



WHITE PAPER

Combating wildlife trafficking with the power of collaboration

Dismantling transnational trafficking rings by uncovering
detailed financial connections



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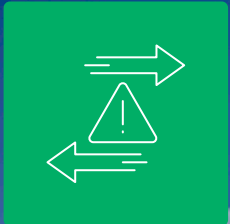
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Executive Summary



Wildlife trafficking

The illegal trade and trafficking of flora and fauna which encompasses animals, plants, illegal fishing and illegal logging of timber and non-timber forest products.



Wildlife trafficking is considered the fourth largest illegal industry worldwide¹ and is estimated to be worth up to \$20 billion annually.² Wildlife trafficking is a pervasive and multi-faceted threat to our collective society that undermines global security and human health, biodiversity and climate strength and worldwide economic stability. It is a high margin, lower risk crime that is often used by transnational criminal organizations to generate revenue to facilitate other crimes tied to human trafficking, narcotics, terrorist activity and arms trade and smuggling.

Today’s interconnected and accelerated digital economy creates an ideal pitch for the high-stakes games of international wildlife trafficking to not only flourish, but dramatically expand.

Technology removes global commerce barriers which inadvertently increases both the source market and end markets for illegal wildlife trade. Encrypted networks and dark web activities simplify the obfuscation of illegal activities, interconnected criminal networks and payments that fuel complicated, multi-layered and lucrative wildlife trafficking ecosystems. A confluence of additional factors is also contributing to the proliferation of wildlife trafficking: increases in legal wildlife trade influencing the growth of illegal wildlife trade, significant regional economic inequities, unchecked bribery and corruption issues within global supply chains and the disparate application of laws governing wildlife trafficking at a global level.

Effectively combating the systemic issues surrounding wildlife trafficking is critical on a macro scale to ensuring global security, economic stability and environmental health. Taking a stand against wildlife trafficking on a micro scale is imperative to business sustainability from a corporate accountability, compliance and brand reputation standpoint.

Read on to learn more about how increasing cooperation and concentrated coordination are helping highlight, and successfully disrupt, the financial connections fueling transnational wildlife trafficking.

The persistent growth and complicated global dynamics surrounding wildlife trafficking often make it seem like a paralyzing issue to solve. Collaborative efforts combining private and public endeavors are starting to advance headways in stemming and stopping the growth of wildlife trafficking.

Positioning your business to play a proactive role in preventing wildlife trafficking begins with these seven recommendations:

1. Institutionalize financial workflows, red flags and key risk indicators
2. Conduct ongoing monitoring against current sanctions, Politically Exposed Persons (PEPs) and adverse media intelligence
3. Increase clarity into core investments and lending practices
4. File Suspicious Activity Reports (SARs) to document trafficking risks
5. Review asset management guidelines
6. Build synergies between the Environmental Societal and Corporate Governance (ESG) function and procurement team
7. Promote and participate in private-public partnerships

