easyAML

Running a Customer Due Diligence, Start to Finish

KYC-01 · Version 1.1

This guide walks through a full customer due diligence (CDD) in easyAML from beginning to end — starting the matter, adding and verifying the parties, and clearing the checks — so you understand not just which buttons to press but why the process runs in this order. It's the overview that ties together the more detailed guides for each step.

WHO THIS IS FOR

Anyone completing CDD on a matter — compliance officers, conveyancers, agents, and support staff.

BEFORE YOU START

- Your account should be set up, including your AUSTRAC enrolment number (Account Settings → Account). See the *Add your AUSTRAC number* guide.
- Have the matter details to hand: the designated service, who the parties are, and any supporting documents (trust deed, Customer Authorisation Form, etc.).

Which flow should you use first?

There are two ways to start a CDD in easyAML, and the right one depends on how your industry engages clients.

Two starting points

- **Client-first** — onboard the client (Add Legal Entity or Add Individual), verify them, then link them to a transaction (designated service) as it arises.
- **Transaction-first** — create the transaction first, and add the client(s) — legal entity or individual — as part of the transaction flow.

Both paths end in the same place: a verified client linked to a designated service, with the relationship tracked for ongoing CDD.

Transactional industries — real estate, conveyancing and property law

In property work the designated service is usually identified at the same time as the client — a seller signs an agency agreement, a buyer exchanges contracts, a conveyancer is engaged on a matter. The transaction is known from day one.

Recommended flow: transaction-first. Create the transaction, then add the parties within it. This mirrors how the obligation arises — the designated-service trigger is what starts the CDD clock, and the delayed initial-CDD provisions for real estate are framed around the transaction (e.g. within 15/28 days after exchange, or before settlement, whichever is earliest).

Relational industries — accountants and lawyers (non-property)

In professional services the client relationship typically comes first and designated services arise later, matter by matter. A firm may onboard a client before knowing which services — if any — will be designated.

Recommended flow: client-first. Onboard via Add Legal Entity or Add Individual, complete the verification, then link the client to transactions as each designated service arises. The record and any completed KYC/KYB are then already in place, and the automatic recheck cadence keeps the verification current between matters.

> *These are recommended defaults by industry, not hard rules — your own risk-based procedures or a specific client situation may call for a different sequence. Use judgement.*

The building blocks — and the one rule that always holds

Whichever starting point you use, easyAML is built around three connected blocks:

1. **Transaction** — the matter you're providing a designated service on.
2. **Entities** — the companies and trusts involved, verified via KYB.
3. **Individuals** — the people involved, and the people *behind* the entities, verified via KYC.

The one rule that applies to both flows — entity-first, individuals-attached. For any entity, the KYB is the anchor record, and the KYCs for its directors, controllers and beneficial owners hang off it. In practice that means adding the top-level structure first and letting easyAML *unwrap* it — tracing the ownership chain to surface the people who ultimately own or control it (the Ultimate Beneficial Owners, or UBOs). By the time you add individuals you already know who needs verifying and why, rather than guessing up front.

So within an entity the structural order is always:

Entity
KYB

→

Unwrap the ownership chain

→

UBOs & controllers
KYC

The walkthrough below follows the transaction-first sequence, since it's the most common (and the recommended flow for property work). If you're client-first, the building blocks are identical — you simply add the legal entity or individual first (Step 2 or Step 3) and create or link the transaction (Step 1) once a designated service arises.

STEP 1

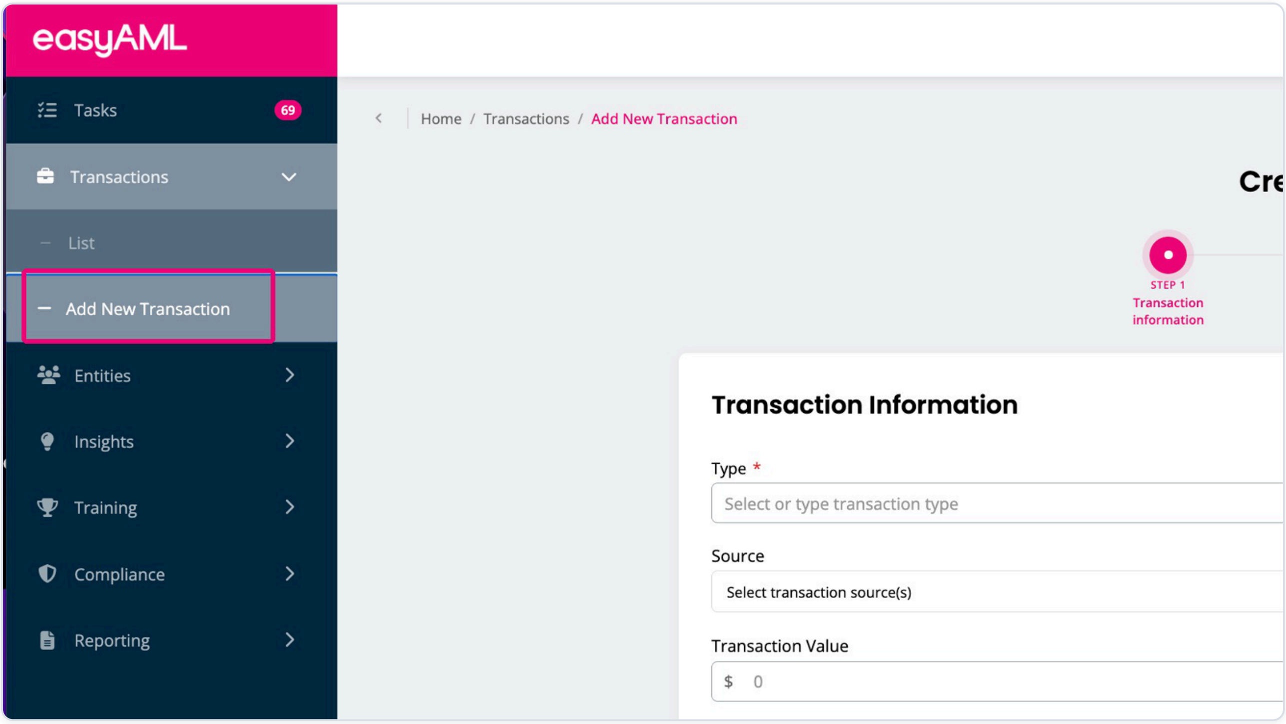
Create the transaction

Every designated service needs a transaction record. It's the starting point of your AML trail.

Create it before you provide the designated service. Under the AML/CTF Act your CDD obligations attach when the service begins, not at settlement or completion — creating the transaction first starts the compliance clock correctly.

