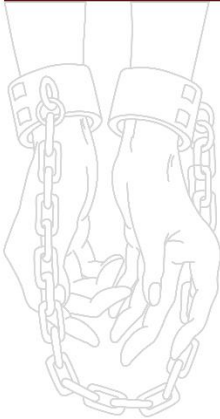


# Human Trafficking & Modern Slavery Typologies



A Strategic Analysis Report

April 2026



UAE Financial Intelligence Unit



[www.uaefiu.gov.ae](http://www.uaefiu.gov.ae)



## Disclaimer

All findings and contents of this report are the property of the United Arab Emirates Financial Intelligence Unit (UAEFIU) or the concerned entities credited as the provider of the data employed in this document. You may not reproduce, distribute, duplicate, alter, create derivative works, or make any modification in any form to exploit or change this document's content and identity.

For any enquiries regarding this document, please contact [rsas@uaefiu.gov.ae](mailto:rsas@uaefiu.gov.ae).

## TABLE OF CONTENTS

LIST OF ACRONYMS .....	v
1. EXECUTIVE SUMMARY .....	vi
Illustrative Summary .....	ix
2. INTRODUCTION .....	1
3. OBJECTIVES .....	4
4. METHODOLOGY AND SCOPE .....	5
5. BACKGROUND .....	6
5.1. Human Trafficking for Sexual Exploitation .....	7
5.2. Human Trafficking for the Purpose of Forced Labor .....	8
5.3. Trafficking for the Purpose of Removal of Organs .....	9
6. OVERVIEW OF STRS/SARS UTILIZED IN THIS REPORT .....	10
7. IDENTIFIED PATTERNS AND KEY FINDINGS .....	17
7.1. Adult Sexual Exploitation .....	17
7.2. Pornographic Content Production .....	20
7.3. Child Sexual Abuse Material (CSAM) .....	22
7.4. Forced Labor .....	24
7.5. Human Trafficking in Support of Armed Conflict and Terrorist Organizations .....	25
7.6. Laundering the Proceeds of Human Trafficking .....	26
7.7. Convergence Trafficking Enterprise .....	27
8. INVOLVED SUBJECT PROFILE .....	28
8.1. Designated Human Traffickers .....	28
8.2. Organized Crime Groups (OCGs) .....	29
8.3. Foreign Politically Exposed Persons (PEPs) .....	29
8.4. Money Mules .....	29
9. SECTORS VULNERABILITY .....	30
9.1. Financial Institutions .....	30
9.2. Legal Persons .....	30
9.3. Real Estate .....	31
9.4. Virtual Asset Service Providers (VASPS) .....	32
10. DEVELOPED RISK INDICATORS .....	34
10.1. Customer’s Profile .....	34
10.2. Behavioral Activities .....	35
10.3. Account and Transactional Activities .....	36
10.4. Documentation and Customer Due Diligence .....	38

11. CONCLUSION.....39



**LIST OF ACRONYMS**

<b>AML</b>	Anti-Money Laundering
<b>BO</b>	Beneficial Owner
<b>CFT</b>	Combatting the Financing of Terrorism
<b>CSAM</b>	Child Sexual Abuse Material
<b>FATF</b>	Financial Action Task Force
<b>GCC</b>	Gulf Cooperation Council
<b>ILO</b>	International Labour Organization
<b>KYC</b>	Know Your Customer
<b>LEA</b>	Law Enforcement Authority
<b>LPs</b>	Legal Persons
<b>ML</b>	Money Laundering
<b>MSBs</b>	Money Service Businesses
<b>NPs</b>	Natural Persons
<b>NRA</b>	National Risk Assessment
<b>OCGs</b>	Organized Crime Groups
<b>POS</b>	Point of Sale
<b>RE</b>	Reporting Entity
<b>RFR</b>	Reason for Reporting
<b>SAR</b>	Suspicious Activity Report
<b>STR</b>	Suspicious Transaction Report
<b>UAE</b>	United Arab Emirates
<b>UAEFIU</b>	The Financial Intelligence Unit of the UAE
<b>UNODC</b>	United Nations Office on Drugs and Crime

## 1. EXECUTIVE SUMMARY

Human trafficking is among the most pervasive and complex transnational crimes, generating significant illicit proceeds that are often integrated into the formal financial system. As a predicate offence to money laundering, human trafficking—whether for the purposes of forced labor, sexual exploitation, or other forms of exploitation—poses substantial detection challenges due to its covert operations, the vulnerability of victims, and the adaptability of criminal networks.

Annual profits from modern slavery—the umbrella term includes human trafficking as well as other forms of exploitation, such as forced labor, slavery, servitude, debt bondage, child exploitation, and forced marriage— are estimated at USD 236 billion, affecting approximately 50 million individuals. According to UNODC (2024), 66% of trafficked women in 81 countries were exploited for sexual purposes, with girls also trafficked for sexual exploitation. The Arab States have the second-highest proportion of individuals in forced labor, following the Asia-Pacific region. In the Gulf Cooperation Council (GCC) states, 81% of recorded trafficked victims are women, with forced labor comprising 66% of exploitation cases and sexual exploitation accounting for 25%.

Nationally, the primary legal framework for criminalizing human trafficking in the UAE is established by Federal Decree-Law No. 24 of 2023, which updated Federal Law 51 of 2006. This law defines human trafficking to include sexual exploitation, prostitution, forced labor, organ trafficking, coerced service, enslavement, begging, and slavery. The UAE's second national risk assessment (NRA, 2024) assessed the risk of human trafficking to money laundering as medium, while the Global Slavery Index (2023) assigned the UAE a score of 40 out of 100 for vulnerability to modern slavery.

From 2021 to 2025, the UAE Financial Intelligence Unit (UAEFIU) received 443 suspicious transaction reports (STRs) and suspicious activity reports (SARs) related to human trafficking, identified through reasons for reporting and keyword searches, representing only 0.17% of the total suspicious reports received during this period. Of these, 150 reports (83 STRs and 67 SARs) were considered directly relevant and reliable for strategic analysis to identify human trafficking typologies and patterns. This data evaluation process highlights the need to improve the quality of reporting through enhanced understanding of human trafficking indicators and associated transactional and behavioral patterns.

UAEFIU strategic analysis found that 43% of examined STRs and SARs were potentially relevant to laundering the proceeds of human trafficking. Additionally, 15% exhibited clear transactional or behavioral indicators consistent with potential human trafficking schemes involving the UAE. The UAE was implicated by subjects of suspicions' involvement in payment chains, as a transit point, or through connections with entities or individuals residing in the country. Some cases presented clearer indicators, particularly where both transactional activity and contextual information suggested potential exploitation. The remaining data were inconclusive, often due to reports based solely on adverse media abroad, with no active accounts or identifiable transactional or behavioral indicators.

Adult sexual exploitation was the most frequently identified concern in the analyzed data, both domestically and internationally, across human trafficking and money laundering schemes. Regarding forced labor, most reviewed reports identified potential money laundering schemes more often than direct human trafficking within the UAE, as many cases were linked to trafficking activities in foreign jurisdictions. The analysis also reviewed requests related to human trafficking from 17 domestic law enforcement agencies and prosecution authorities via the UAEFIU's Integrated Enquiry Management System (IEMS), with adult sexual exploitation identified as the most prevalent crime category, representing over half of the human trafficking requests received. Similarly, international intelligence from counterpart financial intelligence units (FIUs) across various continents highlighted sexual exploitation—primarily involving prostitution and child sexual abuse—as the most common human trafficking typology in requests concerning suspected trafficking or laundering of its proceeds, followed by cases of fraudulent employment and forced labor.

Most suspicions regarding the movement of funds involved the banking sector and money service businesses (MSBs). A limited number of reports identified the misuse of virtual assets in human trafficking, particularly in cases related to child sexual abuse materials. The real estate sector was primarily observed at the integration stage of money laundering or as a potential investment (or layering) channel, especially in cases linked to designated and convicted human traffickers.

The majority of reported subjects in the analyzed data were natural persons, including beneficial owners (BOs) of both foreign and local entities. Companies owned by these individuals were infrequently reported and did not exhibit unusual transactions, as their activities generally aligned with their stated business

profiles. This suggests challenges for reporting entities in detecting human trafficking activities conducted through legal persons, particularly in cases involving front entities. Enhanced training programs and awareness sessions are necessary to improve reporting entities' understanding in this area.









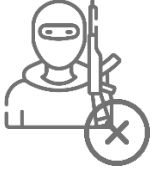





Legal persons were nonetheless observed to be misused across multiple jurisdictions to launder proceeds from human trafficking, often involving the beneficial owner's personal and business accounts to facilitate multiple high-value transfers. Analysis indicated that individuals may own one or several legal entities overseas. Some reports focused exclusively on the individual (BO), while others addressed both personal and business accounts, primarily in connection with suspected money laundering.

This report provides a comprehensive overview of human trafficking typologies that lead to money laundering, drawing on both global trends and national insights within the UAE. It highlights the methods, patterns, and financial behaviors commonly associated with trafficking networks, with particular focus on how these activities intersect with the UAE's financial and economic landscape. By contextualizing international typologies alongside domestic risk patterns, the report aims to enhance the understanding of reporting entities and competent authorities about these typologies.

The report concluded with a set of practical risk indicators designed to assist reporting entities in identifying, investigating, and reporting suspicious activity related to human trafficking. These indicators aim to strengthen early detection, improve the quality of suspicious transaction reports submitted to the UAEFIU, and ultimately contribute to more effective disruption of trafficking networks and their financial flows.

Through this analysis, the report supports broader national and international efforts to combat human trafficking and money laundering, aligning with the UAE's commitment to international standards and its ongoing efforts to safeguard the integrity of its financial system.

## Illustrative Summary

Utilized Data		Covering Period 01/01/2021 to 31/12/2025		
 <b>150</b> <b>STRs/SARs</b>	 <b>Cases disseminated to/ referred from law enforcement</b>	 <b>International intelligence reports</b>	 <b>Open source</b>	
Identified Human Trafficking Typologies				
 <b>Sex Trafficking</b>	 <b>Child Sexual Abuse Material (CSAM)</b>	 <b>Production of Pornography</b>	 <b>Forced Labor</b>	 <b>Human Trafficking to Support Terrorist Groups</b>
Movement of Funds				
 <b>Remittances through MSBs, including third-party transactions</b>	 <b>High volume of ATMS deposits, purchases, and overseas transactions, through the banking sector</b>	 <b>Virtual Asset payments and engagement with high-risk clusters</b>	 <b>Legal Persons network and beneficial owner's account</b>	 <b>Layering or Integration into Real Estate</b>

## 2. INTRODUCTION

Human trafficking ranks among the most profitable global crimes, encompassing a spectrum of exploitative and deceptive practices that impact millions of adults and children. Women and girls constitute the largest proportion of human trafficking cases worldwide, accounting for 61% of all detected trafficked persons in 2022 (UNODC, 2024). There has also been a significant global increase in the exploitation of children among trafficking victims, with a 31% rise in 2022 compared to 2019. Recent global data reveal a shift in the dynamics of recorded human trafficking, as forced labor—including exploitation in forced criminal activities by organized crime groups—now surpasses sexual exploitation as the most prevalent form. Nevertheless, the majority of global convictions remain concentrated on sex trafficking cases (72%), compared to forced labor (17%).<sup>1</sup>

The term human trafficking was first introduced in the United Nations (UN) Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children (New York, 15 November 2000), which supplements the United Nations Convention against Transnational Organized Crime, commonly referred to as the Palermo Convention.<sup>2</sup> The Palermo Protocol defines human trafficking (also known as “trafficking in persons”) as:

*The recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs.*

According to the United Nations, the core elements of human trafficking are **Act, Means, and Purpose**. The "act" encompasses recruitment, transportation, transfer, harboring, or receipt of persons, which is carried out through "particular means" such as force, fraud, or coercion. The "purpose" refers to exploitation in various forms, including sexual exploitation, debt bondage, organ harvesting, slavery, and practices similar

---

<sup>1</sup> UNODC (2024) Global Report on Trafficking in Persons. Available at: <https://www.unodc.org/unodc/en/data-and-analysis/glotip.html>

<sup>2</sup> United Nations (2000) PROTOCOL TO PREVENT, SUPPRESS AND PUNISH TRAFFICKING IN PERSONS, ESPECIALLY WOMEN AND CHILDREN, SUPPLEMENTING THE UNITED NATIONS CONVENTION AGAINST TRANSNATIONAL ORGANIZED CRIME. Available at: <https://www.ohchr.org/en/instruments-mechanisms/instruments/protocol-prevent-suppress-and-punish-trafficking-persons>

to slavery. All three elements must be present for an act to constitute human trafficking; however, in the case of children, the "particular means" are not required, as children cannot legally consent.