Trends illustrating the scope and severity of wildlife trafficking

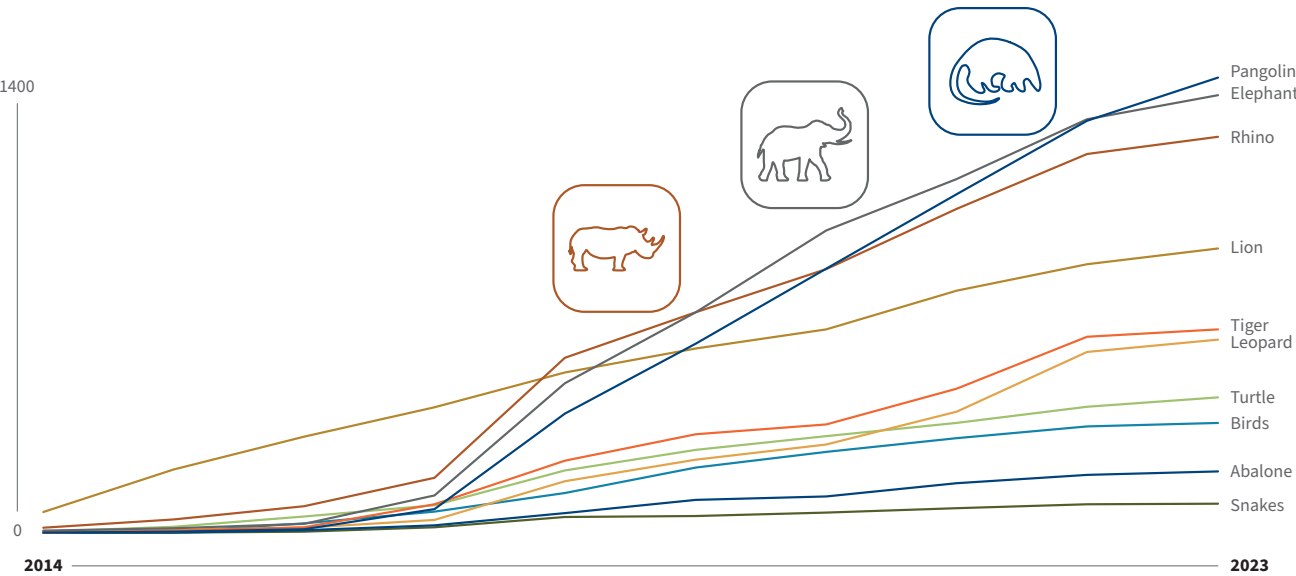
Wildlife trafficking continues increasing on an upward trajectory because it represents a lower risk, high reward route for transnational criminal organizations to diversify and multiply their revenue streams. A typical wildlife trafficking ecosystem is very complex and intersects across individual and independent bad actors, organized crime syndicates, logistics and shipping companies and complicit government entities. The inherent opacity and multiple layers of a wildlife trafficking ecosystem make it difficult to detect and deter within the traditional framework of regulatory and trade compliance oversight mechanisms. Technology advances driving accelerated globalization over the last 10 years are exacerbating the challenge by lowering the entry barrier to include any individual with a mobile device.

“Technology has democratized wildlife trafficking with the rise of social media, digital communications and encrypted messaging,”

according to Patricia Raxter, director of intelligence and analysis, United for Wildlife. “A person in South Korea can instantly connect with an individual in South Africa to collect and ship succulents. A criminal group can recruit and, surreptitiously pay, low-level poachers and smugglers via mobile apps. Our connected societies are driving the expansion of sourcing for wildlife trafficking and the inclusion of so many people who may not necessarily think of themselves as criminals or as part of an organized crime group, but who are now involved in wildlife trafficking. Technology is turning wildlife trafficking into a disorganized crime — one that is operating across such a confluence of facilitators and factors that is difficult to disrupt.”

Tracking adverse media mentions illustrates rising wildlife trafficking trends

Number of records in LexisNexis® WorldCompliance™ database that mention specific animals

