

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:



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

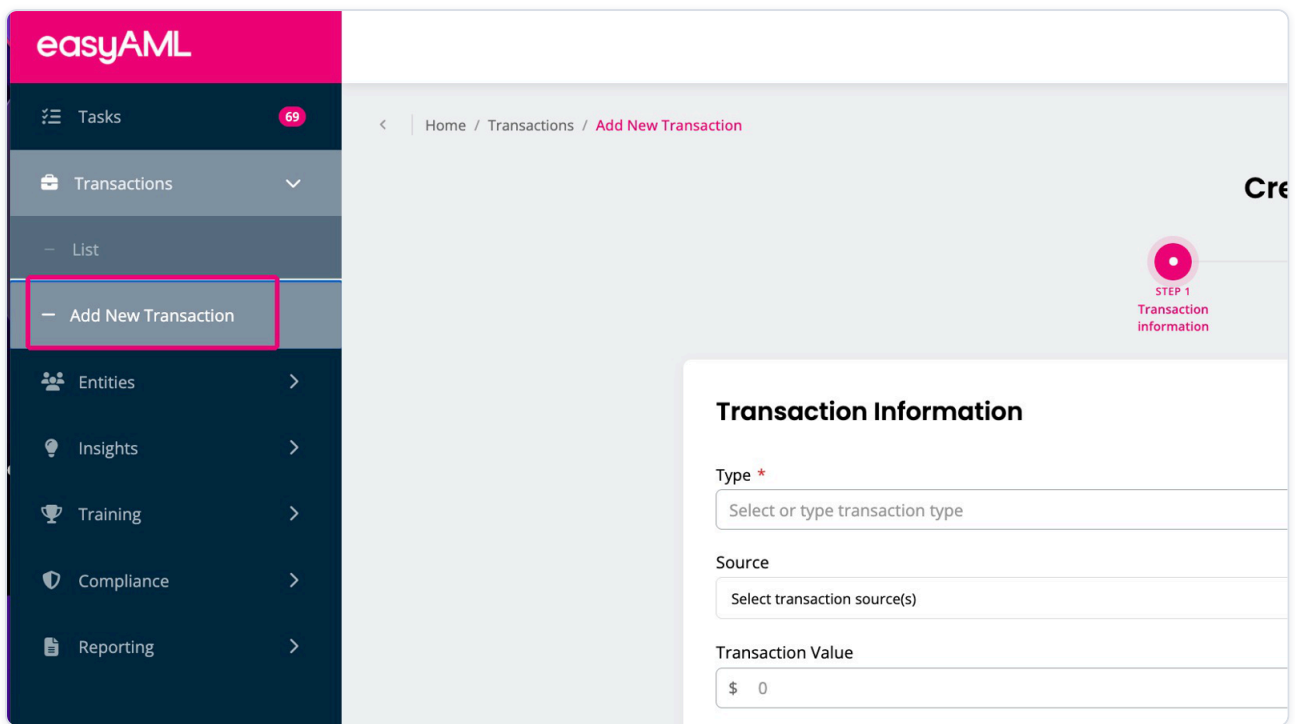
Create the transaction

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**.

Create New Transaction

STEP 1
Transaction
information

STEP 2
Transaction entities

STEP 3
Transaction details

Transaction Information

Type *

Buying residential property (standard domestic buyer)

Source

Bank loan / mortgage (Australian ADI)

Currency

AUD - Australian Dollar

Purchase Price

\$ 950,000

Settlement Date (expected)

25/05/2026

Custom Reference

Optional custom reference for this transaction

Transaction Description

Buying first home

Cancel

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**.

Create New Transaction

STEP 1 Transaction information | **STEP 2 Transaction entities** | STEP 3 Transaction details

Transaction Entities

Individuals (0) | Legal Entities (0)

+ Add New Individual

Search for existing individual or type name to create new...

No individuals added yet. Start typing a name above to search or create.

Cancel | Back | Next

Step 2 — Associate the parties.

