



25

# keys to unlock

the Financial Chains of Human  
Trafficking and Modern Slavery

Workshop Report | July 2017



# 25 Keys to Unlock the Financial Chains of Human Trafficking & Modern Slavery

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A Report from the Workshop

*Breaking the Financial Chains:  
Disrupting Financial Flows associated with Slavery,  
Human Trafficking, Forced Labour and Child Labour*

30-31 March 2017 | Grace Farms, New Canaan, Connecticut

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# Executive Summary

Human trafficking is both illegal and big business. The International Labour Organization estimates that forced labour, one of the forms of exploitation into which humans are trafficked, generates USD 150 billion a year in revenues, while the Global Slavery Index suggests there may be as many as 45.8 million people enslaved today. Most of the victims are women and girls.

The funds generated by human trafficking are proceeds of crime. Handling those funds can constitute money laundering or, in certain cases where designated terrorist organizations are involved, terrorist financing. Financial institutions that handle funds generated by human trafficking and modern slavery, or that finance businesses that engage in these crimes, thus risk violating a range of existing laws and norms, especially in the area of anti-money laundering (AML) and countering the financing of terrorism (CFT).

## Regulators are watching

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Regulators are paying increasing attention. In the US, Senators Elizabeth Warren (D-Mass.) and Marco Rubio (R-Fla.) introduced a bill to strengthen regulation of the financial sector to reduce its use for human trafficking. Western Union, one of the world's largest money service businesses, entered into a USD 586 million settlement with the US Department of Justice relating to money-laundering for various crimes, including human trafficking. In 2014, the US Financial Crimes Enforcement Network (FinCEN) issued an Advisory on identifying activity that could be indicative of human trafficking and human smuggling. Reporting of relevant suspicious activity subsequently increased by 900 per cent.

Increased awareness is evident elsewhere, too. In 2016, the Canadian Financial Intelligence Unit issued an Operational Alert 'recognizing the money laundering activity of human traffickers in sexual exploitation'. They saw a 500 per cent rise in related reporting between 2015 and 2016, and were able, as a consequence, to help law enforcement locate and rescue numerous

women trapped in sexual exploitation. In 2015, Thai authorities seized assets worth more than USD 1 million from individuals suspected of human trafficking. Brazil has been tackling the role of the financial system in slavery-like practices for several years. And the Dutch FIU has recently undertaken a detailed study, *Project Micri*, looking at how migration-related crimes, including human trafficking, show up in formal financial sector records.

Banks and other financial sector actors are beginning to respond, working with the Thomson Reuters Foundation to form 'Alliances' in North America and Europe. In Canada, the Bank of Montreal initiated a partnership with other financial institutions that works with the country's financial intelligence unit (FINTRAC/CANAFE), law enforcement and civil society organizations to identify and address finances related to sex trafficking through *Project Protect*. And financial sector actors and institutions with over USD 53 trillion under management are supporting reporting on efforts to address human rights risks in supply chains, through the UN Guiding Prin-

principles on Business and Human Rights Reporting Framework.

The problem is also receiving growing attention at the international level. In recent years, the Financial Action Task Force (FATF) and FATF-Style Regional Bodies (FSRBs) have moved to issue “typologies”, helping relevant actors to identify suspicious activities and transactions. These have helped to identify the important role that cash couriers, straw men and cash-intensive businesses typically play in human trafficking networks - and helped banks and other financial intermediaries to spot indicators of such activity. There are now signs that FATF may intensify efforts to encourage the sector to prevent and disrupt human trafficking. FSRBs from Money-

val (in Europe) to the Asia/Pacific Group (APG) on Money Laundering are also engaging, as are regional organizations such as the Council of Europe and ASEAN, with its new Convention on Trafficking in Persons, and the Bali Process. Perhaps the most important regulatory development is the adoption of the first ever UN Security Council Resolution on human trafficking in conflict, in December 2016. UNSCR 2331 (2016) draws particular attention to the role of the financial sector, encouraging action by states, FATF, FRSBs, the UN - and the industry.



# What can the financial industry do?

## *Addressing challenges*

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To help industry actors and regulators think through their options for disrupting ties between the financial sector and human trafficking and modern slavery, UN University convened a workshop at Grace Farms in New Canaan, Connecticut, with the support of the Permanent Mission of Liechtenstein to the United Nations. Participants identified three main areas for action:

### A. Strengthening Sectoral Knowledge Uptake

Participants suggested that industry awareness of its own exposure to, and leverage over, the financial aspects of human trafficking, especially labour trafficking, must increase. This could be achieved through the development of financial typologies, which may lead to indicators and red flags, and to strengthened understanding of how due diligence can guide smart investment decisions in this area. FATF, FSRBs, the Egmont Group and the Wolfsberg Group all have important roles to play here. The financial sector should work with regulators and civil society actors to develop, exchange and take-up relevant knowledge tools. Alliance 8.7 may have a role to play in facilitating such efforts.

#### Keys (summarized)

1. Form a multi-stakeholder Financial Sector Working Group;
2. Accelerate the development, exchange and uptake of knowledge tools, including typologies, risk maps, KYC and due diligence methods, case studies, and training and guidance materials;
3. Research the exposure of different types of financial actors (e.g. banks, correspondent banks, money service businesses, branch staff, public

and private investors, credit risk agencies);

4. Promote 'internal action': nomination of a senior focal point, periodic reporting to the board, addressing human trafficking in annual reports;
5. Exchange lessons learned;
6. Work towards sectoral value cases;
7. Review the 'materiality' of human trafficking and modern slavery risk exposure, for listing purposes;
8. Develop strategies for financial sector engagement with high-risk sectors (palm oil, cocoa, conflict minerals, South-East Asian fisheries, hotel industry, mega-sports event construction).

### B. Improving Regulation, Encouraging Leadership

The industry has only recently begun to face pressure from regulators, customers and shareholders to address these issues. Improved regulation does not necessarily require a radical overhaul, however: the conduct underlying human trafficking and modern slavery is already caught by AML/CFT laws in many jurisdictions, even if not so named. Still, participants identified numerous areas where the industry could harness existing AML/CFT systems to better effect, especially if financial regulators take steps to facilitate it. These could include: adjusting Suspicious Activity Reporting (SAR) arrangements, to increase attention on these issues; changed prosecutorial practice; and facilitating information-sharing. Participants suggested that leadership is needed, both from within the industry and from within law enforcement, to overcome the investigative barriers to identifying, disrupting and preventing the industry's handling of human trafficking proceeds.



## Keys (summarized)

### *Financial intelligence and analysis*

9. Treat human trafficking and modern slavery as potential money-laundering and terrorist financing risks in National Risk Assessments under FATF Special Recommendation 1, and in related discussions;
10. Refine SAR/STR reporting through adjustments to how information relating to human trafficking and modern slavery is collected, analyzed and reported;
11. Encourage civil society organizations to report suspicious activities.

### *Investigation, prosecution and asset recovery*

12. Review laws, protections and incentives for whistle-blowers and reporting;
13. Create inter-agency investigation and enforcement teams to combine information and leverage;
14. Consider joint operational teams to address transnational cases;

15. Explore so-called 'diagonal cooperation', with FIU information-sharing supplementing formal mutual legal assistance;

16. Review how mutual legal assistance arrangements work in these cases;

17. Recover victims' stolen wages and provide other forms of restitution;

18. Earmark seized assets for victim restitution.

### *Motivating leadership*

19. Encourage international mechanisms that report on human trafficking and modern slavery to consider financial sector roles and efforts;

20. Stimulate consumer, shareholder and other stakeholder (e.g. employees) awareness and action;

21. Reward leadership, for example through industry association prizes.



## C. Promoting Information Partnerships

Access to reliable and meaningful information about human trafficking and modern slavery will be key for both the industry and regulators. Participants agreed that the promotion of information partnerships - not only between the industry and regulators, but also including civil society and other actors - is essential. These will help banks develop techniques for conducting due diligence at scale and in a cost-effective way. There are already some promising signs: US banks, for example, have combined customer credit card data with open source information to identify highly suspicious transactions relating to online advertisements for sexual services and nail salons. And innovative information solutions are emerging from both the for-profit market and the non-profit sector. More work may, however, be needed to address the legal barriers and other disincentives to effective information-sharing between regulators, the industry and other information-providers. Some jurisdictions have created provisions facilitating such sharing - such as ss 314a and 314b of the USA PATRIOT Act, and the UK Joint Money-Laundering Intelligence Taskforce (JM-LIT). If effective, such arrangements could be replicated elsewhere. And more attention could be given to ensuring scaled access to effective software and hardware infrastructure for information-sharing.

## Keys (summarized)

22. Adopt effective 'safe harbour' provisions to facilitate information-exchange;
23. Review the effectiveness of existing safe harbour arrangements;
24. Ensure protection of civil society and other actors for sharing information with regulators about human trafficking and modern slavery;
25. Develop scalable, accessible, reliable and safe information-sharing software or infrastructure to allow civil society and other actors operating on the frontlines to share relevant information with the financial sector.



