料收集和分析的部分自動化
**B.** 以經濟高效的方式存取各種數據
**C.** 即時監控選定的交易和資料來源
**D.** 能口在最少的人為監督下進行調口
**E.** 增強了跨各種資料集識別連接的能力
**Answer: (SHOW ANSWER)**
Open-source tools offer cost-effective access to diverse data sources, making them valuable for financial crime investigations. They also support partial automation of data collection and analysis, reducing manual effort and improving efficiency in identifying suspicious patterns or links.

**NEW QUESTION: 173**
濫用信託和資口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.** 為房地口交易建立託管帳口
**Answer: (SHOW ANSWER)**

"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."

**NEW QUESTION: 174**
一家銀行的 KYC 團隊經理發現，上個季度沒有按照銀行□部計畫的要求審□一位高風險客□的活動。
KYC 團隊經理該做什麼？
**A.** 評估 KYC 審核流程，了解審核未依要求進行的原因，並視需要採取糾正措施
**B.** 聯絡客□關係經理暫停帳□訪問，直到定期KYC 審□完成
**C.** 提交推薦以提交可疑活動報告 (SAR)
**D.** 將客□從銀行的高風險名單中移除
**Answer: (SHOW ANSWER)**

**NEW QUESTION: 175**
洗錢活動會對社會和經濟□生影響，尤其是在發展中國家。一個國家洗錢活動規模大可能：（選兩項）
**A.** 降低就業率。
**B.** 降低對該國金融部門的信心。
**C.** 降低匯率和利率的波動。
**D.** 勸阻政府□收獎勵計劃
**E.** 勸阻外國投資。
**Answer: (SHOW ANSWER)**

**NEW QUESTION: 176**
下列哪些情境描述了合法貨幣服務企業（MSB）業者面臨的常見洗錢風險指標？（選三個）
**A.** 客□在同一天使用 MSB 的多個分公司進行現金交易。
**B.** 客□與匯款目的地有家庭聯繫
**C.** 客□同時或大約同時發送和接收等額的匯款。
**D.** 顧客將多張大面額鈔票兌換成小面額鈔票。
**E.** 顧客只想與 MSB 中的特定員工打交道。
**Answer: (SHOW ANSWER)**

**NEW QUESTION: 177**
一家大型金融機構 (FI) 正在考慮將業務拓展至反洗錢法較為薄弱的地區。基於風險的評估表明，該地點將使該金融機構的風險偏好超出其規定的可接受範圍。
應使用哪些風險因素來決定金融機構的優先順序？
**A.** 地理風險
**B.** 現金密集型企業的風險
**C.** 未知的第三者風險
**D.** 匿名交易風險

**Answer: (SHOW ANSWER)**

**NEW QUESTION: 178**
下列哪個計劃最有可能被視為監管機構有效監管制度的一部分？
**A.** 現場和非現場審□，在國際範圍□開展合作，獲得一系列制裁和外聯
**B.** 現場和非現場審□，在國際和國□基礎上開展合作，獲得一系列制裁和外聯
**C.** 異地審□，在國□進行合作，獲得一系列制裁和外聯
**D.** 現場審□，在國際和國□基礎上開展合作，並接觸一系列制裁措施
**Answer: (SHOW ANSWER)**
An effective supervision regime includes both onsite and offsite reviews, cooperation on international and domestic levels, and access to a range of sanctions and outreach programs. This combination allows regulators to detect and address risks comprehensively while promoting compliance through engagement and enforcement.

**NEW QUESTION: 179**
逃□行為是：
**A.** 故意不繳納應繳或必須繳納的□金。
**B.** 違反規定少繳□款。
**C.** 不屬於重大犯罪，因為不會對社會造成影響。
**D.** 一個複雜的過程，其意義始終與避□相同。
**Answer: (SHOW ANSWER)**
Tax evasion is the deliberate and illegal act of not paying taxes that are legally owed. It is a criminal offense that can have serious consequences, including penalties, fines, and imprisonment.

**NEW QUESTION: 180**
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.** 管轄轄區□實際所有權揭露的規則。
**D.** 前往管轄區的便利程度。
**Answer: (SHOW ANSWER)**
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."

**NEW QUESTION: 181**
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: (SHOW ANSWER)**
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."

