



Special Bulletin on human trafficking risks associated with major international sporting and entertainment events

Under the [Proceeds of Crime \(Money Laundering\) and Terrorist Financing Act](#) (the Act), the Financial Transactions and Reports Analysis Centre of Canada (FINTRAC) produces strategic intelligence on the nature and scope of money laundering, terrorist activity financing, sanctions evasion, and the financing of threats to the security of Canada.

This Special Bulletin provides background information relevant to financial transactions associated with the suspected laundering of proceeds derived from human trafficking associated with major international sporting and entertainment events, including trafficking for the purpose of sexual exploitation as well as forced labour. It is intended to inform businesses subject to the Act and the public of the characteristics of completed or attempted financial transactions related to this activity to facilitate their detection, prevention, and deterrence.

Major international sporting and entertainment events and human trafficking risks

Major international sporting and entertainment events can draw hundreds of thousands of domestic and international visitors to host cities. This influx is likely to drive increased economic activity across hospitality, entertainment, transportation, and tourism-related sectors, including sectors that may be vulnerable to human trafficking-related exploitation.

Events of this scale typically involve large, mobile populations and complex networks of services and labour operating over compressed timeframes. In parallel, human trafficking remains a persistent and opportunistic crime that operates across a range of licit and illicit environments and targets individuals experiencing existing vulnerabilities.

While human trafficking persists independently of major international sporting and entertainment events, such events may intensify conditions

A decade of Project Protect: an evolving public-private partnership

Project Protect is a public-private partnership initiative led by the Bank of Montreal and supported by Canadian law enforcement agencies and FINTRAC. Launched in 2016, Project Protect has focused on improving the identification and reporting of financial transactions associated with human trafficking for sexual exploitation, contributing to a stronger collective understanding of the laundering of proceeds derived from this activity.

Building on the success of the initiative and recognizing the critical role of financial intelligence, Project Protect has since evolved to include labour trafficking, supporting collective efforts to disrupt and combat human trafficking in all its forms. Through Project Protect, FINTRAC continues to support its partners by delivering actionable financial intelligence to help disrupt trafficking networks and the profits generated through exploitation.

under which existing exploitation occurs. Large-scale events generate short-term surges in economic activity and demand for services, labour, and transactions—often within sectors reliant on temporary, informal, or subcontracted arrangements—concentrating activity within specific locations and timeframes.

In these environments, individuals experiencing social or economic vulnerabilities, including temporary and foreign workers, may face heightened exposure to exploitation as traffickers respond to increased demand while maintaining underlying mechanisms of control. Importantly, trafficking risks associated with major events do not typically arise from new forms of exploitation. Rather, existing operations may scale activity or shift locations to align with periods of concentrated demand.

Human trafficking observed during major events is not necessarily driven by new or external criminal actors. Reporting indicates that much of the exploitation involves domestic victims and networks already operating within host jurisdictions. Major events may therefore be best understood less as points of origin, but instead as opportunities for existing trafficking operations to scale activity, adjust tactics, or temporarily shift the location of exploitation toward areas experiencing concentrated demand.

Sexual exploitation and short-term commercial concentration

Major international sporting and entertainment events may be associated with an increased risk of sexual exploitation, particularly where short-term surges in visitors concentrate demand for accommodations, nightlife, entertainment, and commercial sexual services in proximity to event venues and transportation hubs. As demand rises, individuals vulnerable to exploitation may face heightened risks of sexual exploitation, as traffickers adapt existing operations to capitalize on periods of concentrated economic activity.

Sexual exploitation linked to major events may be facilitated through online advertising on escort platforms, classified advertising websites, and social media. Advertisements may reference event specific themes, nearby venues, or limited-time availability, and may emphasize geographic proximity or appeal directly to visiting clientele. In some cases, advertisements may appear and disappear rapidly or shift across platforms, reflecting efforts to reduce visibility or adapt to short-term demand patterns.

Reporting indicates that sexual exploitation observed during event periods typically involves individuals already being exploited prior to the event. Major events may therefore provide temporary commercial opportunities for traffickers to scale activity or re-position victims in areas experiencing heightened demand, rather than serving as catalysts for new exploitation networks.