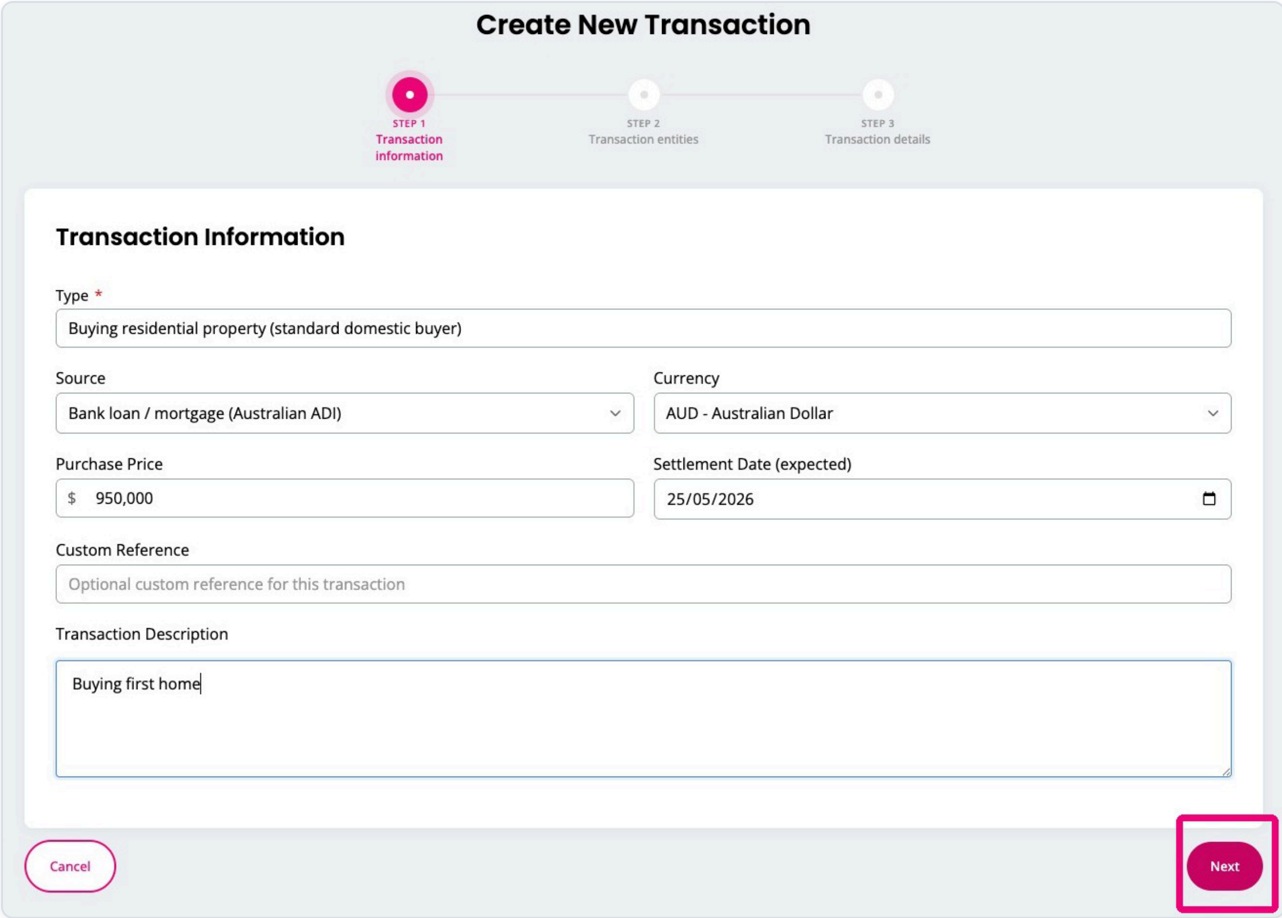
OPEN TO START `https://app.easyaml.com/transactions/new`

1. Go to **Transactions → Add New** in the side menu (or **Add New Transaction** on the transactions list). Both open the same three-step flow.



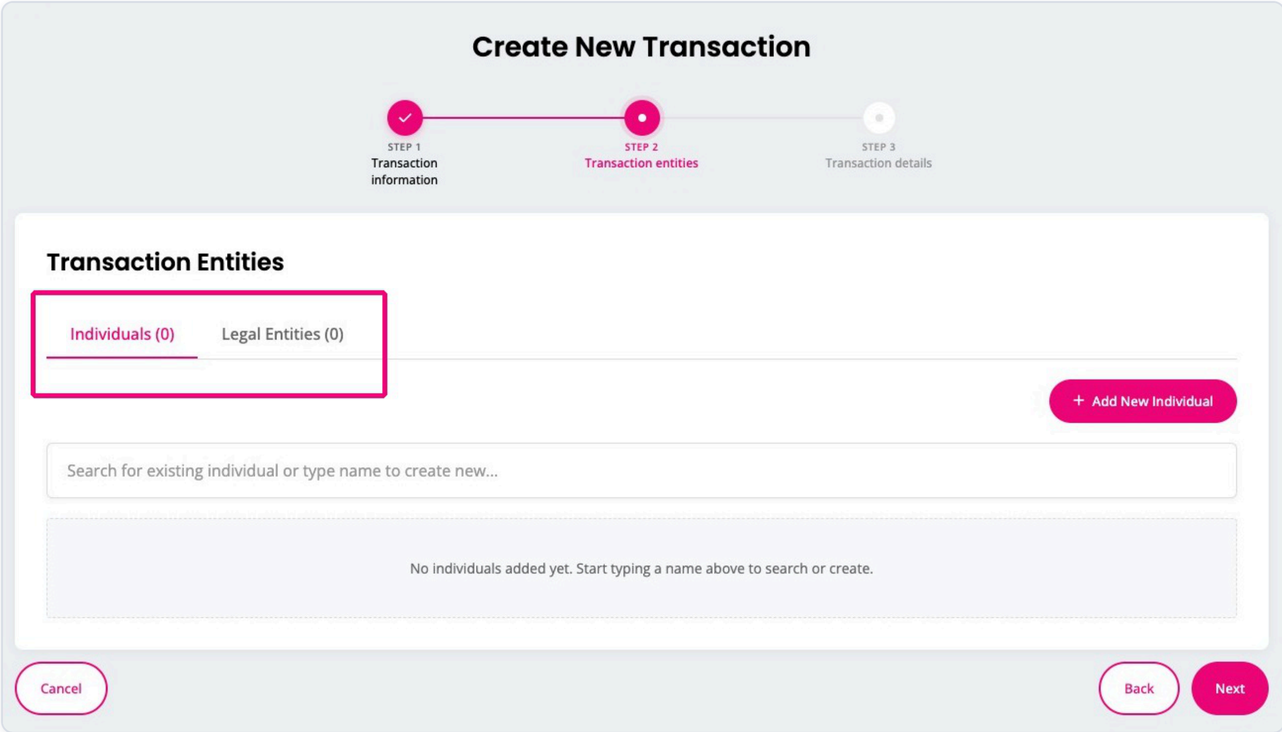
Transactions → Add New in the side menu.

2 **Step 1 — Transaction information.** Capture the core details: transaction type, source, value, any property details and relevant dates. The transaction type matters — it shapes how the platform calculates risk and which CDD steps are required. Nothing is locked in; you can edit before sign-off. Click **Next**.



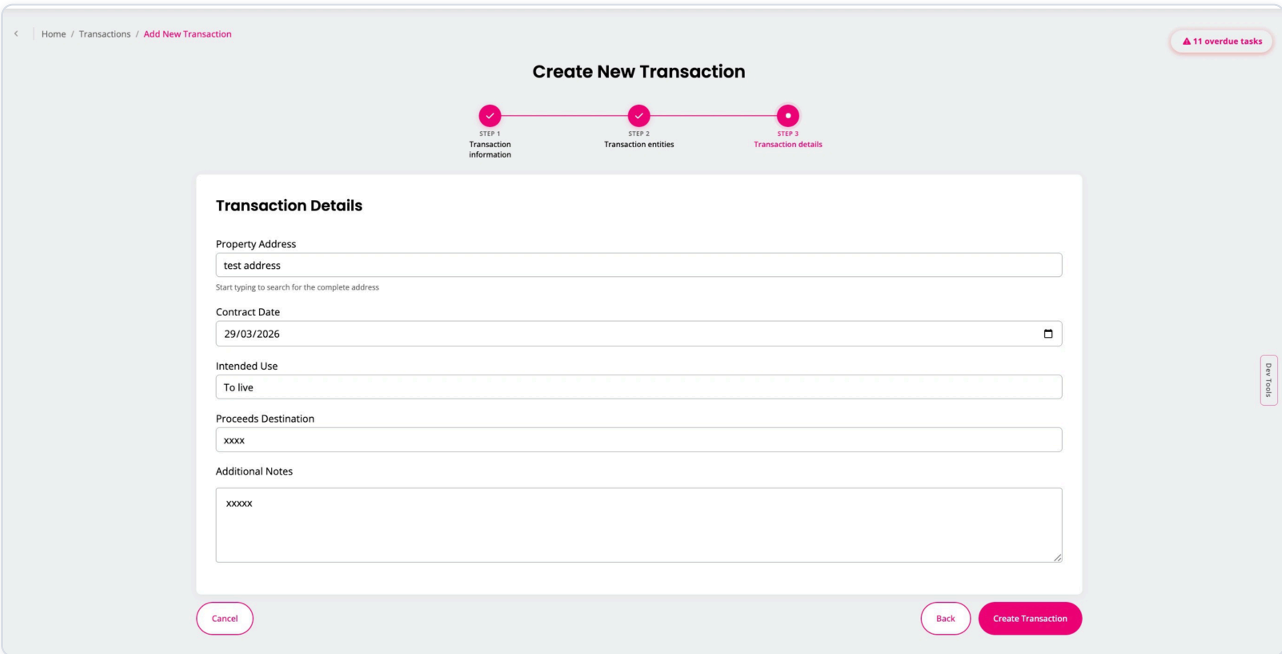
Step 1 — Transaction information.