The terms human trafficking and modern slavery are frequently used interchangeably in public discourse, yet they differ in legal definition and scope. Human trafficking is a legally defined crime under the UN Palermo Protocol, based on the previously mentioned core elements. In contrast, modern slavery is a broad socio-legal concept that describes the condition of "a victim being exploited or deprived of their freedom through the use of coercion, threats, violence or deception".<sup>3</sup> This umbrella term includes human trafficking as well as other forms of exploitation, such as forced labor, slavery, servitude, debt bondage, child exploitation, and forced marriage.

Human trafficking is frequently confused with migrant smuggling. Factors such as political unrest, conflict zones, terrorist activities, natural disasters, and low quality of life drive individuals to seek better opportunities elsewhere. Consequently, migrant smuggling has become a significant industry, generating an estimated US\$5.5–7 billion in 2016 for at least 2.5 million smuggled migrants.<sup>4</sup> The Smuggling of Migrants Protocol defines migrant smuggling as "the procurement, in order to obtain, directly or indirectly, a financial or other material benefit, of the illegal entry of a person into a State Party of which the person is not a national or a permanent resident."<sup>5</sup> It involves "the facilitation, for financial or other material gain, of illegal entry into a country where the person is not a national or resident" (MENAFATF, 2021).<sup>6</sup> In summary, migrant smuggling concludes with the arrival of migrants at their destination, whereas human trafficking involves ongoing exploitation. Nevertheless, migrants remain highly vulnerable to trafficking before, during, or after their irregular migration attempts.<sup>7</sup>

Most human traffickers operate within organized crime groups (OCGs), which may function as loose networks of business-oriented criminals or as structured criminal organizations that use violence and intimidation to maintain social control over territories.<sup>8</sup> These groups are also adept at laundering the

<sup>3</sup> ECOFEL (2023) Modern Slavery.

<sup>4</sup> UNODC (2018) Global Study on Smuggling of Migrants. Available at: <https://www.unodc.org/unodc/en/data-and-analysis/glosom.html>

<sup>5</sup> The Protocol against the Smuggling of Migrants by Land, Sea and Air, which supplements the United Nations Convention against Transnational Organized Crime.

<sup>6</sup> MENAFATF (2021) Money Laundering Resulting from the Human Trafficking and Migrant Smuggling Crimes. Available at: <https://www.menafatf.org/information-center/menafatf-publications/money-laundering-resulting-human-trafficking-and-migrant>

<sup>7</sup> FATF (2018) Financial Flows from Human Trafficking. Available at: <https://www.fatf-gafi.org/en/publications/MethodsandTrends/Human-trafficking.html>

<sup>8</sup> UNODC (2024).

proceeds of human trafficking through various methods and schemes. Human trafficking constitutes not only a significant threat and a predicate offence for money laundering, but also a source of terrorist financing.

Terrorist organizations employ human trafficking typologies to create social instability and disorder within their areas of control, thereby reinforcing their authority. These groups also exploit opportunities to radicalize trafficked victims and recruit them for their causes.<sup>9</sup> Armed conflict and terrorist groups, such as ISIS, Boko Haram, and Al-Shabaab, have financed their activities through human trafficking, including domestic servitude, sexual slavery, forced recruitment of young men and boys, forced labor in organized begging rings, fundraising involving children and women, and forced marriage.<sup>10</sup> However, these methods primarily serve to exploit and benefit from vulnerable individuals, such as through ransom payments, rather than acting as principal sources of terrorist funding.

At the national level, the primary legal foundation for criminalizing human trafficking in the United Arab Emirates (UAE) is governed by the Federal Decree-Law No. 24 of 2023 (which updated Federal Law 51 of 2006). Under this law, human trafficking includes all forms of sexual exploitation, prostitution, forced labor, organ trafficking, coerced service, enslavement, begging, and slavery.<sup>11</sup> Human trafficking offenders face imprisonment of a minimum of five years and fines ranging from AED 100,000 to AED 1 million (Article 6). The law also criminalizes and punishes anyone who is aware of a human trafficking act but fails to report with imprisonment for a period ranging from one to five years and/or a fine of no less than AED 50,000 (Article 8).

The UAE established the National Committee for Combatting Human Trafficking to coordinate anti-trafficking efforts across all seven emirates. The committee comprises 18 representatives from various federal and local institutions, serves as the country's official representative at international conferences, and produces reports on the state of trafficking within the UAE. In collaboration with law enforcement authorities, including the Ministry of Interior, the committee has introduced multiple initiatives to prevent

<sup>9</sup> Soltan, V. (2024) Terrorism and Human Trafficking: A Dark Alliance of Organized Crime. *Acta Universitatis Danubius. Juridica*, 20(3), 41–53. Retrieved from <https://dj.univ-danubius.ro/index.php/AUDJ/article/view/3138>

<sup>10</sup> FATF (2018) and MENAFATF (2021).

<sup>11</sup> Federal Decree-Law No.24 of 2023 on Combating Human Trafficking. Available at: <https://uaelegislation.gov.ae/en/legislations/2127/download>. Other laws that address human trafficking in the UAE are: Federal Decree Law No. 25 of 2023 regarding Donation and Transplantation of Human Organs and Tissues and Federal Decree by Law No. 10 of 2022 concerning the Registration of Births and Deaths Regulations.

and combat human trafficking. These include enhanced controls at entry points and cooperation with international bodies such as Interpol through information exchange on human trafficking crimes.<sup>12</sup> These efforts are implemented through a five-pillared action plan: Prevention, Prosecution, Punishment, Protection (including support for survivors), and Promotion of cooperation.<sup>13</sup>

This report provides a comprehensive analysis of human trafficking and its associated money laundering risks at both global and national levels. It outlines common human trafficking typologies potentially involving the UAE and establishes subject risk profiles and indicators designed to assist UAEFIU stakeholders, including reporting entities, in detecting and reporting suspected human trafficking incidents.

### 3. OBJECTIVES

As part of the Strategic Analysis Plan and in alignment with the UAEFIU's efforts to address and identify patterns and typologies of financial crime, this typology report on human trafficking is provided for the following purposes:

- Identifying trends and typologies in relation to human trafficking and the laundering of its proceeds.
- Developing an understanding of how the UAE could be involved in human trafficking (as a destination or transit country) and the different sectors that can be misused in this offence.
- Examining behavioral and transactional patterns relevant to human trafficking.
- Identifying major features and attributes of the involved subjects' profiles and potential countries of concern.
- Assessing the quality of related STRs/SARs to improve reporting entities' level of understanding of the risk indicators pertaining to human trafficking.
- Developing a list of risk indicators pertinent to this offence and updating the reporting system accordingly, as well as reporting entities' monitoring systems.

---

<sup>12</sup> UAE Official Government Portal (no date) Combatting human trafficking. Available at: <https://u.ae/en/about-the-uae/human-rights-in-the-uae/combating-human-trafficking>

<sup>13</sup> SHERLOC UNODC (no date) UAE National Committee to Combat Human Trafficking (NCCHT) Strategic Plan. Available at: [https://www.unodc.org/cld/en/treaties/strategies/united\\_arab\\_emirates/are0002s.html](https://www.unodc.org/cld/en/treaties/strategies/united_arab_emirates/are0002s.html)

## 4. METHODOLOGY AND SCOPE

This analysis aims to identify human trafficking typologies and associated transactional and behavioral patterns. The analysis addresses the broader context of modern slavery, including forced labor, sexual exploitation, and human trafficking for criminal and terrorist activities. The analysis also assesses the UAE's exposure to human trafficking by analyzing the following data for the period from 1 January 2021 to 31 December 2025:

- i. All STRs and SARs related to human trafficking received through the UAEFIU's reporting system during the examined period.
- ii. Human trafficking cases disseminated by the UAEFIU to the concerned law enforcement authorities (LEAs), and referred by the concerned LEAs through the Integrated Enquiry Management System (IEMS).<sup>14</sup>
- iii. International intelligence received by the UAEFIU from counterpart FIUs, whether spontaneously or by request.
- iv. Open-source data, available criminal records and screening tool results.

This analysis is limited to the financial aspects of human trafficking proceeds and excludes data related to logistics or criminal networks operating beyond regulated sectors under the UAE Anti-Money Laundering, Combating the Financing of Terrorism, and Counter-Proliferation Financing (AML/CFT/CPF) framework. Furthermore, this analysis distinguishes human trafficking from migrant smuggling; therefore, migrant smuggling is outside the scope of this report. This distinction is based on three main differences: consent, exploitation, and transnationality, as highlighted by the FATF (2018):

1. Migrant smuggling includes individuals consent to their smugglers on their movement in dangerous conditions while human trafficking typically involves coercive, deceptive or abusive actions of the traffickers.
2. Smuggling of people does not often exploit victims in illicit, profitable activities following their arrival as it is the case in human trafficking. However, smuggled migrant, especially from areas of conflict

<sup>14</sup> The Integrated Enquiry Management System (IEMS) is established and owned by the UAEFIU to facilitate communication and processing of different requests between domestic competent authorities, regulated financial institutions and the UAEFIU.

could be later exploited in illegal activities, taking advantages of their circumstances and vulnerabilities upon arrival to a country.

3. Movement cross-border where smuggling of migrants is always transnational involving more than one jurisdiction while human trafficking and exploitation of victims could happen locally without the movement from a country to another (e.g., from villages to tourist centers).

Lastly, as with other national and global studies, this analysis faced challenges in establishing links in different incidents to human trafficking due to insufficient contextual and behavioral information and the absence of associated suspected financial flows. Nevertheless, reliable information and comprehensive insights from various reporting entities in the examined STRs enabled the identification of core human trafficking typologies involving the UAE and its financial sector.

## 5. BACKGROUND

Human trafficking is fundamentally a financially motivated crime, as well as a humanitarian issue, driven by the generation of illicit funds. There is currently no comprehensive global estimate of profits generated from human trafficking (FATF, 2018), and this lack of data is recognized as a significant gap that impedes the development of effective anti-trafficking responses (OSCE, 2019).<sup>15</sup> However, available data estimate annual profits from modern slavery at USD 236 billion, impacting approximately 50 million individuals (ILO, 2024, 2022).<sup>16</sup> Notably, a substantial portion of profits from human trafficking arises not only from the exploitation of victims but also from fees charged during the trafficking process. The International Labour Organisation (2024) reports that such fees, imposed by recruiters, travel intermediaries, or corrupt officials, can constitute 10–25% of the total profits derived from exploitation through human trafficking.