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

Create New Transaction

STEP 1 Transaction information | STEP 2 Transaction entities | **STEP 3 Transaction details**

Transaction Details

Property Address
test address
Start typing to search for the complete address

Contract Date
29/03/2026

Intended Use
To live

Proceeds Destination
xxxx

Additional Notes
xxxxx

Cancel | Back | Create Transaction

11 overdue tasks

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

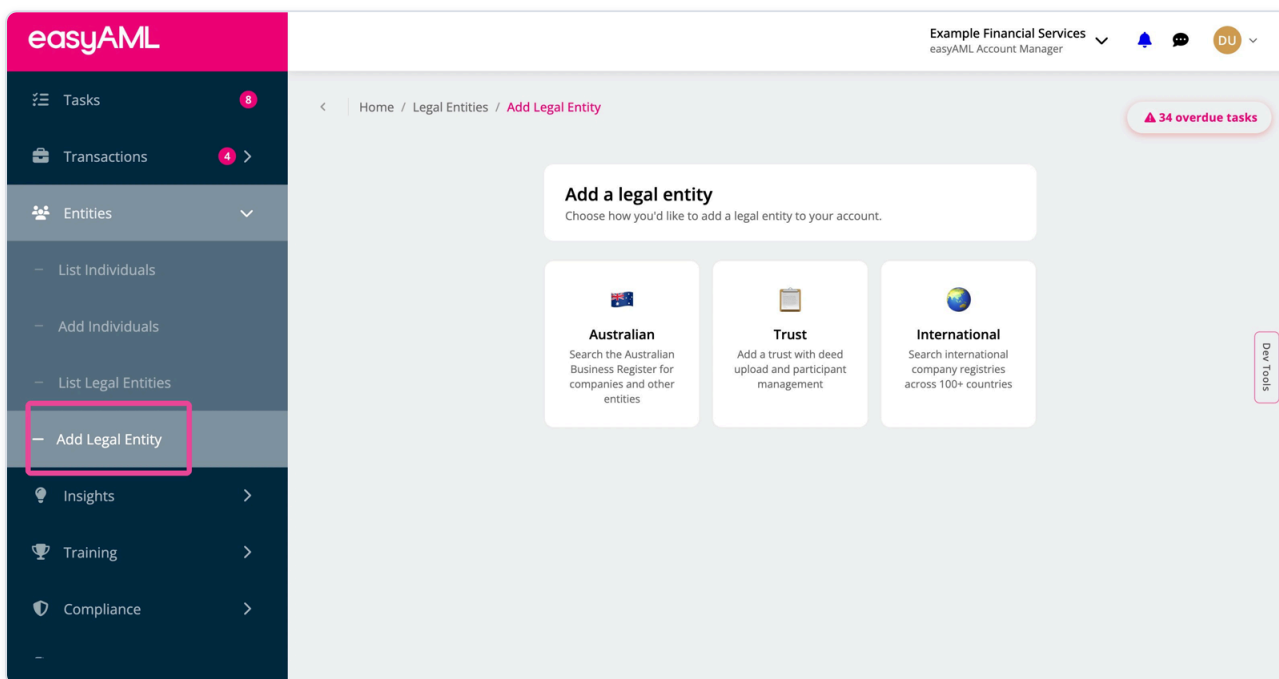
Add the entities (KYB) and let them unwrap

