

The Financial Services KYB Intelligence Buyer's Guide

How to evaluate platforms for beneficial ownership verification, sanctions exposure, and regulatory defensibility

Buyer Guide · Financial Services / KYB

Sayari Evaluation Framework

Forrester, 2024

Forrester, 2026

SECTION
N 01

The Market Has Shifted

FATF beneficial ownership requirements and FinCEN's Customer Due Diligence rule have made beneficial ownership verification a material control domain for financial institutions.

FATF Recommendation 24: Countries and institutions are more effective when they rely on a multi-pronged approach to beneficial ownership verification, rather than a single source or mechanism. Beneficial ownership information must be adequate, accurate, and up-to-date.

The Changing Standard

The evaluation standard has shifted from "Can this vendor complete a basic company lookup?" to "Can this vendor help us reach a well-supported view of ownership and control in a way that can be defended under regulatory or internal scrutiny?"

Deloitte describes the market context as one of *growing regulatory scrutiny* and *increasingly complex corporate structures*, requiring faster and more auditable ownership discovery across jurisdictions.

For buyers, this means that the procurement question is no longer simply tactical. It is strategic: Does this vendor help us construct a defensible, repeatable, and operationally integrated KYB control process?

SECTION
N 02

The Real Obstacle Is Alignment

KYB platform purchases are difficult because the value proposition cuts across multiple internal constituencies, each with different priorities and success metrics.

Compliance: Regulatory sufficiency and evidentiary rigor. Does this platform support a defensible control process?

Risk / Financial Crime: Control effectiveness and blind-spot reduction. Will this improve our visibility into hidden beneficial ownership and connected risk?

Product / Engineering: API reliability, workflow latency, and implementation burden. Can we actually integrate this into production?

Finance / CFO: Spend discipline, operating leverage, and tool consolidation. What is the economic case and payback?

Legal / Regulatory Affairs: Defensibility under challenge. Can we justify our ownership conclusions if questioned?

The Alignment Challenge: Forrester research shows that strategic B2B purchases increasingly require alignment across large internal buying groups. Many deals fail not because the product is weak, but because the internal case is not sufficiently coherent. A successful KYB evaluation therefore has to function as both a vendor comparison exercise AND an internal approval package.

What a Mature Program Looks Like

The progression from reactive to mature KYB operates along a spectrum of ownership depth, source rigor, and operational integration.

Level 1: Surface Verification

Basic company lookups, direct officer/shareholder identification from public records, limited cross-border resolution. Adequate for simple entities, but breaks down on layered structures.

Level 2: Structured Ownership Resolution

Multi-layer ownership tracing through trusts, nominees, and indirect control arrangements. Ownership conclusions are tied to identifiable sources. Defensible under audit or internal review.

Level 3: Integrated Risk and Compliance

Ownership findings are connected to sanctions exposure, adverse media, and enforcement activity. Ownership changes trigger monitoring workflows. Integration with onboarding, CDD, and AML systems eliminates manual reconciliation.

Level 4: Defensible Scale

The platform supports ownership resolution and risk linkage at production scale, with audit-ready case files, reproducible results, and clear provenance. The process survives internal audit, regulatory examination, and senior management challenge.

SECTION 04 **Aligning Your Buying Committee**

A successful procurement requires bringing together compliance, risk, product, finance, and legal stakeholders around a common set of evaluation criteria and success measures.

Stakeholder	Primary Concern	What They Need to See
Compliance Officer	Regulatory sufficiency	Source-backed ownership determination and monitoring logic
CRO / Head of Financial Crime	Exposure reduction	Better visibility into hidden control and linked risk signals
Head of Product / Engineering	Operational viability	API reliability, latency, integration path, production readiness
Finance / CFO	Economic credibility	Reduced manual effort, better onboarding efficiency, fewer fragmented
Legal / Regulatory Affairs	Defensibility	Clear provenance, repeatability, and case-file quality

SECTION 05 **The Evaluation Framework**

A mature KYB evaluation should employ a weighted scorecard that reflects the importance of different capabilities relative to your institution's control obligations and operational constraints.

Sayari KYB Evaluation Framework

Criterion	Weight	What Strong Looks Like	Why It Matters
Ownership Depth	25%	Resolves complex, layered, cross-border structures	Ensures beneficial ownership sufficiency
Source Traceability	20%	Determinations tie back to reviewable sources	Supports defensibility under challenge
Workflow Integration	15%	Fits onboarding, CDD, and AML operations	Reduces manual friction and overhead
Explainability / Auditability	15%	Conclusions can be reconstructed and defended	Improves governance and compliance
Sanctions / Risk Linkage	15%	Ownership connects to broader financial crime signals	Reduces missed exposure
API / Production Performance	10%	Reliable enough for embedded operational use	Supports scalability and adoption

**SECTION
N 06**

Common Failure Modes

Understanding the most common ways KYB evaluations fail can help you design a more rigorous procurement process.

1. The Shallow-Ownership Trap

The vendor performs well on simple companies but breaks down on layered or cross-border structures. You discover this limitation only after implementation, when it matters most.

2. The Evidence Gap

The platform produces conclusions that are hard to trace back to underlying documentation. You cannot use the ownership determination in internal review, audit, or legal challenge.

3. The Integration Illusion

The product appears compelling in a demo but requires substantial manual reconciliation in production. Implementation burden exceeds expectations.