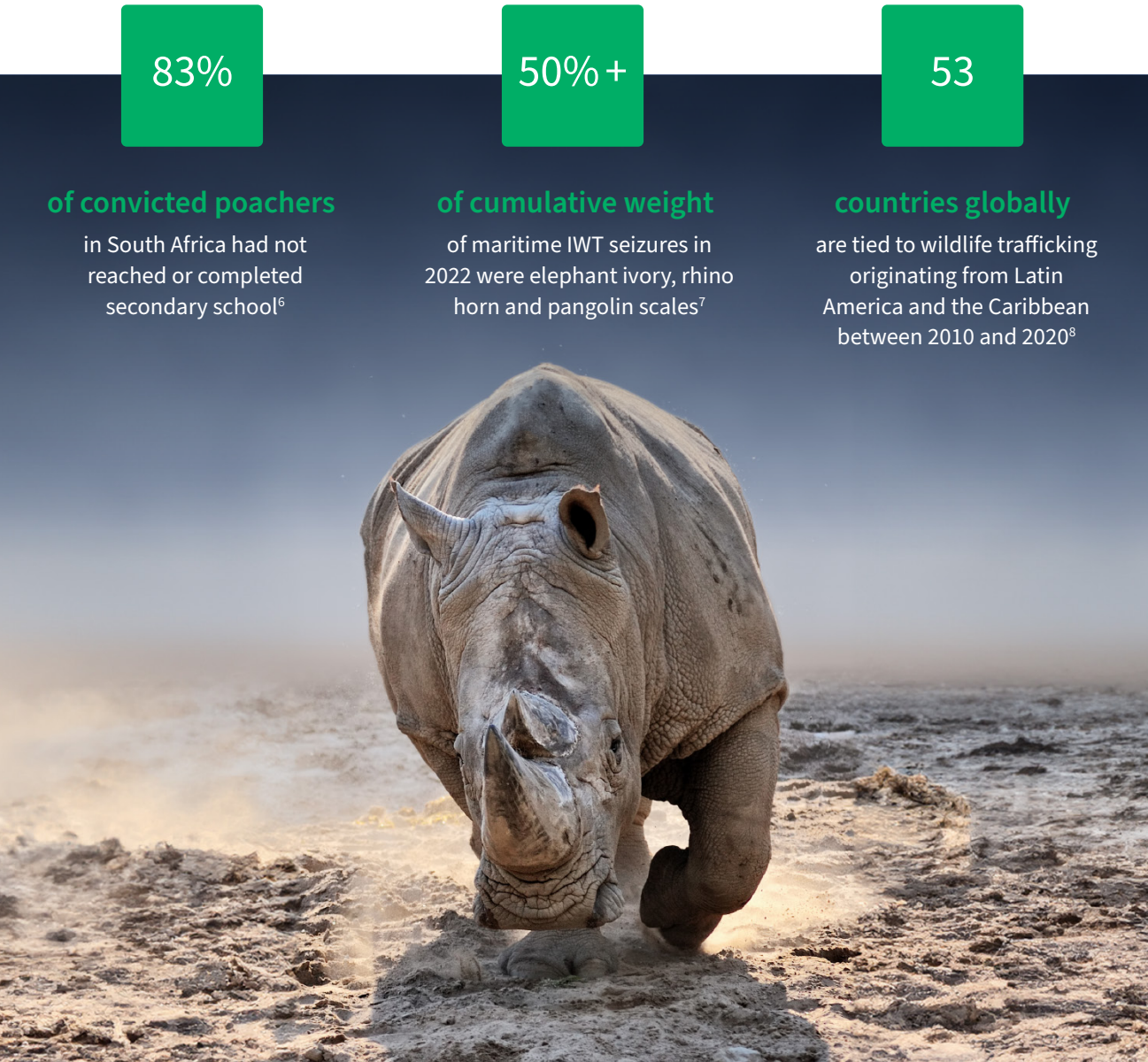


Numbers gathered from adverse media on environmental crimes referencing specific animal keywords across the time period between January 2014- October 2023. Source: LexisNexis® Risk Solutions Data, October 2023

Illegal wildlife trafficking is showing signs of returning to pre-pandemic levels as global trade resumes in full following COVID-19 forced closures and as 2023 draws to an end. Seizures are showing prevalence in routes known as hotspots for wildlife trafficking with 473 seizures linked to China, India, Malaysia and Indonesia between 2022 and 2023 so far.³ Recent statistics also indicate that bulk shipments by sea accounted for most of the illegal wildlife parts seized by authorities around the world in 2022.⁴ Officials in Vietnam seized a bulk shipment of almost 7,000 kilograms (15,400 pounds) of elephant tusks at the port of Haiphong in March 2023.⁵

“Illegal wildlife trafficking is, unfortunately, quickly returning back to the numbers we saw before pandemic shutdowns. I think we need to watch the trends closely as parts of Asia fully re-open for trade,”

observes Robert Campbell, head of United for Wildlife. “The Nigeria to Vietnam corridor seems to be off the scale at the moment with illegal wildlife trade. There also remains a massive issue of illegal wildlife trade coming from Southern Africa headed into parts of Asia. Other notable activity is the significant increases in the volume and pace of illegal wildlife trade originating from South America going into parts of Europe and Asia.”



