CHARTERED INSTITUTE FOR SECURITIES & INVESTMENT

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LEVEL 3

GLOBAL FINANCIAL COMPLIANCE (VERSION 11)

TIME ALLOWED: 2 HOURS

How to use this sample paper

These 100 questions should be answered in two hours in the real exam, so make sure you time yourself accurately.

Record your answer for each question by circling your selected answer.

When you have finished the test, you may check your answers against the **Answer Sheet** at the back of this paper.

The exam is scored as follows:

70-100	Pass
0-69	Fail

For those questions you answered incorrectly, the answer sheet will show you the corresponding syllabus element, sub element and learning objective against which the questions were written, so you can identify any syllabus areas where you may need to revise further.

1 Which type of financial organisation typically has broad jurisdiction over financial markets?

A National pension funds

B Central banks

C Trade bodies

D Multilateral Trading Facilities

2 One of the main reasons why regulators want to stop companies making misleading statements is because these can:

A affect the smooth operation of markets

B result in a conflict of interest

C trigger excessive liquidity

D result in senior management change

3 How can a corporate responsibility programme be of a benefit to a single firm if its competitors remain ambivalent?

A Its costs will be lower

B It can develop a unique selling proposition

C Its customer retention will be higher

D It can develop better regulatory relationships

4 What outcome should be achieved by effective corporate governance?

A Reduction in exposure to non-business risk

B Reduction in competition

C Increase in money supply

D Increase in public confidence

5 To conform with best practice, a firm's compliance report for management should normally include:

A a cost/ benefit analysis

B an executive summary

C a colour coded risk rating

D a key personnel listing

6 An individual within a firm’s sales department appears to be selling financial products that are unsuitable for the customers and are not currently permitted within the scope of the firm’s authorised status.

If left unchecked, how far could the repercussions of these actions extend?

A The salesman

B The entire sales department

C The firm

D The entire industry

7 When the Regulator carried out a dawn raid at a firm the warrant named only three officers, but a fourth also requested entry. In accordance with best practice, the firm should:

A seek legal advice before admitting anyone

B admit all four officers, then seek urgent legal advice

C only admit the three named officers

D admit all four officers, but continuously accompany the unnamed officer

8 In order to satisfy ethical requirements, an individual operating as a fiduciary must:

A put the principal's interests above their own interests

B seek client approval before making any investment decisions

C choose the cheapest option when undertaking transactions

D report back to the principal as frequently as possible

9 The person responsible for assessing internal suspicions of money laundering must:

A have an appropriate level of independence

B be a legal or accountancy professional

C have a minimum 12-month contract of employment

D be a director of the firm

10 Business risk usually increases as a result of major institutional shareholders of a firm:

A suppressing their views

B seeking independent non-executive appointments

C expanding their equity stake

D investing simultaneously in a rival firm

11 If compliance is solely about ethical behaviour rather than being rules-based, firms are likely to perceive this as being preferable, primarily because it:

A creates certainty

B provides flexibility

C reduces breach penalties

D affects fewer people

12 An employee of a financial institution recently received information on the company's 5 year profit forecasts. In accordance with market abuse rules, these details:

A could be considered price-sensitive

B would automatically be deemed public information

C cannot trigger the offence of insider dealing

D must be made available to all the employees

13 During a risk assessment exercise, a particular event has been given a likelihood rating score of 1 and an impact loss rating score of 4. What will be the overall risk score for this event?

A 0.25

B 3

C 4

D 5

14 What is the key difference between tax avoidance and tax evasion?

A Only tax avoidance is a legal activity

B Only tax evasion is a legal activity

C Only tax avoidance is carried out by corporate entities

D Only tax evasion is carried out by corporate entities

15 The Islamic Financial Services Board (IFSB) could most accurately be described as:

A an international self-regulatory body

B a domestic regulator

C a supervisory college

D a host supervisor

16 According to the Bank for International Settlements, failure to comply with regulations can damage which of the following?

