

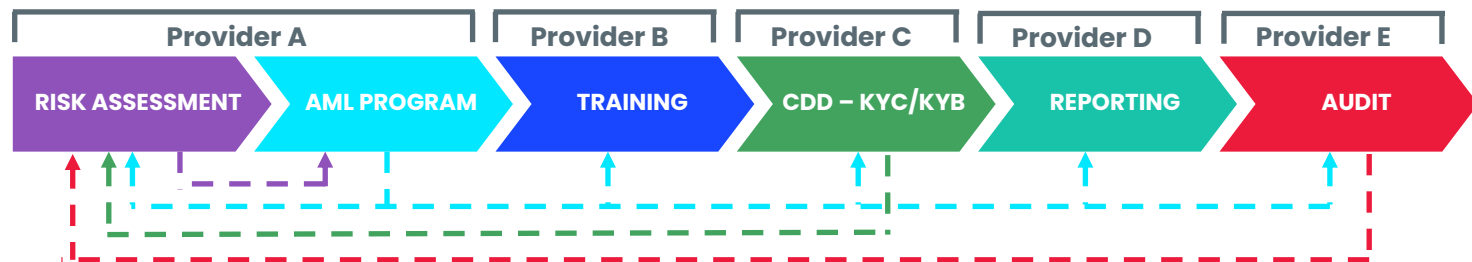
The future: All in one AML Solutions

The hidden cost of managing multiple AML providers

November 2025



The current AML model



The current model leads to manual compliance costs:

- Periodic RA reassessment
- RA methodology documentation and approval
- Program effectiveness reviews
- Board reporting preparation
- Regulatory Change Monitoring
- Governance Management reporting
- Training content development and updates
- Training completion tracking
- SMR/TTR Report Recording
- Annual Report Compilation
- Risk Profile Review
- Audit Review Compilation

The future: all in one model



The new model leads to compliance certainty:

- Reduce administrative time with seamless data integration
- Auto-populates risk scores into monitoring rules
- Centralised document source for instant access
- Built-in audit trails capture all actions
- System-enforced controls prevent compliance gaps
- Eliminate compliance gaps with smart workflow controls
- Real-time dashboards provide complete oversight visibility
- Simple, regulatory reporting from single source

Step 1: Design your AML/CTF Program

1 Identify Governance Structure

Designate who in your business will be the Governing Body, the Senior Manager(s) and the AML/CTF Compliance Officer. Usually, these roles will be filled by different people within your business. However, smaller businesses, it is possible for one person to hold all three roles.

2 Undertake Risk Assessment

Businesses providing a designated service must appoint a Compliance Officer to oversee the operation of the entity's AML/CTF policies. This person ensures regulatory compliance, manages risk assessments, oversees reporting obligations, and maintains compliance programs.

3 Document your Policies

Some of the policies that you will need to consider include how you plan to identify changes in risk factors, how you plan to conduct CDD, how you will monitor transactions and how you will ensure that your staff are trained.

How easyAML helps

1 Manage your organisation's governance

- ✓ Manage your entire governance hierarchy and role management in one place.
- ✓ Easily structure role responsibilities within the platform for each staff member
- ✓ Empower your Compliance Officer to manage your business's end-to-end compliance within the platform
- ✓ Comprehensive audit records for governance roles

2 Complete your Risk Assessment

- ✓ Take Risk Assessment Questionnaire, which guides you through questions about your business and your clients
- ✓ Your responses, will generate a tailored, done-for-you AUSTRAC-compliant AML/CTF Program
- ✓ Comprehensive Risk Assessment and AML/CTF Program audit records
- ✓ Leverage our ongoing Risk Assessment and AML/CTF Program compliance monitoring
- ✓ Includes AML Program governance sign off