The interconnected global impacts stemming from wildlife trafficking

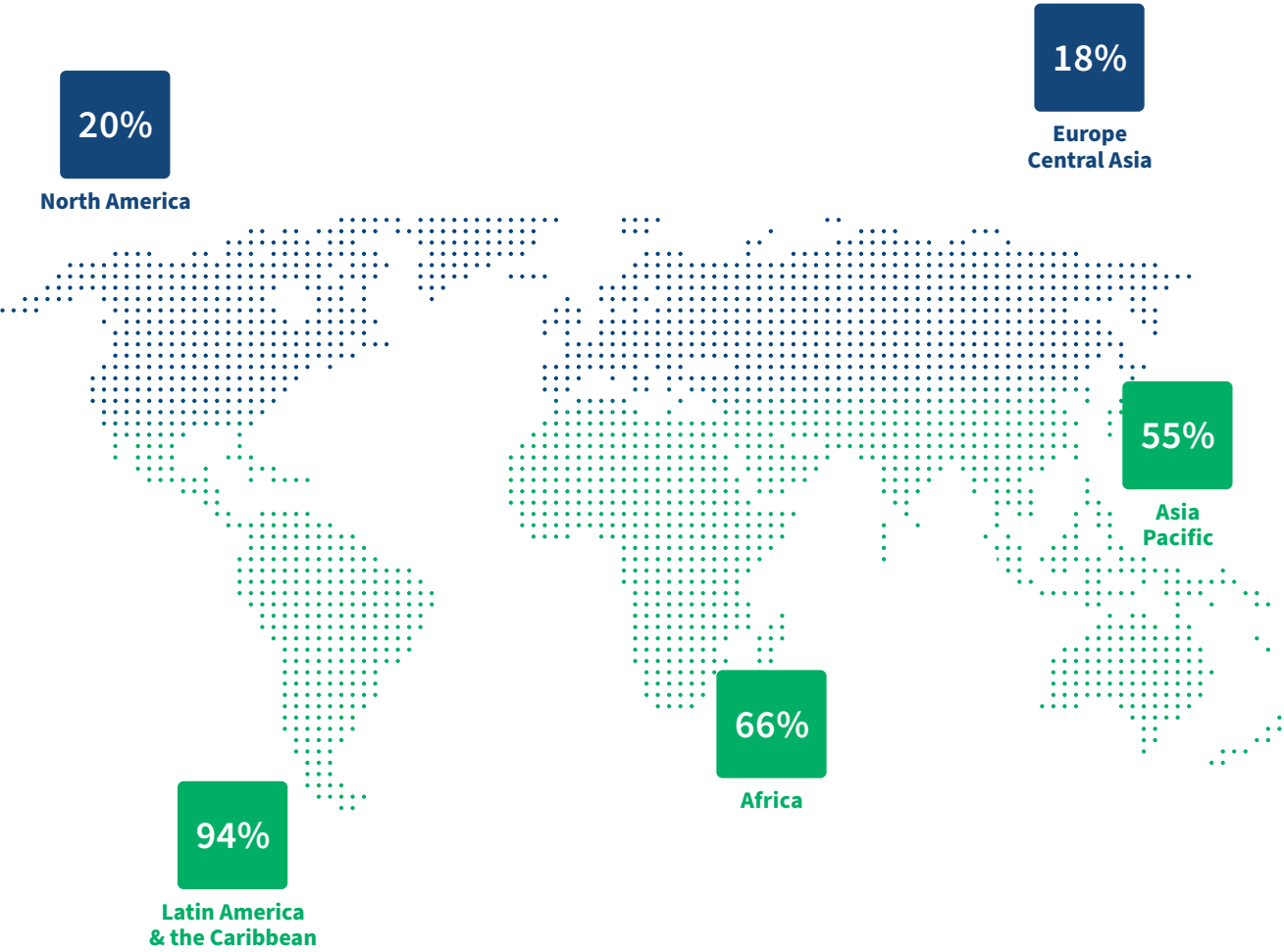


Wildlife contraband

can also be concealed with legitimate cargo, hidden in luggage, in taxidermy, inside logs, in the trunk of a car, in public transport or air freight, and has even been found disguised inside boxes of wine, custom-made clothing or hair rollers.⁹