# The Financial Chains of Human Trafficking & Modern Slavery

Human trafficking is both illegal and big business. The International Labour Organization estimates that forced labour, one of the forms of exploitation into which humans are trafficked, generates USD 150 billion a year in revenues, while the Global Slavery Index suggests there may be as many as 45.8 million people enslaved today.<sup>1</sup> Most of the victims are women and girls.<sup>2</sup>

The funds generated by human trafficking are proceeds of crime.<sup>3</sup> Handling those funds can constitute money laundering or, in certain cases where designated terrorist organizations are involved, terrorist financing.<sup>4</sup> In other cases, modern slavery and human trafficking may involve underlying crimes such as kidnapping, enforced disappearances, assault, sexual assault - and often also bribery or corruption.

Financial institutions that handle funds generated by human trafficking and modern slavery, or that finance businesses that engage in these crimes, thus risk violating a range of existing laws and norms, especially in the area of anti-money laundering (AML) and countering the financing of terrorism (CFT). And in handling these finances, the global financial sector risks contributing to, and perpetuating, crimes that retard local, national and regional sustainable development, by excluding victims from participating as consumers, savers, spenders and investors in the economy.<sup>5</sup> Financial actors that facilitate modern slavery and human trafficking

are contributing to an extreme form of inequality, with detrimental effects not only for its victims but the communities around them.

By disrupting illicit financial flows associated with human trafficking and modern slavery, the financial sector may thus make an important contribution to global efforts to promote peaceful and sustainable development, including UN Sustainable Development Goals 1 (end poverty), 5 (gender equality), 8 (decent work), and 16 (peaceful, just and inclusive societies). Yet relatively little attention has been paid to the role of the financial sector in efforts to tackle human trafficking and modern slavery, helping to make these crimes relatively low risk and high reward for perpetrators - and, arguably, for banks, other financial intermediaries and investors.

This is now beginning to change. Slowly, regulators, banks and other financial sector actors are beginning to appreciate these risks - to their own business, to their clients' business, and to people generally - and take action. In the US, Western Union, one of the world's largest money service businesses, entered into a USD 586 million settlement with the US Department of Justice relating to money-laundering for various crimes, including human trafficking.<sup>6</sup> In 2015, Thai authorities seized assets worth more than USD 1 million from individuals suspected of human trafficking. A decade ago, Brazil created a listing system that reduced the financial system

access of those companies benefitting from slavery, though the system has faced challenges in recent years.<sup>7</sup> And in early May 2017, Senators Elizabeth Warren (D-Mass.) and Marco Rubio (R-Fla.) introduced a bill to strengthen regulation of the financial sector to reduce its use for human trafficking.<sup>8</sup>

Banks and other private sector actors are also taking action. In North America and Europe, the Thomson Reuters Foundation-backed Bankers Alliances Against Trafficking (one in North America, one in Europe) have done ground breaking work to raise awareness and initiate training.<sup>9</sup> In the United Kingdom, the Royal United Services Institute - a think-tank with close ties to the UK government - recently published an important report considering the role of financial institutions in disrupting human trafficking and modern slavery.<sup>10</sup> In Canada, the Bank of Montreal initiated a partnership with other financial institutions that works with the country's financial intelligence unit (FINTRAC/CANAFE), law enforcement and civil society organizations to identify and address finances related to sex trafficking through *Project Protect*.<sup>11</sup> And financial sector actors and institutions with over USD 5.3 trillion under management have supported reporting by companies on their efforts to address human rights risks in their supply chains, through the UN Guiding Principles on Business and Human Rights Reporting Framework.<sup>12</sup>

Financial sector regulators and financial intelligence units are also paying ever-closer scrutiny to these issues. In 2014, the US Financial Crimes Enforcement Network (FinCEN) issued an Advisory on identifying activity that could be indicative of human trafficking and human smuggling.<sup>13</sup> Reporting of relevant suspicious activity subsequently increased by 900 per cent. FinCEN is currently considering updating the Suspicious Activity Reports that banks send it when they identify suspicious transactions, to further increase the attention paid to these issues. Similarly, in 2016, FINTRAC/CANAFE issued an Operational Alert 'recognizing the money laundering activity of human traffickers

in sexual exploitation.<sup>14</sup> They saw a 500 percent rise in related reporting between 2015 and 2016, and were able, as a consequence, to help law enforcement locate and rescue numerous women trapped in sexual exploitation. Such financial reporting also lessens the burden on these women during investigation and at trial, because it provides corroborating evidence, reducing the reliance on victim testimony. And the Dutch FIU has recently undertaken a detailed study, *Project Micri*, looking at how migration-related crimes, including human trafficking, show up in formal financial sector records.<sup>15</sup>

The problem is also receiving growing attention at the international level. In recent years, the Financial Action Task Force (FATF) and FATF-Style Regional Bodies (FSRBs) have moved to issue "typologies", helping relevant actors to identify suspicious activities and transactions.<sup>16</sup> These have helped to identify the important role that cash couriers, straw men and cash-intensive businesses typically play in human trafficking networks - and helped banks and other financial intermediaries to spot indicators of such activity.<sup>17</sup> There are now signs that FATF may revisit these issues in some detail, taking into account existing public-private initiatives. FSRBs from Moneyval (in Europe) to the Asia/Pacific Group (APG) on Money Laundering are also engaging, as are regional organizations such as the Council of Europe and ASEAN, with its new Convention on Trafficking in Persons,<sup>18</sup> and the Bali Process.

These efforts have taken on an increased urgency following the adoption of the first ever UN Security Council Resolution on human trafficking, in December 2016. UNSCR 2331 (2016)

*1. Calls upon Member States:*

...

*(c) To investigate, disrupt and dismantle networks involved in trafficking in persons in the context of armed conflict, in accordance with national legislation, including anti-money-laundering, anti-corruption and anti-bribery laws and, where appropri-*

ate, counter-terrorism laws,...

4. Encourages the Financial Action Task Force (FATF) and FATF-Style Regional Bodies (FSRBs) to consider including an analysis of financial flows associated with trafficking in persons that finances terrorism as part of its ongoing work, in close cooperation with CTED, the Analytical Support and Sanctions Monitoring Team and with UNODC;

5. Calls on those Member States who have not yet done so to develop the expertise of their Financial Intelligence Units (FIUs) to analyse cases of trafficking in persons that finance terrorism, and encourages them to work together to develop that capacity, and, in this regard, further encourages Member States and relevant UN entities and other international and regional or-

ganizations to provide other States which may need so, upon their request, with the financial, material and technical assistance that they may require to build the capacity mentioned above;

6. Calls on Member States to consider reinforcing legal and regulatory measures to facilitate the sharing of information, both domestically and internationally, between law enforcement and regulatory actors and the private sector as well as within the private sector, in line with applicable international and national law, to help identify and detect suspicious financial activity related to trafficking in persons that finances terrorism, while also recognizing the need to protect the confidentiality of personal data of victims ...

All of this points to a growing urgency for the financial sector to consider its role in the per-



petuation - and disruption - of modern slavery and to take steps to address it. To assist, United Nations University organized a workshop on *Breaking the Financial Chains* at Grace Farms in New Canaan, Connecticut, with the support of the Permanent Mission of Liechtenstein to the United Nations. The workshop brought together a select group of 100 leaders from the financial sector, financial regulators, investigators and prosecutors, anti-slavery organizations and key practitioners from around the world (listed in the Annex). The workshop aimed to:

- identify good practice in the areas of AML/CFT and compliance, to reduce financial institutions' risk of exposure to human trafficking and modern slavery finances and the risks associated with them;
- connect leaders who will work together and within their organizations to advance efforts

by the financial industry and financial regulators to tackle the scourge of human trafficking and modern slavery;

- identify measures to improve access to reliable and useable data about modern slavery finances, including potential public-private partnerships, and regulatory measures;
- begin to consider the links between AML/CFT due diligence and due diligence in investment and lending, as they relate to modern slavery, human trafficking, forced labour and child labour.

The workshop was held under the Chatham House Rule. Accordingly, this paper summarizes the deliberations and resulting proposals, without attributing any particular statement to specific participants.





# II. Challenges and Responses

Participants at *Breaking the Financial Chains* considered the obstacles that the financial sector faces in its efforts to scale-up and accelerate the enforcement of AML/CFT norms and standards, and related financial regulation, to human trafficking and slavery finances, as well as obstacles to responsible financial investment decisions in accordance with the UN Guiding Principles on Business and Human Rights. In each case, participants also considered how the financial sector, regulators and other stakeholders might address these challenges.

## Limited Understanding – Strengthening Sectoral Knowledge Uptake

Most financial institutions have a limited understanding of the financial aspects of human trafficking and their risk of exposure to modern slavery. There appears to be greater awareness of the risk of sex trafficking than other forms of illegal exploitation such as labour trafficking and domestic servitude. This suggests a need to engage leading financial institutions, especially their compliance officers, to understand how and when they may be handling funds generated by modern slavery, and the associated risks. Participants agreed that financial sector actors need to work together, and with regulators and anti-slavery, anti-trafficking and anti-forced labour organizations, to strengthen sectoral knowledge tools, infrastructure and uptake.

New initiatives, such as the toolkit developed by the European Bankers' Alliance Against Trafficking, are promising.

In the global anti-slavery movement, the increasing sophistication of data is generating important new typologies that may help the financial sector to understand how modern slavery manifests in different contexts.<sup>20</sup> These have, however, focused on the *incidence* of modern slavery crimes themselves, rather than the financial aspects of these crimes. *Financial* typologies, exploring how each of these sub-types of modern slavery show up in formal financial systems, are in their infancy. The development of financial typologies by FATF, supported by the financial industry, the Egmont Group of FIUs and Alliance 8.7 could help the sector to understand what kinds of modern slavery are likely to show up in different contexts and places, how – and what leverage the sector has to address this extreme exploitation.