easyAML's Tailored AML/CTF Program

The screenshot displays the 'easyAML' web application interface. On the left is a dark blue sidebar with a menu containing: Transactions, Entities, Insights, Training, Compliance (expanded), Reporting, and Integrations. The 'Compliance' menu is open, showing sub-items: AML Program, Compliance Officer (highlighted with a mouse cursor), DEMO ML/TF Risk Assessment, ML/TF Risk Assessment, Compliance Calendar, and AUSTRAC Advice. The main content area is titled 'Compliance Officer' and includes a subtitle: 'Designate a primary compliance officer and secondary (2IC) backup to ensure continuous AML/CTF program oversight'. Below this are three tabs: 'Staff selection' (active), 'History', and 'Responsibilities'. The 'Staff selection' tab contains two sections: 'Current compliance officers' and 'Staff members'. The 'Current compliance officers' section features a table with columns: Name, Position, Role, Start date, End date, Status, and Actions. It lists two officers: John Smith (Primary Compliance Officer, started 2020-03-15, status 'Complete') and Sarah Johnson (2IC Compliance Officer, started 2021-06-01, status 'Complete'). Each row has a 'Remove' button. The 'Staff members' section has a '+ Add Staff' button and a table with columns: Name, Position, Department, Training status, Eligible, and Actions. It lists three staff members: John Smith (Chief Compliance Officer, Compliance department, Not Eligible), Michael Chen (AML Analyst, Compliance department, Not Eligible), and Sarah Johnson (Deputy Compliance Officer, Compliance department, Not Eligible). Each row has a 'Send reminder' button. The top right of the interface shows the user 'Scantek Investment Group Compliance Officer' and a profile icon.

Name	Position	Role	Start date	End date	Status	Actions
John Smith		Primary Compliance Officer	2020-03-15		Complete	<button>Remove</button>
Sarah Johnson		2IC Compliance Officer	2021-06-01		Complete	<button>Remove</button>

Name	Position	Department	Training status	Eligible	Actions
John Smith	Chief Compliance Officer	Compliance		Not Eligible	<button>Send reminder</button>
Michael Chen	AML Analyst	Compliance		Not Eligible	<button>Send reminder</button>
Sarah Johnson	Deputy Compliance Officer	Compliance		Not Eligible	<button>Send reminder</button>

Step 2: Creating your AML/CTF Culture

AUSTRAC views building a compliance culture as key to your business meeting your AML obligations.

AML/CTF Culture

Compliance should be a **core business priority**, not just a box ticking exercise.

AUSTRAC is looking for:

- ✔ Active leadership engagement in compliance matters
- ✔ Demonstrated staff awareness and understanding of AML/CTF obligations
- ✔ Ongoing employee due diligence and role suitability