Labour trafficking and event-related labour demand

Preparations for and delivery of major international sporting and entertainment events may place additional pressure on labour-intensive sectors, including hospitality, accommodation, cleaning, construction, transportation, security, and other event services, among others. Increased demand within these sectors may create opportunities for traffickers to exploit vulnerable individuals through deceptive, coercive, or exploitative recruitment and employment practices, including through seemingly legitimate employment, subcontracting, or temporary staffing arrangements. Heightened labour demand in these sectors may create opportunities for traffickers to exploit vulnerable individuals through deceptive, coercive, or exploitative recruitment and employment practices. These practices may be embedded within ostensibly legitimate employment arrangements and may involve the control of wages, imposition of unlawful fees, or the use of debt and dependency to maintain exploitation. Financial activity associated with labour trafficking may therefore be intermingled with legitimate business revenues and payroll-related transactions.

Indicators of money laundering linked to human trafficking associated with major international sporting and entertainment events

The following indicators are intended to support reporting entities in the analysis and assessment of financial transactions that may be linked to the laundering of proceeds derived from human trafficking associated with major international sporting and entertainment events, including trafficking for the purpose of sexual exploitation and forced labour. They should not be assessed in isolation, as the presence of a single indicator may not, on its own, be sufficient to indicate the laundering of proceeds derived from human trafficking or other suspicious activity.

When determining whether there are reasonable grounds to suspect that a completed or attempted transaction is related to the commission or attempted commission of a money laundering offence, reporting entities should consider these indicators in combination with what they know about their client, as well as with other factors surrounding the transaction. In some cases, the presence of several indicators may reveal otherwise unknown links that, when assessed together, could establish reasonable grounds to suspect that a transaction or attempted transaction is associated with the laundering of proceeds derived from human trafficking. Where such grounds are established, reporting entities are required to submit a suspicious transaction report to FINTRAC as soon as practicable.

In addition to the indicators outlined below, reporting entities are encouraged to consult FINTRAC's 2021 Operational Alert, [Updated Indicators: Laundering of proceeds from human trafficking for sexual exploitation](#), for additional context and indicators to support the identification and reporting of financial transactions that may be associated with this activity.

General and contextual money laundering indicators associated with major international sporting and entertainment events

Major international sporting and entertainment events may result in temporary but significant shifts in local economic activity, often characterized by defined event timelines, elevated transaction volumes, increased cash usage, and geographically concentrated activity. In these environments, certain transactional behaviours may take on greater significance when assessed alongside event timing and other contextual or behavioural indicators, particularly where activity intensifies during the event period and subsides shortly thereafter.

During the events, traffickers may increase reliance on transaction techniques that help evade detection, including transaction structuring, round-dollar transfers, prepaid or stored-value instruments, or advertising credit systems to obscure underlying financial flows. Payments related to online advertising, accommodation, transportation, or labour-related services may be distributed across multiple accounts or payment methods, allowing trafficking-related proceeds to be masked into heightened levels of legitimate economic activity.

The following indicators may be relevant when assessing accounts or transactions associated with major international sporting and entertainment events:

- Transaction activity is geographically concentrated around event venues, hotels, entertainment districts, or transportation hubs associated with a major event.
- Transactions reflect elevated use of cash or cash-equivalent instruments during event periods, including frequent cash withdrawals, cash deposits, or the use of prepaid or reloadable payment products.

- Incoming funds from multiple unrelated individuals are received during the lead-up to or duration of a major event and are rapidly withdrawn, transferred onward, or otherwise depleted.

General and contextual money laundering indicators associated with major international sporting and entertainment events and human trafficking for the purpose of sexual exploitation

Indicators associated with suspected perpetrators of sexual exploitation

Human trafficking for sexual exploitation is a profit-driven activity that generates illicit proceeds requiring concealment, movement, or integration into the financial system. Individuals and entities facilitating or controlling sexual exploitation frequently rely on intermediary accounts, pooled funds, and rapid movement of transactions to obscure the origin and beneficiaries of proceeds. Increasingly, these financial behaviours are enabled and reinforced by the use of digital tools and informal services that support recruitment, advertising, and coordination.