- **A** Market share
- **B** Equity value
- **C** Quality
- **D** Reputation

17 Which of the following ultimately determines whether a regulatory breach is notifiable?

- **A** Any individual
- **B** The Compliance officer
- **C** The firm’s senior management
- **D** The regulator

18 Which source of business risk can typically result from excessive use of gearing?

- **A** Financial risk
- **B** Regulatory risk
- **C** Technological risk
- **D** Social risk

19 One of the activities often carried out by professional bodies in the financial services industry is to:

A advise on product pricing

B liaise with national regulators

C conduct credit risk checks

D amend financial regulations

20 A new UK financial institution is planning to appoint a Data Protection Officer. To comply with the requirements of the EU General Data Protection Regulation, this person:

A should also be appointed to the board

B must be a member of the senior management team

C should be a full-time member of staff

D can be a member of staff or an external specialist

21 A firm's client will normally be considered as posing an above-average risk in relation to money laundering if he is:

A an employee of a rival firm

B classed as a politically exposed person

C the holder of a foreign passport

D the subject of a poor credit history

22 Why is it deemed appropriate to analyse all minor regulatory breaches?

A To prevent a potential conflict of interest

B To identify future preventative measures

C To avoid the need for excessive delegation

D To review whether there has been excessive costs

23 What type of records should the compliance function within a bank be given access to?

A Only customer-specific records

B Only those which are issued on a regular periodic basis

C Any records it needs apart from those with a monetary value

D Any records it needs

24 A financial services firm recently established a Chinese wall arrangement. This is because it wanted to:

A reduce the degree of market risk

B segregate client assets

C avoid a conflict of interests

D trade on more than one common platform

25 A client is planning to move abroad AND wants his nephew to look after his domestic assets whilst he is away. What legal process is designed to deal with this issue?

A Agency by estoppel

B Power of Attorney

C Succession planning

D Incapacity protection

26 One of the key differences between money laundering and terrorist funding is that:

A money laundering is an international activity

B terrorist funding can be legitimately sourced

C money laundering is an indictable offence

D terrorist funding can result in a term of imprisonment

27 In Germany, members of a firm's supervisory board will be elected by shareholders and by:

A the executive board

B the chief operating officer

C the employees

D the regulator

28 Where a firm identifies a regulatory breach, the establishment of what key fact will determine the action it needs to take?

A The status of the individual responsible

B The severity of the event

C The confidentiality of relevant information

D The time frame involved

29 A key effect of moving derivatives trading from an off-venue environment to an organised trading facility is that:

A the need for central counterparties disappears

B the quality of price discovery declines

C market transparency increases

D liquidity reduces

30 How might a general increase in ethical decision making eventually influence a regulator's actions?

A Increase in supervisory staff

B Wider level of monitoring

C Reduced use of prescriptive rules

D Less need for external support

31 Where a client appoints an adviser to give instructions to buy and sell securities on their behalf, how is this adviser legally described?

A Principal

B Testator

C Trustee

D Agent

32 To be effective, a firm's risk management framework should ensure that risks are:

A reported to the regulator

B externally quantified

C appropriately controlled

D mutually exclusive

33 Which of the following relates to the situation where an individual decides that another person can take decisions on their behalf?

A Law of succession

B Insolvency

C Power of attorney

D Law of contract

34 A firm identified a breach of a particular regulation, but the breach was deemed minor with no remedial action required. In these circumstances, the firm should:

A make an entry in the breaches log

B produce a detailed remedial action report

C notify the regulator on the next scheduled return

D take disciplinary action against the culprit

35 The business unit of a firm wants to ensure that its regulatory-based practices and procedures remain compliant. One key way of helping to achieve this is to:

A delegate responsibility downwards as far as possible

B increase management spans of control

C document all the processes

D encourage the take-up of professional examinations

36 One of the three objectives of securities regulation, as defined by IOSCO, is the reduction of:

A systemic risk

B diversification risk

C investment risk

D market risk

37 If the compliance function of a large organisation operates within a silo structure, this can typically result in what problem?