How to promote a positive AML/CTF culture

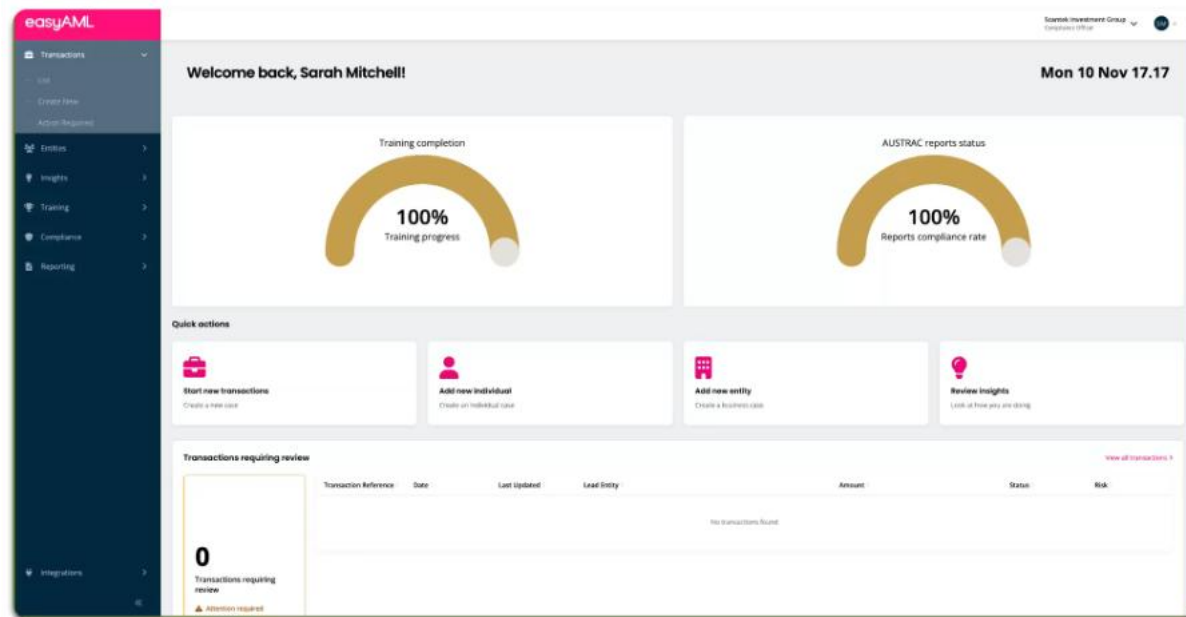
While there are many indicators of a strong AML/CTF culture, some of the ones to consider include:

- ✔ Involving leaders within your business in any risk and compliance updates
- ✔ Encouraging staff to report concerns and ensure a clear reporting process
- ✔ Conduct regular staff training and enforce disciplinary measures for non-compliance with your policies

How easyAML helps

Dashboards align compliance:

- ✓ An easy-to-navigate user dashboard
- ✓ Detailed dashboards for senior management
- ✓ Training dashboards to monitor staff training
- ✓ Record of all AUSTRAC submitted reports
- ✓ Board reports to demonstrate compliance



Step 3: Customer Due Diligence

CDD is knowing your customers before providing designated services and throughout your engagement.

1 Initial CDD

- KYC (Know Your Customer)
- KYB (Know Your Business)
- UBO (Ultimate Beneficial Owner) verification

2 Delayed Initial CDD

- Real estate – Prior to settlement, max 15 days
- Essential to avoid interrupting business
- Low ML/TF risk

3 Ongoing CDD

- Monitor the client's profile
- Transactions and behaviour ongoing,
- Sanction/PEP status.

4 Enhanced CDD (ECDD)

- Foreign PEPs
- SMR needs to be submitted
- Unusual or complex transactions

As part of your CDD, you need to identify:

- ✓ Whether your client or any beneficial owners are a PEP, or designated for targeted financial sanctions
- ✓ The nature and complexity of the transaction
- ✓ For PEPs and any other high-risk clients you need to conduct ECDD on the source of their funds and source of wealth

easyAML's CDD solution

easyAML has a comprehensive, integrated digital ID verification service for KYC.

Features of the ID verification service include:

- ✓ The ID link is sent directly to your customer's email or phone (no additional apps to download) \
- ✓ **The whole process takes just 60 seconds.**
 - ✓ Automated Document extraction and validation > 10,000 IDs
 - ✓ Liveness validation
 - ✓ Biometric verification
 - ✓ Location data and
 - ✓ Back-to-source document checks to confirm the validity of the information your client is providing.

As part of the KYC process, easyAML also checks over 1,000 international databases for:

- ✓ PEPs screening
- ✓ Sanctions checks
- ✓ Adverse media screenings

The platform centralises your CDD information with audit trails and secure Australian document storage.

easyAML's CDD solution

The screenshot displays the easyAML web application interface. On the left is a dark blue sidebar with navigation links: Transactions, Entities, Insights, Training, Compliance, Reporting, and Integrations. The main content area is titled 'All Transactions' and includes a subtitle 'View and manage all transactions across the account'. A search bar and filter buttons (All Status, All Risk, All Business Group, Discouraged Only) are at the top. Below is a table with 17 results, showing transaction details like reference, date, lead entity, amount, status, and risk. A pagination bar at the bottom indicates 'Showing 1 to 10 of 17 results' and 'Showing 10 per page'.