3 **Step 2 — Associate the parties.** Search your existing records and select each party. Anyone verified within the last two years carries their profile and screening across automatically — no double-handling. Parties not yet in your records can be added later. Click **Next**.



Step 2 — Associate the parties.

4. **Step 3 — Transaction details.** Complete any remaining type-specific details, then click **Create Transaction**.



Step 3 — Transaction details, then Create Transaction.

From here easyAML runs screening across all parties, calculates a risk rating against your firm's Risk Assessment baseline, and queues any outstanding CDD. High-risk matters are flagged for Enhanced CDD (source of funds and source of wealth). Everything is logged to the audit trail.

STEP 2

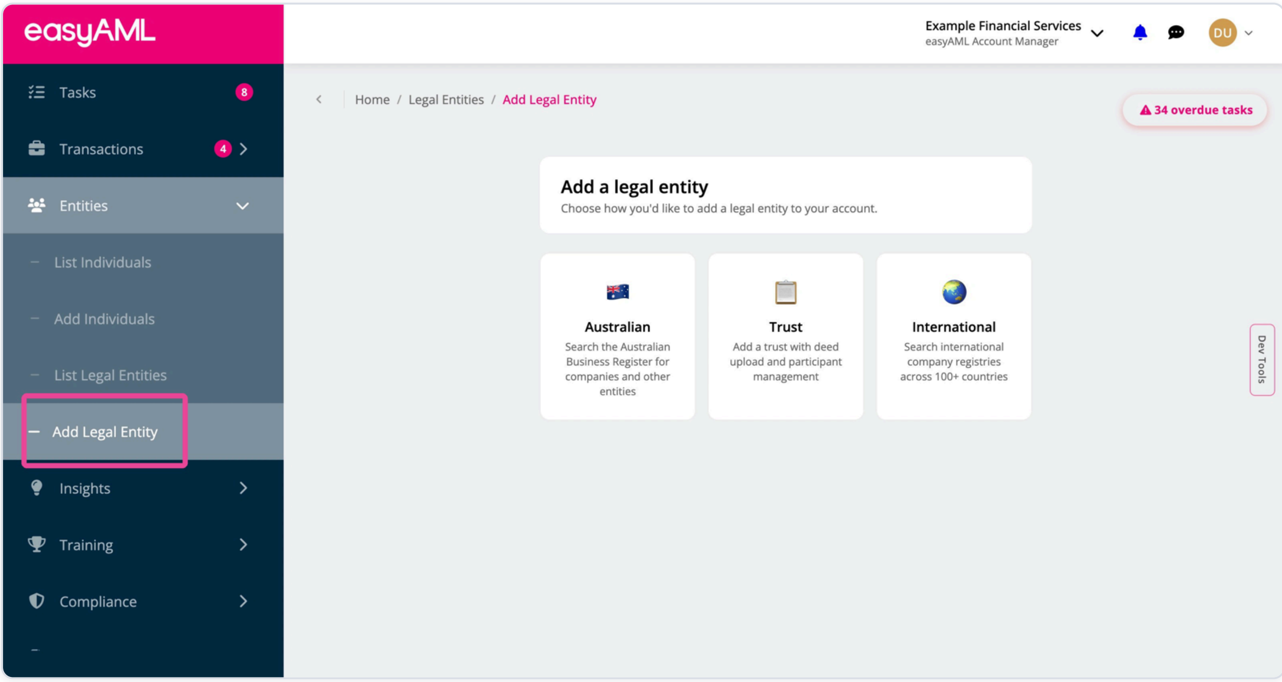
Add the entities (KYB) and let them unwrap

For any company, trust, SMSF, or partnership in the matter, add the entity so easyAML can verify it and unwrap its ownership.

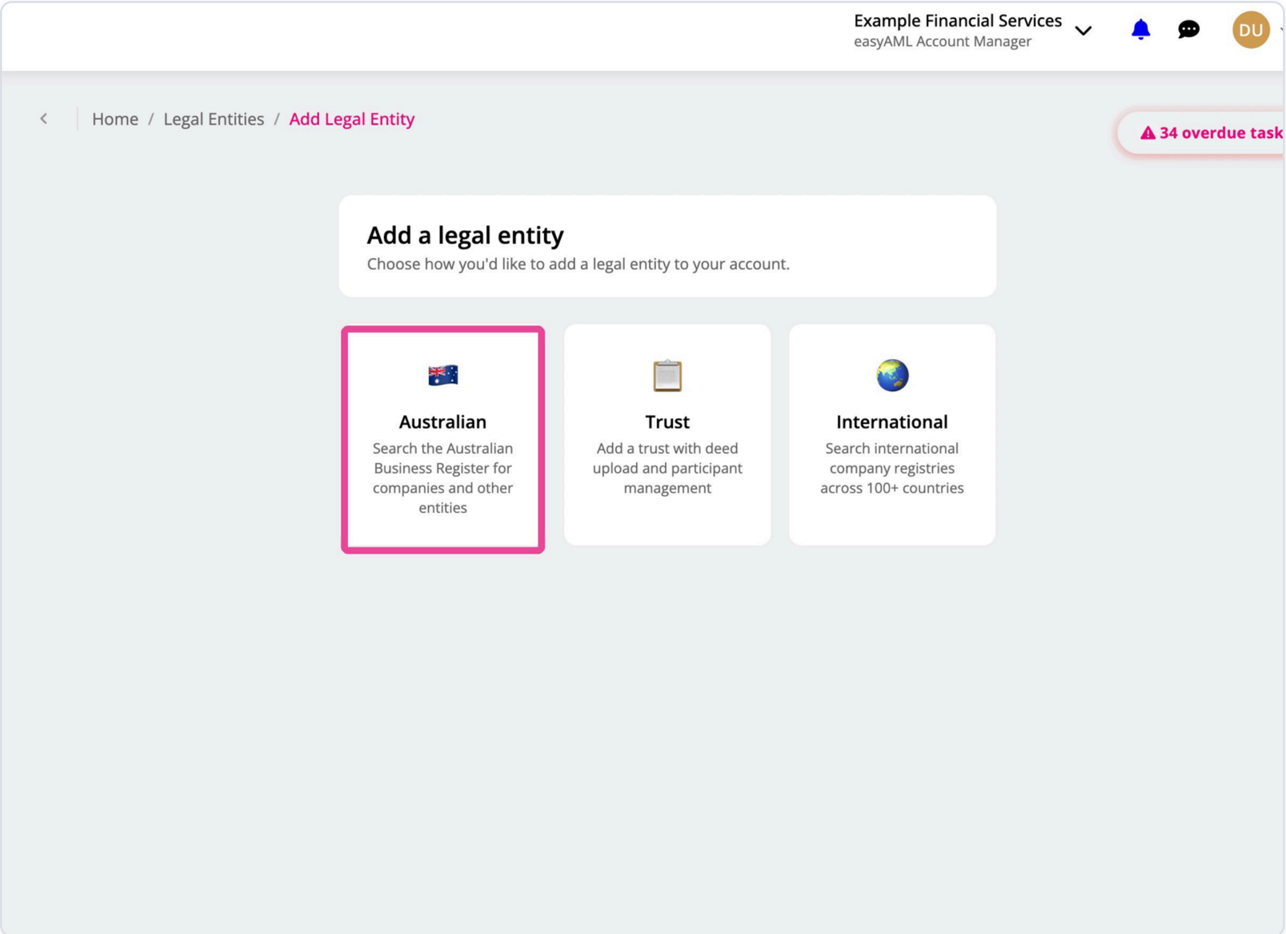
OPEN TO START `https://app.easyaml.com/legal-entities/new`

Companies

1 **Entities → Add Entity**, then choose **Australian**.