Trafficking operations commonly leverage online platforms, classified advertising websites, social media, and encrypted messaging applications to promote services, communicate with clients, and coordinate activities involving victims. While much of this activity occurs openly, it is conducted at scale and often relies on coded language, aliases, and frequently changing identifiers that reduce transparency. During major international sporting and entertainment events, the volume and velocity of online advertising and communications may increase, potentially resulting in higher volumes of associated financial transactions within condensed timeframes.

Financial activity associated with facilitators of sexual exploitation may therefore involve the aggregation of funds from multiple unrelated individuals, payments for online advertising, accommodation, or transportation made on behalf of others, and the use of prepaid instruments, virtual assets, or nominee accounts. These behaviours may be designed to distance traffickers from direct transactional links to victims or purchasers.

The following indicators may be associated with the organization or financial control of commercial sexual exploitation, particularly in the context of major international sporting and entertainment events:

- Accounts receive unusual spikes in peer-to-peer payments or first-time transfers, often from multiple unrelated individuals, particularly during the lead-up to or duration of a major event.
- Incoming funds from multiple unrelated individuals are rapidly withdrawn, transferred onward, or redistributed, with minimal balance retention and little evidence of personal discretionary spending.
- Clusters of accommodation-related expenses (e.g., hotels or short-term rentals) coincide with frequent late-night or early-morning automated banking machine withdrawals, particularly in event-host cities.
- Multiple accounts appear linked through shared contact details, identifiers, devices, or transaction timing, suggesting centralized management or coordinated financial control.
- Payments are made for online escort advertisements, premium listings, advertising credits, or digital promotion services on behalf of multiple individuals by a single account holder.
- Frequent transfers to virtual currency exchangers or payment facilitators, particularly following incoming peer-to-peer payments associated with escort-related activity.

- Frequent use of automated banking machines located near hotels, motels, casinos, or entertainment districts, including white-label ATMs, often shortly after peer-to-peer deposits or cash deposits.

Indicators associated with the demand for sexual services

Major international sporting and entertainment events may be associated with increased demand for commercial sexual services, driven by large inflows of visitors, short-term stays, and heightened nightlife and entertainment activity. Financial behaviours associated with the purchase or facilitation of sexual services may include repetitive low- to mid-value payments, event-timed cash withdrawals, short-term accommodation-linked spending, and use of digital platforms or intermediaries. These patterns may warrant closer examination where they are inconsistent with a client's historical behaviour or known financial profile.

As major international sporting and entertainment events attract large numbers of short-term visitors, including individuals without established banking relationships within Canada, observed financial activity may reflect greater reliance on cash, mobile payment applications, peer-to-peer transfers, payment service providers, or money services businesses.

The following indicators may be associated with event-driven demand for sexual services:

- Frequent low- to mid-value peer-to-peer payments, including email money transfers, made to multiple recipients within condensed timeframes during a major event.
- First-time electronic transfers or peer-to-peer payments made to previously unknown recipients shortly before or during an event, including by clients with limited prior transaction history in the jurisdiction.
- Electronic payment messages or transfer descriptions containing terminology commonly associated with escort services, agencies, aliases, or coded language.
- Use of automated banking machines located in or near hotels, motels, or short-term rental properties, particularly following electronic or peer-to-peer payments.

Indicators associated with suspected victims of sexual exploitation

Accounts associated with individuals subjected to sexual exploitation may exhibit financial activity indicative of limited autonomy or external control. Such activity may be observed through rapid depletion of income, coordinated transactional patterns across multiple individuals, or a lack of discretionary personal spending.

The following indicators may be relevant when assessing potential sexual exploitation in the context of major international sporting and entertainment events:

- Incoming funds are rapidly transferred onward, consolidated into another account, or withdrawn by a third party, leaving little or no balance available to the client.
- Multiple clients exhibit similar transaction patterns, shared identifiers, or overlapping payment timing, inconsistent with independent financial activity.
- Personal account receives frequent deposits but is typically kept depleted, showing no purchases or transactions that would indicate normal activity.
- A third party appears to monitor, direct, or exert control over account activity, including instructions on how or where funds should be transferred.