4. The Onboarding-Latency Problem

The platform's response time or workflow burden is incompatible with real onboarding expectations. Users bypass the system to meet SLAs.

5. The Committee Misalignment Problem

Compliance likes the control logic, but product objects to implementation burden, finance objects to economics, or legal objects to evidentiary weakness. The deal stalls.

How to Design the Proof of Concept

The proof of concept should be designed to test the exact conditions under which KYB controls typically fail.

1. Use Difficult Real-World Entities

Test with layered cross-border structures, indirect control arrangements, and cases where ownership is known to be hard to resolve.

2. Test Source-Backed Defensibility

Require underlying sources for every ownership conclusion. Assess whether the case file is usable for audit review without reconstruction.

3. Test Operational Embedability

Evaluate API response time under load. Test the workflow inside your actual onboarding or case-handling system.

4. Test Change Handling

Assess how ownership changes, sanctions updates, or other material developments are surfaced over time.

5. Document Disqualifiers

Define clear failure criteria: shallow ownership resolution, weak provenance, unacceptable latency, or heavy manual reconciliation burden.

How to Make the Final Decision

For sophisticated financial institutions, the right KYB platform is not the one that looks best in a demo. It is the one that best combines:

- Ownership depth across complex, cross-border, and indirect-control structures
- Source traceability and audit-ready evidence
- Workflow fit with your onboarding, CDD, and AML operations
- Production reliability and API performance at scale

- Defensibility under internal audit, regulatory challenge, or legal scrutiny

The core procurement question: Can this vendor help us construct a *defensible, scalable, and economically rational* KYB operating model that will survive both internal and external challenge?

APPENDIX A1 — For the Chief Compliance Officer

As the primary champion for KYB capabilities, you are focused on regulatory sufficiency, control defensibility, and evidentiary quality.

Your Core Evaluation Priorities:

Ownership Depth (25% weight): Does the platform resolve beneficial ownership through multi-layer, cross-border, and indirect-control structures? Can it reach UBOs in complex corporate arrangements?

Source Traceability (20% weight): Are ownership conclusions tied to reviewable sources? Can you export the underlying documentation to support an exam or internal challenge?

Explainability (15% weight): Can the ownership logic be explained to a non-specialist? Is the case file usable without extensive reconstruction?

Key Questions for Vendors:

- What is your maximum practical depth of ownership resolution? How do you handle ambiguity when clean ownership chains don't exist?
- What percentage of ownership determinations are traced to primary sources vs. inferred? How do you document the distinction?
- How do you support ongoing monitoring of beneficial ownership changes? How quickly are updates reflected in downstream screening?
- Can you demonstrate audit-readiness? How would you support a regulatory examination of our ownership determinations?

APPENDIX A2 — For the Chief Risk Officer / Head of Financial Crime

Your focus is on reducing blind spots, improving visibility into beneficial ownership and control, and connecting ownership to broader financial crime signals.

Your Core Evaluation Priorities:

Ownership Depth (25% weight): Better ownership visibility reduces exposure to hidden beneficial owners with sanctions, adverse history, or other risk indicators.

Risk Linkage (15% weight): Does the platform connect beneficial owners to sanctions exposure, adverse media, enforcement activity, and other risk signals?

Workflow Integration (15% weight): Can ownership findings be embedded into your AML/CDD/monitoring workflows so risk decisions are based on current intelligence?

Key Questions for Vendors:

- How do you link beneficial owners to sanctions lists, adverse media, and enforcement databases? What is the latency?
- How do you surface ownership changes that may trigger new risk monitoring or escalation?
- What percentage of your beneficial ownership determinations connect to linked risk signals (sanctions, adverse history, etc.)?
- How do you integrate with downstream risk systems so intelligence flows into ongoing monitoring?

APPENDIX A3 — For Head of Product / Engineering

Your focus is on API reliability, workflow integration, latency, and whether this platform can scale in production without introducing unacceptable overhead.

Your Core Evaluation Priorities:

Workflow Integration (15% weight): Can this platform integrate into existing onboarding, CDD, or case-management systems without heavy customization?

API / Production Performance (10% weight): What are the SLAs? Can the API meet your onboarding latency requirements? What is uptime?

Operability (implicit): What is the implementation burden? What ongoing maintenance and monitoring is required?

Key Questions for Vendors:

- What is your typical API response time for single and batch lookups? What are your published SLAs?
- What is your platform uptime? Do you have redundancy and failover?
- How do you handle rate limiting? What volumes can your API support?
- What integration options do you provide (REST API, webhooks, SDKs)? What is the implementation timeline?
- How do we monitor integration health and troubleshoot failures?

APPENDIX A4 — For Legal / Regulatory Affairs

Your focus is on whether the resulting process is defensible under challenge—whether by internal audit, regulators, or senior management.

Your Core Evaluation Priorities:

Source Traceability (20% weight): Ownership conclusions must be tied to identifiable sources that can support a defensible record.

Explainability (15% weight): The ownership logic must be understandable and reproducible if challenged.

Auditability (implicit): Case files must be complete enough to support internal audit, regulatory examination, or legal discovery.

Key Questions for Vendors:

- How do you document the evidentiary basis for ownership determinations? What records are preserved?
- How reproducible are your results? Can we replicate a determination months or years later?
- What is your data retention policy? How long do you maintain ownership and source documentation?
- What happens if you need to revise an ownership determination? How do you document the change and the basis for it?
- How do you handle regulatory inquiries about specific ownership determinations?