<sup>15</sup> The Organization for Security and Cooperation in Europe -OSCE (2019) Following the Money: Compendium of Resources and Step-by-Step Guide to Financial Investigations Related to Trafficking in Human Beings. Available at: [https://cthb.osce.org/sites/default/files/f/documents/f/5/438323\\_0.pdf](https://cthb.osce.org/sites/default/files/f/documents/f/5/438323_0.pdf)

<sup>16</sup> International Labour Organisation (2024) Profits and poverty: The economics of forced labour. Available at: <https://www.ilo.org/publications/major-publications/profits-and-poverty-economics-forced-labour>; International Labour Organisation (2022) Forced Labour and Forced Marriage. Available at: <https://www.ilo.org/publications/major-publications/global-estimates-modern-slavery-forced-labour-and-forced-marriage>

Human trafficking can be categorized into several typologies and purposes, with recognition that certain classifications may overlap, such as forced labor for commercial sexual exploitation. The primary categories are outlined as follows:

### 5.1. Human Trafficking for Sexual Exploitation

Human trafficking for sexual exploitation is among the most profitable forms of trafficking and encompasses prostitution, sexual slavery, and pornography. **Sex trafficking** is defined as involving “individuals [who] are compelled to engage in commercial sex through the use of force, fraud, or coercion” (Richardson, 2023).<sup>17</sup> This form of trafficking primarily affects women and children; UNODC (2024) reports that 66% of trafficked women in 81 countries were exploited for sexual purposes, with girls similarly trafficked for sexual exploitation. Such exploitation occurs through prostitution in both public venues (such as massage parlours, clubs, and bars) and private settings (households). Victims frequently experience physical violence, sexual assault, and significant emotional trauma. These operations are often orchestrated by OCGs. According to the International Labour Organization, forced commercial sexual exploitation constitutes approximately one quarter of all individuals in privately imposed forced labour, yet it generates 73% of total illegal profits from forced labour, amounting to \$173 billion (ILO, 2024).

A significant aspect of sexual exploitation involves the online exploitation of victims for the **production of pornography**. Minors are especially vulnerable, as exploitative content is distributed among offenders, especially via dark web markets. Traffickers increasingly use social media, online dating platforms, and messaging applications to engage with victims. Exploitation may occur online, with pornographic material coerced from victims through deceptive romantic relationships, which can subsequently be used to further coerce victims into prostitution (FATF, 2018).

**Forced marriage** constitutes another form of sexual exploitation. Victims are trafficked into marriage for purposes such as immigration benefits or domestic servitude, frequently resulting in sexual abuse. This category includes individuals trafficked for forced marriage without their consent, or involving children who are legally unable to consent. FATF (2018) notes that this practice is particularly prevalent in East and West

---

<sup>17</sup> Georgia Southern University (2023) A Cross-National Investigation of Human Trafficking Exploitation. Available at: <https://digitalcommons.georgiasouthern.edu/honors-theses/857>

Africa, where child marriages are common. Additionally, armed terrorist groups often impose forced marriage on victims, leading to sexual, physical, and emotional trauma.

## 5.2. Human Trafficking for the Purpose of Forced Labor

The International Labour Organization (2024) estimates that forced labor, including commercial sexual exploitation, generates USD 236 billion annually. As of 2021, global data indicate that 50 million individuals were living in modern slavery, comprising 27.6 million in forced labor and 22 million in forced marriage (ILO, 2022). The Arab States have the second highest proportion of people in forced labor, following the Asia and Pacific region. UNODC (2024) highlights that in the GCC states, 81% of recorded trafficked victims are women, with forced labor accounting for 66% of exploitation cases, followed by sexual exploitation at 25%. The Global Slavery Index (2023) ranks the UAE at 40 out of 100 in terms of vulnerability to modern slavery.<sup>18</sup>

**Forced labor** is defined as "all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily" (ILO, Forced Labour Convention, 1930, No. 29).<sup>19</sup> This encompasses any work performed under coercion or threat of punishment. Coercion may occur at any stage of employment, including recruitment, changes in working conditions, or upon attempting to leave the employer. Punishments can involve physical, emotional, sexual, or financial threats to compel victims to work for traffickers. While forced laborer may receive wages, compensation is typically grossly inadequate relative to the work performed. Victims often endure hazardous and exhausting conditions. Forced labor occurs across various industries, including mining, manufacturing, construction, accommodation and food services, arts and entertainment, and domestic work in private households (ILO, 2024).

Involuntary **domestic servitude** is a form of forced labor involving the trafficking of predominantly women and girls for domestic work in private residences. Tasks typically include housekeeping, childcare, and related duties. The clandestine nature of this exploitation often results in victims experiencing physical, emotional, and sexual abuse. Escape is particularly challenging, as victims live with their exploiters, and

<sup>18</sup> Walk Free (2023) Global Slavery Index: Modern slavery in United Arab Emirates. Available at: <https://worldpopulationreview.com/country-rankings/global-slavery-index-by-country>

<sup>19</sup> International Labour Organisation (no date) What is forced labour? The international legal definition of forced labour. Available at: <https://www.ilo.org/topics/forced-labour-modern-slavery-and-trafficking-persons/what-forced-labour>

detection is difficult in private settings. This pattern is observed globally, with victims frequently trafficked from low-income countries to serve as domestic workers in other regions (UNODC, 2018).

**Debt bondage** represents another form of forced labor, characterized by a system of indentured servitude in which trafficked victims are compelled to repay debts through their labor. Compensation is typically grossly inadequate relative to the work performed, resulting in victims working indefinitely for exploiters. Debts may be significantly inflated or entirely fabricated, yet victims may perceive this arrangement as their only opportunity for a better future.

Forced labor is also utilized for **criminal activities**. In this context, victims are coerced into engaging in illegal acts under threat from traffickers. Organized crime groups often perpetuate these schemes by falsely advertising legitimate job opportunities to individuals in impoverished regions. Upon arrival, victims are compelled to participate in activities such as phone fraud, online romance scams, begging, street crime, and other illicit enterprises. Working conditions and compensation are highly exploitative and enforced through threats. It is essential to recognize that individuals forced to commit crimes under these circumstances are also victims of human trafficking.

Forced labor affects not only adult men and women but also **children**. This category includes the trafficking of children for servitude, debt bondage, or forced involvement in criminal activities, with or without explicit coercion, resulting in exploitation and mistreatment. According to ILO-UNICEF (2024), 138 million children were subjected to child labor in 2024, with over one third engaged in hazardous work that poses direct risks to their health and development.<sup>20</sup> The recruitment of **child soldiers** constitutes another form of forced child labor, frequently perpetrated by terrorist groups that traffic children for use as combatants or in logistical and support roles (Soltan, 2024).<sup>21</sup>

### 5.3. Trafficking for the Purpose of Removal of Organs

Trafficking in persons for the purpose of **organ removal** is the least prevalent form of human trafficking, yet it is highly profitable for traffickers and causes severe harm to victims. UNODC (2024) reports that a

---

<sup>20</sup> ILO (no date) Child Labour: Global estimates 2024, trends and the road forward. Available at: <https://www.ilo.org/publications/major-publications/child-labour-global-estimates-2024-trends-and-road-forward>

<sup>21</sup> Soltan, V. (2024) Terrorism and Human Trafficking: A Dark Alliance of Organized Crime. Acta Universitatis Danubius. Juridica, 20(3), 41–53. Retrieved from <https://dj.univ-danubius.ro/index.php/AUDJ/article/view/3138>

single kidney procedure can yield up to \$200,000 for traffickers, while significantly endangering the health of the donor. Removal of organs typically requires access to medical facilities and professionals. This form of trafficking is usually a one-time event, with victims transported from low-income countries to other regions for organ removal and subsequent sale on the black market. A related form of exploitation involves trafficking individuals for **illegal medical activities**, including the extraction of human tissues or the conduct of medical experiments on living persons.

Ultimately, human trafficking is a profit-driven crime that frequently results in money laundering to conceal the origins of illicit proceeds. Traffickers employ sophisticated laundering techniques, including the use of front businesses (such as cash-intensive establishments like bars, nightclubs, restaurants, massage parlors, and beauty salons), shell companies, and alternative payment systems such as Hawala and virtual assets to transfer funds internationally.<sup>22</sup> Further insights are provided by the analysis of STRs/SARs discussed later in this report.

## 6. OVERVIEW OF STRS/SARS UTILIZED IN THIS REPORT

This section provides an overview of the descriptive analysis conducted using data from the UAEFIU's databases covering the period from 1 January 2021 to 31 December 2025, in particular, human trafficking-related STRs/SARs submitted through the reporting system. Section 7 will present the typologies and patterns of human trafficking identified from these data sources.

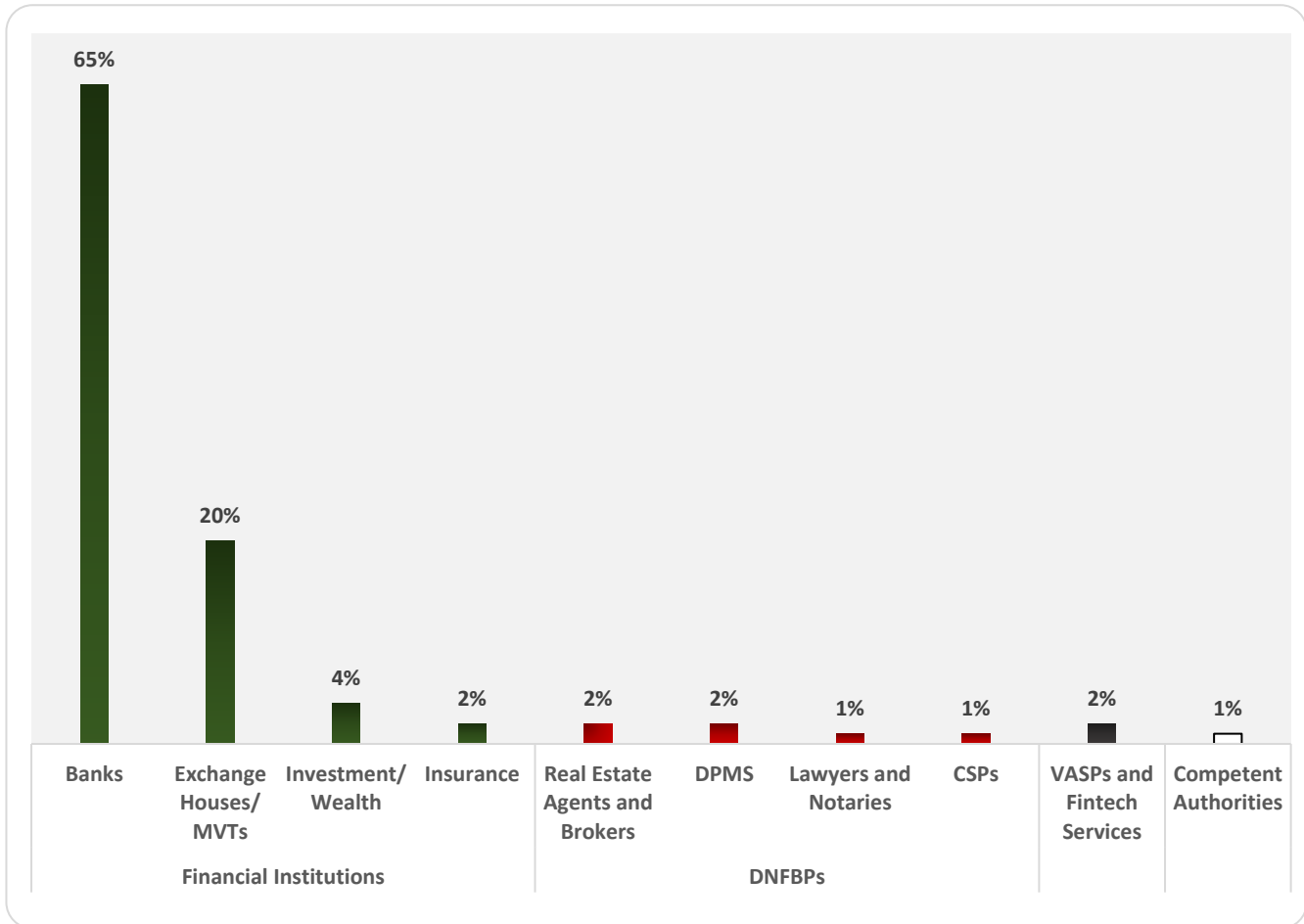
Between 2021 and 2025, the UAEFIU received **443 STRs/SARs** related to human trafficking, identified through reasons for reporting (RFRs) and keyword searches. After evaluating the relevance, validity, and reliability of these reports, **150 suspicious reports** (comprising 83 STRs and 67 SARs) were deemed directly relevant and reliable for strategic analysis to identify human trafficking typologies and patterns. Additional feedback on the quality and reliability of STRs/SARs is provided in the conclusion section for consideration by reporting entities.