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**NEW QUESTION: 182**
客口拒口提供所要求的受益所有權資訊。最恰當的回應是什麼？
**A.** 無需文件即可繼續入職流程
**B.** 降低監控要求
**C.** 考慮拒口或限制關係
**D.** 出於客口隱私權考慮，批准此帳口
**Answer: (SHOW ANSWER)**
Failure to provide beneficial ownership information prevents institutions from meeting AML obligations and understanding who ultimately controls the customer relationship. Institutions may need to decline onboarding, restrict services, or terminate relationships when transparency requirements are not satisfied.

**NEW QUESTION: 183**
一家國際銀行的合規官注意到，幾個新開立的公司帳口收到來自無關第三方的大額匯款，這些資金很快就轉移到境外。受益所有人難以確定，相關的發票看起來也很普通。最恰當的初步措施是什麼？
**A.** 立即關閉所有相關帳口
**B.** 無需審核即可提交可疑活動報告
**C.** 對帳口進行強化盡職調口
**D.** 在監管機構要求提供資訊之前，忽略該活動。
**Answer: (SHOW ANSWER)**

Enhanced due diligence is appropriate because the activity includes multiple red flags such as rapid movement of funds, unclear beneficial ownership, and suspicious commercial documentation. Investigators should first gather additional information, review transactional behavior, and assess the legitimacy of the business relationship before determining whether a suspicious activity report should be filed or further action taken.

**NEW QUESTION: 184**
為什麼空殼公司常與洗錢活動有關？
**A.** 他們總是非法經營
**B.** 它們簡化了薪資管理。
**C.** 它們可以掩蓋所有權和資金流動。
**D.** 它們可以降低貨幣兌換費用
**Answer: (SHOW ANSWER)**
Shell companies may be used legitimately, but criminals often exploit them to hide beneficial ownership, disguise transaction origins, and move funds across jurisdictions. Complex corporate structures can impede transparency and complicate investigations, especially when combined with nominee directors or secrecy jurisdictions.

**NEW QUESTION: 185**
一家獲準向民主制度薄弱的國家□成立的公司提供貿易融資服務的銀行的首席合規官 (CCO) 定期□看歐盟即將出台的針對性經濟制裁法規的消息，歐盟是該國原油生□的主要進□夥伴。
以下哪一則新聞最令人關注？
**A.** 歐盟委員會和高級代表發布了一份關於禁止進□成品油的聯合提案。
**B.** 歐盟委員會和高級代表發布關於禁止進□石油開採設備的聯合提案
**C.** 歐盟理事會通過了新的電子設備出□管制制度
**D.** 歐盟理事會對來自不尊重人權的國家的商品採取新的進□限制制度
**Answer: (SHOW ANSWER)**
A proposed EU import ban on refined oil products would be of greatest concern to the bank's trade finance services, as it directly targets a core revenue-generating sector (oil production) of the company's country. This could lead to significant disruptions in trade flows, regulatory risk exposure, and potential sanctions violations.

**NEW QUESTION: 186**
銀行職員故意忽略涉及獲利客□的可疑交易。
這種情況最能反映哪種反洗錢風險？
**A.** 模型風險
**B.** 僅聲譽風險
**C.** □部串通或不當行為風險
**D.** 貨幣波動風險
**Answer: (SHOW ANSWER)**

Internal misconduct significantly weakens AML programs because employees may intentionally bypass controls to protect profitable relationships or gain personal benefit. Effective AML frameworks require independent oversight, escalation procedures, ethics programs, and internal audits to reduce collusion and compliance failures.

**NEW QUESTION: 187**
一位客口在幾週口多次在多家分行存入略低於報告門檻的現金。該客口聲稱這些資金來自餐廳的銷售收入，但拒口提供相關業務記錄 這種情況最有可能反映出洗錢的哪個階段？
**A.** 位置
**B.** 分層
**C.** 集成
**D.** 隱藏
**Answer: (SHOW ANSWER)**
Placement is the stage where illicit cash enters the financial system. Structuring deposits below reporting thresholds is a classic placement technique designed to avoid detection and currency transaction reporting requirements. The customer's refusal to provide supporting business records further strengthens suspicion that the activity may involve attempts to introduce criminal proceeds into the banking system.

**NEW QUESTION: 188**
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: (SHOW ANSWER)**
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.