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

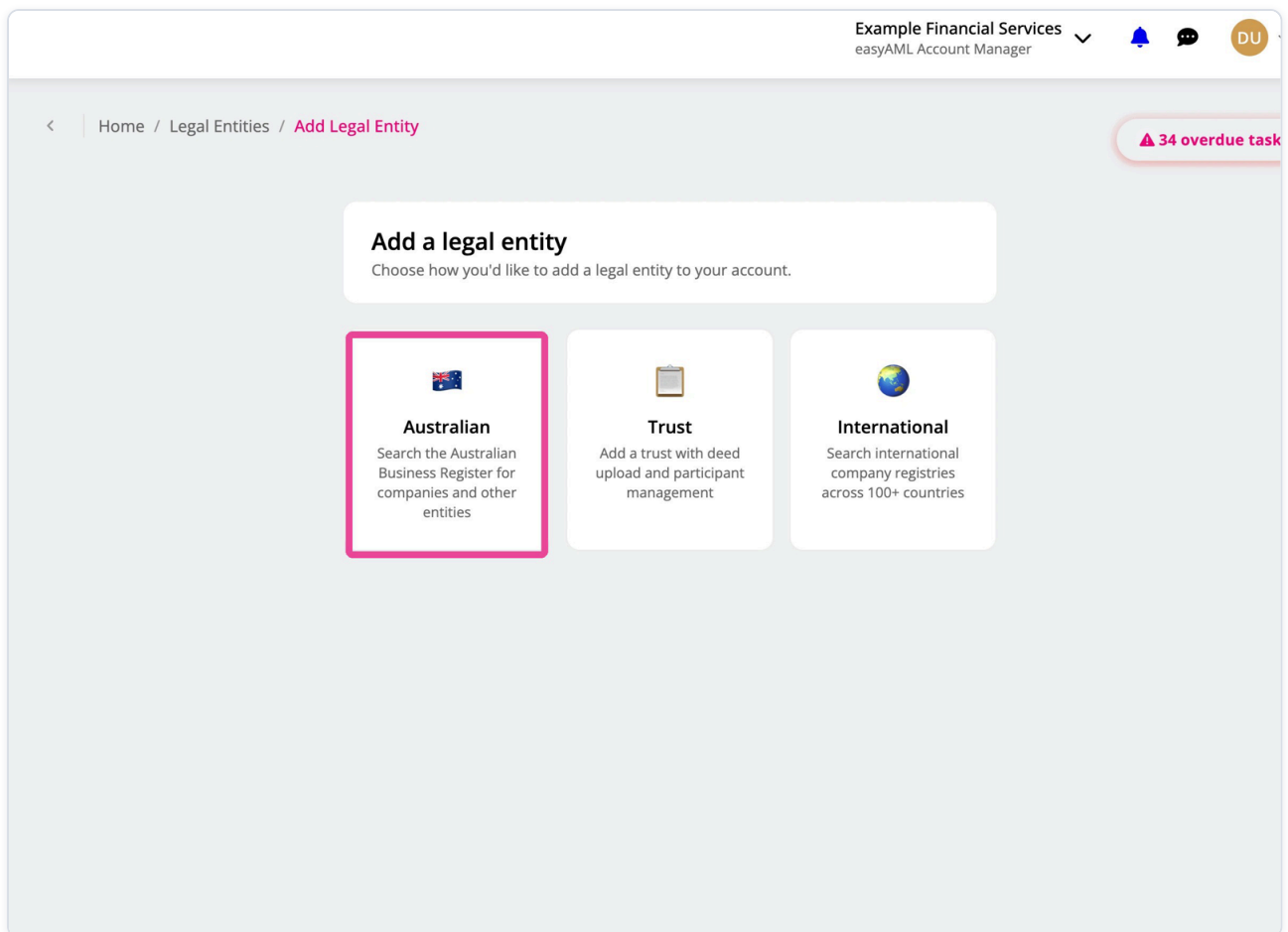
OPEN TO START <https://app.easyaml.com/legal-entities/new>