---

<sup>22</sup> FATF (2018) and Shukla, A., Phookan, J. and Pavitra (2026) Resisting Gender Violence: Combating Human Trafficking Through Legal Frameworks, Enforcement, and Prevention Strategies. Oregon State University. Available at: <https://open.oregonstate.education/resistinggenderviolence/chapter/combating-human-trafficking/>

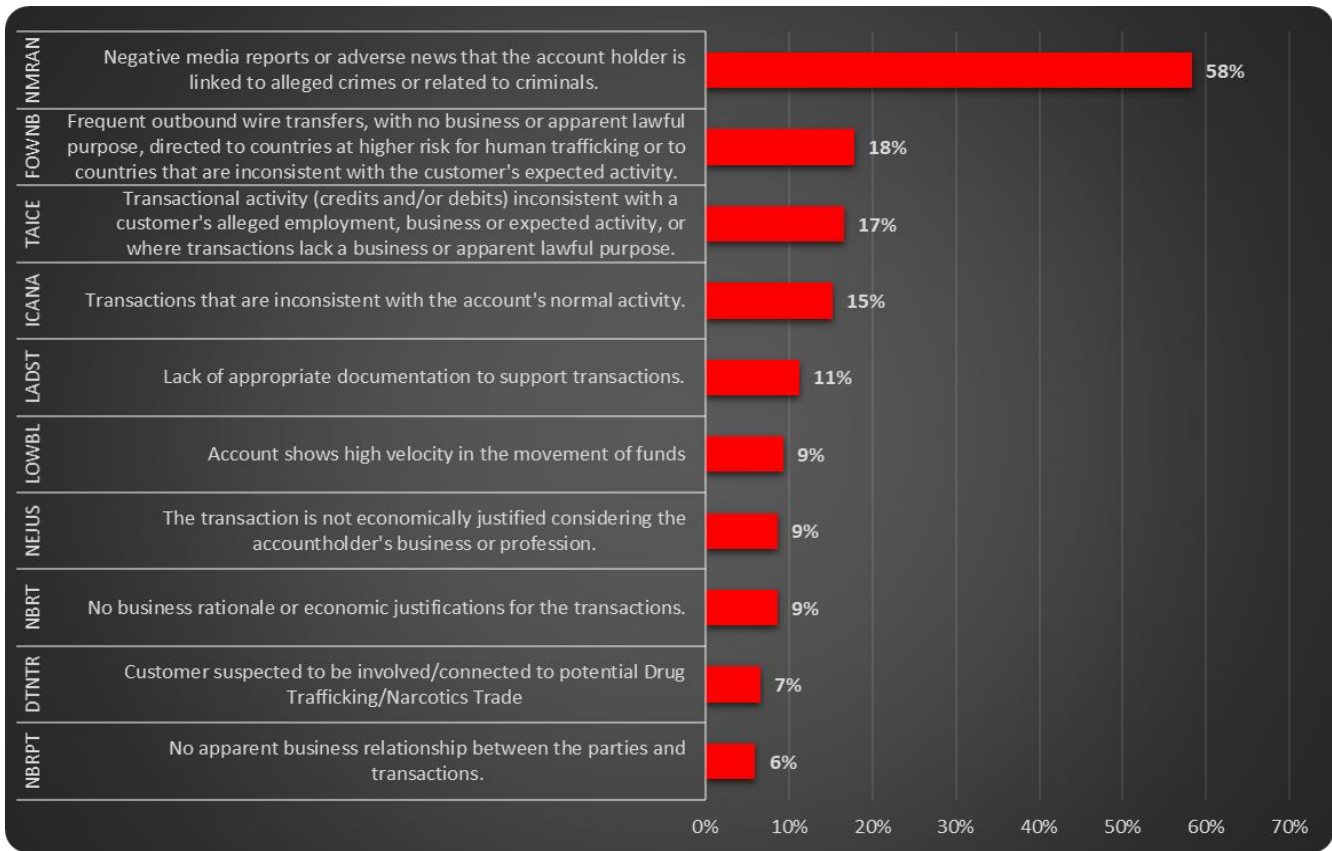
As illustrated in Figure 1, financial institutions submitted the majority of reports analyzed (91%), followed by designated non-financial businesses and professions (DNFBPs), Virtual Assets Service Providers (VASPs) and other sources.

**Figure 1:** Volume of received human trafficking-relevant STRs/SARs by sector from 2021 to 2025



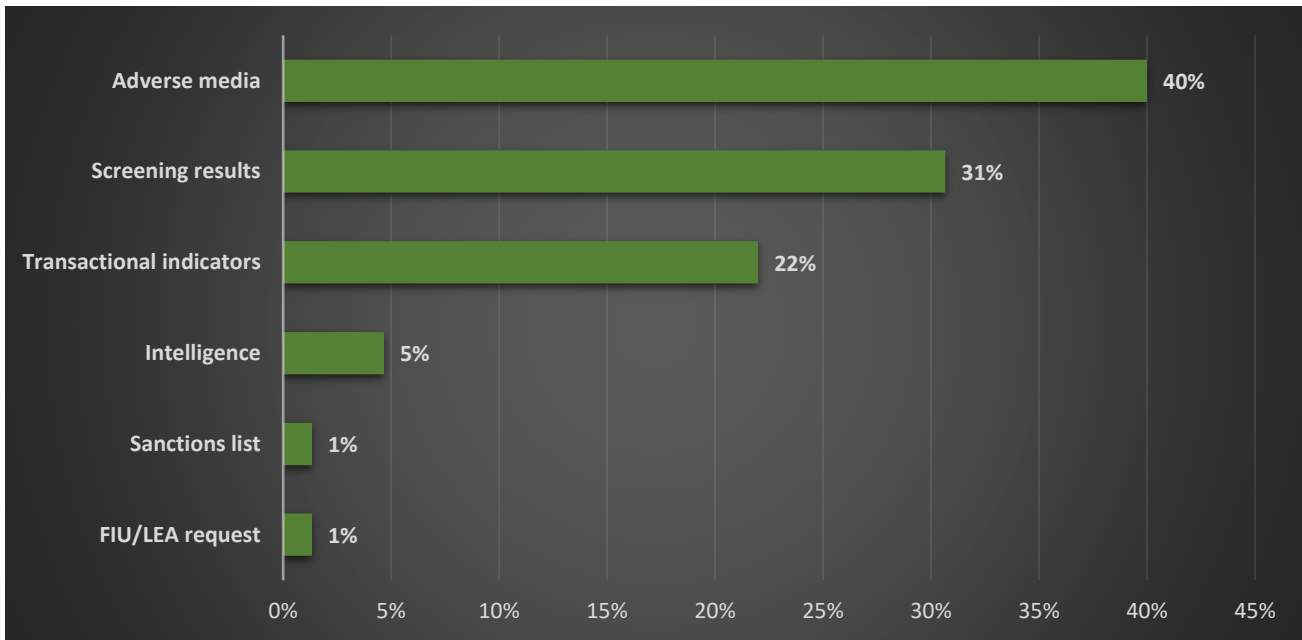
Regarding the reasons for reporting used by reporting entities when submitting reports related to suspected human trafficking and the laundering of its proceeds, negative media articles concerning customers were the most frequently cited reason for reporting to the UAEFIU. Additional reasons for reporting are illustrated in Figure 2 below. It should be noted that more than one RFR can be selected during submission.

**Figure 2: Top 10 Reasons for Reporting (RFRs)**



As indicated in Figure 3 below, the analysis further classified core triggers based on textual analysis and predefined factors. Consistent with the reasons for reporting, 40% of the analyzed STRs/SARs were primarily triggered by adverse media, followed by screening tool results. Some reports were reclassified based on screening tools, as these tools were identified as the primary trigger of suspicion.

**Figure 3:** Main reporting triggers based on the textual analysis of the suspicious report narrative



The analysis examined human trafficking in relation to the extent of UAE link, assessing whether the data clearly indicated the country's involvement in human trafficking or the laundering of its proceeds. As indicated in Figure 4 below, an additional classification was applied when the data only showed elements of human trafficking incidents that occurred abroad without clear evidence of UAE link. For example, SARs received based solely on adverse media abroad against the customer, with no other transactional or behavioral indicators suggesting human trafficking operations within the country.

This is in addition to “Others” classification associated with different unclear or insufficient connections to human trafficking rather than broader criminal groups, potential unlicensed sourcing of domestic workers, among others.

Nevertheless, those latter classifications (human trafficking in foreign jurisdictions and others) should not be excluded from the potential risk of human trafficking if further data surface based on investigation.

Moreover, in some cases, both human trafficking and money laundering indicators were present. Predicate offences and money laundering indicators often overlap. As a result, the percentages shown in Figure 4 are not definitive, but an illustration of potential risk direction and may change as investigations progress or new information becomes available.

**Figure 4:** Volume of reports by suspected crime type



### I. Human trafficking involving the UAE

This analysis references human trafficking involving the UAE primarily through transactional and behavioral indicators, which offer contextual information on trafficking elements. Data sources include open-source materials and screening tools.

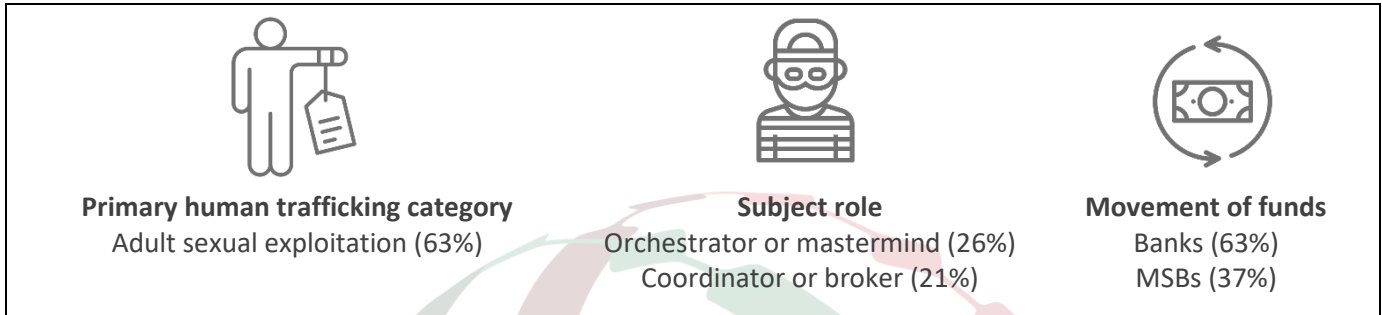
Of the 150 STRs/SARs analyzed, 22 reports were assessed as potentially involving human trafficking activity in the UAE. These reports were associated with 2 legal persons (LPs) and 17 natural persons (NPs), most of whom are UAE residents.<sup>23</sup> Men accounted for 76.5% of the cases, while women represented 23.5%. The most common occupations identified were company owners or partners and individuals employed in sales roles.