General and contextual money laundering indicators associated with major international sporting and entertainment events and labour trafficking

Indicators associated with suspected perpetrators of labour trafficking

Major international sporting and entertainment events often require large volumes of short-term labour, including cleaning, hospitality, security, construction, transportation, food services, and other event-related sectors. Accelerated timelines and reliance on subcontracting, labour brokers, or temporary staffing arrangements may increase vulnerability to labour exploitation, particularly where oversight is limited.

Proceeds derived from labour trafficking may be concealed through employer-controlled payroll arrangements, intermediary accounts, or disproportionate deductions from wages. In many cases, such activity occurs within otherwise lawful businesses, increasing the risk that illicit proceeds are commingled with legitimate commercial revenues.

The following indicators may be associated with forced or exploitative labour arrangements linked to event-driven demand:

- Businesses operating in event-related sectors exhibit suppressed, irregular, or absent payroll activity relative to the apparent size of the workforce.
- A client operates, manages, or is financially linked to businesses in sectors experiencing elevated demand during major events while displaying irregular payroll, contractor, or remittance patterns.
- A client incurs repeated short-term accommodation, transportation, or travel expenses across multiple event-host locations within short timeframes.
- Frequent transfers occur between business and personal accounts, including circular movements of funds or generic payment descriptions without a clear business rationale.
- Cash deposits, withdrawals, or electronic transfers are clustered around known worksites or temporary housing associated with event-related services.
- Multiple individuals' wages are deposited into, transferred through, or controlled by a single account holder or a small group of related accounts.
- Payroll or employment income is accompanied by recurring transfers described as fees, rent, travel costs, recruitment costs, or services, where deductions appear disproportionate to earnings.

Indicators associated with suspected victims of labour trafficking

Individuals subjected to labour trafficking may display financial activity indicative of limited independence or centralized control over income and spending. These patterns may be particularly pronounced in event-driven contexts, where short-term employment and temporary accommodation are common.

The following indicators may be relevant when assessing suspected labour trafficking:

- Payroll income is received in round dollar amounts and withdrawn on the same day or within a short period, often depleting the account.
- Minimal or no spending on basic living needs (e.g., food, housing, personal goods) despite indications that the client is working or generating income during a major event.
- Transaction descriptions reference immigration- or recruitment-related fees (e.g., “LMIA”, “work permit”, “recruitment fee”) that appear to be borne by the worker rather than the employer.
- Account activity reflects limited financial autonomy, including incoming funds that are rapidly transferred onward, withdrawn by another party, or consolidated into accounts not controlled by the client.
- A client appears accompanied, monitored, or directed by a third party when conducting transactions, including circumstances where identification documents are controlled by another individual.
- Payroll or other employment-related income credited to individuals is rapidly transferred to a common account or entity without a legitimate contractual explanation. There may also be a discrepancy between the listed employer on the client’s profile and the entity crediting or receiving payroll.
- A client is employed in event-related sectors (e.g., construction, hospitality, cleaning, security, food services), where suspected payroll is received in round-dollar amounts and withdrawn on the same day or within a relatively short period, often depleting the account to a near-zero balance.
- A client appears to be isolated from the rest of society and relies upon their employer for food, shelter, work, and/or transportation.
- Open-source checks (e.g., corporate registries, property listings, street-level imagery) indicate that a single residential or commercial address is associated with an unusually large number of workers, accounts, or businesses, inconsistent with reasonable occupancy or living conditions.

Reporting suspicious transactions to FINTRAC

Under the Act, reporting entities must submit a suspicious transaction report to FINTRAC if there are reasonable grounds to suspect that a financial transaction that occurs or is attempted is related to the commission or the attempted commission of money laundering, terrorist financing or sanctions evasion offence. These reports play a critical role in FINTRAC’s ability to produce financial intelligence related to human trafficking, supporting efforts to disrupt the financial flows generated through exploitation.