Companies

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

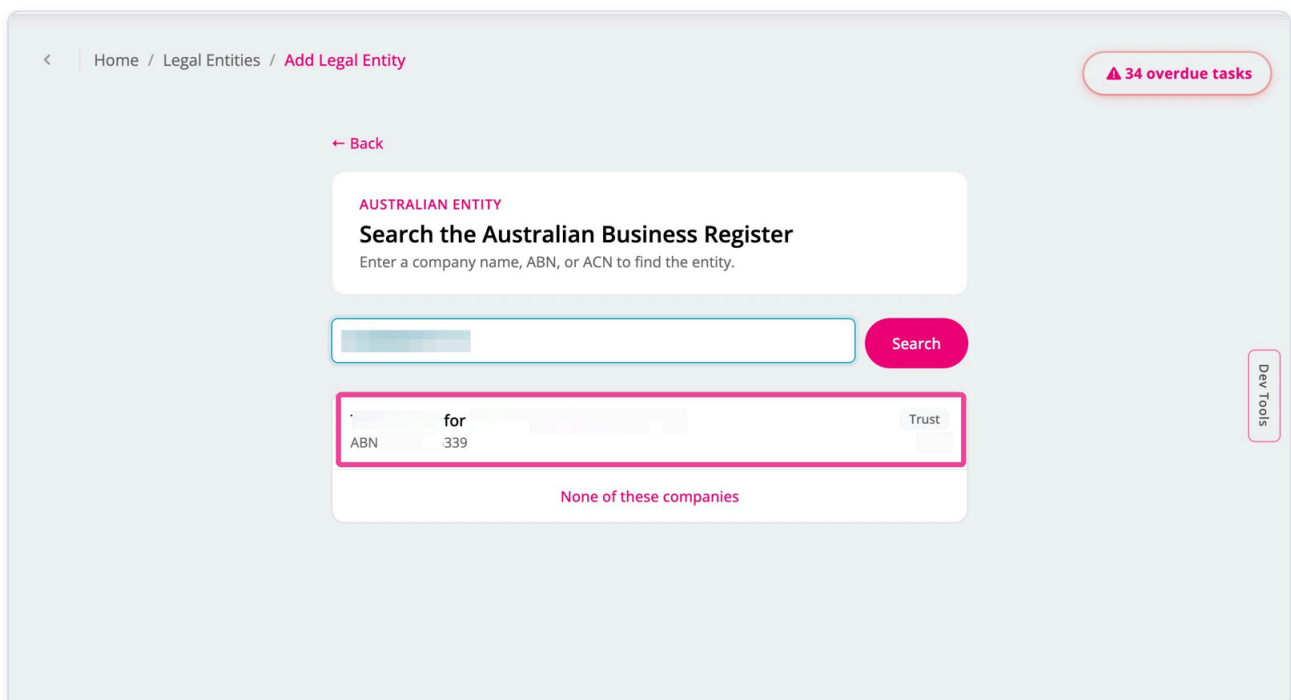


Add Entity → choose the entity source.



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).