Adult sexual exploitation was the predominant human trafficking typology, accounting for 63% of the involved subjects. Individuals were identified in various roles within the trafficking chain, including

<sup>23</sup> Some STRs/SARs were reported against the same subject.

orchestrators or masterminds (26%), as well as potential coordinators or brokers, exploiters, and recruiters (21% each). Regarding the movement of funds, 63% of the subjects utilized the banking sector, while 37% used MSBs. The following figure summarizes these findings.

**Figure 5:** Main elements of human trafficking involving the UAE<sup>24</sup>



## II. Laundering the proceeds of human trafficking

The analysis identified 64 STRs/SARs associated with laundering the proceeds of human trafficking, involving 59 NPs and 5 LPs. Among the NPs, most were residents of the UAE, with approximately half aged 35-44. The suspicious reports indicated a diverse range of nationalities.

The review of ML scenarios connected the illicit proceeds to human trafficking typologies occurring across multiple jurisdictions. The primary typology identified was sex trafficking (33%), followed by forced adult labor (11%) and pornography (8%). In these schemes, orchestrators or masterminds played the most significant roles, followed by third parties, potential money mules, and exploiters.<sup>25</sup>

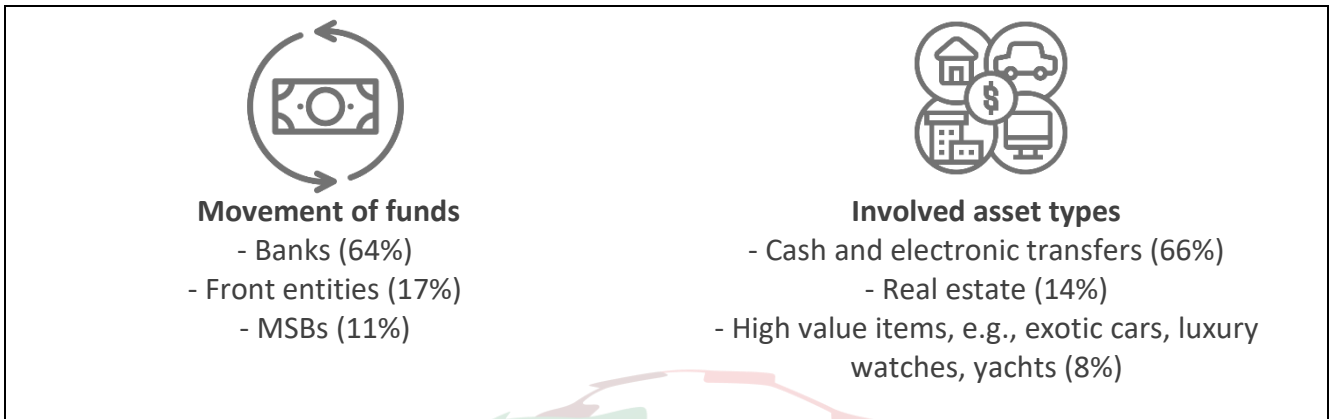
The cross-border dimension of the analyzed reports was significant, with various jurisdictions frequently identified in connection with suspected laundering of human trafficking proceeds.

As illustrated in Figure 6 below, the examined money laundering scenarios highlighted the movement of funds primarily through the banking sector, followed by the misuse of legal persons and MSBs.

<sup>24</sup> Subject role is based on interpretation and inconclusive, subject to investigation results.

<sup>25</sup> Majority of third parties were identified to be family members, followed by known business associates.

**Figure 6:** Main elements of potential ML with human trafficking connection



### III. Human Trafficking Activities in Foreign Jurisdictions

This classification encompasses human trafficking activities occurring outside the UAE, including recruitment, harboring, and exploitation, where there are no transactional or behavioral indicators linking these activities to the UAE in terms of human trafficking or money laundering (e.g., only adverse news or screening results are present).

Within this criterion, the analysis identified 51 suspicious reports associated with 34 NPs and 15 LPs.<sup>26</sup> Of the 34 NPs, 85% were residents of the UAE; however, the group was diverse, representing 18 nationalities. Among the 15 LPs, business activities were diverse, most commonly involving travel and tour services, automobile trading and rentals, information technology.

The underlying human trafficking activities abroad were primarily associated with adult sexual exploitation (24%), followed by forced adult labor (20%) and fraudulent employment schemes (8%). Within these reports, subjects assumed various roles within the trafficking network, including orchestrators or masterminds (29%), exploiters (20%), and recruiters (14%). Among the subjects in this category, 22% were also linked to organized criminal groups (OCGs).

<sup>26</sup> Some STRs/SARs were reported against the same subject.

## 7. IDENTIFIED PATTERNS AND KEY FINDINGS

This section presents the findings of the analysis conducted for this report, emphasizing human trafficking typologies identified at both national and international levels in the examined STRs/ SARs. The analysis aims to equip reporting entities, supervisory and law enforcement authorities, and other stakeholders with a comprehensive understanding of current human trafficking methods and trends, including observed transactional and behavioral patterns, as well as potential emerging risks and areas requiring increased vigilance and monitoring.

### 7.1. Adult Sexual Exploitation

Sex trafficking is a distinct form of human trafficking that generally involves the use of force, fraud, or coercion to compel individuals to engage in commercial sex acts. Adult sexual exploitation emerged as the most frequently identified concern in the analyzed data, both domestically and internationally, particularly when proceeds were laundered across multiple jurisdictions, including the UAE. Cases within this typology involved a variety of actors, such as exploiters, coordinators, and recruiters, operating in both the UAE and foreign jurisdictions.

Transaction patterns commonly revealed a high volume of payments for multiple low-cost airline tickets, hotel bookings, and short-term homestays (e.g., Airbnb), as well as expenditures at beach clubs, bars, and retail establishments. Additional regular expenses included payments to pharmacies, fast food outlets, public transportation, limousine services, beauty salons, clinics, and wellness centers. The analysis further highlighted instances in which multiple women shared the same accommodation address, or in which several units within the same building or vicinity were rented by a controller, with monthly payments consolidated to a single beneficiary, typically the landlord.

Frequent low-value cash deposits, particularly through ATMs, were observed across all subjects, along with multiple small payments received from unidentified individuals within the UAE. Funds circulated rapidly through multiple accounts and were often transferred across borders, with withdrawals occurring immediately or within a short timeframe. Deposited and withdrawn amounts were typically similar and occurred within a few consecutive days. Many transactions occurred during late-night or early-morning

hours. Transactional activity also included purchases and multiple POS transactions. In some cases, accounts were opened in various currencies and received multiple inbound transfers from individuals abroad.

In cases involving broader criminal networks operating across multiple jurisdictions and engaging in fraudulent recruitment schemes and sexual exploitation, debit transactions and expenditures were recorded at luxury hotels, yachts, clothing stores, and beauty salons in several countries using UAE bank accounts. Concurrently, credits were received from multiple unidentified individuals.

In several cases, beauty pageants and modeling agencies abroad were reportedly used as mechanisms to lure young women. Other scenarios involved the use of online escort platforms, social media, or digital payment systems to generate revenue from adult sexual services. Payments to social media platforms (such as Facebook and Google) were also observed, likely for advertising purposes to promote these activities.

In addition to the banking sector, MSBs were misused within this typology. For example, exchange houses reported cases involving non-resident young women who exchanged foreign currencies and sent frequent instant cash transfers to multiple beneficiaries across several jurisdictions. These women simultaneously received funds from various males, primarily from a neighboring jurisdiction. The women were linked by a shared residential address, and the source of funds could not be explained. Another scenario involved an individual identified in adverse media reports for alleged involvement in human trafficking for sexual exploitation and prostitution abroad. This individual was observed sending and receiving numerous remittances and conducting currency exchanges through various exchange houses, both domestic and international, purportedly for personal needs. Multiple transactions were also conducted through the individual's bank accounts at different financial institutions, primarily as ATM cash deposits and withdrawals.

In contrast to the aforementioned scenarios involving the misuse of financial institutions, a review of certain suspicious reports linked to adverse media coverage of an individual's arrest for human trafficking allegations abroad suggested deliberate avoidance of significant transactions through bank accounts to evade detection by banking monitoring systems. Overall transaction volumes remained moderate, with cash deposits being immediately withdrawn.

The association between suspected sex traffickers and the misuse of corporate networks was also observed, regardless of whether these entities were established in the UAE or abroad. In many cases, the reported subjects were owners or managing directors of companies operating overseas, including within the UAE. Some of these corporations provided services such as project management, advertising, and marketing, while others specialized in supplying models, waitresses, and bartenders. Although most reported subjects were individuals, some were identified as beneficial owners of both foreign and local entities. The companies owned by these individuals were not frequently reported in the examined suspicious reports and did not exhibit unusual transactions, as their activities generally aligned with their stated business profiles.

A small number of local legal entities were reported due to activities inconsistent with their declared business profiles, including the selection of corporate names containing sentimental language. Transactional indicators further substantiated concerns of human trafficking, as these entities exhibited multiple hotel bookings and related transactions commonly associated with escort-related activities, such as payments to accommodation platforms, car rental services, and high-end luxury purchases. Additional payments to social media platforms, possibly for advertising purposes, were also observed. Furthermore, some payments were made to multiple female individuals, often sharing the same nationality and age range.

Overall, several scenarios within this typology suggested false job promises that led to exploitation, as evidenced by open-source data and the information contained in the examined suspicious reports. Reporting entities also frequently noted uncooperative behavior, lack of documentation, and individual transactions that were inconsistent with declared income or known financial profiles.

Further analysis of international requests indicated that most victims abroad originated from unstable or remote regions. Some individuals were lured through romantic relationships and subsequently coerced into recruiting others for larger scam operations, which included the production of sexual content such as pornography or participation in webcam activities. It was also observed that women involved in prostitution could become addicted to drugs and subsequently exploited for drug trafficking, particularly in cross-border narcotics transportation. These examples demonstrate the association between human trafficking and drug

trafficking, as well as other global crimes such as fraud, highlighting how victims may be subjected to multiple forms of criminal exploitation (further details are provided in 7.7).

## **7.2. Pornographic Content Production**

Within the previous context, additional reports highlighted suspected subjects' links to online platforms producing pornographic content, either as purchasers of such content (adult subscribers) or as recipients of funds from those platforms, such as vendors, producers, or abusers. In the latter scenario, customer financial flows were found to be linked to these platforms, and the customer was unable to provide a consistent explanation or the required supporting documents during due diligence, while claiming the source of funds was generated from uploading content on social media or from dividends on personal investments in a similar incident.

A few other suspicious reports showed no transactional movement or active accounts, but instead linked the reporting entity's customer to adverse media revealing involvement with associates in human trafficking charges, including rape and the formation of organized criminal groups in foreign jurisdictions. Open-source information indicated that victims were misled through deceptive means, such as false promises of romantic relationships, and subsequently coerced into producing pornographic content for online platforms.

**Case Example 1: Human Trafficking for Sexual Exploitation**

The UAEFIU received multiple suspicious activity reports concerning **Subject A**. Open-source information alleges that Subject A is involved in trafficking women from **Country X in Africa** to the UAE for sexual exploitation through debt bondage. Subject A's arrival in the UAE coincided with fleeing the home country while facing human trafficking charges.