The risk of exposure to modern slavery is not *only* a compliance question: bank and other financial institution officials (both public and private) involved in investment decisions also need to improve their understanding of how they have leverage over their customers and even other businesses in supply chains to which they are exposed. Financial institutions are only now beginning to appreciate the connections between due diligence for compliance and due dil-

igence for investment and lending. Modern slavery risks have to date largely been the concerns of AML/CFT and other compliance personnel. There is, however, a growing appreciation of how financial actors' corporate responsibility to respect human rights (as defined by the UN Guiding Principles on Business and Human Rights) may also be relevant to their investment and lending decisions. Banks and investors that lend to clients with slavery and labour trafficking in their supply chains may not only face reputational and, potentially liability, risks, but may also confront expectations that they use their leverage within those relationships to mitigate those risks.<sup>21</sup> Participants discussed how, for example, banks are mapping human rights risks in mineral extraction supply chains and using that knowledge not only to 'de-risk' (exit risky business relationships), but also to work with actors in the supply chain to improve respect for human rights, including to prevent forced labour. Here again, typologies may be useful, to assist

banks - and other investors - to understand their potential exposure to slavery, human trafficking, forced and child labour, and to understand how their leverage in certain relationships and sectors may help to prevent such exploitation.

### Limited Incentives - Improving Regulation, Encouraging Leadership

Financial institutions have to date not felt significant pressure - from their customers, from within, or from financial regulators - to focus on these issues. Because financial regulators have not focused attention on this issue, because prosecutors do not often investigate and prosecute these crimes, and because customers do not focus on this issue, financial institutions that may be unwittingly handling funds generated by modern slavery and human trafficking may not care to find out if they are doing so.

Some FIUs, and a few financial regulators, for example in the US, Canada, Brazil and Thailand



are now, however, paying increased attention to these issues in financial regulation. Workshop participants considered in particular how Suspicious Activity Reporting (SAR, also known as Suspicious Transaction Reporting (STR)) might be better refined to facilitate reporting on these crimes. Participants discussed the fact that a wide variety of jurisdictions, including many in Asia, already treat the offences that are typically perpetrated during cases of human trafficking and modern slavery as predicate offences to money laundering. Modern slavery is a 'crime of many crimes' - fraud, assault, theft, kidnapping. Yet few SAR tools offer ways for financial institutions to alert regulators specifically to the potential presence of these crimes.<sup>22</sup> Of those jurisdictions surveyed by participants, only Hong Kong currently has a specific human trafficking 'tick-box' on its SAR form, although a similar proposal is currently being considered by US FinCEN. Such arrangements may help regulators identify human trafficking and modern slavery, and disaggregate different forms of exploitation that are occurring.

Increased attention to these issues will also be more likely, however, if the industry itself shows leadership, if consumers pay more attention to these issues, and as public prosecutions and private litigation increase. Money laundering charges can be incorporated into the human trafficking cases, as they were in a recent case involving Walmart and Target.<sup>23</sup> Where prosecutors are taking action against modern slavery, they face numerous challenges, including the frequently transnational nature of the crime. Some participants suggested that existing Mutual Legal Assistance Treaty (MLAT) frameworks may exacerbate these problems, because they do not incentivize rapid response, despite the ongoing nature of many modern slavery crimes; Joint Investigative Teams (JITs) may provide an alternative solution.<sup>24</sup> One participant suggested that the appropriate response would be to explore the feasibility of creating timelines or even time limits for responding to MLAT requests relating to modern slavery. Asset recov-

ery also poses challenges; but participants also pointed to the potential for cooperative action in this area, for example through the use of existing regional networks and centres of excellence.

### Limited Information - Promoting Information Partnerships

Once financial institutions become interested in these issues, they often discover they have limited access to reliable information on which to assess potentially suspicious transactions. Innovative techniques and methodologies have however been developed, tested and demonstrated in recent years, showing that financial sector actors frequently do hold customer information that relates to these four forms of exploitation, and that they can identify and organize that information at relatively low cost. US banks, for example, have combined customer credit card data with open source information to identify highly suspicious transactions relating to online advertisements for sexual services and nail salons.

At the same time, an effort may be needed to connect financial institutions to reliable sources of data, including data reliably developed and managed by anti-slavery civil society organizations, other leaders in the compliance industry and leading voices on forced labour in supply chains. Participants discussed a range of innovative partnerships under way in the sector to source, aggregate, synthesize, scale and deliver relevant data from civil society and the private sector to financial sector users. These include the Victim Case Management System developed by LibertyAsia, covering 8 countries across Asia and Africa;<sup>25</sup> work by Stop the Traffik; *Project Protect* in Canada; the Thomson Reuters Foundation work mentioned above; and efforts by commercial information providers such as Thomson Reuters (WorldCheck), Palantir, Kroll and others.

Yet organizations that have reliable data may face legal, technical and other obstacles to sharing it. In some countries, defamation, libel,

privacy, confidentiality and other laws may prevent those organizations that have data about human trafficking and slavery from sharing it with financial institutions or regulators. Equally, financial regulators may be prevented from sharing such data with each other, or with regulated financial institutions. Some jurisdictions have created provisions allowing for such sharing - such as ss 314a and 314b of the USA PATRIOT Act, and mixed public-private partnership advisory groups such as the UK Joint Money-Laundering Intelligence Taskforce (JMLIT).<sup>26</sup> There may be a need for other jurisdictions to learn from these approaches. Some banks may, however, be unwilling to participate in such voluntary arrangements, given the lack of legal certainty around them. Some participants at the workshop suggested it could be useful to revisit some of these arrangements, to provide great-

er legal certainty and increase banks' voluntary participation.

Resources are also an important issue: the frontline NGOs working with victims of trafficking, slavery and forced labour generally do not have easy access to or use of software and other tools that would allow low-cost, routine, reliable and safe delivery of relevant data to financial sector users. There may be a need to build a common, open-source infrastructure for such information-sharing, and to think about how effective hardware and software solutions can be made available at scale.



# III. 25 Keys to Unlock the Financial Chains

After extensive deliberations, participants at the workshop presented a range of concrete proposals for strengthened action in, with and by the financial sector to break financial sector links to slavery, human trafficking, forced labour and child labour. These ideas were not presented as consensus 'recommendations', but are nonetheless synthesized here to provide guidance on avenues for potential collaboration to further these efforts.

These '25 Keys to Unlock the Financial Chains of Human Trafficking and Modern Slavery' are addressed to all stakeholders involved with these issues, including banks, other financial institutions (such as money service businesses, private investment firms and agencies, institutional investors, public investment bodies), financial sector regulators, and anti-slavery organizations.

These stakeholders can be found worldwide. Given, however, that estimates suggest a significant majority of contemporary modern slavery cases occur in Asia and Africa, participants encouraged particular attention to engagement with stakeholders in those regions.

## A. Strengthening Sectoral Knowledge Uptake

1. Form a **multi-stakeholder Financial Sector Working Group**, perhaps in the context of Alliance 8.7, to drive forward knowledge and action. Both the Financial Action Task Force, the FATF-

Style Regional Bodies (FSRBs) and the Egmont Group of Financial Intelligence Units have particularly important roles to play in encouraging the development, exchange and uptake of sectoral knowledge products. The Wolfsberg Group could also play a useful role.<sup>27</sup> This Financial Sector Working Group could be global, but particular attention should be paid to participation by actors operating in Africa and Asia, where most victims of modern slavery are found.

2. This Financial Sector Working Group should rapidly accelerate the coordinated development, exchange and uptake of strengthened **knowledge tools** for the sector, particularly:

- a. **typologies** and common terminology;
- b. **sectoral/geographic risk maps**;
- c. **know-your-customer (KYC) and due diligence methods**;
- d. **case studies to showcase best practices**; and
- e. **training and guidance materials** and opportunities.

3. Generate and exchange **research on the exposure of different actors within the global financial sector** - banks, correspondent banks, money service businesses, branch staff, public and private investors, credit risk agencies - to slavery-finance related risks.

4. Encourage financial institutions' leadership

to **prioritize internal action** against human trafficking and modern slavery, for example by:

- a. designating a senior official as a modern slavery/human trafficking '**focalpoint**' to coordinate the organization's response across compliance, investment, procurement, human resources, public relations and other functions;
- b. seeking **periodic reporting** to organizational leadership on risk exposure and response; and
- c. inclusion of relevant information in **annual reports**.

5. Encourage financial sector actors to **share information with each other about what tools and techniques are working** to identify and address human trafficking and modern slavery.

6. Work towards **sectoral value cases** for: 1) divestment from business with high human trafficking and modern slavery risk exposure; and 2) investment in specific anti-trafficking/anti-slavery measures in such businesses. These should build on existing and emerging guidance in the field, such as the guidance on OECD Responsible Business Conduct for Institutional Investors.<sup>28</sup>

7. Conduct a comprehensive review of the '**materiality**' of human trafficking and modern slavery risks for securities listing and related disclosure purposes.<sup>29</sup>

8. Identify, exchange information about, and develop **financial sector engagement strategies for, high-risk sectors** (including palm oil, cocoa, conflict minerals, South-East Asian fisheries, hotel industry, mega-sports event construction).

