

Certified Global Sanctions Specialist (CGSS) Exam Blueprint

1. Governance and Enforcement

- 1.1 How sanctions are created, changed, and enforced (e.g., global laws and regulations, legal processes, assumptions and errors)
- 1.2 Key concepts of sanctions (e.g., definitions, UN Security Council, OFAC, EU, UK-HMT, AUSTRAC sanctions; multilateral v. unilateral sanctions; restrictive measures)
- 1.3 Different types of sanctions (e.g., individuals, countries, goods, vessels, sectoral sanctions, terrorism-related sanctions)
- 1.4 Geographic scope of sanctions (e.g., the IEEPA, extraterritorial reach, blocking statutes, the effect on trade restrictions, national and autonomous sanctions)
- 1.5 Beneficial control, ownership, and the 50% rule
- 1.6 License types and the scope of permitted activities (e.g., authorities for issuing licenses, assumptions and errors related to licenses, license application processes, operational challenges)
- 1.7 Principles of governance, risk-based approach, and how they apply to sanctions screening (e.g., risk categories, regulator expectations)

2. Sanctions Evasion Techniques

- 2.1 Types of attempts that are made by illicit actors to evade sanctions, including evasion techniques related to payments and transactions
- 2.2 Trade-related evasion techniques (e.g., how targets try to conceal the end-use of goods or the identity of the end-user, export controls)
- 2.3 Methods that targets use to hide their identity (e.g., shell companies, LLCs, restructuring, ownership schemes)

3. Sanctions Due Diligence

- 3.1 Sanctions due diligence key concepts to effectively mitigate sanctions risks (e.g., approach for assessing sanctions risks, geographic scope, risk assessment formula, transaction-level due diligence)
- 3.2 How to apply sanctions due diligence to different lines of business (e.g., luxury goods industry, retail banking, commercial banking, insurance)
- 3.3 Beneficial ownership calculation (e.g., compare the 25% rule for AML to 50% rule for Sanctions, EU guidance on beneficial ownership)
- 3.4 Key sanctions risk areas, including customers, the nature of their business, products, and jurisdiction (e.g., dual-use goods, differences between the EU and OFAC concerning due diligence and beneficial ownership)
- 3.5 Financial services and products as they relate to sanctions risks.



Certified Global Sanctions Specialist (CGSS) Exam Blueprint *(continued)*

4. Sanctions Screening

- 4.1 Sanctions monitoring procedures and important controls (e.g., similarities and differences between AML monitoring and controls and sanctions monitoring and controls, interdiction software)
- 4.2 Screening key concepts, including Automated Screening Tools (ASTs), interdiction systems, algorithms, and regulatory expectations (e.g., inequalities and exclusion lists, filtering and weighting of potential matches)
- 4.3 Customer and third-party name screening (e.g., common naming conventions, transliteration, fuzzy logic, Romanization)
- 4.4 Payment screening process (e.g., common methods for managing AST alerts, relevant fields in a SWIFT payment message)
- 4.5 Sanctions technology (e.g., screening software, matching algorithms, machine learning, artificial intelligence)
- 4.6 Sanctions-related software features (e.g., match proximity thresholds, validation)
- 4.7 Data management and analysis (e.g., list management, predictive analytics, data quality)

5. Sanctions Investigations and Asset Freezing

- 5.1 How to conduct investigations, keep records, and file reports
- 5.2 Sources of information to use in an investigation (e.g., primary and secondary sources)
- 5.3 How to freeze assets, notify targets, and make reports (e.g., institutional requirements for managing frozen assets, identifying a target's assets)

