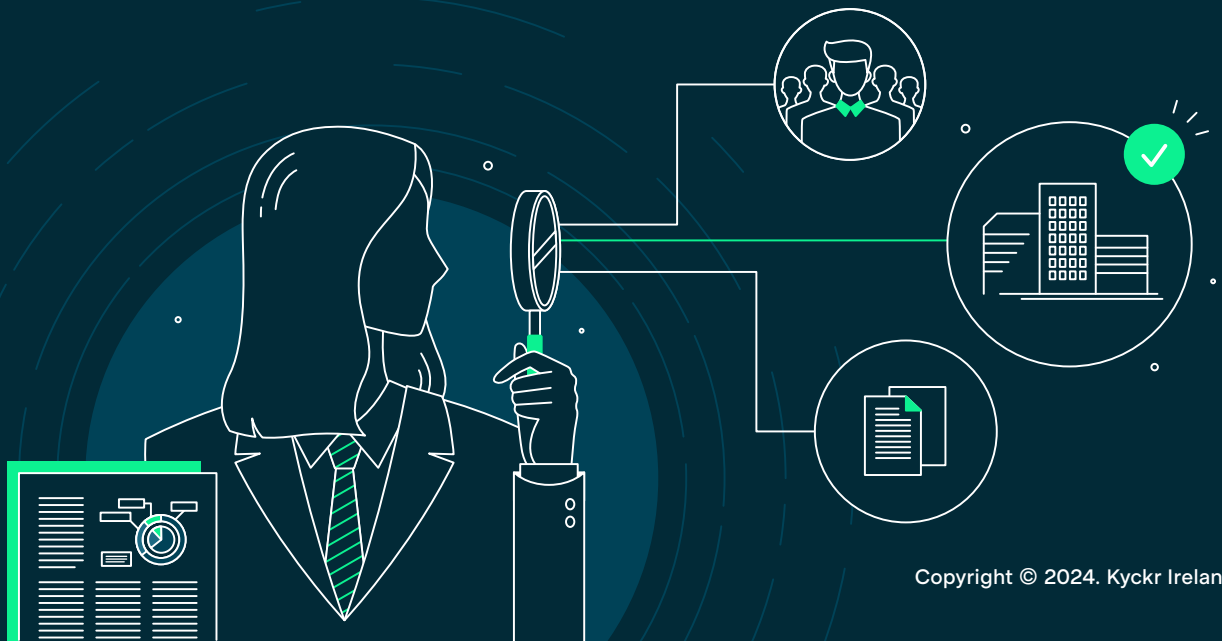




The Kyckr Guide to UBO Verification



Contents

03 Introduction

04 Summary – top challenges

05 UBO regulations

10 Why is UBO data so hard to find?

16 Manually verifying UBOs

20 How Kyckr automates the
UBO verification process

24 Case Study

30 About Us



INTRODUCTION

Why is understanding the identity of Ultimate Beneficial Owners (UBO) so important?

In recent years there has been a stream of leaked documents from Law Firms and Company Formation Agents showing the extent to which company structures are misused for financial crime and tax evasion purposes.

Starting with the 'Panama Papers' in 2016, the document leaks that have emerged over the past few years from the International Consortium of Investigative Journalists (ICIJ) have revealed the hidden beneficiaries of almost 800,000 offshore companies. It has become clear that while there are legitimate uses for offshore companies and trusts, they are often used for illicit purposes such as laundering the proceeds of financial crime, evading taxes or disguising true ownership of property.

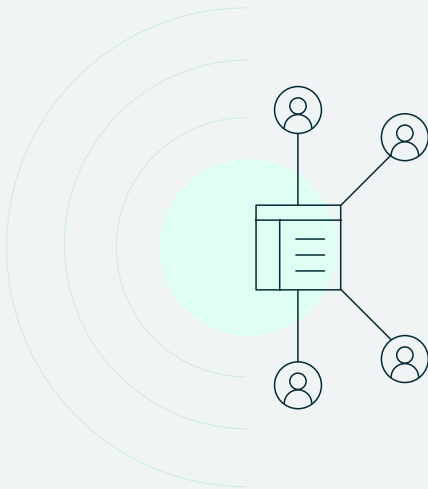
This results in vast sums of dirty money entering the financial system and countries being denied huge tax revenues, all of which have a significant impact on society. Since the individuals who ultimately control, influence and benefit from company activities could not only be part of organised crime, but could also be politically exposed, or subject to sanctions, it's vital for financial institutions to know who they're ultimately dealing with and the potential risk exposure and legality of doing so.

However, identifying and verifying beneficial owners or persons of significant control remains a significant challenge for compliance teams. This guide is designed to give practitioners some practical pointers and advice to help them navigate the process. In it, you will learn:

- What global anti-money laundering (AML) regulations say about verifying UBOs
- Why finding independent and verifiable UBO data remains a key challenge
- What to look out for when manually unwrapping ownership structures
- How to automate this process and save hours per case using Kyckr's solution



SUMMARY – TOP CHALLENGES



Uncovering and verifying UBOs adds complexity at customer onboarding

Verifying UBOs can lengthen the customer onboarding process, adding time and effort for compliance teams and causing friction for the prospective customer, which can lead to drop-outs and lost revenue

There is a lack of accurate and available UBO data

Unlike with basic company information, reliable and independent sources of UBO data are scarce. Whilst more countries are now launching public beneficial ownership registries, it remains the exception, not the norm.



Manually unwrapping complex ownership structures takes time and effort

In the absence of good UBO data, Know Your Customer (KYC)/AML analysts are undertaking desk research to find ownership information that can be used to build up a clear picture of the ultimate owners. This can often take hours per case, leading to further delays.



What is an Ultimate Beneficial Owner?

A universal definition of the term ultimate beneficial owner is the natural person or persons who directly or indirectly own or control an asset such as a corporate entity or property.