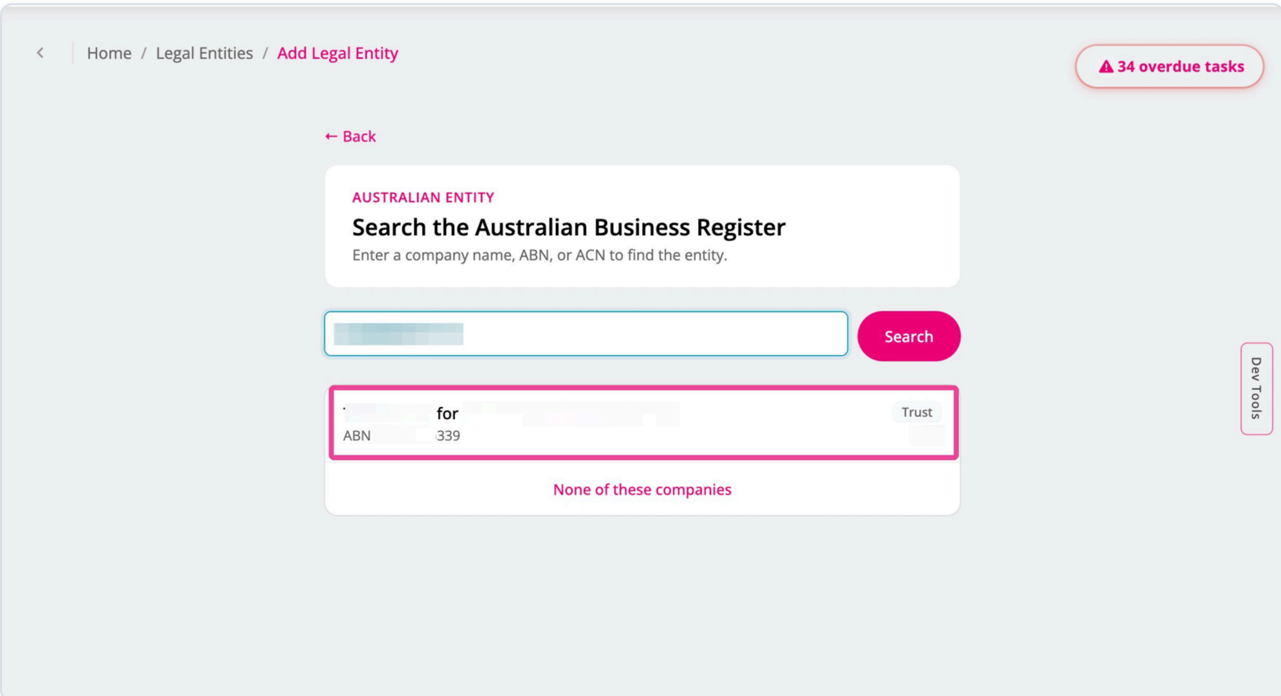


Add Entity → choose the entity source.



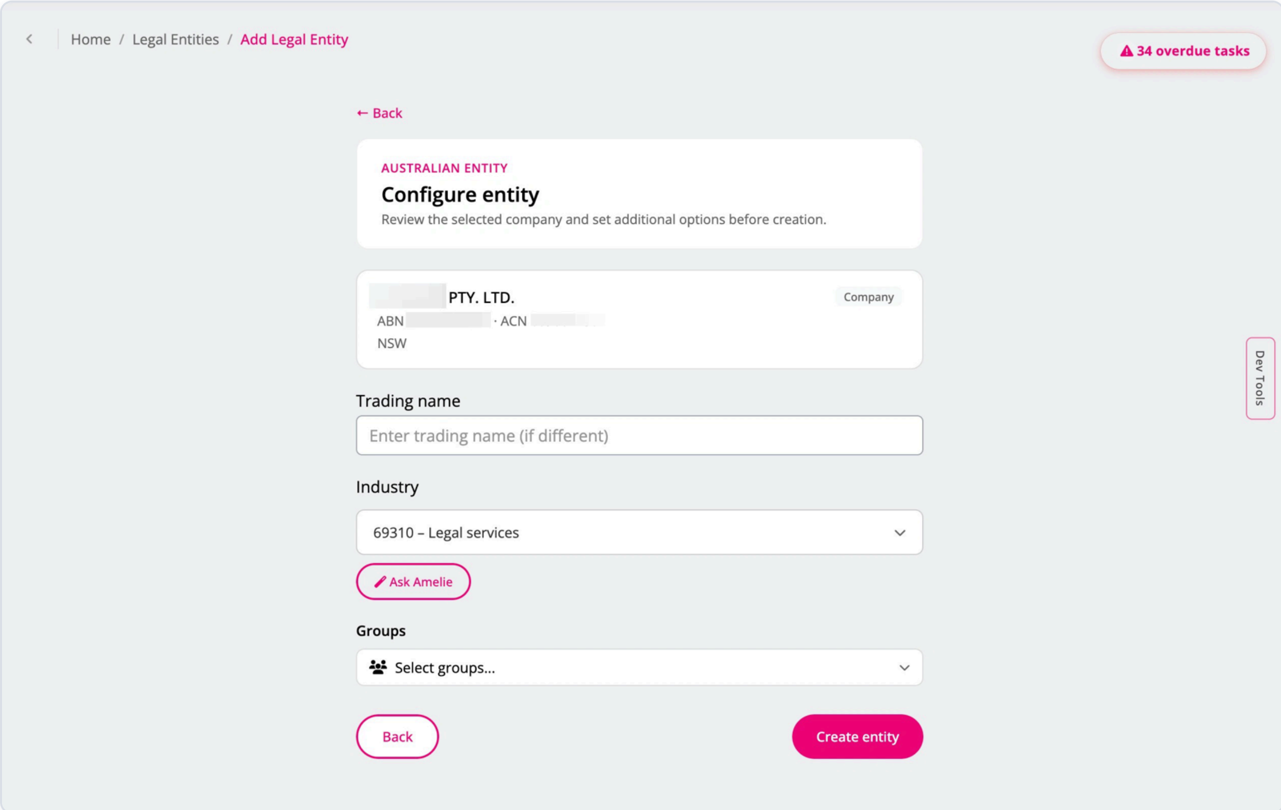
Choose Australian for an ABR/ASIC-registered company.

2 Enter the name, ABN or ACN. easyAML queries ABR & ASIC in real time and returns an exact match (for ABN/ACN) or a list of candidates (for a name).



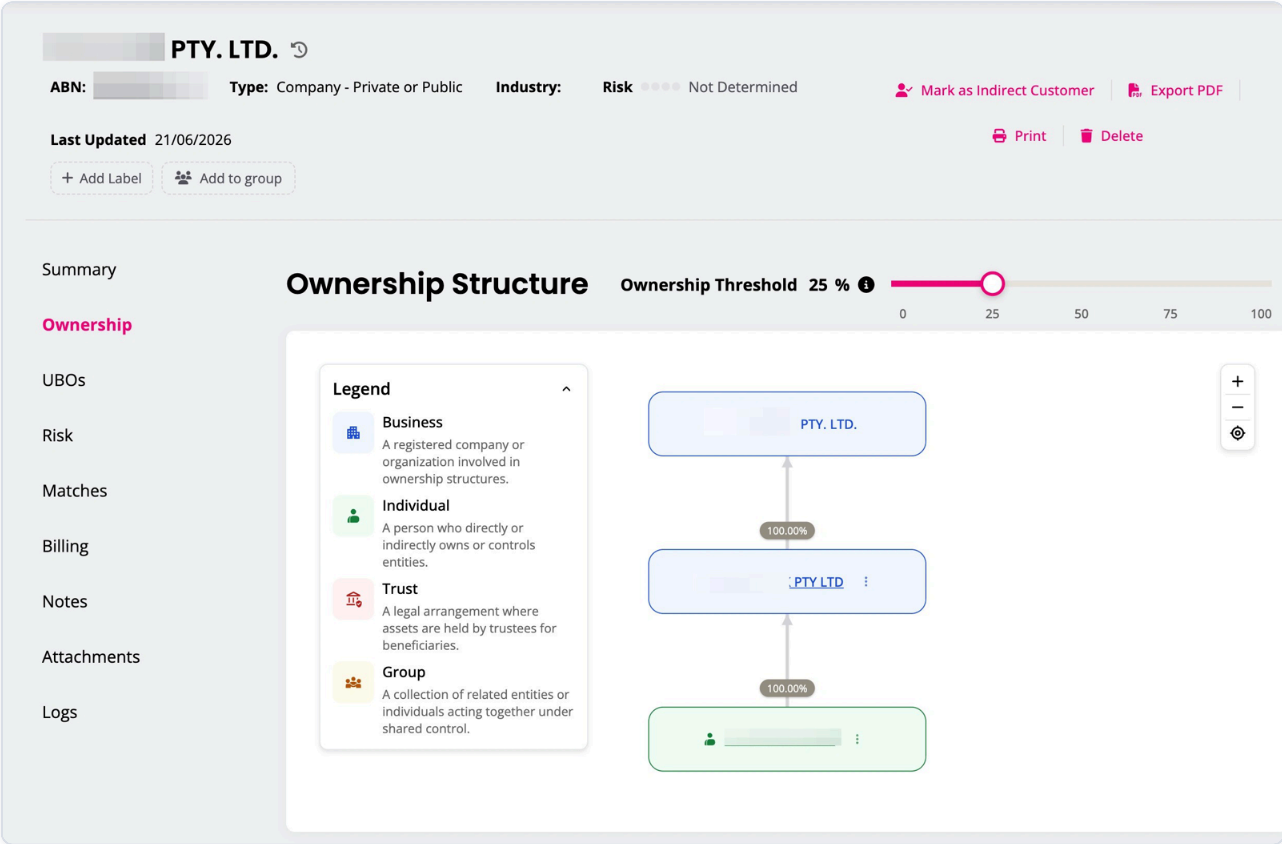
Real-time ABR & ASIC search.