A Lack of local knowledge

B Excessive reliance on technology

C Inconsistency of approach

D Lack of accountability

38 If a firm identifies that an existing customer has been added to the sanctions list, the firm must:

A send a disclosure letter to the customer

B freeze any funds belonging to the customer

C issue a confidential notification to the customer's professional adviser

D operate any existing funds normally but refuse to accept any further money

39 A firm recently sold products to retail clients X and Y, but in accordance with the regulations only Client Y was issued with a suitability report. This was because:

A only Client X was deemed risk averse

B only Client Y required advice

C Client X is a repeat customer

D Client Y is a high net worth individual

40 In order to promote ethical decision-making, a firm's staff induction course should include training on the importance of:

A expedience

B integrity

C efficiency

D pragmatism

41 The BIS Principles for Enhancing Corporate Governance state that an employee's compensation should be effectively aligned with:

A company strategy

B competitor levels

C prudent risk-taking

D quantitative responsibilities

42 The main way in which the Sarbanes-Oxley Act 2002 aims to protect investors is by:

A enhancing corporate disclosure requirements

B bringing consistency to cross-border transactions

C improving the monitoring of money laundering activities

D setting higher standards for accredited financial advisers

43 The primary purpose of a firm's compliance manual is normally considered to be to:

A provide policy and guidance

B document administrative procedures

C act as a breach resolution tool

D formalise internal reporting lines

44 As part of an effective compliance programme, the regular reports issued by a firm's head of compliance to senior management should include:

A a risk assessment

B a loss ratio analysis

C a disaster recovery strategy

D a mission statement

45 A risk-based approach to identifying money laundering should focus on:

A the most topical issues

B the most relevant issues

C all transactions

D the largest transactions

46 Mark works in the back office of an equity trading firm and last received formal training on general administrative procedures three months ago. To comply with best practice, further training must take place:

A in a maximum of three months time

B within 12 months of the original training

C whenever necessary to ensure his knowledge remains current

D whenever a significant management change takes place

47 A typical reason for carrying out sanctions screening is to prevent:

A organisations from trading while technically insolvent

B individuals benefiting from the use of illegally obtained funds

C countries suffering from reputational damage

D terrorists obtaining funds from cross-border donations

48 The process of due diligence:

A is purely an assessment of financial data

B replaces the need for corporate governance

C can be performed by sellers or buyers

D can be used to guarantee profitability

49 Transaction reporting to regulatory authorities is important in combating financial crime because it:

A reinforces client due diligence procedures

B helps detect misstated market valuations

C reduces the opportunity for front running

D helps to identify the placement stage of money laundering

50 As part of the implementation of a risk-based approach to a compliance monitoring programme, a particular risk was given a probability weighting of 0.08. This means that the relevant adverse event is:

A likely to occur once every eight years

B 8% more likely to occur in the current year than the previous year

C likely to occur eight times every year

D 8% likely to occur in a given year

51 A key role of a financial services professional body is to:

A publicise an agreed industry position

B design financial investment products

C collect data relating to systemic risk

D prevent money laundering

52 Which of the following is an example of acting in best interest? A firm makes recommendations to its clients based on:

A the value of the transaction

B their suitability

C the commission generated

D the market price

53 Why are politically exposed persons subject to enhanced due diligence?

A The amounts involved are much greater

B The relationship is likely to operate more remotely

C The types of product purchased are likely to be more complex

D The individuals may be more vulnerable to corruption

54 Effective complaints procedures can be of regulatory importance to a firm because they can:

A evidence fair treatment

B prevent financial crime

C prevent market abuse

D evidence KYC information

55 One of the three objectives of securities regulation, as prescribed by IOSCO, is to ensure that markets are fair, efficient and:

A rational

B transparent

C competitive

D consistent

56 Under a Ponzi scheme arrangement, how are investors' ongoing income payments typically funded?

A Through illegally claimed tax refunds

B Through the laundering of criminally obtained money

C From the money paid in by subsequent investors

D From the profits earned by existing investments

57 Where a misstatement takes place in relation to a firm's earnings, this typically means that there is a disparity between:

A the amount reported and the true earnings

B the amount reported and the amount forecast

C the amount of earnings against estimated profit

D the amount calculated and the amount previously submitted

58 A key way to reduce ethical violations within a firm is to:

A maximise the scope for delegation

B introduce detailed rule books

C influence the behaviour of employees

D focus on company-wide cost controls

59 Why might a principles-based approach to compliance be preferred over a rules-based approach? It:

A prevents repetitive errors

B avoids the need for supervisory staff

C offers more flexibility

D provides more certainty

60 What is the KEY starting point in developing an ethics training programme for an organisation?

A Identify company values

B Conduct a cost / benefit analysis

C Review the company's profitability levels

D Implement a technology solution

61 When compiling a compliance report for management, a bank:

A must include quantitative analysis

B should always ensure that the report is very detailed

C will be expected to use a narrative style

D can use whatever format it deems appropriate

62 In accordance with Principle 6 of the BIS Principles for Enhancing Corporate Governance, banks should appoint a:

A chief risk officer or equivalent

B group finance director or equivalent

C chief technology officer or equivalent

D chief corporate governance officer

63 How can the compliance department of a bank play a role in the development of new business?

A Calculate profit margins

B Perform full due diligence

C Help to market the product

D Maximise cost-effectiveness

64 During an unscheduled visit by the Regulator, a firm legitimately refused to provide certain documents. This was because these documents:

A included information about sanctioned individuals

B were considered legally privileged

C related to a previous investigation

D contained confidential staff information

65 One typical way in which political risk may affect the financial services industry is by:

A increasing technology costs

B reducing product demand

C increasing self-regulation

D reducing operational expenses

66 A client deposits an unusually large sum of money into their bank account. Under what circumstances is the suspicion of money laundering increased for this transaction?

A The payment is made in two or more separate tranches

B The customer requires the payment to be processed urgently

C The source of the funds cannot be easily verified by the bank

D The investment discussions are taking place on a face-to-face basis

67 Following a number of breaches at a stockbroking firm, the regulator publicly censures the Firm. What impact will this have on the firm?

A The Firm will be prohibited from expanding

B Reputational damage is likely

C Regulatory fees will increase

D Conflict of interest issues will arise

68 Which type of organisation normally has direct jurisdiction over contracts listed for trading?

A Broker councils

B National audit offices

C Recognised investment exchanges

D Industry trade bodies

69 Who does the BIS deem responsible for reporting to the board of directors on the management of a firm's compliance risk?

A The finance director

B The compliance officer

C The internal audit team

D The senior management

70 Where an industry sets up an organisation to look after the well-being of its markets and participants, this is often described as a:

A mutual society

B ombudsman office

C quango

D professional body

71 A firm's anti-money laundering training programme shoud identify which of the following?

A Money Laundering Reporting Officer

B Chief Executive Officer

C Main custodian

D External auditors

72 A firm uses formal interview-based appraisals to monitor employees compliance with regulations. In accordance with best practice:

A the frequency should be at least six monthly

B two managers should always be present

C self-assessment should be part of the process

D written records of areas discussed should be kept

73 If the appointed compliance officer in a large authorised firm also undertakes the role of the company's sales director, it is likely that:

A this person will be required to report direct to the CEO

B this situation will give rise to an unmanageable conflict of interest

C this person will need to have at least one named deputy exclusively to conduct oversight duties

D this situation will only be permitted to continue for a maximum of 12 months

74 What is the final stage of the money laundering process?

A Integration

B Placement

C Layering

D Switching

75 Publication of aggregate position information helps in terms of regulatory supervision in off-market transactions by:

A increasing the transparency of available collateral to the market

B enabling earlier detection of risk

C reducing the level of legal risk

D preventing any unauthorised transactions

76 The key aim of money laundering is to:

A utilise legitimate money to fund ongoing criminal operations

B disguise the true origin of criminally obtained funds

C enable illegitimately obtained assets to pass between criminals

D transfer funds from higher risk to safer jurisdictions

77 In the UK, how can a bank address specific statutory responsibilities as part of its compliance monitoring programme?

A Act as the final arbiter on customer complaints

B Advise on the pricing strategy for new products to be launched

C Appoint a Money Laundering Reporting Officer

D Liaise with similar banks to decide on the level of monitoring required

78 The Chief Compliance Officer for the asset management division of a bank has a performance-related element to his remuneration package. To comply with BIS principles, this element:

A must be disclosed in the annual company accounts

B should relate to company performance as a whole

C should be capped at a maximum of 10% of basic salary

D must be removed irrespective of any other circumstances

79 How can technology BEST help to identify any systemic problems that might exist in a bank? By:

- **A** designing disaster recovery procedures
- **B** creating firewalls
- **C** recording incidents
- **D** delivering refresher e-courses

80 Some firms prefer rules-based regulation to principles-based regulation because the:

- **A** compliance costs are considerably lower
- **B** disciplinary measures are lighter
- **C** requirements are clearer
- **D** ability to innovate is easier

81 Compliance staff of a regulated firm should observe business processes in action because it:

- **A** replaces the need to conduct sampling
- **B** enables control measures to be assessed
- **C** encourages greater work productivity
- **D** ensures processes are completed on time

82 In relation to illicit stockmarket activity, an extradition arrangement between two countries can only exist if:

A both countries are members of the Financial Action Task Force

B both countries operate international trading operations

C the activity yields significant financial gain

D the activity is a crime in both countries

83 When compliance risk is reduced by building prompts relating to anti-money laundering checks into the software used for processing new business applications, this is BEST described as:

A a preventative tool

B a detective tool

C an incident reporting activity

D a management information activity

84 Which of the following statements is TRUE in relation to regulation?

A Principles-based regulation allows firms greater flexibility than rules-based regulation

B Rules-based regulation places higher capital adequacy requirements on firms than principles-based regulation

C Regulatory fines are higher in a rules-based regulatory model than a principles-based one

D Principles-based regulation allows for a less intrusive supervision of firms than rules-based regulation

85 The introduction of a corporate social responsibility programme will typically lead to a firm experiencing improvement in which key area?

A Market risk

B Reputation

C Costs

D Capital adequacy

86 For staff working in regulatory organisations, the IOSCO's principles state that they should:

A be sufficiently experienced

B maintain the highest level of training

C observe the highest professional standards

D be sufficiently remunerated

87 What stage of the money laundering process describes the point where criminally obtained banknotes are paid into a bank account?

A Integration

B Phasing

C Placement

D Layering

88 Who has the responsibility for notifying the authorities about suspicious trading activity?

A All employees

B The nominated officer

C The Compliance officer

D Senior management

89 An individual executes a security transaction despite being in possession of price-sensitive information. In accordance with insider dealing rules, this was deemed legitimate because he:

A only made a very modest profit

B donated his gains to a recognised charity

C was acting in the role of market maker

D acquired the information from his wife

90 A MLRO receives information from one of the firm's employees about a suspected offence. This information should be passed to a law enforcement agency only if:

A the sum involved exceeds a prescribed threshold

B the MLRO believes it to be suspicious

C the alleged culprit appears on the government's sanctions list

D the MLRO has insufficient resources to review the case

91 One of the typical differences between regulations and internal policies is that:

- **A** regulations go further than internal policies
- **B** internal policies go further than regulations
- **C** only regulations are objective rather than subjective
- **D** only internal policies are objective rather than subjective

92 One of the BEST ways that the compliance function can add value to a business is by:

- **A** publishing its procedures
- **B** adopting a proactive approach
- **C** delegating its regulatory authority
- **D** imposing severe penalties for rule breaches

93 The likelihood of an internal item of information being classed as price-sensitive non-public information is likely if:

- **A** it contains historical data
- **B** it contains the names of individuals
- **C** it relates to a company with a stockmarket listing
- **D** it relates to a company with less than 25 employees

94 The fitness and propriety process carried out as part of due diligence before the purchase of a company, typically covers an assessment of:

A the individual buyer

B the counterparty

C the senior management of an organisation

D the main customers of an organisation

95 When assessing whether a firm is likely to deliver the treating customers fairly outcomes, a key factor the regulator will consider is:

A the level and stability of its capital reserves

B the strength and vision of its leadership

C the number and frequency of investment reports

D the size and location of its target market

96 Which of the following will a regulator expect to be in place if a firm outsources a material risk?

A A public disclosure

B A service level agreement

C Indemnity insurance

D A professional code of conduct

97 A customer in the UK was unhappy with a product they were sold and, having failed to receive a satisfactory response from the firm, wanted to take the matter to court. Why were they prevented them from doing so?