Although Subject A declared income as a Sales Executive, the financial and digital footprint indicated a lavish lifestyle inconsistent with the KYC documentation. Social media analysis revealed connections primarily with low-income females, while Subject A frequently purchased and advertised high-value gold trading items.

Subject A maintained two active bank accounts, which primarily featured structured cash deposits purportedly originating from a licensed project management business, likely serving as a front entity. The financial profile was further complicated by unexplained transactions and unusual spending patterns that exceeded typical personal use. The accounts exhibited regular point-of-sale (POS) activities at pharmacies (one to three times weekly), as well as frequent purchases of low-cost airline tickets, public transportation, fast food, clothing, and groceries, primarily from discount centers and retail outlets in areas with high concentrations of low- to medium-income populations.

Debits primarily consisted of cash withdrawals and cheques, which frequently bounced due to insufficient funds or mismatched signatures. These cheques appeared to be issued for monthly rent payments for residential accommodations over varying timeframes.

Outward remittance activity was observed through different exchange houses, with funds directed to three African countries and two European countries. The beneficiaries remained consistent across multiple transactions. Subject A also received limited inward remittances from Africa. Additionally, Subject A frequently exchanged foreign currencies, primarily United States Dollars (USD) and Euros (EUR), for United Arab Emirates Dirhams (AED). These transactions consistently involved low and similar round-figure amounts.

The UAEFIU referred the case to the concerned LEA for investigation. Subject A has since been arrested in Country X.

**Risk indicators:**

1. Repeated transactions for public transportation, pharmacy products, airline tickets, and similar expenses without clear justification.
2. Transaction activity inconsistent with declared monthly income and customer profile.
3. Frequent small cash deposits are used as the main funding source for personal accounts.

4. Multiple outgoing cross-border transfers to various foreign recipients without justification.
5. Gold trading activity without a valid business license or a legitimate source of income for gold purchases.
6. Open-source data indicating a lavish lifestyle without an explained source of funds.
7. Customer link to high-risk jurisdictions known for elevated human trafficking activities.

### **7.3. Child Sexual Abuse Material (CSAM)**

A limited number of reports in the examined data were related to CSAM. Analysis of suspected subject accounts identified subscription-based payments to online merchant websites or clusters on the blockchain associated with CSAM. Some subjects were also linked to previous convictions for sexual assault of minors abroad, as indicated by open-source information. However, this analysis did not yield further details on the operational locations of these online platforms or the identities of the victims involved.

Misuse of MSBs was prevalent in this typology, particularly for sending remittances to flagged subjects involved in CSAM within jurisdictions known for elevated human trafficking risks. Additionally, some subjects directly engaged with virtual asset clusters attributed to CSAM. The transactional pattern typically involved small-value Bitcoin (BTC) transfers consistent with illicit online content purchases. In certain cases, subjects also received funds directly from scam clusters, suggesting involvement in broader illicit schemes.

In one notable case disseminated by the UAEFIU to the relevant LEA, a reported subject was identified as the orchestrator who coordinated the production and sale of illicit content and managed associated financial flows. Distribution of illicit material to international buyers occurred via social platforms such as Telegram. The movement of funds demonstrated structured laundering, including frequent low-value incoming transfers from multiple unrelated accounts, inflows through service providers such as PayPal, POS transactions, engagement with exchange houses, and subsequent ATM withdrawals.

Review of international intelligence identified cases involving the exploitation of minor females in modeling and sex trafficking. These cases emphasized the role of logistics and related financial transactions, such as airline ticket purchases and hotel bookings.

**Case Example 2: Child Sexual Abuse Material (CSAM)**

The UAEFIU received STR from a financial institution regarding **Subject A**, a UAE resident originally from **Country X**. Open-source information indicated that Subject A had a history of distributing and selling child sexual abuse material via Telegram to multiple foreign individuals across multiple jurisdictions, receiving payments through online wallets. These activities were associated with multiple victims, identified as nationals of Country X, as confirmed by foreign authorities in publicly available sources. Further screening established that Subject A was the subject of an Interpol Red Notice and was wanted in Country X for human trafficking, sexual exploitation, human rights violations, and child exploitation.

Subject A conducted financial activities through two bank accounts and two exchange houses. One bank account was primarily funded by local transfers from various individuals, while the other account received limited credits from a payment service provider's online wallet. These specific transactions were considered suspicious due to the anonymity of the remitter and included payment references mentioning a room number.

On the debit side, funds were primarily withdrawn in cash and transferred locally to various individuals. Additionally, transactions involving two exchange houses indicated that Subject A remitted funds to both personal accounts and to other individuals in Country X.

The analysis further revealed that Subject A engaged with individuals who were also subjects of STRs due to suspected involvement in human and drug trafficking, based on their account activity patterns. This suggests potential participation in a broader criminal network. A secondary connection was identified through a counterparty whose transactions were flagged as suspicious; remittances to Country X included payment references using terminology translated as or referring to "a young boy".

The UAEFIU referred the case to the concerned authority for further investigation and action. Subject A was subsequently deported from the UAE to Country X, where the individual is currently serving a 60-year sentence.

**Risk indicators:**

1. Receipt of small-value payments from multiple individuals via bank transfers and online wallets.
2. Transactional links with individuals suspected of involvement in drug and human trafficking, with account activity patterns indicating potential participation in a broader criminal network.
3. Use of specific terminology within payment references that may indicate human trafficking.
4. Presence of historical criminal records, adverse media coverage, and positive screening results related to the subject.

## 7.4. Forced Labor

The majority of reviewed reports concerning forced labor identified potential ML schemes more frequently than direct human trafficking within the UAE, as most cases were associated with trafficking activities in foreign jurisdictions. In these instances, subject accounts in the UAE typically received substantial inflows shortly after account opening, accompanied by inconsistent explanations of the funds' purpose and a refusal to provide financial statements for the primary business. Additionally, funds often demonstrated pass-through characteristics, being routed between accounts controlled by the subjects across multiple jurisdictions with minimal retention within the UAE.

Several scenarios did not demonstrate a clear connection to the UAE in terms of human trafficking or money laundering, aside from adverse media coverage involving resident individuals. No suspicious or unusual transactions were identified in these cases, nor were there definitive screening results, as many subject names were common and lacked key identifiers such as date of birth. However, the reviewed data indicated that historical forced labor schemes abroad involved resident individuals in the UAE, thereby exposing a potential risk of similar misconduct in the country. These risks should be closely monitored by reporting entities.

The majority of analyzed schemes abroad involved fraudulent employment and deception. These scenarios highlighted the recruitment of victims through false job promises or fake employment offers, after which individuals were forced into cyber fraud activities, subjected to poor living conditions, and controlled through threats, abuse, and movement restrictions. Agents often deceived victims, who were subsequently abandoned by the agents and affiliated agencies. Fraud was frequently observed in conjunction with forced labor, both in luring victims under false pretenses and in coercing them to participate in various scams and illegal activities.

Another example indicated the involvement of an orchestrator of human trafficking operations abroad who resided in the UAE. This scenario involved trafficking between two foreign jurisdictions by a broader OCG, with victims coerced into making fraudulent phone calls targeting individuals in a third jurisdiction. Open-source information reported that victims worked in degrading conditions, endured long hours to meet targets set by the OCG, and rarely received salaries. When payments were made, victims could only spend them within the detention camp, from which they were not permitted to leave. Court proceedings revealed

that the subject acted as the primary contact for recruiting victims into the fraudulent employment scheme, after which they were transferred to members responsible for facilitating the movement and operations of the fraud camp.

Only a small number of cases provided clearer indicators of potential forced labor within the UAE, involving individuals conducting remittances on behalf of third parties, such as employers or controllers. However, the information available for this analysis was inconclusive and requires further operational investigation to establish stronger concerns.

A review of international intelligence highlighted schemes involving fake employment offers and false promises of employment visas to the UAE, which could result in forced labor incidents. However, insufficient information was available to further substantiate concerns regarding human trafficking, while in a few incidents, suspicion of money laundering appeared more plausible.

Additional concerns regarding forced labor were identified in the vulnerability of domestic workers brought to the UAE through unlicensed channels.

## **7.5. Human Trafficking in Support of Armed Conflict and Terrorist Organizations**

Among all received human trafficking-related STRs/SARs, only one incident was identified as relevant to a terrorist group and was promptly disseminated to the concerned authority. This case demonstrated indicators of human trafficking, specifically recruitment for an armed conflict group with elements of sexual exploitation. Analysis of the available data, including international intelligence and open-source information, indicated the reported subject's involvement in abduction, forced religious conversion, and the transportation of women for sale to an extremist organization for sexual exploitation. The subject was suspected of acting as a facilitator, orchestrating the cross-border movement of a victim for exploitation. Further analysis of the subject's transactions revealed misuse of both banking and MSB sectors to conduct cross-border transfers, indicating abuse of the UAE financial system employing pass-through transactions.

## 7.6. Laundering the Proceeds of Human Trafficking

A majority of the examined STRs/SARs indicated the laundering of human trafficking proceeds, accounting for 43% of the reviewed reports. Human trafficking offenses frequently co-occurred with other crimes, including tax evasion, fraud, trafficking of counterfeit goods, gambling, and money laundering. The proceeds from these activities were subsequently suspected to be laundered across multiple jurisdictions, including the UAE. In the analyzed cases, funds were transferred to the UAE primarily through cash, bank transfers, the establishment of shell entities, and integration into the real estate sector. In certain scenarios, bank accounts showed minimal or no fund activity. Nevertheless, suspicions of money laundering arose from the use of unexplained large cash amounts to purchase high-value items such as gold, exotic cars, and real estate. These transactions typically did not display transactional or behavioral indicators of human trafficking, aside from screening results and open-source information related to the customer.

The data analyzed indicated that many of these activities were associated with established organized crime groups involved in a range of illicit operations. For example, an OCG abroad coercing individuals to perform illicit activities, including operating scam centers. Victims of forced labor were enticed by false promises of well-paying jobs in customer service and related fields, but were subsequently compelled to participate in schemes such as romance baiting and sextortion.<sup>27</sup>

Additional cases highlighted the involvement of foreign politically exposed persons (PEPs) in facilitating human trafficking schemes. For example, one suspicious report submitted to the UAEFIU concerned a corrupt former foreign official attempting to invest funds in the UAE. Open-source information revealed that this individual allegedly facilitated the recruitment of migrant workers into a foreign country using fraudulent contracts in exchange for payments. Reports claimed that these workers were forced to work against their will for extended hours under inhumane conditions, without receiving wages or adequate housing as stipulated.

Other scenarios included the operation of prostitution rings and engagement in blackmail schemes abroad, as well as individuals convicted of assisting sex and human traffickers by advertising their services. Many

---

<sup>27</sup> Romance baiting is a combination of romance and investment scam – sophisticated, long-term and cyber-enabled. Sextortion is the threat of exposing sexually explicit materials unless financial demands are met

other cases highlighted the involvement of spouses and family members, particularly when the human trafficker was convicted or became the subject of adverse media coverage.

An illustrative case of laundering the proceeds of sex trafficking involved the UAEFIU receiving multiple suspicious reports concerning an individual identified in adverse media reports and accused of human trafficking, rape, and forming an organized crime group. The suspect allegedly established an organized crime group abroad to recruit and exploit women by coercing them to produce pornographic content for distribution on specialized websites. Analysis of the subject's UAE account transactions revealed significant expenditures indicative of a lavish lifestyle and high-value remittances from unidentified third parties, both domestic and international. These transactions were purportedly explained as endorsement fees received as a social media influencer. The analysis also indicated possible conversion of funds into Bitcoin (BTC) abroad and the use of shell entities.