When submitting a suspicious transaction report to FINTRAC related to suspected human trafficking, reporting entities should include all relevant information that may assist in identifying the nature and context of the suspicious activity. This includes detailed descriptions of the transactional behaviours observed, as well as any patterns or anomalies that informed the suspicion. Where available, reporting entities should include identifying information related to associated accounts, payment instruments, addresses, and digital identifiers, as well as any observable links between multiple clients, accounts, or transactions. Information concerning the ownership, control, or organizational structure of entities involved—such as business owners, directors, officers, signing authorities, or intermediaries—may be particularly relevant where exploitation is embedded within otherwise legitimate commercial activity.

Reporting entities are also encouraged to include information on related persons or third parties, including recruiters, advertisers, labour intermediaries, payment facilitators, or other individuals exercising control over financial activity. Descriptive details that help establish links between accounts, entities, or transactional activity and suspected human trafficking—whether for the purposes of sexual exploitation or forced labour—may further assist in FINTRAC’s analysis.

To facilitate FINTRAC’s disclosure process, please include the term #Project PROTECT or #PROTECT in Part G-Description of suspicious activity on the Suspicious Transaction Report. For guidance on submitting suspicious transaction reports to FINTRAC, see [Reporting suspicious transactions to FINTRAC](#).

Additional resources

A range of domestic and international organizations have published reports, guidance, and research addressing the contextual, operational, and financial aspects of human trafficking, including trafficking for the purposes of sexual exploitation and forced labour. Several external sources describe risk environments, facilitation mechanisms, and financial patterns consistent with trends observed in FINTRAC’s strategic and operational analysis. Alongside the information provided in this Special Bulletin, the following resources offer additional context and information on evolving risks, typologies, and indicators associated with human trafficking.

Reporting entities should consider these resources while establishing and implementing various elements of their compliance program—such as when developing and refining risk assessments, applying enhanced measures to mitigate identified risks, and maintaining ongoing compliance training programs, among other compliance program requirements—to support meeting their obligations under the Act and associated Regulations.

Domestic resources

- Financial Transactions and Reports Analysis Centre of Canada, [Indicators: The laundering of illicit proceeds from human trafficking for sexual exploitation](#)
- Financial Transactions and Reports Analysis Centre of Canada, [Updated Indicators: Laundering of proceeds from human trafficking for sexual exploitation](#)
- [Canadian Centre to End Human Trafficking](#)
- [Canadian Human Trafficking Hotline](#)
- Public Safety Canada, [Actions to Combat Human Trafficking](#)
- Public Safety Canada, [National Strategy to Combat Human Trafficking - 2023-2025 Report](#)
- Statistics Canada, [Trafficking in persons in Canada, 2024](#)
- Royal Canadian Mounted Police, [How human trafficking works](#)

International resources

- Financial Action Task Force, [Financial Flows from Human Trafficking](#)
- Financial Action Task Force, [Money Laundering Risks Arising from Trafficking of Human Beings and Smuggling of Migrants](#)

Special Bulletin on human trafficking risks associated with major international sporting and entertainment events May 2026

- Financial Crimes Enforcement Network, [FinCEN Notice on the Threat of Human Trafficking During the 2026 FIFA World Cup](#)
- United Nations Office of Drugs and Crime, [Action Against Human Trafficking and Migrant Smuggling: 2025 Annual Report](#)
- [Polaris Project](#)

Contact FINTRAC

- **Email:** guidelines-lignesdirectrices@fintrac-canafe.gc.ca (include Special Bulletin FINTRAC-2026-SB003 in the subject line)
- **Telephone:** 1-866-346-8722 (toll free)
- **Mail:** FINTRAC, 24th Floor, 234 Laurier Avenue West, Ottawa ON, K1P 1H7, Canada

© His Majesty the King in Right of Canada, 2026.

Cat. N°. FD4-52/2026E-PDF

ISBN 978-0-660-99846-6

FINTRAC Special Bulletins provide information related to new, emerging and particularly topical methods of money laundering, terrorist activity financing, sanctions evasion and threats to the security of Canada. However, these Bulletins should not be considered legal advice. Please refer to the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act* and associated Regulations for the full description of the reporting entities' obligations.