## B. Improving Regulation, Encouraging Leadership

### *Financial Intelligence Units and analysis*

9. Encourage countries to consider human trafficking and modern slavery as money-laundering and terrorist financing risks in their **national risk assessments (FATF Special Recommendation 1)**, and pay attention to these issues in FATF, FATF-Style Regional Body and Egmont Group

analysis and discussions.

10. Refine **suspicious activity/transaction reporting (SARs/STRs)** on these issues, for example through:

- a. **disaggregation of sex trafficking and labour trafficking** in suspicious transaction reporting analysis. This may be facilitated by including appropriate 'tick boxes' in suspicious transaction reporting forms;
- b. **pattern analysis**, including to identify shifting modern slavery business models;
- c. **feedback to reporting entities**, to explain what kinds of information were useful and why;
- d. **targeted dissemination** to partner agencies at home and, in cross border cases, sharing of information with FIUs abroad; and
- e. **periodic public reporting** by financial intelligence units (FIUs) on information received about modern slavery, and/or the patterns contained in that information.

11. Consider whether **civil society organizations should be authorized or encouraged to report suspicious activities/transactions relating to human trafficking and modern slavery**, to financial intelligence units.

### *Investigation, prosecution and asset recovery*

12. Review whether **whistle-blower laws, protections, incentives and reporting lines** encourage reporting of modern slavery crimes.

13. Consider creating **inter-agency taskforces, teams and inspection groups** to integrate criminal, financial market regulation, labour market regulation, health and social service capabilities and other state capacities, to pool information and strengthen enforcement.

14. Explore the possibility of developing regional or cross-border **Joint Investigative Teams** to address human trafficking financial crimes in specific transnational cases.

15. Review the utility of so-called '**diagonal cooperation**' arrangements such as the EU 'Match3' system, with law enforcement actors encouraging exchange-of-information by FIUs, in human

trafficking and modern slavery investigations.

16. Encourage states and international actors to discuss whether existing **Mutual Legal Assistance Treaty** arrangements pose barriers to effective investigation and prosecution of human trafficking and modern slavery cases, and if so to consider the feasibility of remedies such as the creation of response timelines.

17. Encourage public prosecution, private litigation and administrative action to **recover victims' stolen wages and other forms of restitution**, for example by working with existing regional networks and centres of excellence on asset recovery.

18. Study the possibility of **seized assets being earmarked for victim restitution and support efforts**.

#### *Motivating leadership*

19. Encourage **international reporting** on financial sector action against human trafficking and modern slavery, for example:

- a. in the UN General Assembly review of the *Global Plan of Action to Combat Trafficking in Persons*;
- b. in the upcoming UN Secretary-General's report on follow-up to Resolution 2331 (2016);
- c. by the UN Special Rapporteur on Contemporary Forms of Slavery and the UN Special Rapporteur on Trafficking in Persons;
- d. in the annual US State Department Trafficking in Persons Report;
- e. in relevant regional processes (OSCE, Council of Europe, AU, ASEAN Trafficking in Persons initiative, Bali Process); and
- f. through the UN Principles for Responsible Investment process.

20. Stimulate **awareness and action by consumers, shareholders** and other stakeholders (such as employees), to create pressure on banks and other financial institutions that are handling the proceeds of human trafficking or investing in businesses that profit from modern slavery.

21. Encourage **industry associations to reward**

**leadership** in the sector, for example through the creation of an award at annual gatherings.

#### C. Promoting Information Partnerships

22. Where **safe harbour arrangements** exist, **periodically review their effectiveness**. Do they provide sufficient legal certainty to incentivize voluntary participation?

23. Encourage the **replication of effective 'safe harbour' provisions** such as ss 314a and 314b of the USA PATRIOT Act, to facilitate information-exchange amongst relevant stakeholders.

24. Review whether **statutory measures are required to protect civil society actors** from libel, defamation or other liability risks that chill information-sharing.

25. Develop scalable, accessible, reliable and safe **information-sharing software or infrastructure** to allow civil society and other actors operating on the frontlines to share relevant information with the financial sector. Thought should be given to how and where such an information-exchange infrastructure could be housed to maximize legal protections for those participating.



# Notes

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<sup>1</sup> International Labour Organization (ILO), *Profits and Poverty: The Economics of Forced Labour* (Geneva: ILO, 2014), p.13; Walk Free Foundation, *The Global Slavery Index 2016* (Perth: Walk Free Foundation, 2016). Available from: <http://www.globalslaveryindex.org/findings/>.

<sup>2</sup> The UN Office on Drugs and Crime estimates that 71% of trafficking victims are women and girls. It also found that 96% of detected victims of trafficking for sexual exploitation are female. See UNODC, 2016 Global Report on Trafficking in Persons (Vienna: UNODC, 2016), p.7, 27. Available from: [http://www.unodc.org/documents/data-and-analysis/glotip/2016\\_Global\\_Report\\_on\\_Trafficking\\_in\\_Persons.pdf](http://www.unodc.org/documents/data-and-analysis/glotip/2016_Global_Report_on_Trafficking_in_Persons.pdf) ; Additionally, the International Labour Organization (ILO) estimates that 55% of forced labour victims are female. See ILO, 2012 Global Estimate of Forced Labour (Geneva: ILO, 2012); Polaris, "The Typology of Modern Slavery: Defining Sex and Labor Trafficking in the United States" (Washington DC: Polaris, March 2017). Available from: <https://polarisproject.org/sites/default/files/Polaris-Typology-of-Modern-Slavery.pdf>.

<sup>3</sup> On the definition of trafficking in persons see Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime ('UNTOC'), United Nations, *Treaty Series*, vol. 2237, p. 319; Doc. A/55/383, Article 3. On the treatment of funds arising from such trafficking as proceeds of crime see UNTOC Art. 6.

<sup>4</sup> James Cockayne and Summer Walker, *Fighting Human Trafficking in Conflict: 10 Ideas for Action by the United Nations Security Council* (New York: United Nations University, September 2016). Available from: <https://unu.edu/fighting-human-trafficking-in-conflict>; Anna de Courcy Wheeler, "Modern Slavery and Trafficking in Conflict: The UN's Response" (New York: Freedom Fund, November 2016). Available from: <http://freedomfund.org/wp-content/uploads/UN-trafficking-in-conflict-WEB.pdf>

<sup>5</sup> James Cockayne, *Unshackling Development: Why we need a global partnership to end modern slavery* (New York: United Nations University, December 2015). Available from: <http://freedomfund.org/wp-content/uploads/Unshackling-Development-FINAL-FOR-EMAIL.pdf>

<sup>6</sup> Federal Trade Commission v. The Western Union Company (M.D. Pa. 2017) Available from: [https://www.ftc.gov/system/files/documents/cases/western\\_union\\_consent\\_order\\_final\\_jan2017.pdf](https://www.ftc.gov/system/files/documents/cases/western_union_consent_order_final_jan2017.pdf)

<sup>7</sup> Sarah Pierce, "Blacklisted: An Overview of Brazil's 'Dirty List'", 11 May 2015, available at <http://www.humantraffickingsearch.net/wp1/blacklisted-an-overview-of-brazils-dirty-list>

<sup>8</sup> Fact Sheet, 'End Banking for Human Traffickers Act', 1 May 2017, available at [https://www.warren.senate.gov/files/documents/2017\\_04\\_26\\_EBHT\\_Factsheet.pdf](https://www.warren.senate.gov/files/documents/2017_04_26_EBHT_Factsheet.pdf).

<sup>9</sup> Magdalena Mis, "European banks join drive to combat human trafficking using data," Thomson Reuters Foundation, 9 June 2015. Available from: <http://www.reuters.com/article/us-europe-crime-trafficking-idUSKBN0OP1RM20150609>; Thomson Reuters Foundation, "Manhattan DA Cyrus Vance, Jr., Thomson Reuters Foundation CEO Monique Villa, Top U.S. Financial Institutions Issue White Paper to Combat Human Trafficking using Financial Data," *Thomson Reuters Foundation*, 10 January 2014. Available from: <http://news.trust.org/item/20140110101411-vphyw/>.

<sup>10</sup> Tom Keatinge and Anne-Marie Barry, "Disrupting Human Trafficking: The Role of Financial Institutions," *RUSI Publications*, 14 March 2017, p. 21-22, 26-27. Available from: <https://rusi.org/publication/whitehall-reports/disrupting-human-trafficking-role-financial-institutions>.