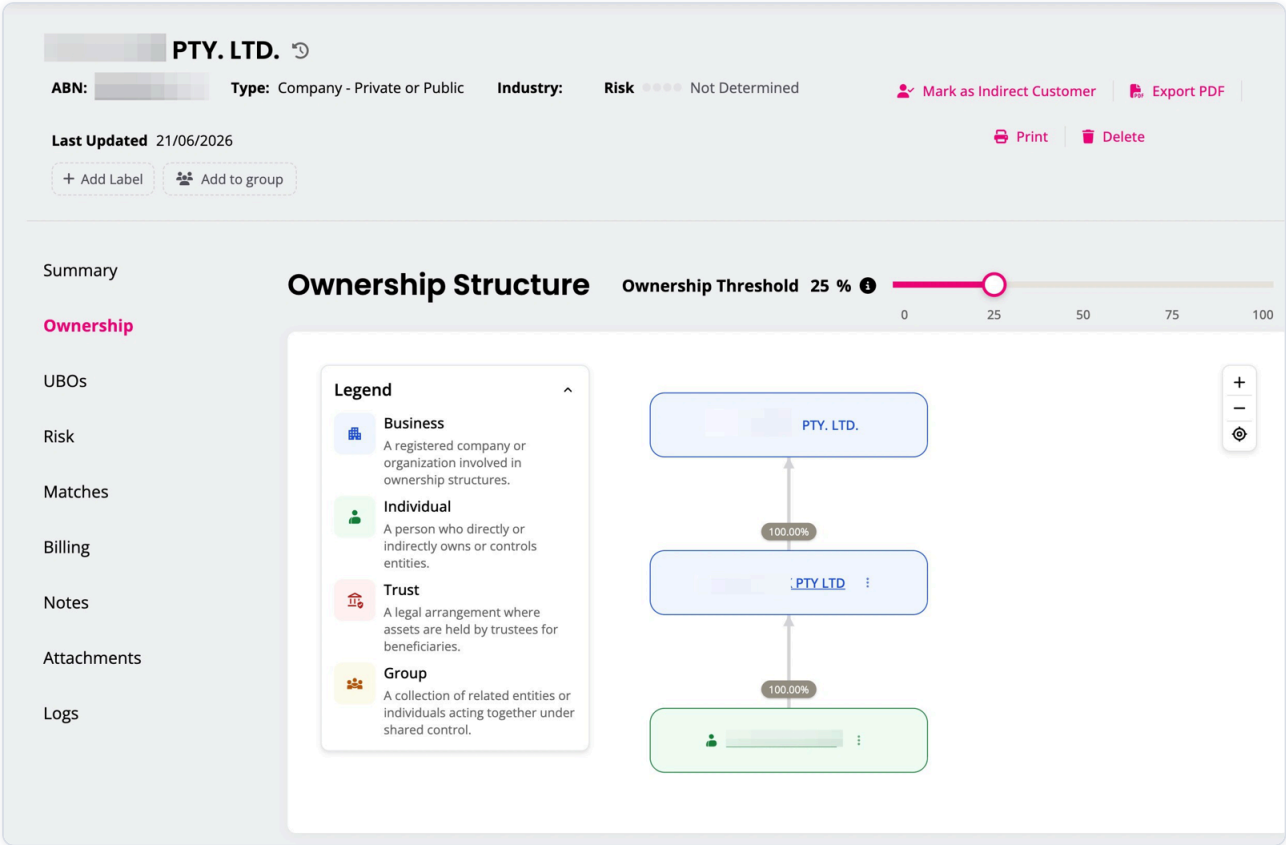
Real-time ABR & ASIC search.

- 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**.

The screenshot shows a web interface for configuring a new legal entity. At the top, there is a breadcrumb trail: Home / Legal Entities / Add Legal Entity. In the top right corner, a notification bubble indicates '34 overdue tasks'. A 'Dev Tools' sidebar is visible on the right. The main form is titled 'AUSTRALIAN ENTITY Configure entity' with a subtitle 'Review the selected company and set additional options before creation.' Below this, there is a section for company details: 'PTY. LTD.' (Company), 'ABN [redacted] · ACN [redacted]', and 'NSW'. The 'Trading name' field is empty with the placeholder 'Enter trading name (if different)'. The 'Industry' dropdown menu is set to '69310 - Legal services'. There is a red 'Ask Amelie' button next to the industry dropdown. The 'Groups' section has a dropdown menu labeled 'Select groups...'. At the bottom, there are two buttons: a red 'Back' button and a red 'Create entity' button.

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.

Summary

Ultimate Beneficial Owners (UBOs) + Add Participant Export UBO Report

Individuals who ultimately own or control 25% or more of the shares or voting rights, or who otherwise exercise control over the entity. CDD is required for these individuals.