Regulation focuses on those shareholders whose control is significant and who ultimately can influence and benefit from the activities of the enterprise. Control of a business however is often not held by the legal owner but by a 'Person of Significant Control (PSC)'. Regulations recognise the difference between ownership and control and from a compliance perspective, there is a need to identify both for checks.

US, EU and UK regulators agree that a beneficial owner is someone who owns 25% or more of the share capital and/or voting rights, although in some higher risk cases financial institutions such as banks may set an even lower threshold such as 10%.



How has regulation regarding UBOs evolved?

In its guidance (Recommendation 24), the Financial Action Task Force (FATF) stipulates that financial institutions who deal with corporate entities should hold 'adequate, accurate and timely information' about the beneficial owners of their business customers.

Recently updated FATF guidance on UBOs cascades into local AML regulations and places greater obligations on firms to collect and maintain this data. FATF advises that firms take a 'multi-pronged approach' using different mechanisms and data sources to find the beneficial owners, recognising that there is no single data source that covers all situations. Step one in this process is a 'Registry Approach' wherever possible, as these records will be the most accurate and up-to-date available. Public UBO registers in countries where they are available will also be primary sources of information, although they require verification and the reporting of any inaccuracies found.

Regulated banks, other financial institutions and professional services organisations such as Trust and Company Services Providers including Law Firms and Accountants must take a risk-based approach when on-boarding business customers. This will involve carrying out a thorough risk assessment of the entity, ensuring there is a good understanding of the business, its activities, its funding and ownership and control structure identifying what risk there might be for money laundering and terrorist financing.

What are the percentage thresholds used for beneficial owner calculations ?

Most AML regulations set 25% and above share ownership or voting rights as the threshold that defines a natural person as a beneficial owner.

Some financial institutions will set a lower threshold in certain situations. For example, it's typical for a threshold of 10% to be used in relationships deemed to be high-risk upon initial assessment.

Apart from AML regulation, some sanctions regimes have also used a 50% threshold on Russian entities.



What type of organisations require UBO checks?



Private organisations

The principal concerns regarding beneficial ownership are with privately owned organisations.

Regulation recognises that ownership and control of private entities may be exercised through a chain of ownership or by means other than direct control. Company Formation agents including Law Firms and Accountants are especially vulnerable to financial criminals misusing corporate entities.

The collection and analysis of beneficial ownership information is one way of preventing bad actors creating opaque company structures to hide illegitimate or harmful activities.



Trusts

Trusts were recently brought into regulatory scope for beneficial owner checks, but their structure requires a different approach to businesses due to the separated responsibilities of trustees and beneficiaries. In the UK, the Trust Registration Service requires that most trusts are registered with His Majesty's Revenue & Customs. However, the regulatory obligation to take reasonable steps to verify the identity of the beneficial owners of trusts remains.



Public organisations

Public companies are less of a concern as their ownership structures typically entail mass ownership and the involvement of regulated entities themselves.



Sole Traders

As a sole trader, you have sole ownership and control over your business activities.

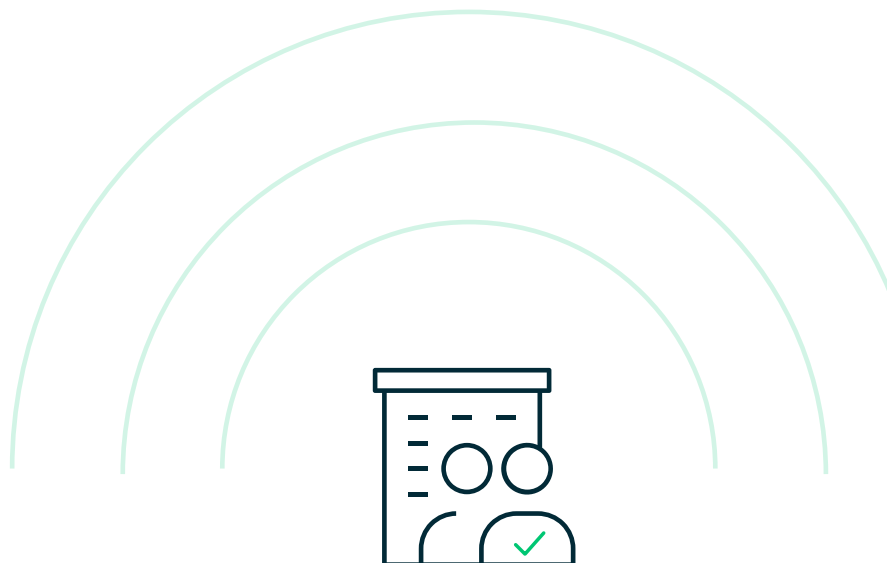


Which organisations are required to conduct UBO verification?

Under most AML regulations, all regulated entities are required to conduct UBO identification and verification. For example, the EU's AML Regulations requires the following types of entities to have business and UBO verification measures in place:

- Financial service providers
- Investment firms
- Credit institutions
- Legal and Accounting firms
- Asset exchanges
- Company service providers, such as tax advisors and auditors
- Gambling companies
- Estate agents
- Crypto-asset service providers
- Third-party financing intermediaries who trade in high value goods

The situation is similar in the UK and other countries are also aligning.



Additional scenarios where UBO verification may be required

The need for UBO information isn't just limited to regulated entities under AML legislation. There are several use cases where understanding true ownership is important to mitigate risk, commercial damage or legal concerns, such as:

- Financial Intelligence Units (FIUs) conduct internal investigations from suspicious activity reports.
- A procurement officer may need to know who ultimately benefits from the award of contracts to identify possible conflicts of interest from companies bidding for public money. For example, a senior political figure or to check if all companies bidding shared a common beneficial owner.
- Ensuring vendor beneficial ownership is identified and understood in the supply chain
- A procurement officer may need to ensure that disqualified individuals are not involved in government procurements/contracts, including preventing them from delegating named control to another individual or legal entity.
- A compliance officer may need to ensure that procurement officials do not themselves have an interest in a procurement/contract which they have influence over.
- A law enforcement official may need to be able to trace the ownership of assets and financial flows across borders.