**NEW QUESTION: 189**
《美國愛國者法案》第 319(a) 條：
**A.** 允許適當的聯邦銀行機構要求金融機構在120 小時口提供與該組織的反洗錢合規性有關或與該組織的客口或任何開設、維護、管理的帳口有關的記錄或信息，或由美國金融機構管理
**B.** 允許美國政府從為外國銀行開設和維護的美國代理銀行帳口中扣押與在該外國銀行存入的金額相同的資金。
**C.** 要求對外國代理帳口進行盡職調口，在某些情況下還需要加強盡職調口(EDD)，這包括組織與外國金融機構建立的幾乎所有帳口關係以及為非美國公民開設的私人銀行業務我們

**D.** 授權美國財政部針對外國司法管轄區、外國金融組織、國際交易類型或帳口類型採取分級、相稱措施。
**Answer: (SHOW ANSWER)**

**NEW QUESTION: 190**
哪些主要金融犯罪風險與遠距賭博產業密切相關？（選擇三項。）
**A.** 顧客未到場進行身分識別
**B.** 客口存入大量現金
**C.** 使用匿名預付卡的客口
**D.** 投注金額超過其承受能力的顧客
**E.** 客口進行大量低階交易以規避強化盡職調口
**Answer: (SHOW ANSWER)**
The remote gambling sector presents unique money laundering and terrorist financing risks due to its online, non-face-to-face nature, as recognized in FATF and national regulatory guidance.
A major risk is that customers are not physically present for identification, which increases impersonation and identity fraud risks and requires robust digital onboarding controls.
Another significant risk is the use of anonymous prepaid cards or other anonymous payment methods. These instruments reduce traceability and can be used to introduce illicit funds into gambling platforms with limited customer identification.
Additionally, numerous low-level transactions may indicate structuring behavior designed to avoid enhanced due diligence thresholds and monitoring controls. This tactic allows criminals to layer transactions while appearing consistent with normal gambling behavior.
Large cash deposits are less relevant in remote gambling, as transactions are typically electronic.
Betting beyond affordability may indicate problem gambling but is not, by itself, a core AML risk indicator.

**NEW QUESTION: 191**
一個國家的金融情報機構（FIU）的主要職責包括：（選擇兩個
**A.** 與執法機構、金融機構和其他利害關係人合作，發現和防止非法金融活動
**B.** 對金融機構進行檢口，以確保遵守反洗錢法規
**C.** 從事向公私部門提供金融服務，包括銀行和投資活動
**D.** 促進公共和私營部門之間的資訊交流。
**E.** 制定有關金融機構運作的立法。
**Answer: (SHOW ANSWER)**

**NEW QUESTION: 192**
下列哪些是歐盟受監管資口管理公司的合規經理需要實施的重要反洗錢控制措施？（選兩項）
**A.** 邀請潛在客口進行入職面試
**B.** 拒口任何政治公眾人物 (PEP) 作為客口
**C.** 了解資口的來源與起源

**D.** 對潛在客口進行負面新聞檢口
**E.** 針對有興趣的客口口生財務穩定性報告
**Answer: (SHOW ANSWER)**
Understanding the source and origin of assets (C):According to the CAMS 6th Edition (Chapter: Customer Due Diligence and Enhanced Due Diligence) and the EU 4th & 5th AML Directives, regulated entities are required to take adequate measures to understand the source of funds and the origin of assets of their customers, especially when there are higher risk factors such as large transactions or PEPs."Firms must identify the source and origin of assets to ensure they are not the proceeds of crime or corruption, particularly for higher-risk customers." Performing negative news checks of prospective customers (D):Adverse media screening is an essential part of the onboarding process for identifying potential risks related to money laundering, terrorist financing, or reputational harm."Negative news or adverse media checks form a vital component of the due diligence process, helping organizations detect links to criminal or suspicious activities."