Name	Direct %	Effective %	Status	Risk	Actions
[REDACTED]	0.00	100.00	Not Verified	Not Determined	Verify Exclude

Company Officeholders

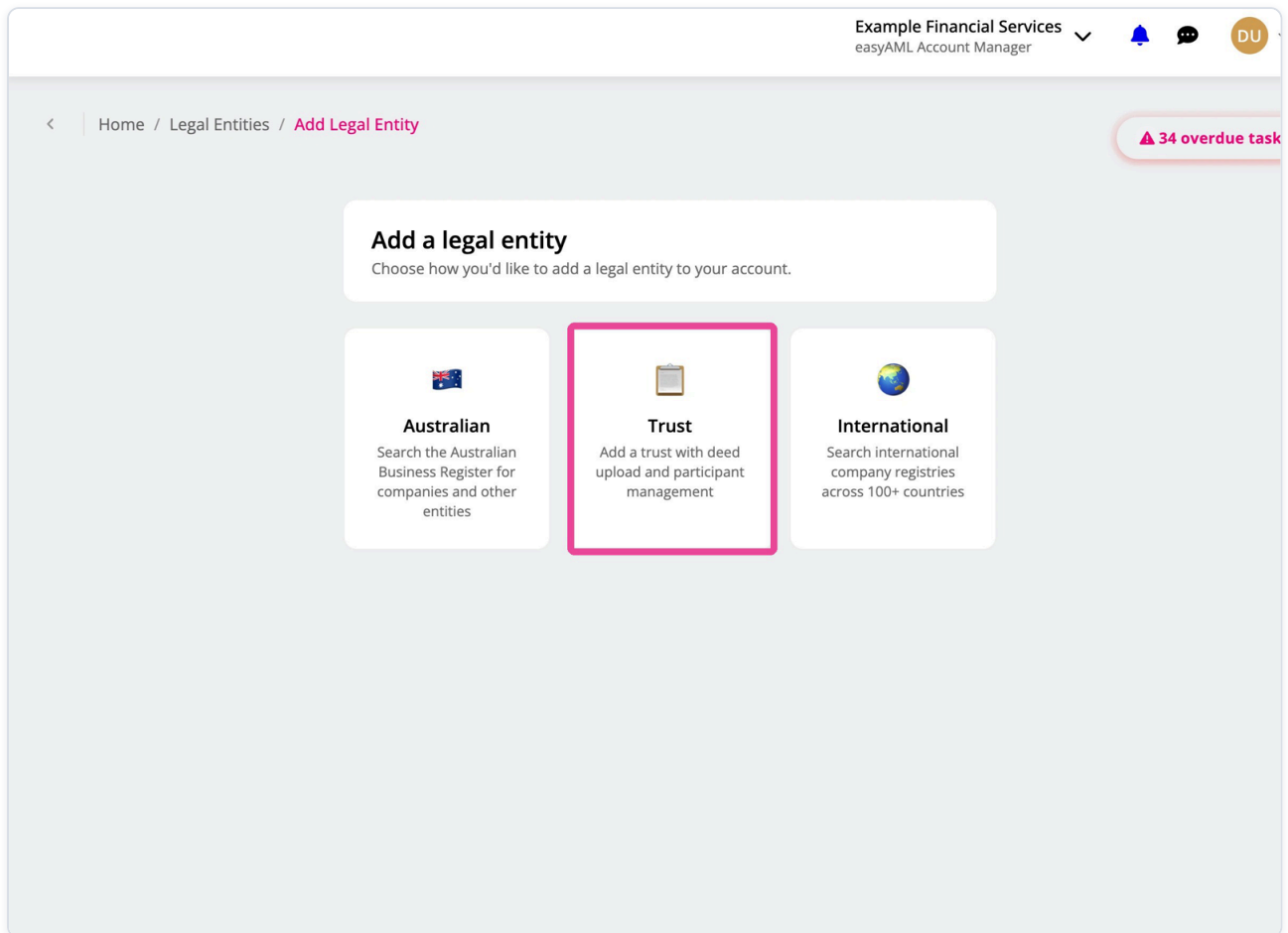
Individuals who hold positions of control or influence in the company, including directors, secretaries, and other officers. CDD is required for these individuals.

Name	Role	Appointment Date	Status	Risk	Actions
[REDACTED]	Director	[REDACTED]	Not Verified	Not Determined	Verify
[REDACTED]	Secretary	[REDACTED]	Not Verified	Not Determined	

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).