3 Confirm the record, set the trading name and industry (use **Ask Amelie** for an AI industry lookup), assign a Group if needed, then **Create entry**.



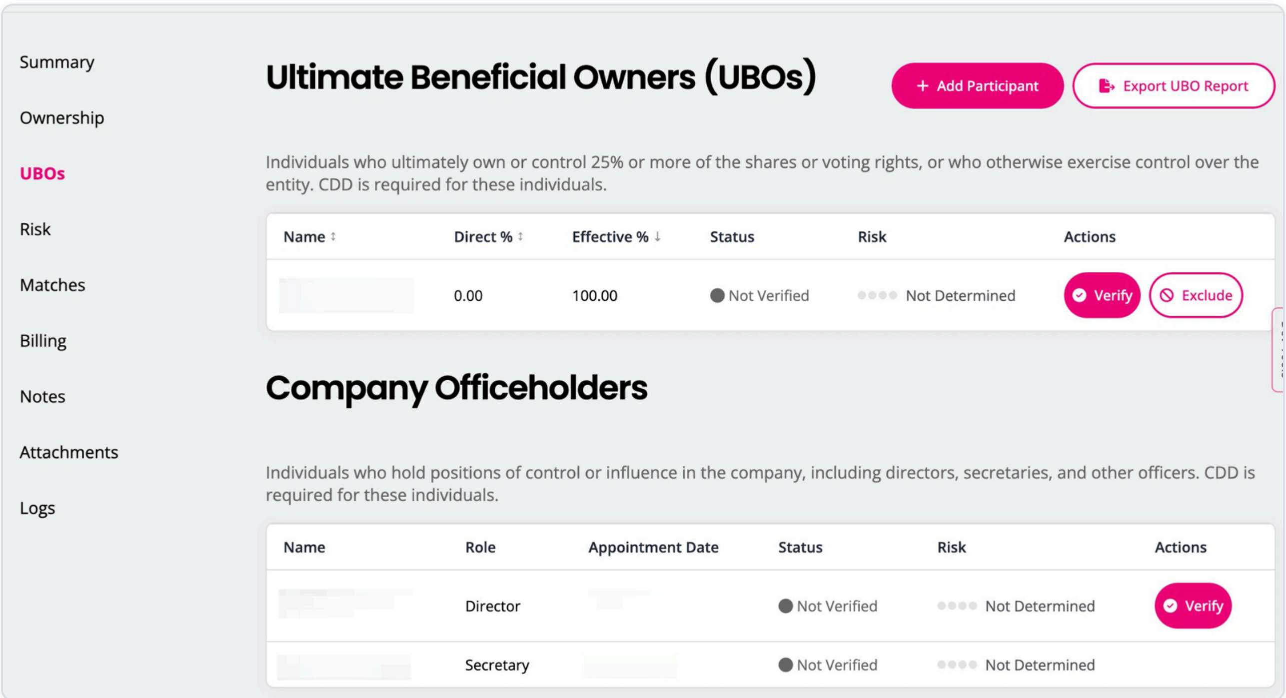
Confirm details, with Ask Amelie for industry lookup.

4 easyAML **unwraps** the ownership chain automatically — following each branch until it terminates in a natural person. Each corporate layer is its own KYB. Default unwrap depth is three layers; it stops once every branch resolves to a person, so you're only charged for layers that exist.



The ownership chain, unwrapped to natural persons.

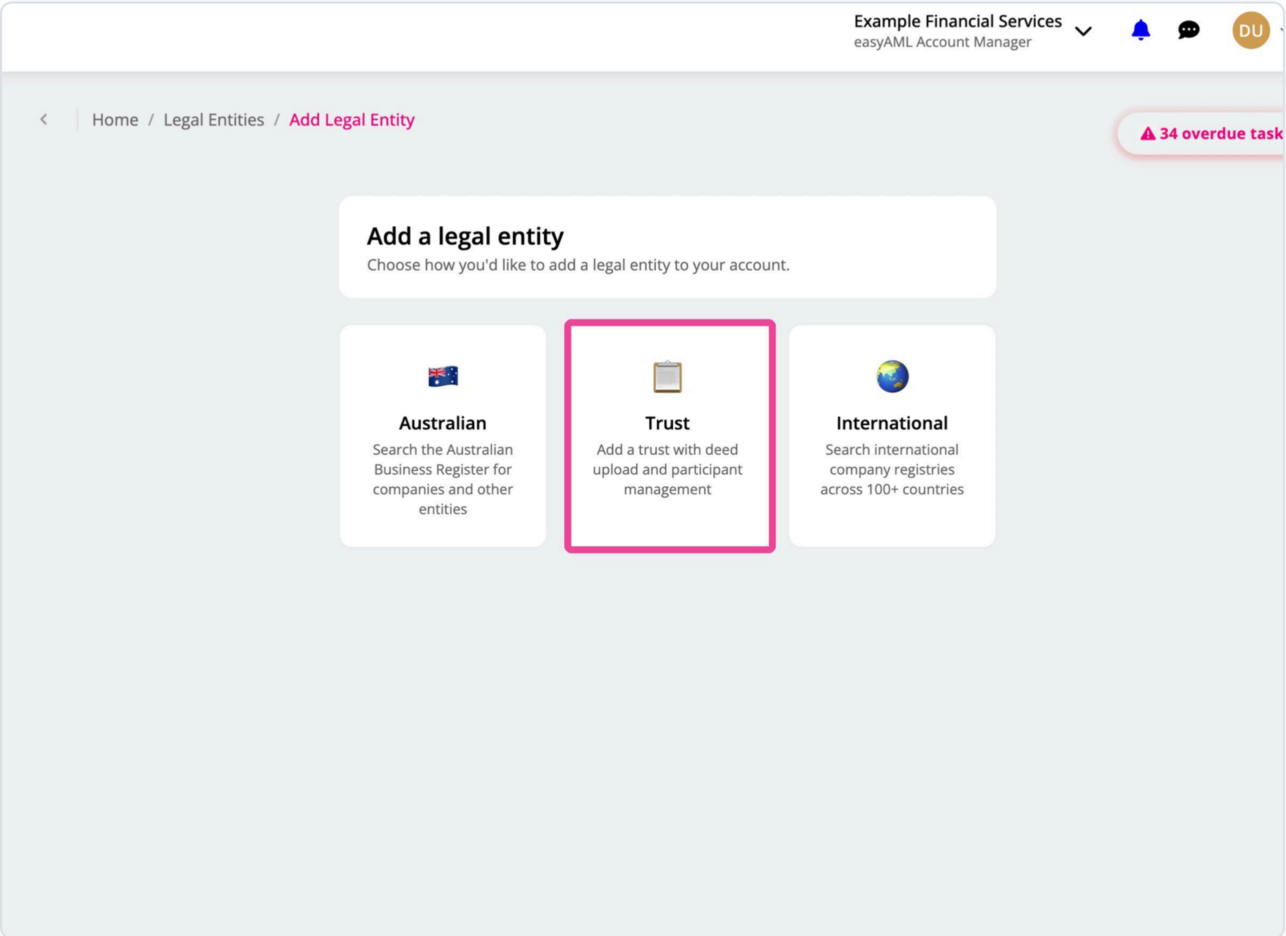
5 Open the **UBOs** tab to see every individual identified — the people who own 25% or more, or otherwise control the entity.