<sup>11</sup> Tavia Grant, "Canadian banks, police following money trail to target human trafficking," *The Global and Mail*, 21 February 2017. Available from: <http://www.theglobeandmail.com/news/national/canadian-banks-police-following-money-trail-to-target-human-trafficking/article34093888/>; FINTRAC/CANAFE, "FINTRAC Tactical Intelligence: Project PROTECT," February 2017. Available from: <https://beta.theglobeandmail.com/files/editorial/News/0219-nw-na-trafficking/PROJECT-PROTECT.pdf>; Peter Warrack and Lepa Jankovic, "Raising Awareness About Human Trafficking," *ACAMS Today*, 27 May 2016. Available from: <http://www.acamstoday.org/warrack-jankovic-raising-awareness-human-trafficking/>

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- <sup>12</sup> "UN Guiding Principles Reporting Framework Investor Statement", February 2017, available at <http://www.ungpreporting.org/early-adopters/investor-statement/>
- <sup>13</sup> FinCEN, "Guidance on Recognizing Activity that May be Associated with Human Smuggling and Human Trafficking – Financial Red Flags", FIN-2014-A008, July 2014.
- <sup>14</sup> FINTRAC/CANAFE, "Indicators: The laundering of illicit proceeds from human trafficking for sexual exploitation," FINTRAC-2016-OA003, December 2016.
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- <sup>16</sup> Eastern and Southern Africa Anti-Money Laundering Group, *Typologies Project Report on the Vulnerabilities of Money Laundering Related to Trafficking in Persons in the ESAAMLG Region*, Doc No. ESAAMLG/TFM/XXII, 22 ESAAMLG Task Force of Senior Officials Meeting And 11th Council of Ministers 1-7, September 2011; Asia/Pacific Group On Money Laundering (APG), *APG Yearly Typologies Report: Methods and Trends of Money Laundering and Terrorism*, 14th Annual Meeting, India, 22 July 2011; APG, *APG Yearly Typologies Report: Methods and Trends of Money Laundering and Terrorism*, (Sydney, Australia: APG Secretariat, 17 July 2014); Financial Action Task Force (FATF), *Money Laundering Risks Arising from Trafficking of Human Beings and Smuggling of Migrants*, (Paris: FATF/OECD, July 2011); Select Committee of Experts on the Evaluation of Anti-Money Laundering Measures, "Proceeds from Trafficking in Human Beings and Illegal Migration/Human Smuggling, European Committee on Crime Problems, MONEYVAL 16th Plenary Meeting, Strasbourg, 17-21 January 2005; Australian Transaction Reports and Analysis Centre (AUSTRAC), *Typologies and Case Studies Report 2014* (Commonwealth of Australia, 2014).
- <sup>17</sup> FATF, *Money Laundering Risks Arising from Trafficking*, pp. 32-33.
- <sup>18</sup> See Article 7, Association of Southeast Asian Nations (ASEAN), *Convention Against Trafficking in Persons, Especially Women and Children*, 27th ASEAN Summit, Malaysia, 21 November 2015. Available from: <http://www.asean.org/wp-content/uploads/2015/12/ACTIP.pdf>
- <sup>19</sup> "Co-chairs' Statement," Sixth Ministerial Conference of the Bali Process on People Smuggling, Trafficking in Persons and Related Transnational Crime, Bali, 23 March 2016; "Co-chairs' Statement," Bali Process: Following the Money Forum, Bangkok, 17 May 2016; "Co-chairs' Statement," Second Annual Meeting of the Bali Process Working Group on Trafficking in Persons, Bangkok, 18 May 2016.
- <sup>20</sup> Polaris, "The Typology of Modern Slavery."
- <sup>21</sup> See e.g. Shift, "Supporting Financial Institutions to Implement the Guiding Principles", available at <https://www.shiftproject.org/resources/collaborations/supporting-financial-institutions-implement-guiding-principles/>
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- <sup>23</sup> United States Department of Justice, "Jury Finds Two More Brothers Guilty In Human Trafficking Scheme," 24 February 2015. Available from: <https://www.justice.gov/usao-edpa/pr/jury-finds-two-more-brothers-guilty-human-trafficking-scheme>
- <sup>24</sup> On the relevance of JITs in this field see especially UN Office of the High Commissioner for Human Rights, "International operational-level cooperation with respect to criminal investigation: a short study of the work of Joint Investigation Teams ("JITs") in the European Union", Preliminary Research Project #3 within the project on Business and Human Rights: Enhancing Accountability and Access to Remedy, 27 July 2015, available at [http://www.ohchr.org/Documents/Issues/Business/DomesticLawRemedies/Project6\\_a\\_study\\_JIs\\_in\\_EU.pdf](http://www.ohchr.org/Documents/Issues/Business/DomesticLawRemedies/Project6_a_study_JIs_in_EU.pdf).
- <sup>25</sup> Cambodia, Thailand, Hong Kong, India, Phillipines, Vietnam, Uganda and Kenya.
- <sup>26</sup> Keatinge and Barry, "Disrupting Human Trafficking," p.26, 34.
- <sup>27</sup> <http://www.wolfsberg-principles.com>
- <sup>28</sup> OECD, "Responsible Business Conduct for Institutional Investors: Key Considerations for Due Diligence under the OECD Guidelines for Multinational Enterprises," (Paris: OECD, 2017). Available from: <https://www.oecd.org/corporate/RBC-for-Institutional-Investors.pdf>.
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# Annex I – Workshop Agenda

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Thursday 30 March 2017

**10:20**

## **Introductory session**

**Welcome** – Ms Krishna Patel, Grace Farms Foundation

**Introduction** – Dr James Cockayne, United Nations University

**10:40**

## **Session 1 – Understanding the financial chains**

### **Moderator**

Dr James Cockayne, United Nations University

### **Keynote: What do we know about the risks for the financial sector?**

Mr Tom Keatinge, Royal United Services Institute

### **Identifying the financial footprint of human trafficking**

Mr Barry Koch, Former Counsel to the Investigation Division, New York County District Attorney's Office

### **Brazil's effort to break the links between banks and slavery**

Dr Rafael de Araújo Gomes, Coordinator, Financial Industry Working Group, Brazilian Labour Prosecution Service

### **The challenge of breaking the financial chains**

Mr Duncan Jepson, LibertyAsia

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**12:30                      Session 2 - Developing new approaches**

**Project Protect**

Mr Peter J. Warrack, Bank of Montreal and Mr Peter Aubin, FINTRAC/  
CANAFE

**Improving access to - and use of - data and information**

Mr Steve Farrer, LibertyAsia

**An intelligence led approach**

Mr Bill Peace, Representative from Stop the Traffik

**What can we learn from a victim hotline?**

Ms Jennifer Kimball Penrose, Polaris

Moderated discussion, considering questions such as:

- Is there data and information available that is not being best used? Why not?
- What other data and information is needed? How can it get where it needs to?
- What partnerships or other changes (e.g. legislative changes) are needed to optimize data use?

**14:30                      Session 3 - What role can FIUs & other AML stakeholders play?**

**Moderator**

Mr Daniel Thelesklaf, Liechtenstein FIU and Chair, Moneyval

**FIUs and where they fit in**

Mr Jérôme Beaumont, Egmont Group of Financial Intelligence Units

**Financial flows associated with migration-related crime**

Ms Eline de Groen, Netherlands FIU

**How do existing compliance regimes address slavery, human trafficking  
and forced and child labour?**

Ms Archana Kotecha, LibertyAsia

**What challenges face FIUs? What new opportunities are emerging?**

Mr René Brülhart, AIF

**What role, if any, is there for the UN?**

Ms Delphine Schantz, UN Counter-Terrorism Committee Executive Directorate

Moderated discussion, considering these questions:

- What is needed to help regulators and FIUs be more effective?
- Is there a need for stronger guidance, typologies, or analysis?
- How can regulators and FIUs work more effectively with financial institutions?
- Where do other actors, such as NGOs, fit in?
- Are regulators making the best use of available technologies?
- How do questions of de-risking fit in?

Thursday 30 March 2017

**14:30                      Session 4 - Investigation, prosecution, and litigation**

**Moderator**

Ms Krishna Patel, Grace Farms Foundation

**The role of public prosecutors in breaking the financial chains**

Mr Luis C. deBaca, former US Ambassador on Trafficking in Persons

**'Following the Money' - Guidance from the Bali Process**

Ms Rebecca Mills, Australian Government Attorney-General's Department

**Is there a role for private attorneys-general - and litigation?**

Ms Martina Vandenberg, Human Trafficking Pro Bono

Moderated discussion, considering questions such as:

- Where do law enforcement actors fit into this discussion?
- How does the incorporation of other data sources into financial sector due diligence impact law enforcement?
- What kinds of partnerships may be useful here?
- Are other fixes (such as regulatory change) needed?

Friday 31 March 2017

**10:00                      Session 5 - Investment risks and due diligence**

**Moderator** – Amb Christian Wenaweser, Permanent Mission of Liechtenstein to the UN

**How should investors manage the risks associated with slavery, forced labor, child labor and human trafficking?**

Ms Rachel Davis, Shift

**The Dutch sector approach to human rights risks**

Ms Maria Anne Van Dijk, ABN Amro

**Investor Activism**

Mr Kilian Moote, Know the Chain

**11:00                      Session 6 - Breakout Groups**

**Introduction** – Dr James Cockayne, United Nations University

**Group 1: Strengthening data partnerships - What can we do, now, to improve access to and use of data through collaboration and partnership?**

Moderator: Dr James Cockayne

**Group 2: Enforcing the law - What concrete steps would strengthen the enforcement of relevant laws?**

Moderator: Ms Krishna Patel

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**Group 3: Improving international compliance - How can states - particularly FIUs & others in compliance- work together on these issues?**

Moderator: Mr Daniel Thelesklaf

**Group 4: Engaging public and private investors - How will investors - public and private - become engaged?**

Moderator: Ms Rachel Davis

**14:00                      Session 7 - Reporting back from groups, discussion, take-aways**

**Led by Dr James Cockayne, United Nations University**

Reports from each breakout group. Moderated discussion. Development of workshop outcome / recommendations.

