







Summary of the Joint Submission to the United Nations Special rapporteur on contemporary forms of slavery, Prof. Tomoya Obokata

15 April 2025

Freedom Collaborative, Humanity Research Consultancy, LexCollective and Operation Shamrock submitted a joint report on the role of the financial sector in eradicating modern slavery in cyber-scam compounds in Southeast Asia ("SEA"). An illicit economy has emerged where organized crime groups ("OCGs") syndicates are trafficking victims into SEA and enslaving them, forcing them to perform online scams. Inside these high-security cyber-scam compounds they are trapped in, victims are subject to debt-bondage, physical and sexual abuse, and severe punishment for those who did not reach their set scam "KPIs".

The industrial scale of these criminal operations means that in addition to the OCGs, they involve a range of financial actors: owners of scam compounds and companies, tycoons, elaborate networks of money launderers, and services from financial institutions, cryptocurrency exchanges, social media companies, application stores, and providers of SIM cards, internet, and electricity. In some cases, local authorities are also actively involved in bringing trafficked victims to the compounds, money laundering services, and other aspects of the criminal enterprise.

Therefore, we call for the Special Rapporteur to recognize this complex form of modern slavery and present our recommendations on its prevention.

- 1. **To address insufficient monitoring regimes,** governments should mandate, and the financial sector should implement, strong monitoring and reporting standards on non-traditional financial actors. The financial sector should support the development and dissemination of up-to-date typologies on trafficking in persons ("TIP").
- 2. **To improve cross-border cooperation and intelligence sharing**, the international community should allocate sufficient resources and protection from retaliation to civil society.
- 3. **To impose multi-modal costs on criminal hosts and kingpin entities**, the criminal economy should be disrupted by sustained action to assist TIP victims in repatriation and rehabilitation and address the root causes of TIP and modern slavery.