UBOs tab — everyone the unwrap identified.

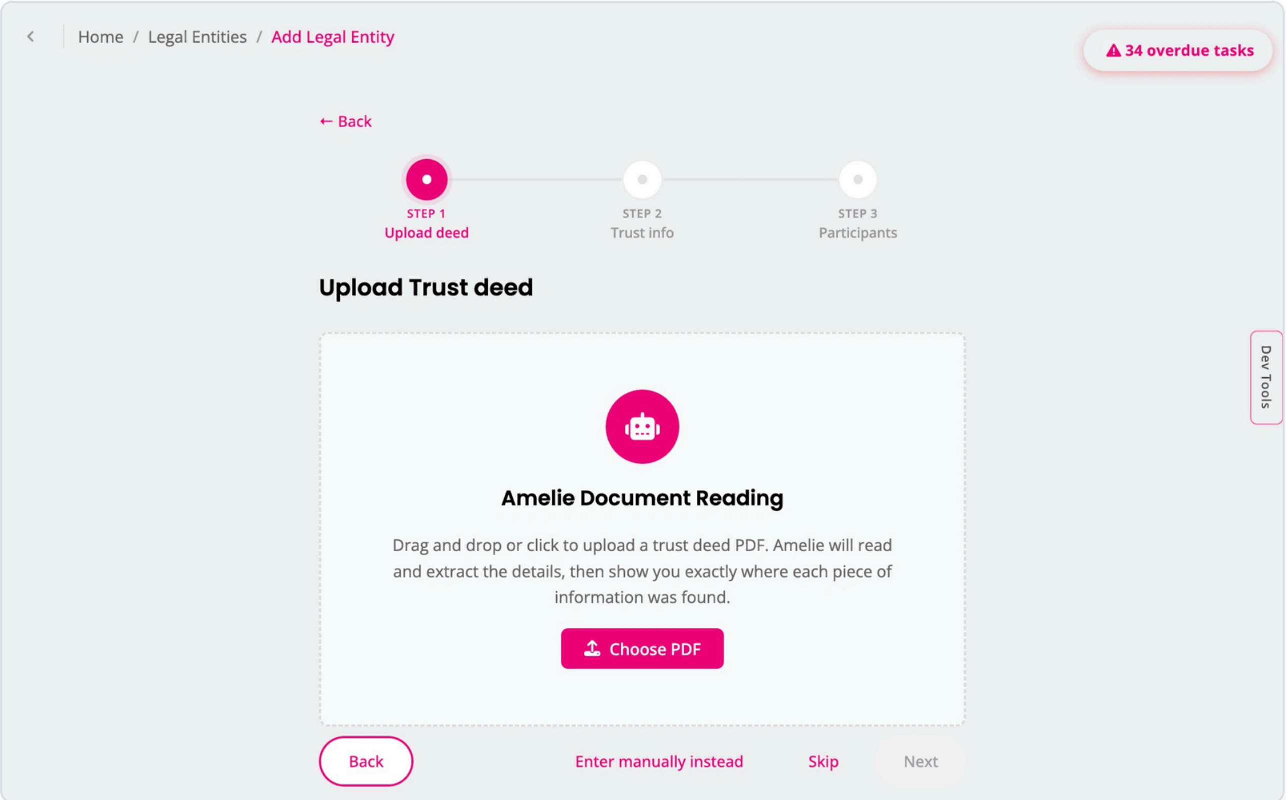
Trusts

1 **Entities → Add Entity**, then choose **Trust**.



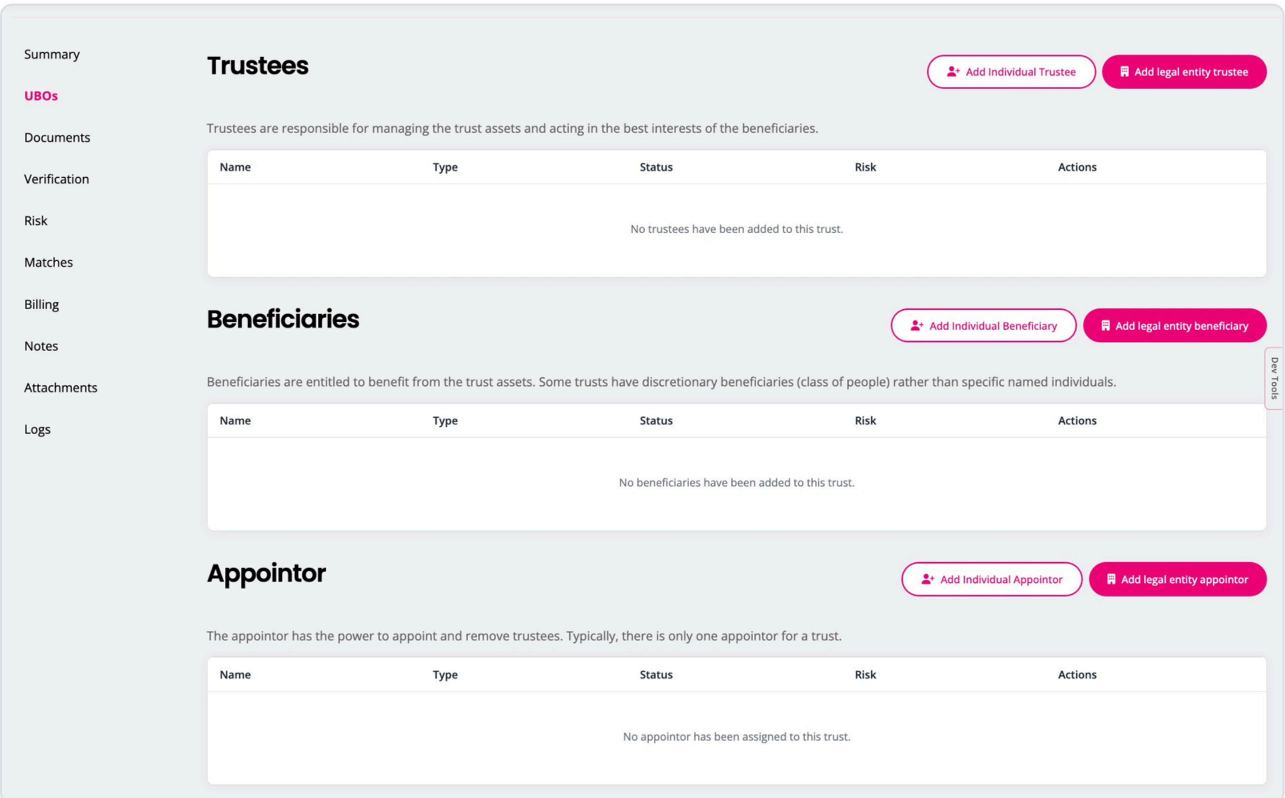
Choose Trust to add a trust with deed upload.

2 A trust isn't on any public register, so the **trust deed is the authoritative source**. Upload the deed — easyAML's AI deed reader extracts the key parties for you to review and confirm (or enter them manually).



Upload the trust deed for AI extraction.

3 The trust profile is created, showing identified controlling persons. The **UBOs** tab lists trustees, appointor, and named adult beneficiaries; the **Documents** tab is the permanent home for the deed and any amendments.



Trustees, beneficiaries and appointor on the UBOs tab.