WHY IS UBO DATA SO HARD TO FIND?

Public UBO registers – the great ‘transparency vs. privacy’ debate

Ever since the Panama Papers leak, there has been lengthy public discussion regarding the merits of corporate ownership transparency and the extent to which public beneficial ownership disclosures may lead to an erosion of individual privacy.

On the one hand, campaigning organisations argue that bringing anonymous owners to light can help anti-corruption efforts, deter money laundering and support greater scrutiny of the actions of wealthy owners, who often carry significant global influence. They point to the findings of recent media investigations and their impact as evidence that transparency leads to greater corporate accountability, which in turn carries benefits for average citizens who would otherwise be negatively affected by the laundering of illicit gains and losses in tax revenue which ownership secrecy can lead to. This argument has driven over 100 countries to implement reforms to their ownership transparency programs and is supported by, amongst others, the Financial Action Task Force (FATF), G7, G20 and UN.

However, the drive for greater transparency has met fierce opposition on several fronts. Many individual business owners have claimed that publishing details such as their address and dates of birth could exacerbate security risks such as kidnapping, or lead to an increase in fraud and identity theft. Some lawyers, accountants and other professional service firms have also publicly questioned the merits of public disclosures, no doubt in part due to the loss of revenue that full transparency would bring to the various advisory services they offer to businesses looking to obscure their real ownership.

Lastly, there are those that argue that greater corporate transparency would harm the international competitiveness of countries. Any country that prioritises transparency, they contend, is at risk of capital flight, as companies may just choose to incorporate in jurisdictions with a reputation for looser disclosure requirements, such as the British Virgin Islands, Cayman Islands and Delaware in the United States. At a time when many countries are becoming more inward-looking in the face of increased global risk and competition, there is an element of prisoner’s dilemma; unless the world’s governments act as one (which as history has shown, can be very difficult) the ‘first movers’ are always likely to be disadvantaged.



The European Union: one step forward, two steps back?

Recent developments regarding public UBO disclosure in the EU reflect its status as a microcosm of the global debate, along with illustrating the challenge that financial crime professionals have in accessing UBO data that is independent and reliable for verification, as legislation requires.

The 5AMLD had seemed a giant leap forward for corporate transparency and led to the majority of member states launching public beneficial ownership registers. Whilst the bloc faced criticisms for the different disclosure requirements and formats, along with the occasionally heavy fees for access to information, overall it represented a win for financial crime analysts who could at least rely on having information to find.

However, the November 2022 CJEU judgement represented a significant win for the privacy campaigners and an unravelling of the transparency gains made since the 5AMLD. As more and more registers reverted to being non-public (or accessible under strict conditions, such as legitimate purpose which must be disclosed with each request), analysts have increasingly turned to manual verification methods, which are significantly more time consuming and come at increased cost for firms.

2024 has brought further change in the form of a new AML package designed to harmonise access provisions for those with legitimate interest, along with improving data coverage. Although public access remains off the table for now, the proposals have generated cautious optimism in those seeking reforms. Simpler access, standardised data formats and the recognition of service providers (like Kyckr) as an extension of the obliged entity have been broadly welcomed as positive steps for financial crime professionals.

As with any legislation, attention now turns to implementation. How long it will take for the reforms to be implemented remains an open question; if the years following the 5AMLD implementation are any indication, it could be a long while before we reach the panacea of interconnected, easily accessible registers for those with legitimate interest. Furthermore, provisions related to the disclosure of full ownership structures are likely to face fierce pushback by privacy campaigners and admin-averse business owners alike.



Expert insight: Public UBO disclosure in the European Union

Tymon Kiepe, Head of Policy and Research, Open Ownership

“ The November 2022 ruling has highlighted the question of how governments can best balance the right to privacy with transparency and effective access for all relevant users. It’s broadly recognised that the EU’s previous legitimate interest access regime did not provide the latter. In response, a number of EU states, such as the Netherlands, have suspended public access, while other countries have maintained public access, such as Latvia, citing broader policy aims for transparency than fighting financial crime.

Many countries that Open Ownership is working with, including Canada, New Zealand, and many African countries remain committed to public access. The future of the debate will depend on whether the EU’s legitimate interest access regime will provide the quality of access for relevant users, both de jure and de facto. If registers can be accessed without undue friction, this could weaken the argument that public access is the most effective way of ensuring all relevant users can access the information. Simultaneously, the outcome of any further legal challenges to public access and changes to other international BO transparency standards will continue to shape countries’ approaches to implementing public BO registers.

”



The state of public access to UBO information globally



United Kingdom

Since 2016, the UK has provided public beneficial ownership declarations via its 'People with Significant Control (PSC) Register'. In 2022, it went further by introducing 'The Register of Overseas Entities', which requires overseas entities that own land or property in the UK to declare their beneficial owners and/or managing officers. Whilst the UK has been pioneering in its repeated public commitments to beneficial ownership transparency, including a national commitment to meet the 'Beneficial Ownership Transparency Disclosure Principles', criticism has dogged the implementation of both registers. Critics have pointed out the lack of data validation and quality, absence of verification of self-reported data and ability to register legal (in addition to natural) persons as PSCs, amongst other perceived weaknesses.