Sexual exploitation emerged as the most frequently associated typology in the reviewed human trafficking schemes occurring in foreign jurisdictions, followed by forced labor. International intelligence reviews corroborated these findings, indicating the link to the UAE in laundering human trafficking proceeds, primarily through front entities and the real estate sector.

### **7.7. Convergence Trafficking Enterprise**

As outlined in previous typologies, human trafficking offenses frequently co-occurred with other crimes, as indicated by transactional patterns or customer behaviors. These included OCGs and individuals previously convicted of or implicated in various criminal allegations. The trafficking of persons, counterfeit goods, arms, illegal drugs, and money laundering often intersected across multiple scenarios.

For example, members of a known criminal organization were identified as counterparties to a primary subject reported to the UAEFIU. This organization is reportedly engaged in illicit activities including drug trafficking, arms trafficking, hacking, fraud, bribery, and money laundering. Significant inward transactions from individuals linked to adverse media within this network were observed, followed by immediate outward transfers to various jurisdictions, particularly in Africa. Additionally, cash withdrawals were conducted outside the UAE, in line with the nationalities of the subjects involved.

Another example was identified through multiple STRs/SARs regarding a subject involved in their spouse's activities. The spouse has been designated in connection with an OCG abroad for serious crimes, including drug trafficking, human trafficking, and extortion. The couple established a network of businesses in the tourism and real estate sectors across multiple jurisdictions, some of which are subject to foreign sanctions. These entities are reportedly used by key OCG members to facilitate money transfers and arrange travel. Most transactions originated from high-risk jurisdictions, and the subject's credit card activity revealed multiple cash payments, unusually high-value purchases, and round-amount transactions involving both purchases and refunds. Additionally, significant cash deposits and retail purchase payments to various counterparties, primarily hotels, were observed.

Overall, the co-occurrence of human trafficking and illegal drug trafficking was frequently observed.

## **8. INVOLVED SUBJECT PROFILE**

### **8.1. Designated Human Traffickers**

A significant proportion of subjects identified in the reviewed STRs/SARs possessed criminal records related to human trafficking or were designated as human traffickers, particularly by foreign authorities, in association with internationally operating organized crime groups. Open-source data and screening tool results indicate that these individuals played significant roles as orchestrators or facilitators in various transnational human trafficking schemes, including prostitution based on false employment promises.

Certain cases were identified as instances of money laundering involving proceeds from foreign human trafficking, based on the analysis of transactional patterns. Other cases were classified as potential human trafficking threats in the absence of transactions or behavioral indicators linked to the UAE, relying solely on screening results or adverse media associated with inactive accounts.

The involvement of third parties was frequently observed in cases related to designated or convicted human traffickers. In some incidents, family members were utilized, while in others, third parties such as business owners and associates were implicated. These individuals are suspected of being recruited to facilitate the laundering of illicit proceeds or to transfer funds to persons accused or convicted of human trafficking.

## 8.2. Organized Crime Groups (OCGs)

Twenty-eight percent of the subjects of human trafficking-related STRs/SARs were associated with OCGs. As indicated in this report, the involvement of subjects who were either identified members of OCGs or closely associated with them was both common and prominent in the examined data. These roles ranged from network leaders and controllers to financial and logistical facilitators. In most analyzed scenarios, OCG members were implicated in orchestrating human trafficking schemes abroad, including forced labor in fraud schemes and scam centers, as well as sex trafficking and prostitution. These individuals were reported for suspected ML in the UAE, exploiting sectors such as corporate networks, real estate, and other high-value assets.

In different incidents, human trafficking co-occurred with other crimes, including corruption, drug trafficking, migrant smuggling, fraud, and money laundering. Link analysis supported these findings by revealing that multiple subjects were interconnected through transactional relationships with previously reported high-risk counterparties involved in narcotics trafficking, fraud, or other organized criminal activities.

## 8.3. Foreign Politically Exposed Persons (PEPs)

A couple of SARs related to forced labor abroad indicated the involvement of former public officials in facilitating visa and labor arrangements through bribery and abuse of influence. Open-source information connected these officials to recruitment schemes involving migrants from third jurisdictions, who were subjected to fraudulent or exploitative employment contracts that resulted in underpayment and abuse. However, no transactional links were identified in the UAE, except for inactive accounts and residency status.

## 8.4. Money Mules

Both the banking sector and MSBs reported suspicions regarding the involvement of money mules in human trafficking, fraud schemes, and money laundering. Some reports were excluded due to weak links to human

trafficking, while other reliable reports were retained. Further operational investigations are still recommended to establish additional connections.

In ML schemes, low-income workers are frequently used as money mules. They deposit structured, low-value cash transactions across multiple accounts and locations, rapidly moving funds through ATMs, domestic transfers, and internal bank mechanisms to layer and obscure their origins.

## 9. SECTORS VULNERABILITY

### 9.1. Financial Institutions

Both banks and MSBs were misused in the typologies identified in this analysis. Notably, many of the reported SARs were linked primarily to adverse media rather than to transactional movements. Nevertheless, many STRs illustrated that the banking sector was primarily utilized for overseas transfers, often involving savings or salary accounts. A notable emerging trend is the use of credit cards instead of personal accounts. In these cases, credit cards were credited via ATMs by unidentified individuals, in connection with purchases and payments indicative of human trafficking activities. Another observed pattern involved cash withdrawals in foreign jurisdictions where illegal activities are suspected.

MSBs were predominantly misused by both residents and non-residents of various nationalities, including money mules and individuals suspected of involvement in the unregulated employment of domestic helpers and laborers. MSBs were also implicated in ML schemes involving proceeds from human trafficking. These schemes often featured structured currency exchanges by resident and non-resident suspects, without supporting evidence for the source of funds.

The insurance sector also raised various suspicious reports, particularly regarding the purchase of high-value cars by customers with positive screening results.

### 9.2. Legal Persons

Legal persons were misused across multiple jurisdictions to launder proceeds from human trafficking, involving the beneficial owner's personal and business accounts to receive and send multiple high-value

remittances. Analysis indicated that individuals may own one or several legal entities overseas. Some reports focused exclusively on the individual, while others addressed both personal and business accounts, primarily in connection with suspected money laundering.

Potential human trafficking was identified involving previously convicted traffickers who were shareholders of local entities licensed for businesses typically vulnerable to such activities. No suspicious transactions were reported or detected for these entities. However, other incidents indicated suspicion of human trafficking involving individual personal accounts, where the individuals were also beneficial owners of local legal persons with no reported concerns or suspicious transactions. Significant inflows and outflows of funds involving unidentified third parties, as well as the ultimate beneficial owners' domestic and foreign bank accounts, were commonly observed. Transfers of ownership to third parties were also noted.

These companies are frequently licensed to provide services such as marketing, advertising, project management, consultancy, public relations, travel and tour operations, facilities management, hospitality, car rental, and entertainment, including the provision of hostesses for events or the supply of models and security personnel.

Many of the examined legal persons were suspected to be shell entities, used to facilitate and justify the movement of funds from foreign jurisdictions under the pretense of corporate investment by the reported subject owners. Front entities were also observed facilitating logistics and concealing illegitimate proceeds. In some cases, the front entity's transactional activity did not initially raise suspicion, as the movement and purpose of funds appeared consistent with expected business activity. A few other incidents suggested the involvement of front entities and UBOs in migrant smuggling, but these have been excluded from this analysis in accordance with the report's methodology.

### **9.3. Real Estate**

The real estate sector has been possibly exploited during the integration stage of money laundering or potentially as an investment channel. Analysis, particularly from international intelligence sources, has identified transactions involving significant expenditures on luxury items such as cars, boats, jet skis, hotels, airfare, and watches. These activities, combined with investments in the real estate sector and the misuse

of legal entities, have been used to launder proceeds from foreign human trafficking. Additionally, some cases involved transfers directed to real estate entities.

Several individuals suspected of laundering proceeds from human trafficking have been identified as property owners with residency status. These assets may represent proceeds derived from human trafficking activities conducted abroad. However, this connection remains inconclusive due to insufficient supporting data, except in cases where the submitted STR indicates no apparent source of income other than property rentals.

#### **9.4. Virtual Asset Service Providers (VASPS)**

The reviewed cases related to virtual assets involved payments conducted through blockchain platforms and clusters identified as CSAM. Most payments were made by customers purchasing CSAM, while a minority of cases involved subjects of STRs receiving payments, indicating their involvement in child exploitation. In several instances, analysis of customer transactions indicated potential conversions of funds into Bitcoin (BTC) in foreign jurisdictions.

The logo for the Financial Intelligence Unit (FIU) is displayed in a large, light gray font. It consists of the letters 'FIU' in a bold, sans-serif typeface. The letters are slightly shadowed and appear to be floating above a faint, stylized world map that is rendered in a light gray color. The map shows the outlines of continents and is positioned behind the text.

**Case Example 3: Misuse of Spa and Wellness Centers in Human Trafficking**

An investigation by the UAEFIU into **Subject A** was initiated following an inquiry from LEA, which indicated potential misuse of the wellness sector for human trafficking and other illicit activities. Subject A is the beneficial owner of two spa and wellness businesses and has nearly two decades of experience in similar business activities.

One of the businesses is licensed as a men’s spa and is located within an apartment hotel facility, while the other operates as a ladies’ spa and salon at a separate location. The men’s spa had no recorded bank account, whereas the ladies’ spa and salon maintained two bank accounts, both with zero balances and no business transactions, despite active business and social media accounts.

According to the UAEFIU analysis of these business accounts and open-source information, including a review of business social media, the businesses received negative customer reviews. Additionally, one of the businesses shared a similar name with another establishment in a different location that was suspected of involvement in prostitution services. Both businesses were observed to operate primarily in cash, raising suspicions of tax evasion, functioning as fronts for illicit prostitution services, and money laundering.

Despite the businesses' lack of a financial footprint, the beneficial owner maintained multiple personal bank accounts. These accounts showed significant cash deposits, and records from an exchange house indicated that the subject exchanged an Asian currency.

Ultimately, the UAEFIU disseminated a technical report to the relevant LEA.

**Risk indicators:**

1. A single individual maintains multiple bank accounts that receive cash deposits in rounded figures.
2. A licensed business with a visible public presence lacks official corporate bank accounts.
3. Absence of visible banking activity or legitimate inflows to company accounts.
4. Operation of a cash-intensive business, potentially facilitating the commingling of illicit funds with legitimate daily revenues.
5. High risk business activities vulnerable to sexual exploitation.

## 10. DEVELOPED RISK INDICATORS

The UAEFIU has developed a set of risk indicators to assist stakeholders, including reporting entities, in detecting, monitoring, and reporting transactional patterns and activities potentially linked to human trafficking and the laundering of its proceeds. Reporting entities are encouraged to integrate these indicators into their monitoring systems, including the assessment of customer activity, business relationships, and transactions.

It is worth recalling that criminal activity cannot explicitly be concluded based on a single indicator, but rather a combination of these indicators, in order to ascertain such suspicion. These indicators do not provide explicit confirmation of illicit activity. However, the presence of one or more indicators should prompt enhanced scrutiny, additional due diligence, and, where appropriate, the filing of STR/SAR. As human trafficking is a predicate offence to money laundering, these risk indicators may also signal other money laundering-related offenses.