**15:45                      Close**

# Participant List

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**Ms Sofia Grace Angeles**  
UN Office on Drugs and Crime

**Mr Scott Apodaca**  
Western Union

**Dr Rafael de Araújo Gomes**  
Brazilian Labour Prosecution Service

**Mr Brian Aryai**  
Icon Compliance Services

**Ms Serwah Asante**  
United Nations University

**Mr Peter Aubin**  
Canada FINTRAC

**Ms Deborah Ayis**  
United Nations Counter-Terrorism  
Committee Executive Directorate

**Mr Jérôme Beaumont**  
Egmont Group

**Mr Audley Bell**  
World Vision International

**Mr Kevin Blagg**  
International Justice Mission

**Ms Julia Blocher**  
United Nations University

**Ms Michele Bongiovanni**  
HealRWorld

**Mr Craig Bowling**  
Homeland Security Investigations

**Mr Brad Brooks-Rubin**  
Enough! Project

**Mr René Brühlhart**  
Autorità di Informazione Finanziaria (AIF)/  
Vatican City State

**Ms Kristen Carey**  
US Bancorp Fund Services

**Ms Alexandra Cerquone**  
United Nations University

**Ms Yu Ping Chan**  
UN Office on Drugs and Crime

**Mr Michael Chen**  
Chen & Associates

**Mr Mark Christopher**  
Blackpeak

**Mr Mark Clookie**  
International Justice Mission

**Dr James Cockayne**  
United Nations University

**Ms Sara Crowe**  
Polaris Project

**Ms Rachel Davis**  
Shift

**Ms Ruth Dearnley**  
Stop the Traffik

**Mr Luis deBaca**  
Former US Ambassador for Trafficking in  
Persons

**Drs Margriet van Diggelen**  
Netherlands National Public Prosecutor's  
Office

**Ms Maria Anne van Dijk**  
ABN AMRO

**Mr Matthew Diserio**  
Water Asset Management

**Ms Brooke Estridge**  
Liberty Asia

**Ms Eliza Eubank**  
Citi

**Mr Steve Farrer**  
Liberty Asia

**Ms Marcella Fava**  
FAVA Advisors

**Mr Howard Fields**  
Mastercard International

**Ms Theresa Forbes**  
US FinCEN and Homeland Security Investigations

**Ms Marcy Forman**  
Citi

**Ms Patricia Gaeta**  
Standard Chartered

**Mr Mahdi Ghandhari**  
Icon Compliance Services

**Mr Ajit Gokhale**  
Palantir Technologies

**Ms Bonnie Goldblatt**  
Citi

**Ms Eline de Groen**  
Netherlands National Police

**Mr Sam Grout-Smith**  
Permanent Mission of the United Kingdom  
to the UN

**Ms Katie Henke**  
Winrock International

**Ms Carolina Henriquez-Schmitz**  
Thomson Reuters Foundation

**Ms Alexandra Huff**  
HSBC Bank USA

**Mr David Jeffries**  
Huntington International Bank

**Mr Duncan Jepson**  
Liberty Asia

**Mr Glenn Johnston**  
Kroll

**Mr Tom Keatinge**  
Royal United Services Institute

**Mr Kenneth Kennedy**  
US Department of Homeland Security

**Mr Rod Khattabi**  
Grace Farms Foundation

**Ms Jennifer Kimball Penrose**  
Polaris Project

**Mr Phil Kittock**  
C4ADS

**Mr Barry Koch**  
Former Counsel to the Investigation Division  
New York County District Attorney's Office

**Ms Archana Kotecha**  
LibertyAsia

**Mr Robert Kushen**  
Porticus

**Father Roger Landry**  
Permanent Observer Mission of the Holy See  
to the UN

**Ms Sophia Lin**  
International Corporate Accountability  
Roundtable

**Ms Aida Marcial**  
Kroll

**Mr Daniel Margolis**  
Ellington Management Group

**Mr Joseph Mari**  
Netherlands National Public Prosecutor's  
Office



**Ms Rebecca Mills**  
Australian Government Attorney-General's  
Department

**Mr Peerapol Monchaigul**  
Anti-Money Laundering Office, Thailand

**Mr Kilian Moote**  
KnowTheChain

**Mr Stevenson Munro**  
Standard Chartered

**Ms Kathrin Nescher**  
Permanent Mission of Liechtenstein to the  
UN

**Ms Benedicte Nolens**  
Hong Kong Securities & Futures Commission

**Mr Jason Nunn**  
Stop the Traffik

**Ms Julie Oppermann**  
United Nations University

**Ms Krishna Patel**  
Grace Farms Foundation

**Mr Bill Peace**  
Stop the Traffik

**Mr Matt Porio**  
Lucas & Associates

**Ms Sharon Prince**  
Grace Farms Foundation

**Mr Brian Romer**  
Thomson Reuters Labs

**Ms Amanda Roth**  
United Nations University

**Mr Giorgi Rtskhiladze**  
Silk Road Group / Toroil Group

**Mr Sajachai Sangsaeyo**  
Anti-Money Laundering Office, Thailand

**Ms Delphine Schantz**  
United Nations Counter-Terrorism Commit-  
tee Executive Directorate

**Mr Richard Schechter**  
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**Ms Satori Shimizu**  
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**Mr Graham Sinclair**  
SinCo

**Ms Ines Sofia de Oliveira**  
Central Bank of Portugal

**Mr Daniel Thelesklaf**  
Liechtenstein FIU

**Ms Paige Thomas**  
Huntington International Bank

**Mr David Thompson**  
Deloitte

**Mr Brian Ulicny**  
Thomson Reuters

**Ms Martina Vandenberg**  
Human Trafficking Pro Bono Legal Centre

**Ms Hennie Verbeek-Kusters**  
Netherlands FIU

**Mr Peter Warrack**  
Bank of Montreal

**Amb. Christian Wenaweser**  
Permanent Mission of Liechtenstein to the  
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**Mr Martin Witteveen**  
Netherlands National Public Prosecutor's  
Office

**Ms C.J. (Karin) Zweers**  
Netherlands National Public Prosecutor's  
Office

## Annex II – UN Security Council Resolution 2331 (2016)

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Adopted by the Security Council at its 7847th meeting, on 20 December 2016

*The Security Council,*

*Recalling* Presidential Statement 2015/25,

*Taking note* of the Secretary-General's reports S/2016/949, as well as S/2015/203 and S/2016/361,

*Recalling* its primary responsibility for the maintenance of international peace and security, in accordance with the Charter of the United Nations,

*Recalling* the United Nations Convention against Transnational Organized Crime, and its Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, which includes the first internationally agreed definition of the crime of trafficking in persons and provides a framework to effectively prevent and combat trafficking in persons, and further recalling the United Nations Global Plan of Action to Combat Trafficking in Persons,

*Recognizing* that trafficking in persons in areas affected by armed conflict and post-conflict situations can be for the purpose of various forms of exploitation, including exploitation of the prostitution of others or other forms of sexual exploitation, forced labour, slavery or practices similar to slavery, servitude or the removal of organs; further recognizing that trafficking in persons in armed conflict and post-conflict situations can also be associated with sexual violence in conflict and that children in situations of armed conflict and persons displaced by armed conflict, including refugees, can be especially vulnerable to trafficking in persons in armed conflict and to these forms of exploitation,

*Reiterating* the critical importance of all Member States fully implementing relevant Security Council resolutions, including resolutions 2195 (2014) and 2253 (2015), which express concern that terrorists benefit from transnational orga-

nized crime in some regions, including from the trafficking in persons among others, as well as 2242 (2015), which expresses concern that acts of sexual and gender-based violence are known to be part of the strategic objectives and ideology of certain terrorist groups; and recognizing the connection between trafficking in persons, sexual violence and terrorism and other transnational organized criminal activities, which can prolong and exacerbate conflict and instability or intensify its impact on civilian populations,

*Expressing* deep concern that acts of sexual and gender-based violence, including when associated to trafficking in persons, are known to be part of the strategic objectives and ideology of certain terrorist groups, used as a tactic of terrorism and an instrument to increase their finances and their power through recruitment and the destruction of communities, as described in the relevant Secretary-General's Reports; that trafficking in persons, in particular women and girls, remains a critical component of the financial flows to certain terrorist groups; and that, when leading to certain forms of exploitation, is being used by these groups as a driver for recruitment,

*Recognizing* that trafficking in persons entails the violation or abuse of human rights, and underscoring that certain acts or offences associated with trafficking in persons in the context of armed conflict may constitute war crimes; and recalling further the responsibilities of States to end impunity and to prosecute those responsible for genocide, crimes against humanity, war crimes as well as other crimes and the need for States to adopt appropriate measures within their national legal systems for those crimes for which they are required under international law to exercise their responsibility to investigate and prosecute,

*Expressing* solidarity with victims of trafficking in persons, including victims of trafficking in persons in armed conflict and post-conflict situations and in humanitarian crisis derived from them; noting in this regard the importance of assistance and services for the physical, psychological and social recovery, rehabilitation and reintegration; recognizing the extreme trauma experienced by the victims of trafficking in persons in the context of armed conflict and sexual violence in conflict, and that humanitarian organizations should consider this vulnerability in humanitarian planning,

*Reaffirming* that trafficking in persons in the context of armed conflict, especially women and girls, cannot and should not be associated with any religion, nationality, or civilization,

*Emphasizing* the importance of engaging religious and traditional leaders, paying particular attention to amplifying the voices of women and girls alongside men and boys, with the objective of countering terrorism and violent extremism which can be conducive to terrorism, refuting the justification of trafficking in persons in the context of armed conflict and sexual or other violence in conflict, addressing the stigmatization suffered by survivors and facilitating their return and reintegration in families and communities,