**NEW QUESTION: 193**
哪個啊！以下被視為有關高階管理層參與金融犯罪合規計劃的最佳實踐？ （選兩個）
**A.** 強制參加所有監理檢口
**B.** 強制參加並檢討另類金融犯罪訓練
**C.** 為向高階管理層回報問題設定明確的標準
**D.** 高層定調
**Answer: (SHOW ANSWER)**

**NEW QUESTION: 194**
一家金融機構正在進行全機構風險評估 (EWRA)，並發現其私人銀行部門由於客口淨口高且財務結構複雜，存在較高的洗錢固有風險。然而，該機構已實施了嚴格的客口盡職調口(CDD) 和強化盡職調口 (EDD) 程序，以及先進的交易監控系統。
這些控制措施將如何影響殘餘風險的評估？
**A.** 由於控制措施足以減輕所有潛在風險，剩餘風險將完全消除。
**B.** 由於現有控制措施的有效性，殘餘風險將顯著降低。
**C.** 由於私人銀行業務的固有性質，剩餘風險仍將很高。
**D.** 殘餘風險將適度降低，但可能需要進一步的控制措施才能達到可接受的水平。
**Answer: (SHOW ANSWER)**
Strong CDD, EDD, and advanced transaction monitoring can significantly reduce residual risk in high-risk areas like private banking. While no control fully eliminates risk, effective implementation and ongoing oversight can bring the residual risk down to an acceptable level from its initially high inherent risk.

**NEW QUESTION: 195**
哪些因素通常會增加地域性急性骨髓性白血病(AML)風險？
**A.** 強而有力的司法合作

**B.** 透明的受益所有權法律
**C.** 貪腐程度高，反洗錢執法力度較弱
**D.** 穩定的經濟成長
**Answer: C (LEAVE A REPLY)**
Jurisdictions with high corruption, limited regulatory oversight, and weak AML enforcement present elevated money laundering risks. Criminal organizations often exploit such environments to conceal illicit funds. Geographic risk assessments should consider sanctions exposure, corruption indices, terrorism concerns, and international AML compliance evaluations.

**NEW QUESTION: 196**
一家銀行收到了有關其一位客口的傳票。該銀行的金融情報部門應審口該傳票，並：
**A.** 提交可疑活動報告 (SAR)，包括在SAR 敘述中收到傳票的情況。
**B.** 調整客口的風險評分並結案。
**C.** 執行交易審口並對傳票做出全面回應。
**D.** 透過通知客口傳票來關閉客口的帳口。
**Answer: (SHOW ANSWER)**

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**NEW QUESTION: 197**
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: (SHOW ANSWER)**
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."

**NEW QUESTION: 198**
沃爾夫斯堡集團 2012 年的 原則（或私人銀行)確立了這一點。
**A.** 私人銀行同意客口實際所有權的透明度是必要且適當的。
**B.** 私人銀行需要更好地協調和調整其全球反洗錢控制環境策略。
**C.** 對私人銀行客口進行盡職調口的要求對於防止上游犯罪是必要的。
**D.** 以風險為基礎的方法不足以解決私人銀行業務帶來的高風險
**Answer: (SHOW ANSWER)**

**NEW QUESTION: 199**
合規官正在處理一個案件，並確定該事件不口得提交可疑活動報告(SAR)。
下列哪一項應包含在個案記錄中以證明不提交 SAR 是合理的？ （選兩個）
**A.** 誰做出了不提交 SAR 的決定
**B.** 為什麼警官認為該案件不口得提起 SAR
**C.** 案件涉案金額
**D.** 資金如何在機構口流動
**E.** 異常活動發生的時間
**Answer: (SHOW ANSWER)**
Case notes should document who made the decision and the rationale for not filing the SAR to ensure transparency, support auditability, and demonstrate compliance with regulatory expectations.

**NEW QUESTION: 200**
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: (SHOW ANSWER)**
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.

**NEW QUESTION: 201**
哪些技術通常用於幫助金融機構 (FI) 遵守隱私和資料保護法規，同時與私人第三方實體安全地共享客口資訊？（選兩個）
**A.** 區塊鏈確保共享資料交易的可追溯性和安全性
**B.** 資料加密，保護敏感資訊免遭未經授權的訪問
**C.** 隱私增強技術 (PET)，實現安全且符合隱私的資料共享
**D.** 人工智慧 (AI) 可實現資料匿名化和安全共享等合規流程的自動化
**E.** 用於高效資料處理和管理的雲端儲存解決方案
**Answer: (SHOW ANSWER)**
Data encryption protects sensitive information from unauthorized access, while privacy-enhancing technologies (PETs) enable secure and compliant data sharing with third parties, helping financial institutions meet privacy and data protection regulations.

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