European Union

The EU's 4th Anti-Money Laundering Directive (AMLD) 2015 required all EU member states to establish central beneficial ownership registers with accurate, adequate and up-to-date information. In 2018, the 5th Directive ('5AMLD') took this further, by extending access to beneficial ownership registers to any member of the general public. Over the next few years, 19 registers became public in what looked like a significant step for corporate transparency and efforts to combat financial crime. However, in November 2022, a court case brought by three individuals who were unhappy their information had been made public on the Luxembourg register, resulted in a Court of Justice of the European Union (CJEU) judgement that full public access to UBO information was invalid, due to its supposed incompatibility with the EU right to privacy and data protection. Many of the registers reacted by immediately restricting public access, striking a blow to transparency and making accurate UBO verification more difficult for regulated entities. It's worth noting that a handful of registers did opt to remain open. France and Latvia in particular have both affirmed their commitment to public access to UBO information as ultimately being of great social benefit, in spite of the ruling.

In April 2024, following intense debate and discussion on all sides, the European Parliament adopted a new AML package (to be amended by the single rulebook and 6AMLD), which includes new provisions surrounding access to beneficial ownership data for obliged entities. Due to the difficulties with legitimate interest access over the past two years, many had voiced scepticism as to how far any reforms would go. However, both the anti-money laundering industry and law enforcement agencies have now welcomed what have turned out to be wide-ranging proposals, covering both access and data provision.



The key provisions include:

Access and Usability

- Some parties are deemed to have 'legitimate interest by default'.
- Access procedures will be standardised across member states.
- Access to one member state's register should give access to all.
- Service providers will be considered an extension of the obliged entity.

Data Format and Coverage

- Data formats will be uniform across registers.
 - Where an ownership structure contains more than one legal entity, the disclosure should include full details, including names of the parties, registration numbers and shareholding.
 - Information shall be available in a 'machine-readable format'.
 - Unclear but implied: obliged entities will have full access to the beneficial ownership dataset.
-



U.S.A.

In 2020, the US government passed the National Defence Authorisation Act, which included provisions requiring the majority of US companies to shortly disclose their beneficial ownership to the US Treasury's Financial Crimes Enforcement Network (FinCEN). However, whilst this is likely to have a positive impact on law enforcement efforts, the Government has made no commitment to this information being made public, restricting its utility for Financial Institutions and other regulated entities. In a letter to the U.S. Treasury Department, the American Bankers Association said the Treasury's latest proposed rule for the registry would so sharply restrict bankers' access to company ownership data that it would be useless to the US financial sector.



Canada

The Canadian Federal Government committed in Budget 2022 to implementing a public, searchable beneficial ownership registry of federal corporations by the end of 2023. This registry will cover corporations governed under the Canada Business Corporations Act, and will be scalable to allow access to the beneficial ownership data held by provinces and territories that agree to participate in a national registry.





Australia

In 2022 the Australian Government announced it would implement a public beneficial ownership register, setting aside \$1.9 million over two years from 2023–24 for its establishment. A recent consultation paper suggested that Australia would adopt the UK’s definition of beneficial ownership, albeit with a lowering of the threshold for declaration from 25% to 20%, in line with existing Australian corporate control and takeover thresholds.



New Zealand

New Zealand has committed to the creation of a public beneficial ownership register as part of its 2023–2024 Open Government Partnership National Action Plan. Led by the Ministry of Business, Innovation and Employment, the plan includes the drafting and introduction of new legislation by December 2023 and the development of publicity and information to support the enactment of the legislation by December 2024. It is unclear when exactly the new register may go live.



China

Whilst in 2022 China committed to a centralised beneficial ownership register, the Chinese government has made no commitment to make this information public in future.



Singapore

All companies in Singapore are required to file beneficial ownership information with a central register maintained by the Accounting and Corporate Regulatory Authority, or ACRA. In 2021, when asked if ACRA planned to make its register publicly accessible in the future, the regulator said somewhat cryptically that Singapore will “continue to work with the international community on the needed international standards to promote transparency and combat money laundering and other financial crimes.” As of 2023 the register remains inaccessible to the general public.



Expert insight: Manually verifying UBOs

Jessica Cath, Head of Financial Crime, Thistle Initiatives

“ Manual UBO verification can be very difficult. Depending on the type and location of the corporate structure, ownership won't necessarily be simple. Ownership structures can be complex, include layers of corporate entities, be based in jurisdictions without open registries, and require lengthy investigatory steps with multiple sources.

We work with firms that are both small and large, as well as operating globally or domestically and with a wide variety of corporate customer types. UBO verification differs across these firms. For firms with domestic customers only, the steps may be simpler. For firms with complex client structures across multiple jurisdictions, the process will be more complex.

We advise firms to really understand the nature of their customer base and build appropriate UBO verification process steps, consider the use of tooling, and ensure training is in place in line with their specific firm.

”



As regulators continue their crackdown on firms with ineffective AML processes, the absence of accessible and high quality UBO data means an increasing number of KYC teams are reverting to manual verification of UBOs.

For regulated entities this typically involves 6 steps:

Step 1

Obtaining and verifying key information on the subject company including shareholders and their percentage holding, either from the registry itself or from a trusted aggregator of primary source data like Kyckr.

Step 2

Analysing the corporate structure including direct and indirect linked entities and shareholders.

Step 3

Retrieving additional information for additional entities involved in the corporate structure, which often involves matching incomplete entity ID information to registered businesses globally; a significant undertaking.

Step 4

Calculating the ultimate beneficial owners based on a defined threshold, taking into account considerations such as indirect, circular and cross-border ownership.

Step 5

Performing full KYC checks on identified UBOs and PSCs

Step 6

Keeping accurate records and ongoing monitoring. Risk profiles and ownership structures frequently change very quickly and its essential firms are quickly alerted to changes.

From Kyckr's own research, for complex structures this process can often take five hours or more per case.

When factoring in analyst time, data charges and lost revenue from prospects abandoning the onboarding process, costs can regularly exceed €300-400 per case.