> **Corporate trustees and layered structures.** *A trust with a corporate trustee, or a company owned by other companies, unwraps layer by layer. Add the top entity, let it unwrap, and follow the chain the platform reveals rather than trying to map it by hand.*

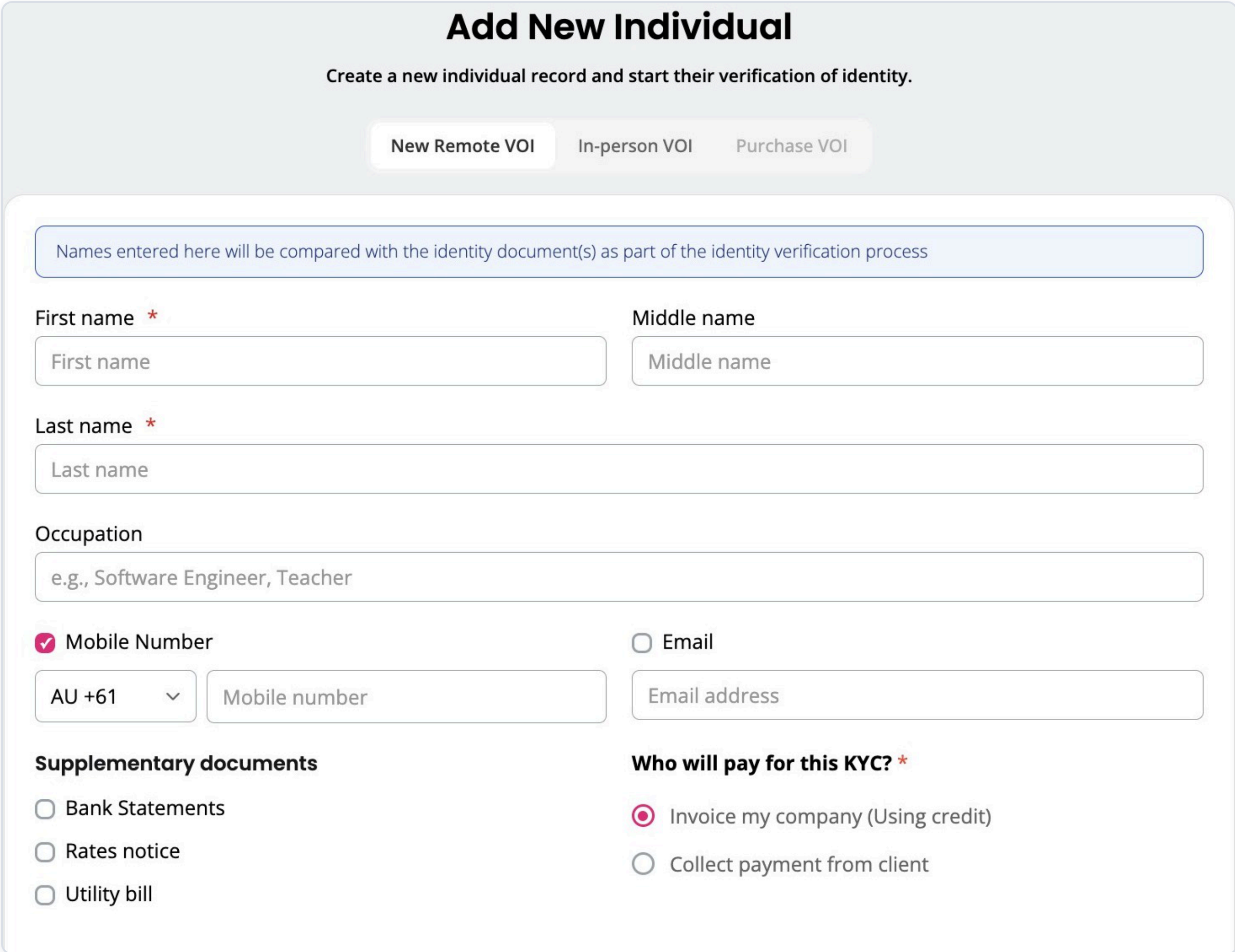
STEP 3

Add the individuals (KYC) revealed by the unwrap

With the structure unwrapped, the UBOs tab tells you exactly which people need verifying. Add any who aren't already in your records.

OPEN TO START `https://app.easyaml.com/individuals/new`

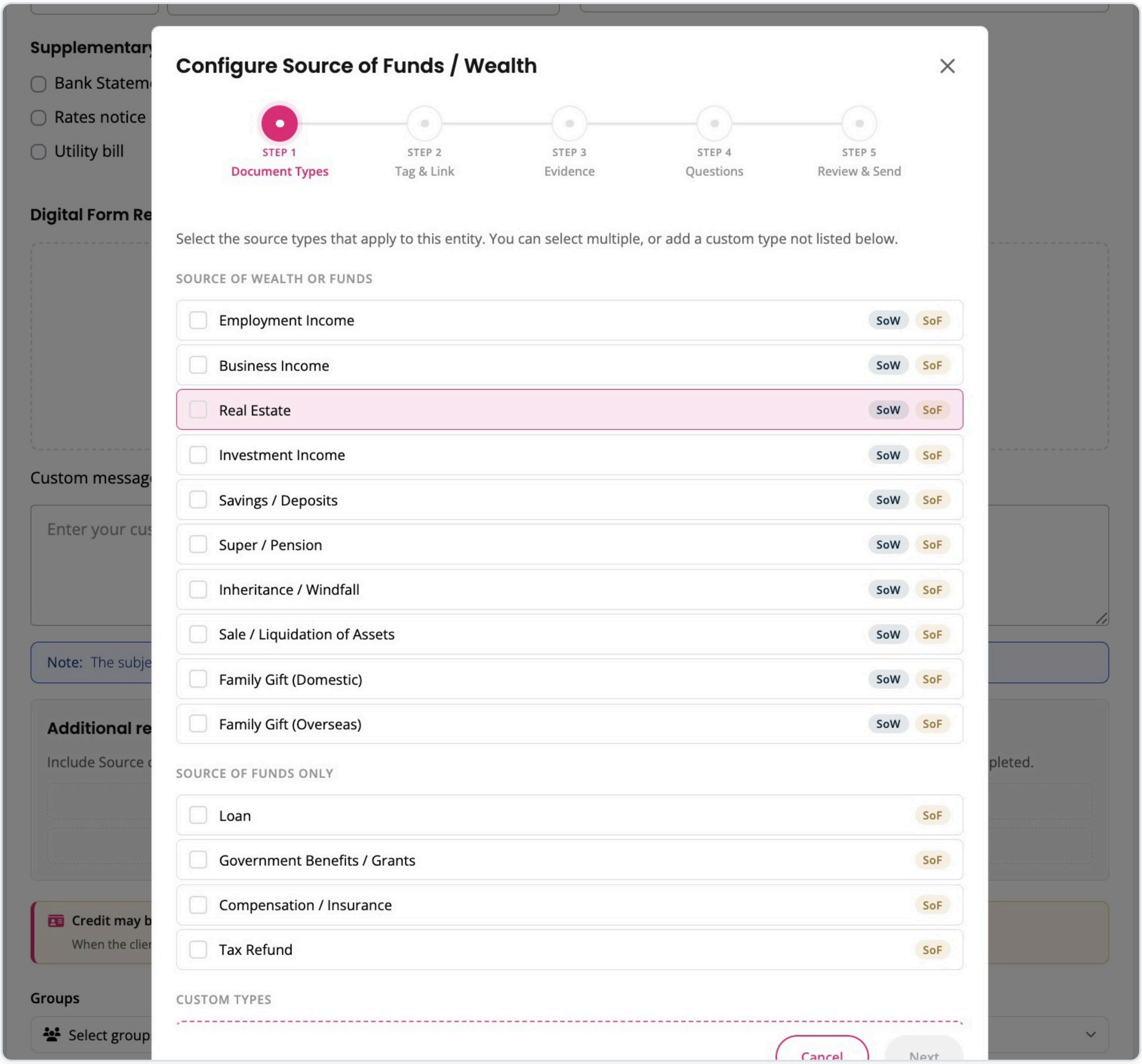
1. **Entities → Add Individuals.**
2. Choose the verification method:
   - **Remote VOI** (default) — easyAML sends the person an SMS/email link; they capture their ID and complete a liveness selfie on their own phone.
   - **In-person VOI** — for someone physically present; a staff member witnesses the capture. The liveness selfie is optional in this mode.



Add Individuals — choose the verification method.