Home / Legal Entities / Add Legal Entity

34 overdue tasks

Back

STEP 1
Upload deed

STEP 2
Trust info

STEP 3
Participants

Upload Trust deed

Amelie Document Reading

Drag and drop or click to upload a trust deed PDF. Amelie will read and extract the details, then show you exactly where each piece of information was found.

Choose PDF

Back

Enter manually instead

Skip

Next

Dev Tools

Upload the trust deed for AI extraction.

- 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.

Summary

UBOs

Documents

Verification

Risk

Matches

Billing

Notes

Attachments

Logs

Trustees

Add Individual TrusteeAdd legal entity trustee

Trustees are responsible for managing the trust assets and acting in the best interests of the beneficiaries.

Name	Type	Status	Risk	Actions
No trustees have been added to this trust.				

Beneficiaries

Add Individual BeneficiaryAdd legal entity beneficiary

Beneficiaries are entitled to benefit from the trust assets. Some trusts have discretionary beneficiaries (class of people) rather than specific named individuals.

Name	Type	Status	Risk	Actions
No beneficiaries have been added to this trust.				

Appointor

Add Individual AppointorAdd legal entity appointor

The appointor has the power to appoint and remove trustees. Typically, there is only one appointor for a trust.

Name	Type	Status	Risk	Actions
No appointor has been assigned to this trust.				

Dev Tools

Trustees, beneficiaries and appointor on the UBOs tab.

easyAML — Running a Customer Due Diligence, Start to Finish

KYC-01 · v1.1

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 New Individual

Create a new individual record and start their verification of identity.

New Remote VOI

In-person VOI

Purchase VOI

Names entered here will be compared with the identity document(s) as part of the identity verification process

First name *

First name

Middle name

Middle name

Last name *

Last name

Occupation

e.g., Software Engineer, Teacher

☒ Mobile Number

☐ Email

AU +61

Mobile number

Email address

Supplementary documents

☐ Bank Statements

☐ Rates notice

☐ Utility bill

Who will pay for this KYC? *

☒ Invoice my company (Using credit)

☐ Collect payment from client

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.

Supplementar

☐ Bank Statem
 ☐ Rates notice
 ☐ Utility bill

Digital Form Re

Custom messag

Enter your cus

Note: The subje

Additional re

Include Source c

Credit may b

When the clie

Groups

Select group

Configure Source of Funds / Wealth

STEP 1

STEP 2

STEP 3

STEP 4

STEP 5

Document Types

Tag & Link

Evidence

Questions

Review & Send

Select the source types that apply to this entity. You can select multiple, or add a custom type not listed below.

SOURCE OF WEALTH OR FUNDS

☐ Employment Income

SoW

SoF

☐ Business Income

SoW

SoF

☒ Real Estate

SoW

SoF

☐ Investment Income

SoW

SoF

☐ Savings / Deposits

SoW

SoF

☐ Super / Pension

SoW

SoF

☐ Inheritance / Windfall

SoW

SoF

☐ Sale / Liquidation of Assets

SoW

SoF

☐ Family Gift (Domestic)

SoW

SoF

☐ Family Gift (Overseas)

SoW

SoF

SOURCE OF FUNDS ONLY

☐ Loan

SoF

☐ Government Benefits / Grants

SoF

☐ Compensation / Insurance

SoF

☐ Tax Refund

SoF

CUSTOM TYPES

Cancel

Next

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.