It can also feel like analysts need the combined skills of a detective and a mathematician.



Identifying beneficial owners can be challenging work

In addition to the challenges laid out above, 'bad actors' are fully aware of methods to conceal their identity with the aim being to make it difficult for the authorities to establish just who is 'behind' the organisation.

Some of the 'red flags' that analysts need to be aware of in UBO analysis and are indicators of possible misuse for illicit purposes include:

- The deliberate creation of complex corporate structures often across multiple jurisdictions which obscure ultimate ownership and control
- The use of Offshore Registered Companies and Shell companies where records of directors and shareholders are simply unavailable.
- Use of Trusts in the structure knowing how difficult identifying UBOs is
- The use of nominee directors or shareholders
- The use of bearer shares

Aware of the dangers of nominee shareholders and bearer shares, the recent FATF updated guidance to AML regulating authorities recommends stronger controls be implemented for nominee arrangements and the banning of the issue of new bearer shares.



Once UBOs are verified, what additional checks are needed?



Screening against PEPs & sanctions watchlists

Screening against Sanctions and Politically Exposed Persons (PEP) lists is an important step in the due diligence process once beneficial owners have been identified. Clearly if the individual appears on a sanctions or other watchlist then the onboarding process must be halted and investigated. If the individual appears on a PEP list then regulations state the enhanced due diligence measures must be applied.



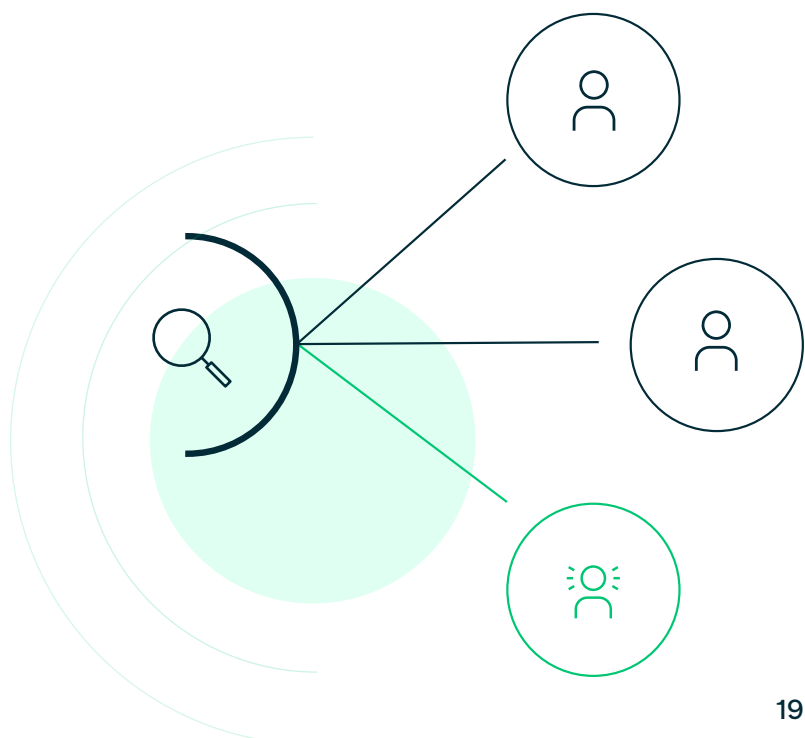
Adverse media & in-depth due diligence

If further investigation is required in the form of enhanced due diligence checks then access to adverse media data will also be needed. In extreme cases, it may even be necessary to carry out an in-depth enhanced due diligence report.



Identity Verification (IDV)

Identity verification is the process of confirming an individual's identity. Common identity verification types include documentary verifications (such as government IDs), biometric verification and 'liveness tests' via selfies or video, and database checks from authoritative sources like government or telco records.



HOW KYCKR AUTOMATES THE UBO VERIFICATION PROCESS

For KYC teams that need accurate and timely information to verify their business customers, Kyckr provides access to a live network of over 300+ corporate registries across 100+ countries, via a single portal or API.

Our information is retrieved and supplied live at the point of request, from a range of official, primary government sources with whom Kyckr has built direct connections, based on decades of combined knowledge of the registry landscape. Unlike static commercial data providers, the information we provide is always the most current and legally authoritative view of a company. Our data is also time- and date-stamped with the name and logo of the relevant corporate registry, giving you audit-friendly data that satisfies relevant AML regulatory obligations.

Our unique approach to UBO verification combines this live, legally-authoritative company data with the latest technology to extract, normalise and match ownership information.

The service automates the analysis and visualisation of corporate ownership structures and calculates ultimate beneficial ownership at the click of a button, meaning accurate UBO verification in seconds, not hours.



Expert insight: Simplifying UBO verification

Mike Black, Product Manager, Kyckr

“ When speaking to our customers about the biggest challenges they face in KYC, we could feel how painful they were finding the UBO verification process and just how much it would benefit from automation. Case data from analysts showed that it was often taking hours to manually unravel complex ownership structures, only for them to resolve to jurisdictions with hidden ownership arrangements – it must have been really frustrating for the analysts. In planning our solution approach we asked “how can we make this process take seconds, not hours?”.

We began by looking at simple, low-risk ownership structures, working to automate UBO verification to free up analysts to spend more time investigating complex cases. The service we have built combines real-time data extraction with a proprietary entity resolution algorithm, trained to match holding companies to businesses registered globally, even if the identification data filed isn't comprehensive. That means it can discover ownership structures across country borders, so analysts no longer need to spend time searching vast amounts of data to identify where a company is registered. Of course, good tech is nothing without high-quality data, so our service consumes live registry data from Kyckr's network of 300+ corporate registries, to build up the most authoritative picture possible.