*Recalling* all its resolutions on children and armed conflict that call for the protection of children affected by armed conflicts; condemning all violations and abuses against children in armed conflict and noting in particular that the recruitment and use of children in violation of applicable international law by parties to armed conflict can be associated with trafficking in persons; expressing grave concern over the high numbers of girls and boys among persons trafficked in armed conflict and their heightened vulnerability to violations and abuses, including girls and boys who are forcibly displaced by armed conflict, particularly when separated from their families or caregivers,

*Recalling* resolution 2249 (2015), in which the Se-

curity Council condemns in the strongest terms the gross, systematic, and widespread abuses of human rights and violations of international humanitarian law by ISIL (also known as Daesh), and resolution 2253 (2015), in which the Security Council condemns in the strongest terms abductions of women and children, including by ISIL, ANF, and associated individuals, groups, undertakings and entities, expresses outrage at their exploitation and abuse, including rape and sexual violence, forced marriage, and enslavement by these entities, and notes that any person or entity who transfers funds to ISIL directly or indirectly in connection with such exploitation and abuse would be eligible for listing by the Security Council Committee established pursuant to resolutions 1267 (1999), 1989 (2011) and 2253 (2015) concerning ISIL (Da'esh), Al-Qaida and associated individuals, groups, undertakings and entities,

*Noting with concern* the criminal misuse of information and communications technologies, particularly the Internet, to facilitate the trafficking of persons, in particular the sale and trade, by certain terrorist groups and emphasizing the importance of countering such use as part of counter-terrorism efforts while respecting human rights and fundamental freedoms and in compliance with other obligations under international law,

1. *Condemns* in the strongest terms all instances of trafficking in persons in areas affected by armed conflicts, and stresses that trafficking in persons undermines the rule of law and contributes to other forms of transnational organized crime, which can exacerbate conflict and foster insecurity and instability and undermine development;

2. *Calls upon* Member States:

a) That have not yet done so, to consider as a matter of priority ratifying or acceding to and to fully implement the United Nations Convention Against Transnational Organized Crime and its Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially

Women and Children, as well as all relevant international instruments;

b) To take decisive and immediate action to prevent, criminalize, investigate, prosecute and ensure accountability of those who engage in trafficking in persons, including in the context of armed conflict, in which it is particularly important that evidence of such crimes be collected and preserved so that investigations and prosecutions may occur;

c) To investigate, disrupt and dismantle networks involved in trafficking in persons in the context of armed conflict, in accordance with national legislation, including anti-money-laundering, anti-corruption and anti-bribery laws and, where appropriate, counter-terrorism laws, and underscores in this regard the importance of international law enforcement cooperation, including with respect to investigation, documentation, and prosecution of trafficking cases, calls in this regard for the continued support of the United Nations Office on Drugs and Crime (UNODC) and other relevant United Nations entities, and international and regional bodies, including INTERPOL, as appropriate, in providing technical assistance upon request and within their existing mandates, and encourages Member States to consider establishing jurisdiction in line with article 15 of the UN Convention against Transnational Organized Crime;

d) To implement robust victim, and possible victim, identification mechanisms and provide access to protection and assistance for identified victims without delay, also in relation to trafficking in persons in armed conflict, including where such victims are refugees and internally displaced persons (IDPs), and to address comprehensively victims' needs, including the provision of or access to medical, psychosocial assistance and legal aid, as well as ensure that victims are treated as victims of crime and in line with domestic legislation not penalized or stigmatized for their involvement in any unlawful activities in

which they have been compelled to engage; calls in this regard for the continued support of UNODC and other relevant United Nations entities, including UNHCR, as well as international and regional bodies, including IOM, in assisting Member States, upon request, with identification of and assistance to trafficking victims;

3. *Encourages* Member States to:

a) Build strong partnerships with the private sector and civil society, including local women organizations, and to redouble their efforts by encouraging these actors to provide information helping to identify, disrupt, dismantle and bring to justice individuals and networks involved in trafficking in persons in areas affected by armed conflict, including by training relevant officials such as law enforcement personnel, border control officers, labour inspectors, consular or embassy officials, judges and prosecutors and peacekeepers to identify indicators of trafficking in persons in areas affected by armed conflict in supply chains;

b) Consider that in some circumstances trafficking in persons in armed conflict in all its forms and sexual violence in conflict can cause large movements of refugees and migrants; recalls the Convention Relating to the Status of Refugees and/or its Protocol relating to the Status of Refugees; and furthermore urges that all refugee-receiving countries provide information on the services available to victims of trafficking and sexual violence survivors, ensure sustainable psychosocial support and provide survivors with the option to document their cases for future legal action to hold traffickers accountable, and that due consideration is given to clarifying and securing the legal status of undocumented refugee children, including refugee children conceived as a result of sexual violence or exploitation, to avoid situations of possible statelessness;

4. *Encourages* the Financial Action Task Force

(FATF) and FATF-Style Regional Bodies (FSRBs) to consider including an analysis of financial flows associated with trafficking in persons that finances terrorism as part of its ongoing work, in close cooperation with CTED, the Analytical Support and Sanctions Monitoring Team and with UNODC;

5. *Calls on* those Member States who have not yet done so to develop the expertise of their Financial Intelligence Units (FIUs) to analyse cases of trafficking in persons that finance terrorism, and encourages them to work together to develop that capacity, and, in this regard, further encourages Member States and relevant UN entities and other international and regional organizations to provide other States which may need so, upon their request, with the financial, material and technical assistance that they may require to build the capacity mentioned above;

6. *Calls on* Member States to consider reinforcing legal and regulatory measures to facilitate the sharing of information, both domestically and internationally, between law enforcement and regulatory actors and the private sector as well as within the private sector, in line with applicable international and national law, to help identify and detect suspicious financial activity related to trafficking in persons that finances terrorism, while also recognizing the need to protect the confidentiality of personal data of victims;

7. *Recalls* its decision, in resolution 1373 (2001) that all Member States shall ensure that any person who participates in the financing, planning, preparation or perpetration of terrorist acts or in supporting terrorist acts is brought to justice, urges all States to ensure that their domestic laws and regulations establish serious criminal offenses sufficient to provide the ability to prosecute and penalize in a manner duly reflecting the seriousness of the offence of trafficking in persons committed with the purpose of supporting terrorist organizations or individual terrorists, including through the financing of and recruitment for the commission of terrorist acts;

8. *Stresses* that acts of trafficking in persons in armed conflict and sexual and gender-based violence in conflict, including when it is associated to trafficking in persons in armed conflict, can be part of the strategic objectives and ideology of, and used as a tactic by certain terrorist groups, by, inter alia, incentivizing recruitment; supporting financing through the sale, trade and trafficking of women, girls and boys; destroying, punishing, subjugating, or controlling communities; displacing populations from strategically important zones; extracting information for intelligence purposes from male and female detainees; advancing ideology which includes the suppression of women's rights and the use of religious justification to codify and institutionalize sexual slavery and exert control over women's reproduction; and therefore encourages all relevant actors at the national, regional and international level to ensure that such considerations are taken into account, in accordance with their obligations under international law and national laws;

9. *Underlines* further that achieving the strategic objectives noted above may entail the use of various forms of sexual violence in conflict, also when associated with trafficking in persons in the context of armed conflict, including, inter alia, rape, sexual slavery, forced prostitution and forced pregnancy, and notes that these different forms of sexual violence in conflict may require tailored programmatic responses including specialized medical and psychosocial assistance and analysis as a basis for action;

10. *Affirms* that victims of trafficking in persons in all its forms, and of sexual violence, committed by terrorist groups should be classified as victims of terrorism with the purpose of rendering them eligible for official support, recognition and redress available to victims of terrorism, have access to national relief and reparations programmes, contribute to lifting the sociocultural stigma attached to this category of crime and facilitate rehabilitation and reintegration efforts; furthermore emphasizes that survivors should benefit from relief and recovery pro-

grammes, including health care, psychosocial care, safe shelter livelihood support and legal aid and that services should include provision for women with children born as a result of wartime rape, as well as men and boys who may have been victims of sexual violence in conflict, including when it is associated with trafficking in persons in armed conflict;

11. *Condemns* all acts of trafficking, particularly the sale or trade in persons undertaken by the "Islamic State of Iraq and the Levant" (ISIL, also known as Da'esh), including of Yazidis and other persons belonging to religious and ethnic minorities, and condemns also any such trafficking in persons and violations and other abuses committed by Boko Haram, Al-Shabaab, the Lord's Resistance Army, and other terrorist or armed groups for the purpose of sexual slavery, sexual exploitation, and forced labour, recognizes the importance of collecting and preserving evidence relating to such acts in order to ensure that those responsible can be held accountable, and notes that such acts may also contribute to the funding and sustainment of such groups or to serve other strategic objectives as outlined in paragraph 5 above;

12. *Expresses* its intention to consider targeted sanctions for individuals and entities involved in trafficking in persons in areas affected by armed conflict and in sexual violence in conflict, and encourages information exchange and other appropriate forms of cooperation between relevant United Nations entities, including the Special Representative on Sexual Violence in Conflict and the Special Representative on Children in Armed Conflict, within their respective mandates, regarding initiatives and strategies to curb trafficking in persons in the context of armed conflict;