### 10.1. Customer's Profile

1. Positive screening results or adverse media coverage indicate the customer is linked to forced labor, employment scams, false visa advertising.
2. Positive screening results or adverse media coverage indicate the customer is linked to the abuse and exploitation of female minors, online sexual abuse or exploitation of children, the sale of child pornographic materials, or statutory rape.
3. A customer linked via open-sources to adult websites known for prostitution rings or escort services.
4. The customer's name is listed in the wanted list for human trafficking, or has previous convictions for human trafficking or other financial crimes.
5. Customer transacting with counterparties with suspected or known criminal history, or members of organized crime groups.
6. A politically exposed person who is the subject of allegations of human rights violations or has been charged with bribery related to the facilitation of exploitative employment contracts.
7. Business sector commonly associated with potential labor or sexual exploitation (e.g., use of front companies in cleaning or manpower-related sectors, visa facilitation, construction, travel agency, car

rental, spas and beauty centers, consultancy and project management, entertainment service providers, including those offering bartenders, hostesses for events or the supply of models).

## 10.2. Behavioral Activities

8. Heavy reliance on alternative payment methods rather than traditional finance and bank accounts (e.g., credit card, prepaid cards, mobile payment applications, and virtual assets).
9. Accounts with a short operational lifespan, characterized by high initial transactional activity followed by sudden dormancy or closure.
10. A Customer's social media displays a lavish lifestyle inconsistent with the customer profile, or evidence of travel to jurisdictions associated with human trafficking.
11. A customer lacks a fixed address or share an address where multiple individuals with low to moderate income are also living,
12. Groups of individuals sharing residential address or close personal connections, conducting coordinated currency exchanges or transfers to common beneficiaries across several jurisdictions.
13. A common registered mobile number used by multiple customers within reporting entity systems, particularly if these customers share the same nationality or a nationality known to be exploited in unregulated or forced labor.
14. Multiple individuals using shared devices, payment cards, or financial accounts to send transfers to the same beneficiary, particularly where recipients are located in jurisdictions known for vulnerabilities to human trafficking.
15. Transfers between potential mule accounts, or the use of such accounts for payments to advertising, travel, or accommodation service providers, may indicate indirect payment of exploitation-related expenses.
16. A customer accompanied by an individual who appears to control the customer's actions or make financial decisions on their behalf.
17. A third-party exercises control over all customer documents and funds or is directly linked to the customer's transactions.
18. A customer who seems to be avoiding transactions that require document verification.

19. A customer sending funds to a foreign jurisdiction on behalf of a worker, justifying it as salary being paid.
20. Third-party sending without proof of authorization, whereas funds are controlled by the employer rather than the sender.
21. Recruitment of foreign nationals for temporary work arrangements.
22. Potential exploitation through informal employment arrangements.
23. Avoidance of labor protections, such as the absence of work permits or Wage Protection System (WPS) registration, including circumvention of the WPS wage system in favor of cash wage payments, which increases vulnerability and reduces oversight.
24. Companies receive large payments from legitimate clients while workers' wages are consistently delayed, partially paid, or not paid at all.
25. Lack of payments for essential expenses such as food, petrol, utilities and rent.
26. Businesses generating disproportionately high cash turnover relative to their size, staffing levels, or declared services.
27. Transactional activity linked to recruitment or travel arrangements for multiple individuals seeking employment abroad, particularly when conducted through personal accounts rather than licensed recruitment or labor agencies.
28. Transactions often took place in areas known for prostitution activities, in unusual working hours.
29. Use of false corporations and business structures, including shell companies.
30. Uncooperative behavior from the customer, lack of documentation, and individual transactions that are inconsistent with declared income or the customer financial profile.

### **10.3. Account and Transactional Activities**

31. High volume of purchases for low-cost airline tickets (from one or different providers) within a short timeframe.
32. Multiple hotel bookings and use of short-term accommodation providers, such as Airbnb.
33. Unusually high volume of car rental services or public transportation.

34. High-volume expenditures at bars, entertainment venues, pharmacies, grocery stores, and discount retailers are inconsistent with the customer profile or potentially exceed the needs of a single individual.
35. Unusual transactions linked to cash-intensive businesses, beauty salons and clinics, spas and wellness centers.
36. Unusual turnover and transactions that are not consistent with the customer's profile or KYC information.
37. A personal account is potentially used as a funnel account to receive multiple cash deposits from various geographic areas.
38. Individuals acting as intermediaries or transit account holders, receiving funds from several sources and quickly transferring them onward while maintaining minimal account balances.
39. Credit card activity significantly exceeds the subject's declared income and financial profile, with expenditures largely funded through frequent cash deposits of unclear origin.
40. The customer's personal account or credit card is mainly funded through ATM/CCDM cash deposits.
41. Multiple ATM deposits by third parties in the late night or early morning, followed by immediate withdrawal.
42. Multiple small payments were received in the customer account from an unknown individual, along with multiple low-value cash deposits, all of which were immediately withdrawn or made within consecutive days.
43. Funds deposited are quickly moved out of the account via payment methods inconsistent with the account's established purpose.
44. Business owners are making frequent cash withdrawals shortly after receiving client payments.
45. Heavy inflow and outflow of funds from UBO's bank account(s) in the UAE and overseas, combined with multiple transfers to third parties abroad.
46. Circular international transfers lack a clear economic purpose and involve the use of multiple jurisdictions without an apparent commercial rationale.
47. Frequent unexplained transfers or remittances to third parties located in jurisdictions popular for human trafficking (origin, transit, or destination).

48. A group of individuals, whether residents or non-residents, sending high volumes or values of remittances to the same beneficiary in a country known for providing labor and domestic helpers to the UAE.
49. Exchange of different foreign currencies in low amounts with no clear source of funds (by resident or non-resident women).
50. Female customers receive an unusual volume of remittances from unrelated male individuals.
51. A beneficiary has been receiving multiple remittances from individuals with similar characteristics, such as gender, nationality, address, or financial profile.
52. Customers receiving funds from digital content subscription platforms or adult content-related companies.
53. Repeated small-value crypto transactions to adult websites.
54. Virtual asset transactions are linked to identified clusters associated with CSAM or dark web markets.

#### **10.4. Documentation and Customer Due Diligence**

55. No evidence of a customer employment contract or official documents.
56. Significant increase in business revenue/customers' income with no obvious rationale.
57. Account activity is not aligned with the customer's declared income.
58. Lack of transparency and unknown business and ownership structure.
59. Remitters have failed to provide supporting documentation to substantiate the purpose and the beneficiary's relationship.
60. Payments to recruitment agencies or third parties without clear documentation of agreement.
61. Payroll-like payments without a formal payroll structure.
62. Large cash payments are made to purchase gold, real estate, or other high-value items from an unverifiable source.
63. Transaction or activity referred to sourcing domestic workers, housekeepers, or migrant labor while lacking documentation supporting legitimate recruitment arrangements.
64. The use of a personal account to process business-related payments, particularly when the nature of the activity is unclear or unsupported by documentary evidence.

## 11. CONCLUSION

As of this report's conclusion, 185 jurisdictions have joined the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, which supplements the United Nations Convention against Transnational Organized Crime.<sup>28</sup> Over 90% of countries have criminalized trafficking in accordance with the Palermo Protocol.<sup>29</sup> In 2022, global victim detection increased by 25% compared to pre-pandemic levels, and convictions rose by 36% compared to 2020.<sup>30</sup> Despite these advances, many systems continue to face challenges in converting victim identification into effective investigations, prosecutions, and convictions, particularly where victims fear authorities, experience stigma, or anticipate negative consequences.<sup>31</sup> For example, the UNODC (2024) notes that forced labor constitutes a growing proportion of detected trafficking cases. However, labor exploitation remains significantly under-detected, often due to its occurrence in unregulated sectors, victims' lack of awareness of their exploitation, or the complexity of supply chains.

Financial intelligence is essential for disrupting the proceeds of trafficking networks and depriving criminals of illicitly obtained assets. Financial evidence strengthens victim testimony in court by providing actionable intelligence and facilitating the seizure of illegally acquired funds for victim remediation.<sup>32</sup> Additionally, financial intelligence enhances understanding of national risks by identifying high-risk jurisdictions and sector vulnerabilities. In this way, FIUs play a pivotal role in detecting and mitigating human trafficking and its associated financial flows.

This report offers a comprehensive overview of human trafficking typologies that contribute to money laundering, drawing on both global trends and national insights from the UAE. By contextualizing international typologies with domestic risk patterns, the report highlights financial behaviors commonly associated with human trafficking networks, with particular emphasis on their intersection with the UAE's financial and economic landscape.

<sup>28</sup> United Nations Treaty Collection (no date) 12. a Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime. Available at: [https://treaties.un.org/pages/ViewDetails.aspx?src=TREATY&mtdsg\\_no=XVIII-12-a&chapter=18](https://treaties.un.org/pages/ViewDetails.aspx?src=TREATY&mtdsg_no=XVIII-12-a&chapter=18)

<sup>29</sup> MENAFATF (2021).

<sup>30</sup> UNODC (2024).

<sup>31</sup> U.S. Department of State (2024) Trafficking in Persons Report. United States Department of State. Available at: <https://www.state.gov/reports/2024-trafficking-in-persons-report/>.

<sup>32</sup> ECOFEL (2023) Modern Slavery.

Adult sexual exploitation emerged as the most frequently identified human trafficking typology in the analyzed data, both domestically and internationally, followed by vulnerability to labor exploitation. Organized crime groups were particularly associated with multiple schemes involving trafficking in persons across jurisdictions, as well as money laundering. Overall, indicators of money laundering related to human trafficking proceeds appeared more frequently in the analyzed data than direct suspicions of human trafficking.

Multiple official reports and successful cases of detecting and prosecuting human traffickers underscore the importance of domestic coordination among competent authorities, international cooperation, public-private strategic partnerships, and the use of technology to more effectively disrupt human trafficking networks. Specialized training in human trafficking investigation remains essential to further develop the capacity of the UAEFIU stakeholders, particularly, reporting entities.

This analysis developed a set of practical risk indicators intended to assist in identifying, investigating, and reporting suspicious activities related to human trafficking. UAEFIU stakeholders are encouraged to consider these risk indicators and scenarios not only in relation to customers as subjects but also to potential victims, particularly those involved in sending suspected funds and exhibiting indicators of exploitation, coercion, or threats of violence.

Reporting entities are urged to incorporate risk indicators into their monitoring systems and rely more on transactional and behavioral indicators more than adverse media. The included risk indicators in this report should enhance reporting entities' understanding of relevant transactional patterns and contextual risk indicators to detect and suspect customer involvement in human trafficking, whether as perpetrators or victims.

Reporting entities are also encouraged to improve the quality of their reporting on suspicious transactions and activities related to human trafficking, taking into account the following feedback from the analysis of examined reports:

- Use more targeted reasons for reporting, as several reports were filed under broad reasons for reporting (RFR) that pertain to other types of suspicious activity or financial crime, rather than specifically to human trafficking. Some scenarios lacked clear transactional or behavioral indicators to substantiate suspicions of human trafficking, instead aligning with other financial crimes or

generic suspicion. The UAEFIU will update its reporting system to incorporate the risk indicators developed in this report, enabling more direct reporting of human trafficking suspicions.

- Avoid making assumptions based solely on country or nationality, as some examined reports relied on generalized perceptions of higher-risk countries without human trafficking-specific risk indicators or reasonable grounds for suspicion.
- Employ reliable and accurate screening tools, and ensure that positive results are reported with all essential identifiers. Several suspicious reports included potential name matches or common names, but lacked core identifiers (e.g., date of birth).
- Establish substantial suspicions using verifiable sources, particularly when acting on information from external intelligence.
- Avoid duplicate reporting on the same subject unless new information is obtained. In such cases, use the Additional Information File (AIF) or Additional Information File with Transaction (AIFT) instead of submitting a new SAR or STR.



FIU