Full Name	Country	Screening	Result	Labels	Risk	Updated
	-	Clear	Review		Low	21/06/2026
Esha Amar	Australia	Clear	Clear		Low	21/06/2026
Fake Seller	-	Clear	Pending		-	21/06/2026
Nick Smith	-	Action Required	Review		Not Determined	21/06/2026
tony Ingram	-	Clear	Pending		Low	21/06/2026
Nadia TEST	-	Clear	Pending		Not Determined	21/06/2026
	-	Clear	Pending		Low	19/06/2026
	-	Clear	Pending	NOT COMPLETED	Low	19/06/2026
	-	Clear	Review	NOT COMPLETED	Low	19/06/2026
	-	Clear	Review		Low	19/06/2026
	-	Clear	Clear		Low	19/06/2026
Fake Person	-	Clear	Pending		-	18/06/2026
im	-	Clear	Review		Low	18/06/2026
Michael Example	Australia	Clear	Pending		-	17/06/2026
Sarah Example	Australia	Clear	Pending		-	17/06/2026
James Example	Australia	Clear	Pending		-	17/06/2026
Test Test	-	Clear	Pending		Not Determined	17/06/2026

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"

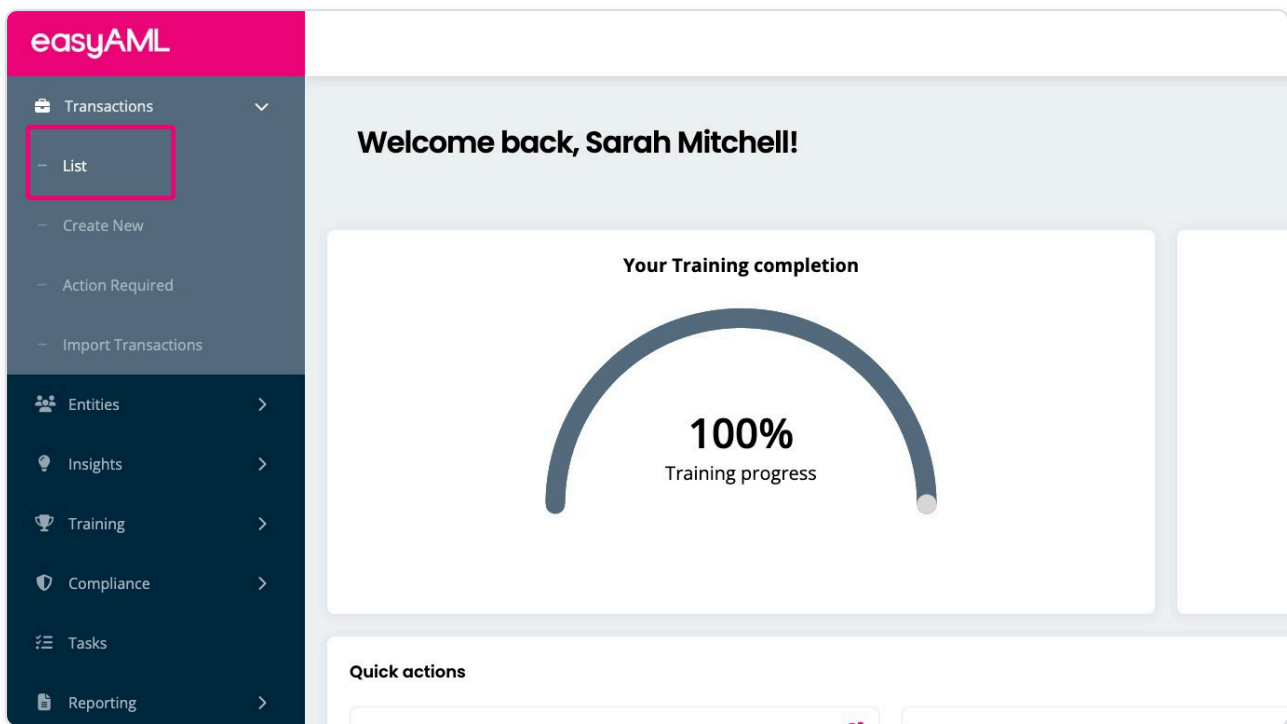
These hand a verification decision to a person rather than auto-passing it. Common triggers: a name variance (e.g. a middle name on the ID that wasn't entered), a slight DOB or field difference, a facial-match issue on a low-quality ID image, an attached Customer Authorisation Form, uploaded supplementary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