Transaction Reference	Date	Last Updated	Lead Entity	Amount	Status	Risk
TX-176276909274	18/12/2025	10/11/2025	CHAD ALEXANDER FLECKERMANN	ALD 864,450	Pending	Medium
TX-1762769044953	29/11/2025	10/11/2025	Katharine Hanson	ALD 565,800	Pending	Medium
TX-1762769003951	30/12/2025	10/11/2025	Andrew Shannon	ALD 2,150,000	Pending	Medium
TX-1762768954036	05/09/2025	10/11/2025	Michael Cameron	ALD 1,250,900	Pending	Medium
TX-1762768893533	02/01/2026	10/11/2025	GOLD PARK PTY LTD	ALD 899,500	Pending	Medium
TX-1762768817255	17/12/2025	10/11/2025	Murray Woodhouse	ALD 455,800	Pending	Medium
TX-1762768779124	07/02/2026	10/11/2025	DARROD SCOTT FLECKERMANN	ALD 154,891	Pending	Medium
TX-1762768621305	30/11/2025	10/11/2025	Emily Amos	ALD 999,555	Pending	Medium
TX-1762769502626	10/11/2025	10/11/2025	Charles Le Bletan	ALD 1,851,851	Pending	Medium
TX-1762325103952	29/11/2025	05/11/2025	Scanek Solutions Pty Ltd	ALD 999,555	Pending	Medium

Step 5: Reporting

Correctly reporting the required information on time is fundamental part of obligations

1 Suspicious Matter Reports (SMRs)

These must be submitted within three business days of forming a suspicion (24 hours for terrorism financing).

3 International Funds Transfer Instructions (IFTIs)

Where funds are transferred overseas, an IFTI report must be submitted within 10 business days.

2 Threshold Transaction Reports (TTRs)

Required for cash transactions of \$10,000 or more, to be submitted within 10 business days.

4 Annual Compliance Report

Annual reports are due from 1 January to 31 March each year, reporting on activities for the previous calendar year.

Good recording keeping is key. You must ensure:

- ✓ You maintain clear internal reporting channels
- ✓ Your staff are trained to recognise red flags and understand the process in which to escalate concerns
- ✓ You keep all records for at least seven years.

easyAML's Reporting solution

The screenshot displays the easyAML Reporting solution interface. On the left is a dark blue sidebar with navigation options: Transactions, Link, Create New, Action Required, Overview, Insights, Training, Compliance, Reporting, and Integrations. The main content area is titled "All Transactions" and includes a subtitle "View and manage all transactions across the account". A search bar and filters for Status, Risk, Business Group, and Outsourced Only are present. A table lists 9 transactions with columns for Transaction Reference, Date, Last Updated, Lead Entity, Amount, Status, and Risk. The first transaction is highlighted with a mouse cursor. The table shows various statuses like "Pending" and "Needs review", and risk levels like "Medium" and "High".

Transaction Reference	Date	Last Updated	Lead Entity	Amount	Status	Risk
TX-176275002629	10/11/2025	10/11/2025	Charles Le Breton	AUD 1,651,651	Pending	Medium
TX-1762325103902	25/11/2025	05/11/2025	Scantek Leunions Pty Ltd	AUD 999,555	Pending	Medium
TX-17595972185460	24/10/2025	09/10/2025	No lead entity selected	AUD 155,606	Pending	Medium
TX-1758782010841	25/09/2025	30/05/2025	No lead entity selected	AUD 10,000	Pending	Low
TX-1758601983767	12/10/2025	23/09/2025	No lead entity selected	AUD 999,555	Pending	Medium
TX-1758521572400	11/10/2025	23/09/2025	No lead entity selected	AUD 999,555	Pending	Medium
TX-1758343948394	05/10/2025	30/09/2025	No lead entity selected	AUD 999,555	Pending	Medium
TX-1758310186341	05/10/2025	20/09/2025	No lead entity selected	AUD 999,555	Needs review	High
TX-1758172851703	05/10/2025	18/09/2025	No lead entity selected	AUD 999,555	Pending	High

Step 6: Training & Recordkeeping

All staff need AML/CTF training with records proving who, when and what was covered.