13. *Expresses further* its intention to integrate the issue of trafficking in persons in the areas affected by armed conflict and sexual violence in conflict into the work of relevant sanctions committees where in accordance with their mandates, and to ensure that sexual violence in

conflict expertise, including when it is associated with trafficking in persons in the context of armed conflict consistently informs the work of sanctions committees, and further expresses its intention to invite the Special Representatives of the Secretary-General on Sexual Violence in Conflict and on Children and Armed Conflict to brief these sanctions committees, as necessary, in accordance with the Committee's rules of procedure, and to provide relevant information including, if applicable, the names of individuals involved in the trafficking in persons who may meet the committees' designation criteria;

14. *Requests* the Analytical Support and Sanctions Monitoring Team, when consulting with Member States, to include in their discussions the issue of trafficking in persons in the areas of armed conflict and the use of sexual violence in armed conflict as it relates to ISIL (also known as Da'esh), Al-Qaida and associated individuals, groups, undertakings and entities and to report to the Security Council Committee established pursuant to resolutions 1267 (1999), 1989 (2011) and 2253 (2015) on these discussions as appropriate;

15. *Encourages* Member States to ensure that existing national strategic frameworks and national action plans against trafficking in persons national action plans and other planning frameworks on women and peace and security, developed through broad consultations, including with civil society, and comprehensive and integrated national counter-terrorism strategies are complementary and mutually reinforcing;

16. *Requests* the Counter-Terrorism Committee Executive Directorate (CTED), within its existing mandate, under the policy guidance of the Counter-Terrorism Committee (CTC), and in close cooperation with UNODC and other relevant entities, to include in CTED's country assessments, as appropriate, information regarding Member States efforts to address the issue of trafficking in persons where it is committed for the purpose of supporting terrorism, including through the financing of or recruitment for the commission of terrorist acts;

17. *Encourages* UNODC and other relevant United Nations entities, including UNHCR and UNICEF, and other international and regional bodies, including INTERPOL and the International Organization for Migration (IOM), to continue supporting upon request, in accordance with their respective mandates and expertise, Member States efforts to develop such capabilities, including through the exchange of information and the strengthening of networks for regional and international cooperation in relation to trafficking in persons in areas affected by armed conflict; and in this regard, encourages further the above-mentioned entities and bodies to train their personnel to prevent and respond appropriately to trafficking in persons in areas affected by armed conflict in all its forms and sexual violence in conflict; support the tracking and identification of individuals and groups responsible for the trafficking in persons in the context of armed conflict; share relevant information to ensure accountability; enhance cooperation in documentation, extradition and legal assistance and enhance public awareness to combat trafficking in persons in armed conflict, including when it is associated with sexual violence in conflict and facilitate accountability;

18. *Takes note with appreciation* of the efforts undertaken by the Special Representative on Sexual Violence in Conflict and the Team of Experts on Rule of Law and Sexual Violence in Conflict to strengthen monitoring and analysis of sexual violence in conflict, including when associated with trafficking in persons in armed conflict and post-conflict situations, used as a tactic of war and also as a tactic by certain terrorist groups, as well as in seeking concrete and time-bound commitments and implementation plans by all parties to conflict to prevent and address such crimes in line with resolutions 1960 and 2106, and encourages a more systematic approach and the acceleration of such efforts; furthermore requests information, as appropriate, on practical measures undertaken by parties to the conflict pursuant to the above-mentioned commitments and implementation plans;

19. *Further encourages* Member States to provide training to all peacekeeping personnel to be deployed in UN peace operations in conflict and post-conflict zones on responding to trafficking in persons in the context of armed conflict, gender expertise, sexual exploitation and abuse prevention and assessing sexual violence in conflict as a component of predeployment training, and to ensure that this consideration is integrated into the performance and operational readiness standards against which troops are assessed;

20. *Urges* relevant UN agencies operating in humanitarian crises derived from armed conflict and post-conflict situations to ensure, in accordance with their respective mandates, that the risk of trafficking in persons in armed conflict is considered in protection of civilians and humanitarian needs assessments, that they build their technical capacity to assess situations for instances of trafficking in persons in armed conflict and that they work together to identify, prevent and respond effectively to victims of trafficking; and calls upon the Inter-Agency Standing Committee to strengthen the humanitarian community's response to addressing trafficking in persons in armed conflict and exploitation during a crisis through existing protection mechanisms and programming;

21. *Invites* the Secretary-General to integrate, when relevant, the issue of trafficking in persons in the context of armed conflict and post-conflict situations in all its forms as a factor in conflict prevention strategies, conflict analysis, integrated missions' assessment and planning, peacebuilding support and humanitarian response; requests that relevant mission and thematic reporting to the Security Council includes information relating to trafficking in persons in the context of armed conflict and recommendations to address it; requests further that the Secretary-General takes steps to improve the collection of data, monitoring and analysis of trafficking in persons in the context of armed conflict, in order to better identify and prevent its incidence;

22. *Welcomes further* briefings on trafficking in persons in armed conflict, as necessary, by relevant United Nations entities, including the Executive Director of UNODC, and other international and regional bodies such as IOM; and encourages further consideration of the perspective and experience of civil society representatives, in particular of survivors of trafficking in persons in armed conflict, in briefings to the Security Council in relevant country-specific considerations and thematic areas, in accordance with established practice and procedure;

23. *Requests* the Secretary-General to follow up the implementation of this resolution and report, within twelve months, on strengthening coordination within the United Nations system, including through the United Nations' Inter-Agency Coordination Group against Trafficking in Persons (ICAT), to prevent and counter trafficking in persons in armed conflict in all its forms, and to protect those affected by

armed conflict at risk of being trafficked, especially women and children; and further requests that this report also consider, inter alia, options for: strengthening efforts by existing subsidiary bodies of the Security Council, Security Council-mandated peacekeeping operations and special political missions, in accordance with their respective mandates, as well as by Member States; data on geographical areas, routes or locations where patterns of trafficking in persons in armed conflict are being developed, in coordination with all relevant UN entities; and recommendations for UN agencies to mitigate the risk of contributing to trafficking in persons in armed conflict through procurement and supply chains;

24. *Decides* to remain actively seized of this matter.



# Photo Credits

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## Page 3

'Burmese Migrant on a Thai Boat'

© ILO/Thierry Falise

November 2005

Vichai, 27, is a Burmese migrant working on a Thai boat.

## Page 5

Security Council Debates Human Trafficking in Conflict Situations

20 December 2016, United Nations, New York, USA

Nadia Murad Basee Taha (left), UNODC (UN Office on Drugs and Crime) Goodwill Ambassador for the Dignity of Survivors of Human Trafficking, addresses the Security Council ministerial open debate on the theme "Trafficking in persons in conflict situations". At her side is Ameena Saeed Hasan, civilian activist for the Yazidi women's rights.

## Page 7

© Vanessa Van Ryzin

30 March 2017, Connecticut, USA

A two-day workshop, *Breaking the Financial Chains: Disrupting Financial Flows associated with Slavery, Human Trafficking, Forced Labour and Child Labour*, convened at Grace Farms in New Canaan, Connecticut, USA—a new center for nature, arts, justice, community and faith—on 80 acres of open space.

## Page 9

© UNHCR/Andrew McConnell

1 February 2014, Kafraya, Lebanon

Syrian refugee Manar, 13, works tending vines in a vineyard near Kafraya, in the Bekaa Valley, Lebanon. Six days a week she wakes up at 6 am to catch a truck with other children leaving the settlement to work in the fields. Asked what she would do if she could return to Syria, Manar says, "The first thing I will do is go back to school".

## Page 12

Security Council Adopts Resolution on Human Trafficking in Conflict Situations

20 December 2016, United Nations, New York, USA

The Security Council unanimously adopts resolution 2331 (2016), condemning in the strongest terms all instances of trafficking in persons in areas affected by armed conflicts.

## Page 14

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11 June 2015, Turkman refugee village, Pakistan

Ughul Juma is seven years old and weaves carpets with other weavers in the Turkman Afghan refugee village in Pakistan. They weave carpets for a dealer/buyer in Peshawar who then sells them to European clients. They also make carpets to order for other refugees in the village. She says that she hates weaving and would rather be playing tag and hopscotch with her friends. She wants to be a doctor one day.

## Page 16

© UNHCR/Andrew McConnell

25 November 2014, Yida, South Sudan

Yacob Ibrahim, 10, and Jelaha Mataran Tia, 10, from the Nuba Mountains in Sudan wash mudfish that they have just caught from a lake formed by flood water near the town of Yida, in South Sudan. Yida is situated only a few kilometres from the Sudanese border and has become home to thousands of Sudanese refugees fleeing fighting in the border states as well as to 17,000 IDPs fleeing fighting between government troops and anti-government rebels within South Sudan. Yacob says, "This is a job for me, I do it to buy pens and exercise books for school".

## Page 19

© UNHCR/Bassam Diab

18 October 2015, Aleppo, Syria

Hadi, an 8-year-old displaced from eastern Aleppo, lives now with his family of four in the unfinished buildings of the Tishreen shelter. He sells croissants and makes about two dollars per day to help secure his family's needs. Thousands of internally displaced people in Aleppo are living in unfinished buildings that have been rehabilitated as shelters.

## Page 25

© Vanessa Van Ryzin

30 March 2017, Connecticut, USA

The workshop, hosted by the United Nations University, the Permanent Mission of Liechtenstein and Grace Farms Foundation brought together a select group of 100 key practitioners from around the world.

# About UNU

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