



Gibraltar Financial Intelligence Unit
HM Government of Gibraltar

Typology Report

MODERN SLAVERY & HUMAN TRAFFICKING

OVERVIEW

Typology reports provide guidance to reporting entities, focusing on money laundering (ML), terrorist financing (TF) and proliferation financing (PF) risks, vulnerabilities, and suspicious activity reporting obligations. These reports offer insights into ML, TF and PF trends and methods, helping businesses identify and mitigate risks.

This information strengthens Anti-Money Laundering and Combating the Financing of Terrorism (AML/CFT) programs, policies, procedures, risk management and improves reporting quality to the Gibraltar Financial Intelligence Unit (GFIU).

Purpose

This typology report aims to assist reporting entities and other relevant stakeholders in identifying and reporting suspicious activities related to Modern Slavery and Human Trafficking (MSHT). Drawing on insights from the GFIU's MSHT workshop, financial intelligence, as well as international best practices and case studies, the report outlines common financial patterns and red flags associated with trafficking activities, thereby contributing to Gibraltar's broader efforts to combat financial crime and protect vulnerable individuals from exploitation.

This report does not constitute legal advice, and any reliance on its content is at the user's own risk. If necessary, professional legal advice should be sought to ensure suitability for specific circumstances.

BACKGROUND

MSHT are among the most pervasive and profitable transnational crimes, generating immense illicit proceeds while inflicting deep human suffering. These crimes are sustained by sophisticated financial flows that often intersect with the legitimate financial system, making the private sector a key stakeholder in disrupting their operations. Understanding the financial mechanisms that underpin MSHT is therefore critical to identifying illicit proceeds, dismantling trafficking networks, and enhancing the effectiveness of national and international responses.

Despite the most recent International Labour Organization (ILO) update in May 2025, indicating that annual illicit profits from MSHT have increased by US\$86 billion over the past decade, reaching US\$236 billion, the Global Coalition to Fight Financial Crime (GCFFC) contends that this figure remains significantly underestimated. The ILO describes the US\$236 billion figure as “the obscene level of annual profit generated from forced labour in the world today.”

In anticipation of the ILO’s publication, the GCFFC commissioned a review of the available data, reflecting concerns among independent experts that both the US\$150 billion and the updated US\$236 billion estimates fall short of capturing the true scope of criminal profit. Based on this review, GCFFC estimate that the annual proceeds from MSHT may be as high as US\$498 billion globally.

For more information click [here](#).

TYPOLGY CASE STUDY 1

CASE OVERVIEW

Two clients were flagged by a risk department of a Gibraltar based company, following an attempted transaction using an internal payment system. The transaction description was suspicious referencing "Human Trafficking."

Both clients maintained business websites that appeared legitimate. However, due to the alarming nature of the transaction description, their accounts were subject to a detailed investigation and subsequently closed by the company for engaging in prohibited activities.

Client 1 had conducted transactions over several months, receiving moderate sums that were primarily withdrawn via ATMs and point-of-sale transactions within their country of residence.

Analysis of IP addresses indicated irregular patterns, suggesting cross-border account management practices potentially aimed at obscuring operational bases or identities. The use of third-party payment processors, reduced traceability and detection of illicit flows.

The transaction description served as the red flag in this case, leading to comprehensive monitoring, immediate investigation, and eventual termination of both accounts by the Gibraltar based company.

TYPOLOGY CASE STUDY 1

Indicators

1

Transaction reference to “Human Trafficking”, indicating possible direct involvement or an attempt to test controls using provocative or coded language.

2

Mismatch between customer’s transaction behaviour and declared profile, raising doubts about the legitimacy of business operations.

3

Irregular cross-border IP logins and access patterns, consistent with third-party account control or use of proxy operators.

4

Use of internal payment systems to initiate transfers potentially outside standard monitoring thresholds.

5

Transactions routed through third-party payment processors reducing traceability and complicating detection of illicit flows.

TYPOLGY

CASE STUDY 2

CASE OVERVIEW

An individual opened a credit card account with a Gibraltar-based company, declaring a modest monthly income. Over a period of less than one month, the account was used to carry out multiple high-value transactions to a classified advertising platform known to be linked to escort services and reportedly associated with human and sex trafficking activities.