A The amount being contested was £36,500

B The customer had been through a complaints scheme

C The firm involved was a public limited company

D The product was classed as a pension product

98 What was the main driving force behind the launch of the Bank for International Settlements' Principles for enhancing corporate governance?

A Awareness of public and market sensitivity to corporate governance problems

B The increasingly complex and costly nature of corporate governance obligations

C Pressure from international regulators to legislate on corporate governance issues

D Lack of training for individuals holding corporate governance responsibilities

99 In the UK, how often should a money laundering reporting officer (MLRO) report to the firm's governing body concerning systems and controls?

A At the end of each month

B At least every three months

C Every six months since incorporation

D At least every twelve months

100 How does the Dodd-Frank Act aim to promote financial stability in the United States?

A By enhancing solvency requirement levels

B By facilitating bailouts for bankrupt firms

C By improving accountability and transparency

D By tightening the rules on mergers and acquisitions

Global Financial Compliance (Version 11)

Question Number	Answer	Syllabus Reference
1	B	1.2.1
2	A	4.2.2
3	B	4.1.5
4	D	5.1.1
5	B	2.1.9
6	D	2.2.3
7	C	3.3.3
8	A	4.1.2
9	A	3.2.6
10	C	5.2.2
11	B	4.1.3
12	A	4.2.3
13	C	5.2.5
14	A	3.1.8
15	A	1.1.4
16	D	5.2.7
17	D	2.3.5
18	A	5.2.3
19	B	1.2.3
20	D	1.1.6
21	B	3.3.2
22	B	2.3.4
23	D	2.1.10
24	C	4.2.6
25	B	4.3.3
26	B	3.1.1
27	C	5.1.4
28	B	2.3.4
29	C	1.1.8
30	C	4.1.3
31	D	4.3.3
32	C	5.2.4
33	C	4.3.3
34	A	2.3.4
35	C	2.1.6
36	A	1.2.5
37	C	5.1.5
38	B	3.3.3
39	B	4.4.2
40	B	4.1.5
41	C	5.1.9
42	A	1.1.6

43	A	2.1.3
44	A	2.1.5
45	B	3.2.5
46	C	2.2.1
47	B	3.2.8
48	C	5.1.7
49	B	3.2.1
50	D	2.1.5
51	A	1.2.3
52	B	4.3.1
53	D	3.2.9
54	A	4.4.4
55	B	1.2.5
56	C	3.1.6
57	A	3.1.7
58	C	4.1.4
59	C	1.2.7
60	A	4.1.5
61	D	2.1.9
62	A	5.1.9
63	B	2.2.9
64	B	2.3.3
65	B	5.2.2
66	C	3.3.2
67	B	2.2.3
68	C	1.2.1
69	D	5.2.8
70	D	1.2.3
71	A	3.3.2
72	D	2.2.7
73	B	1.2.11
74	A	3.1.2
75	B	1.1.9
76	B	3.1.1
77	C	2.2.10
78	B	2.2.4
79	C	5.2.10
80	C	1.1.3
81	B	2.2.2
82	D	3.1.9
83	A	5.2.10
84	A	1.1.3
85	B	4.5.3
86	C	1.2.8
87	C	3.1.2

88	B	3.3.3
89	C	4.2.4
90	B	2.3.6
91	B	2.1.7
92	B	2.1.4
93	C	4.2.3
94	C	5.1.7
95	B	4.3.4
96	B	2.1.8
97	B	4.4.4
98	A	5.1.9
99	D	3.2.6
100	C	1.1.6