What your staff training should cover

All of your staff who work in roles which could be exposed to ML/TF risks must be regularly trained to ensure that they understand:

- ✓ Your business's AML/CTF obligations
- ✓ The consequences of non-compliance
- ✓ The types of risk your business could face and the impact of those risks
- ✓ Your business's AML/CTF processes and procedures that they must follow

It is your responsibility to keep a training register with names, dates, content covered, and assessments completed.

Off-the-shelf or generic training

AUSTRAC provides general e-learning modules, however these are not specific to your business.

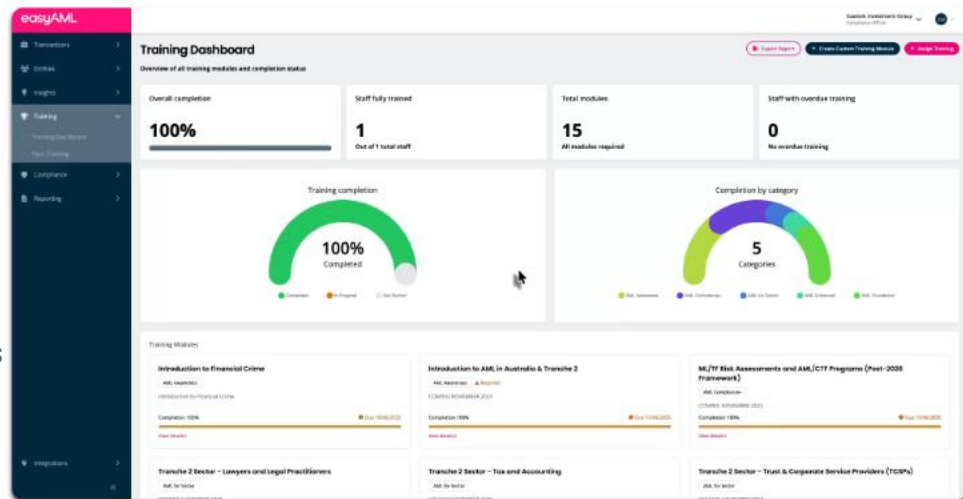
You should not rely solely on this to fulfil your training, – training must be tailored to your business and ML/TF risks.

Australia's most engaging AML training

Our training modules are engaging and modern and have been developed to foster a positive AML/CTF culture within your business.

Your easyAML training includes:

- ✓ A mix of interactive learning, micro quizzes and tests.
- ✓ Tailored industry and Role-specific modules
- ✓ Clear, step-by-step training (no guesswork)
- ✓ Controls so only trained staff see assigned AML tasks
- ✓ Automated, ongoing training based on individual roles
- ✓ Module certificates & social badges to motivate team
- ✓ Detailed individual records and team training reports



All in one model: the benefits



The Connected Platform Benefits:

- **Cut Compliance Costs:** Automation reduces FTE requirements
- **Redeploy Resources to Risk:** Focus on investigations, not admin
- **Ensure Regulatory Confidence:** System controls prevents gaps
- **Improve ROI:** Reduce external consultants and audit costs

The Disconnected Landscape:

- **Process failure risks:** Lack of integration increases undetected failures
- **Executive Time Drain:** Compiling reports consume leadership time
- **Training Burden:** Training management & tracking creates costs
- **Regulatory Uncertainty:** Manual processes risk inconsistent outcomes

Questions?



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