Our goal was to make the complex simple, with an output that could be easily interpreted and built into the wider KYC workflow; I'm proud of our team for creating a solution that delivers on this objective. As we continue to improve the solution and teach it to find more companies, we're excited to work with our customers to further save them time and get them the data they need, fast.

”



Our UBO service comprises several elements:

- Automated unwrap of corporate ownership structures, with the information presented in a simple graph visualisation that highlights entity type, role and geographic location.
- Identification of directors and shareholders for intermediate holding companies.
- Matching of shareholder data to registered entities across borders, using a name-matching algorithm coupled with indexes of corporate registry data.
- Calculation of UBOs according to a user defined threshold.
- Flagging which indicates when automated unwrap isn't possible (such as hitting a registry without ownership data) and why.
- A downloadable PDF report, including extended profile information for every company in the structure and a time and date stamp upon retrieval.
- Expert support with integration into existing KYC processes.



How does Kyckr use corporate registries to calculate UBOs, if UBO data is so rarely available?

Kyckr's UBO service is based on shareholding disclosures, which can be frequently found within statements of capital, annual accounts and other registry extracts within the registries of many major economies.

This data is not the same as UBO information (which is generally published in its own registry), but it can be used to build up a picture of an ownership structure in steps, so that ultimate ownership can be calculated.

Our process involves extracting the shareholder data, normalising it and using it to determine the intermediate layer of ownership. This process then repeats until we build up a full picture of the structure.

Whilst shareholder data is not available at every corporate registry, we have significant coverage of major onshore financial centres and large global economies. Where we are unable to retrieve data (from a jurisdiction which does not require companies to file details of their shareholding) we provide a simple explanation (and optionally, any information that is filed) in seconds, unlike the minutes or hours it would take to come to this realisation manually.



CASE STUDY

Here's a case study of our how service can save KYC teams hours in the manual verification process (names have been changed to preserve confidentiality):

Task

Christina, a KYC analyst at a large global bank, needs to verify the ultimate beneficial ownership information submitted by a prospective client at onboarding, a UK-based business called Sunshine Corp Ltd. ('Sunshine'). Sunshine asserts it has two UBOs, both with 50% ownership; Michael Dong and James Carrick.

Current Process

Whilst the Persons of Significant Control (PSC) registry confirms this information has been filed with Companies House, Christina wishes to verify this data (and assess any additional parties which need to be screened) by conducting her own investigation. She begins by retrieving Sunshine's most recent statement of capital from the UK's Companies House registry, which states that Sunshine is wholly owned by another entity, Midnight Enterprises. As the filing does not include any additional identification information, Christina must attempt to locate shareholding information for Midnight Enterprises to uncover its ownership, while minimising the repetitive back and forth contact between the bank and Sunshine's representatives.

After 30 minutes of desk research, during which she is forced to rely on Google searches to match the name (with no guarantee of the provenance of the data) Christina locates a 'Midnight Enterprises' in the Singapore Corporate Registry, Accounting and Corporate Regulatory Authority (ACRA). Singapore does not have a public UBO register, so once again Christina must retrieve filed documentation to understand Midnight's ownership. However, Christina has never used the ACRA website before and therefore spends further time understanding how to navigate the site and retrieve the correct document.



Finally, Christina locates the correct document, downloads it, parses the correct information...only to find that ownership of Midnight is split between two limited companies, based in Australia and New Zealand. After repeating the process and spending a further 30 minutes finding the correct documents, navigating the payment gateway on the Australian Securities & Investments Commission (ASIC) registry website and extracting the shareholder data, Christina is finally able to confirm that Sunshine Corp Ltd. is ultimately owned by Mr. Carrick and Mr. Dong.

Celebrations all round? Not so...according to bank policy, Christina must now enter this information into her team's KYC workflow platform and draw a diagram to outline the ownership 'tree' she has discovered. After a further 20 minutes of work, Christina is finally able to close her UBO verification task and confirm the relevant parties can be screened for key money laundering risk factors.

In total:



2

Total UBOs found



1hr 45 minutes

Time taken



New process using Kyckr

Christina requests a new UBO verification report for Sunshine Corp Ltd. from Kyckr, using the integration into her bank's proprietary KYC system. Behind the scenes, Kyckr's system immediately retrieves a structured profile for Sunshine, including Directors and Shareholder details extracted from the last statement of capital. Our proprietary algorithm is able to match 'Midnight Enterprises' to 'Midnight Enterprises PTE. LTD' based on an index of registry data and immediately retrieves the next layer of data. The same process occurs for both 'Midnight Invest Co. PTY LTD' and 'Carrick Holdings Limited (NZ)'. Within seconds, Christina is presented with the calculated UBOs, Michael Dong and James Carrick, along with a structured data set including profile information for all of the intermediate shareholders found. A PDF report and graph visualisation are also automatically downloaded to the case record, eliminating the need for Christina to create her own.

In total:



2

Total UBOs found



8 seconds

Time taken

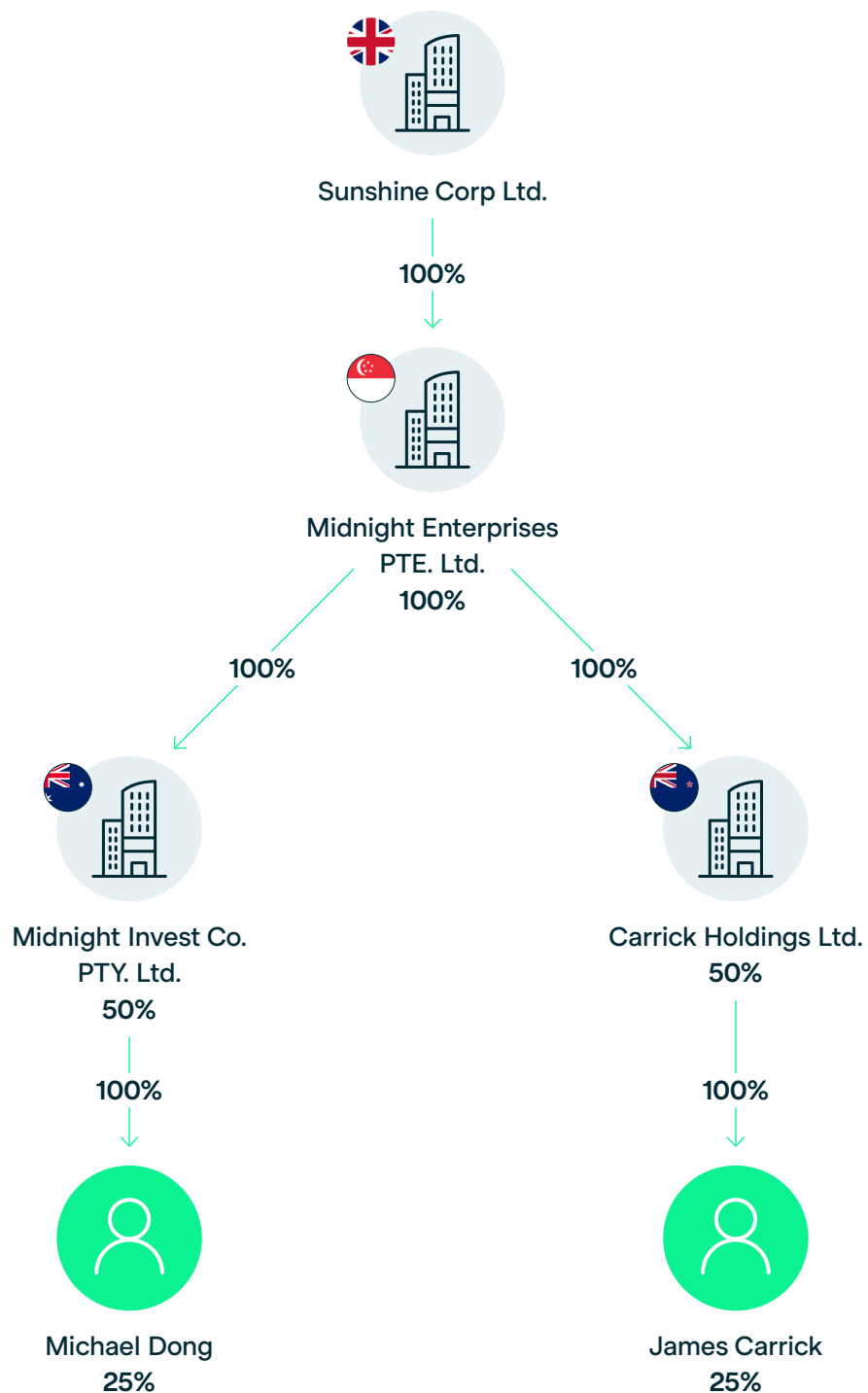


**1 hr 44 minutes
and 52 seconds**

Total reduction
in handling time

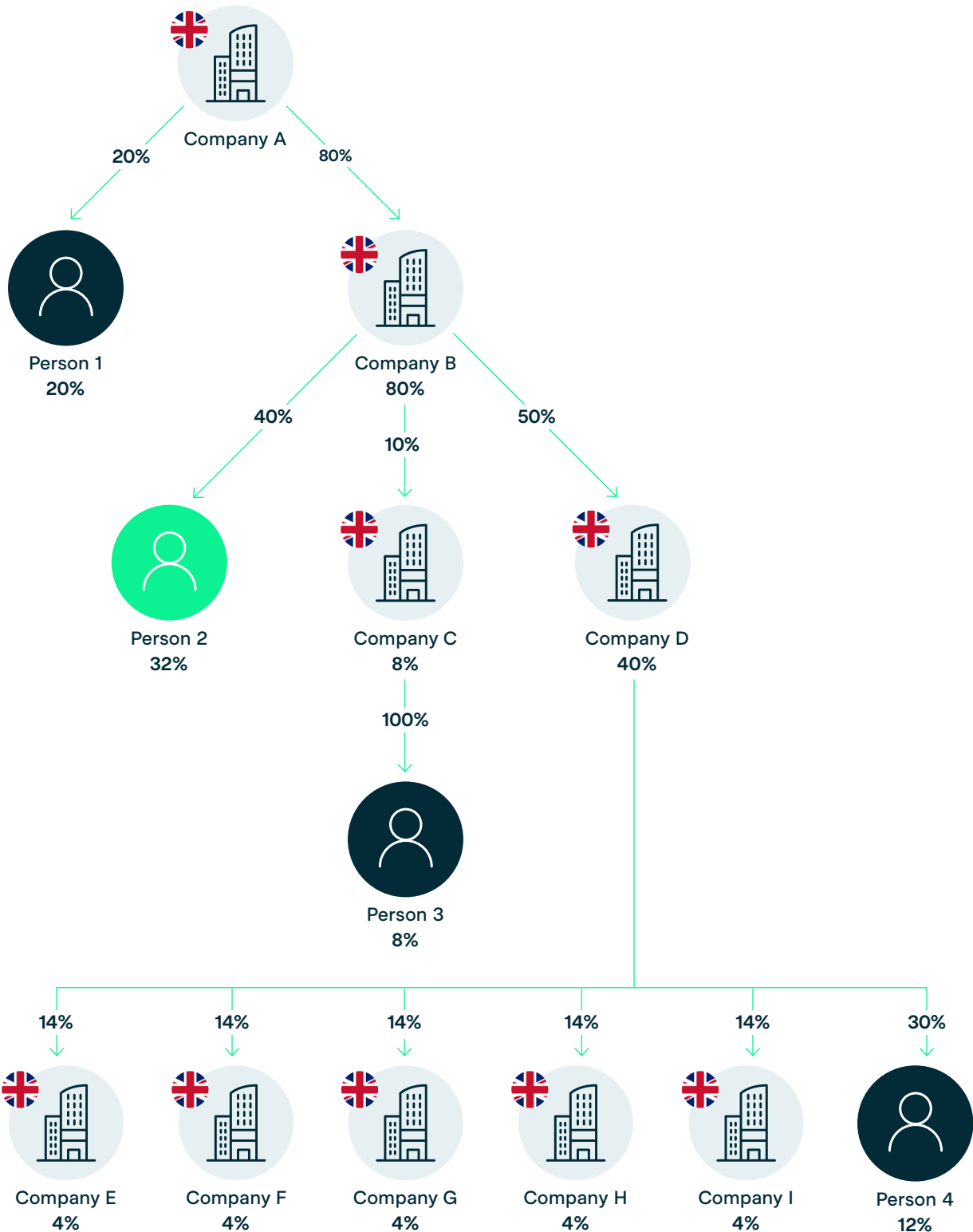


Sunshine Corp Ltd. Ownership Structure

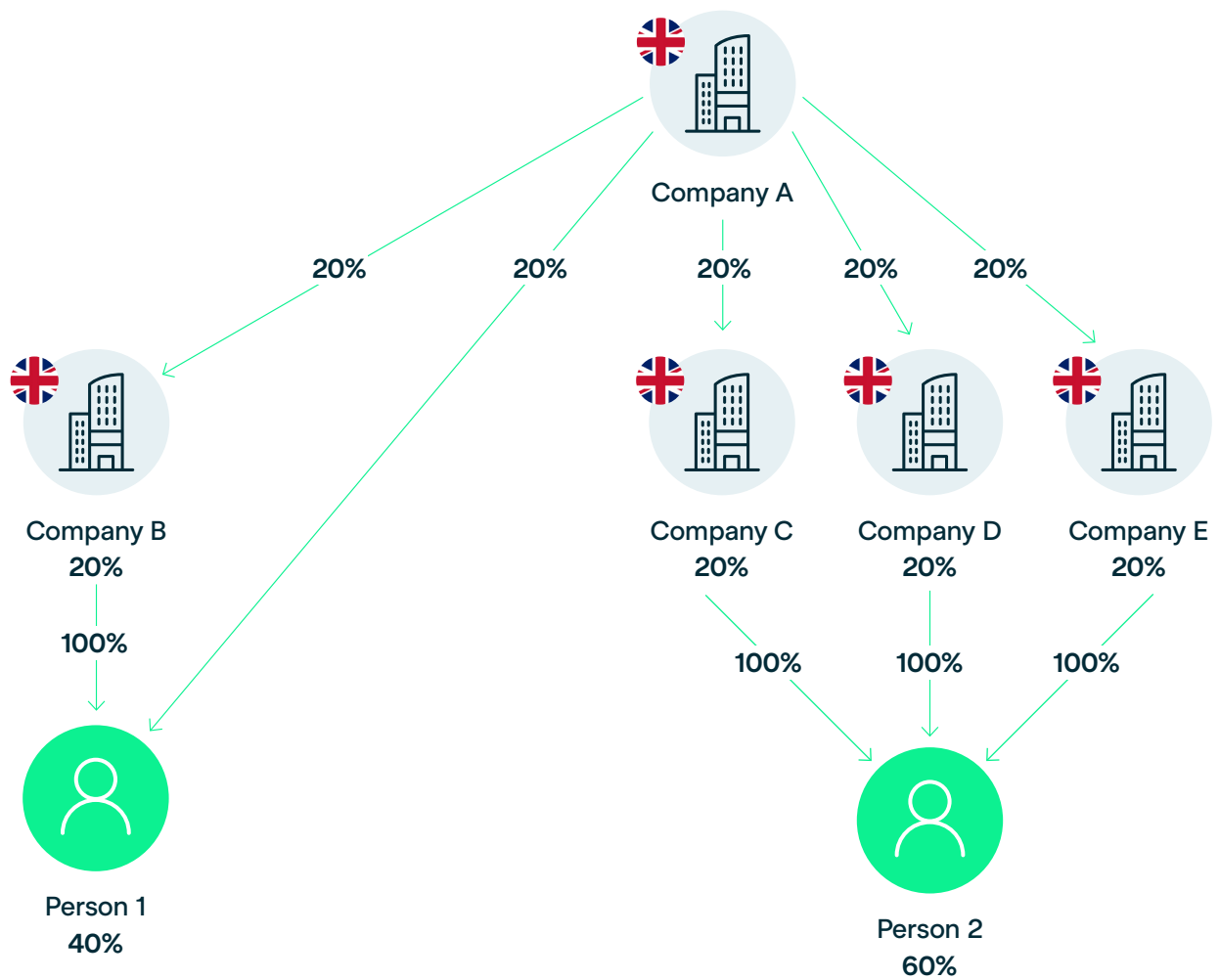


Example ownership structures requiring verification

Complex structure with a single UBO



Structure with indirect shareholding and multiple UBOs





**Verify your customers
effortlessly with instant
access to global primary
source company data**

Book a demo →



About Kyckr

Kyckr is a B2B information services company that aggregates, organises and structures the world's primary source company data, to help businesses reduce the risks associated with counterparty relationships. Unlike traditional data companies which source data from multiple, secondary sources, Kyckr provides accurate data with legally authoritative provenance. This helps organisations to avoid the significant regulatory and commercial costs associated with using poor quality data. Through the combination of accurate data with innovative technology, Kyckr's solutions help businesses to succeed in the fight against fraud, money laundering and financial crime.

Get in touch

www.kyckr.com
marketing@kyckr.com

With special thanks to [Thistle Initiatives](#) and [Open Ownership](#) for their contributions to this report.