These transactions represented an increase in both frequency and amount when compared to the individual's lower-value transactions to the same platform throughout earlier periods. The pattern of spending was inconsistent with the individual's declared financial profile, and the reported outcome did not justify such high-value transactions.

The individual claimed the payments were for online advertising services and provided receipts listing vague descriptions such as "publication," with no further details.

Several weeks just before carrying out the high-value transactions, cash withdrawals were made in a jurisdiction identified as high risk for human trafficking. These were accompanied by other international transactions throughout the year, further compounding concerns about the nature of the activity.

TYPOLOGY CASE STUDY 2

Indicators

1

Use of a platform with known ties to escort services and sexual exploitation, raising concerns of possible client involvement in or funding of illicit activity.

2

Significant rise in transaction amounts and frequency that did not align with declared income or account history.

3

Generic or vague transaction justifications, lacking documentary evidence or credible explanations.

4

Use of prepaid and credit cards, likely employed to mask the nature or source of payments related to trafficking or exploitation.

5

Repeated transactions and travel to countries with elevated levels of human trafficking risk, pointing to possible logistical coordination or direct involvement.

6

Cash withdrawals and transactions in high-risk jurisdictions, particularly before online purchases, indicating potential structuring or laundering tactics.

7

Undeclared international activity with no evident business or personal rationale, especially involving jurisdictions linked to MSHT.

TYPOLGY

CASE STUDY 3

CASE OVERVIEW

A client of a Gibraltar-based institution purchased around 90 low-cost airline tickets over six months, an unusual volume given their financial profile. Funds were also transferred to several linked accounts, all with the same provider, which collectively purchased over 400 tickets in the same period.

Some accounts were held by individuals over 75, whose transaction patterns were inconsistent with their age group. The coordinated activity across multiple accounts, combined with the use of prepaid cards, raised concerns of potential money laundering and human trafficking. The high volume of airline purchases, lack of a commercial rationale, and the potential misuse of elderly identities suggested possible logistical coordination for the movement of trafficking victims.

The pattern of dispersing funds, layering through multiple accounts, and the use of non-face-to-face financial products aligns with known MSHT financing typologies. These indicators, taken together, pointed to the potential operation of a trafficking network using the financial system to facilitate transport, obscure money trails, and exploit vulnerable individuals.

TYPOLOGY CASE STUDY 3

Indicators

1

High frequency of airline ticket purchases that did not align with the user's financial profile or declared purpose of the account, raising concerns over logistical coordination for trafficking.

2

Linked accounts displaying coordinated behaviour, with similar transaction types and timing, suggesting organised movement and control by a central actor.

3

Structuring and layering activity, evidenced by repetitive, low-cost transactions across multiple accounts, used to avoid detection and obscure the flow of funds.

4

Use of funds for logistics potentially connected to the transport of trafficked individuals, with no legitimate commercial explanation for the scale of travel-related expenditure.

5

Regular travel-related transactions that did not correspond to the customer's known occupation, income, or stated source of funds.

6

Use of funnel accounts or layering strategies, where multiple small transactions flowed into or out of shared accounts, consistent with efforts to clean or redistribute illicit proceeds.

7

Demographic mismatches (e.g. elderly account holders engaging in atypical travel-related spending), indicating possible exploitation, identity misuse, or third-party control.

8

Indicators of pooled logistics spending, such as the bulk purchase of travel services, commonly associated with trafficking or smuggling operations.

CONCLUSION

The case studies identified in Gibraltar demonstrate that MSHT is not a distant threat, but a current and evolving risk that may involve the abuse of Gibraltar's financial services by criminals. These examples highlight the importance of maintaining awareness across all reporting sectors, particularly where financial flows may conceal exploitation and abuse.

Gibraltar's proactive identification of MSHT-linked transactions, through collaboration between the GFU, law enforcement, and the private sector, illustrates the important role financial intelligence plays in uncovering victims, exposing criminal networks, and disrupting the financial infrastructure that enables exploitation. These cases highlight not only the typologies and indicators that can aid detection but also the tangible impact that timely reporting and analysis can have in safeguarding human lives.

This Typology Report is produced by the Gibraltar Financial Intelligence Unit and is based on intelligence from multiple sources, including Suspicious Activity Reports, to identify and assess emerging financial crime risks.