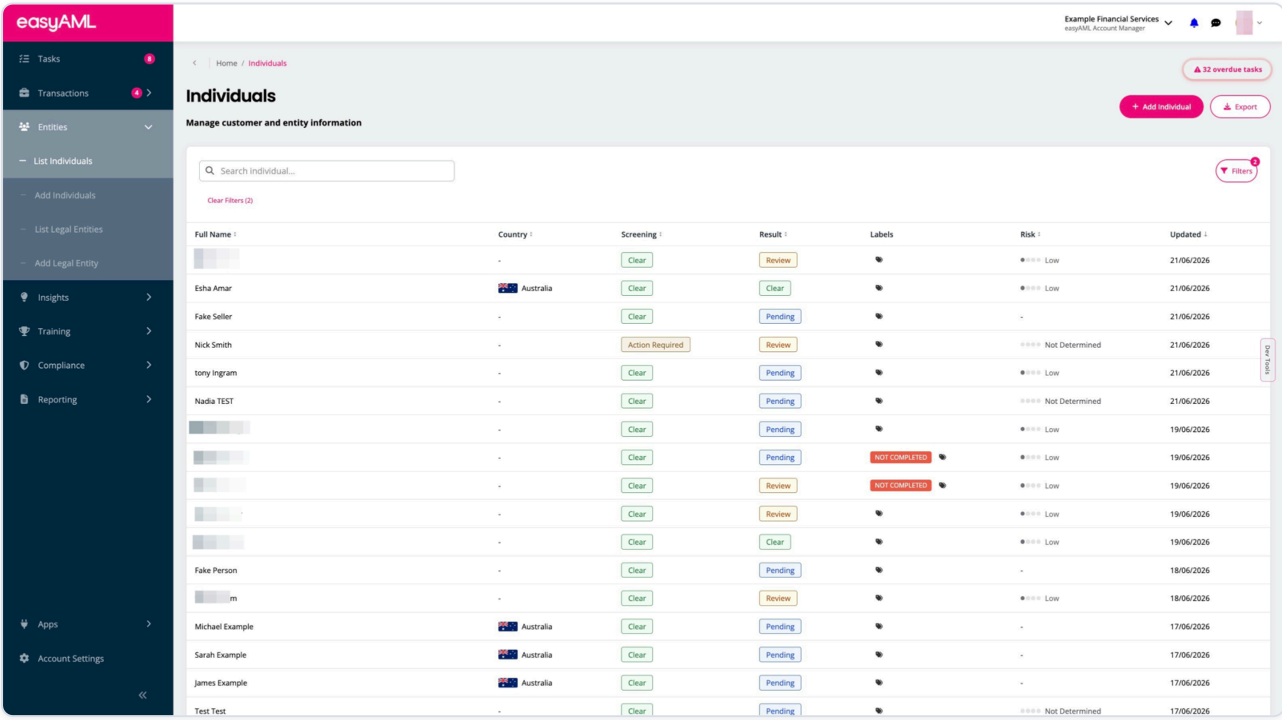
3 Add optional extras where relevant:

- **Questionnaire** — broader onboarding information, separate from financial evidence.
- **Source of Funds / Source of Wealth** — where the money comes from. Choose the **Enhanced** evidence tier for higher-risk individuals or PEPs, **Standard** for routine matters.



Configure Source of Funds / Source of Wealth.

4 Submit, then track status under **Entities → List Individuals** — who's completed, who's pending, and any records flagged for review.



List Individuals — verification and screening status at a glance.

STEP 4

Clear what screening surfaces

As parties verify, easyAML screens them and may raise items for a human decision. These are deliberate review gates, not errors.

PEP / sanctions / adverse-media matches

Screening data is supplied by Dow Jones. The system auto-dismisses matches that clearly aren't your customer (mismatched photo, DOB far apart, plainly different names), leaving only genuine possibles to review. For each remaining match:

- **Dismiss, with a reason** where the details point away from your customer — a different DOB, a different country, or a different person of the same name — or where nothing found confirms a link. Always record a specific reason. The dated note is your audit evidence that the match was assessed, not waved through.
- **Confirm** where the verified details clearly identify your customer. Confirming can trigger Enhanced Due Diligence and raise the customer's risk rating; add a short note on what confirmed it.

"Force Match Required" / "Needs Review" / "Sign Off Required"

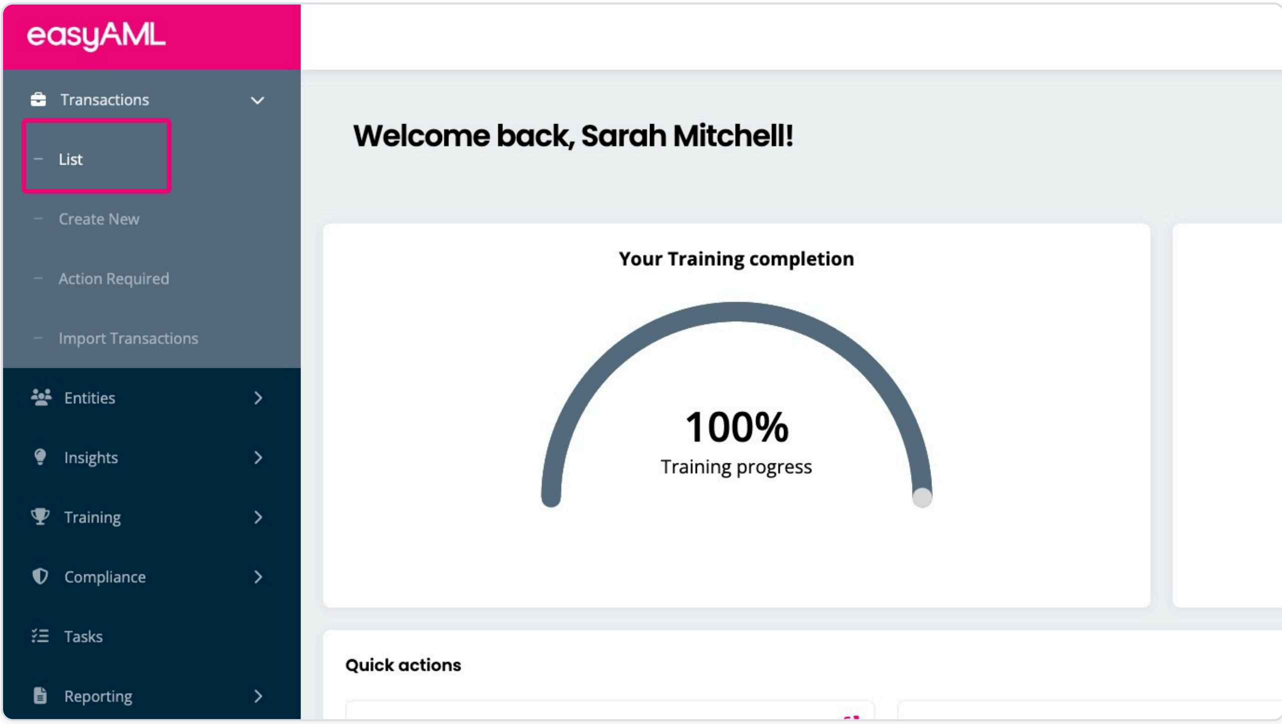
These hand a verification decision to a person rather than auto-passing it. Common triggers: a name variance (e.g. a middle name on the ID that wasn't entered), a slight DOB or field difference, a facial-match issue on a low-quality ID image, an attached Customer Authorisation Form, uploaded supplementary documents, or a sector rule that always requires CO sign-off.

The Compliance Officer (or a suitably-roled user) uses the **force-match** function to record a deliberate decision: *"I've reviewed the variance, I'm satisfied this is the correct person, and I approve the verification."* The action is audit-logged with user, timestamp and reason — you don't restart the KYC. Use it deliberately, not as a shortcut around poor data quality; your audit position is strongest when force-match is rare and well justified.

STEP 5

What "done" looks like

- Each party shows a clear KYC/KYB and screening status.
- Once all parties are verified, the entity's (and transaction's) risk rating resolves — an entity's rating combines its own profile with the risk of the people behind it.
- The full transaction record — parties, ratings, screening results, documents, audit log — is the single view your Compliance Officer or an AUSTRAC reviewer will reference.



The completed transaction record — your single source of truth.

More ways to get help

- **In-platform:** the **"Want Help?"** button on each page opens the relevant walkthrough.
- **Knowledge Base:** knowledge.easyaml.com
- **Video walkthroughs:** available in-platform via the **"Want Help?"** button.