The numbers and statistics on wildlife trafficking seizures only partially illustrate the severity of the issue as they do not account for the innumerable illegal shipments that avoid detection and successfully reach their destination. A microcosm of this challenge is illustrated in recent statistics estimating that only about 10% of trafficked ivory contraband is intercepted by law enforcement.¹⁰ Wildlife trafficking crimes form a formidable tributary of revenue for transnational crime syndicates that ripples out into perilous societal, environmental and global security impacts. Profits from wildlife trafficking are often used to fund other organized crimes, including human trafficking and narcotics trade. The same routes used to illegally smuggle wildlife are often used for smuggling weapons, drugs and people.¹¹ Illegal wildlife trade helps facilitate financial crimes including money laundering, bribery and corruption which further erodes economic stability in global regions already facing pronounced economic disparity.

Biodiversity Loss by Region



Source: World Wildlife Fund, Living Planet Report® 2022, Living Planet Report 2022 | Pages | WWF (worldwildlife.org)

Wildlife trafficking is the convergence point of a multi-faceted threat that is fueling interconnected and negative impacts on global security, human health interests and environmental sustainability:

- The Living Planet Index (LPI), tracking populations of mammals, birds, fish, reptiles and amphibians, reveals an average 69% decrease in monitored wildlife populations since 1970.¹²
- Overexploitation of a species tied to illegal wildlife trade is considered the second-largest direct threat to many species after habitat loss.¹³
- The recent pandemic encapsulates the magnitude of human health and economic threats tied to zoonotic diseases linked to illegal trade and consumption of wildlife.
- An estimated 60% of known infectious diseases and up to 75% of new or emerging infectious diseases (EIDs) are zoonotic in origin. Each year, zoonoses are responsible for 2.5 billion cases of human illness and 2.7 million human deaths worldwide.¹⁴
- Live animals, which are shown to carry potential to spread zoonotic diseases, account for 40% of known wildlife trafficking seizures in the air transport sector in the Latin America and Caribbean region.¹⁵
- The top commodity groups seized in the EU in 2021 were, in order of the number of reported seizure records, medicinals derived from plants and animals, live birds, reptile bodies, parts and derivatives, live reptiles and amphibians, live coral and coral rock, elephant ivory and mammal bodies, parts and derivatives.¹⁶
- Invasive species can contribute to the decline and extinction of native species. The growing popularity of the exotic pet industry exacerbates this challenge and damages ecosystems. A microcosm of this is seen in the numbers showing of the 140 non-native species of reptiles discovered in Florida, 85% of them were imported through the exotic pet trade.¹⁷
- The Latin America and Caribbean region is one of the main points of origin for the global timber trade, legal and illegal.¹⁸ Five countries from this region, Brazil, Bolivia, Peru, Colombia and Mexico, are included in the top 10 global countries for total loss of primary forest.¹⁹



Increases in public demand and consumption rank among the root drivers of illegal wildlife trafficking.

“The economics of legal wildlife trade and illegal wildlife trade are often intertwined and difficult to separate,”

says Patricia Raxter, director of intelligence and analysis, United for Wildlife. “Illegal wildlife moves within legal wildlife trade supply chains which obfuscates the issue and makes it complex to track, trace and target with preventative measures. Compounding the challenge is the public end consumer misconstruing the issue of wildlife trafficking into one that is limited to the high-profile media reports about iconic species trafficking, such as elephant ivory and pangolin scales. Consumers are misinformed about the dubious origins of the

pet reptiles and aquarium fish they are buying at their local pet shop or the lizard skin purse or boots they are purchasing online.” This level of voracious and uninformed consumer demand creates a growing market for illegal wildlife trade. Transnational criminal organizations capitalize on these opportunities by using modern logistics and financial systems — pushing forward the cyclical and devastating security, environmental and human health impacts we collectively face as a global society.

Where wildlife trafficking intersects with your day-to-day business

Global and regional regulatory scrutiny is steadily increasing around bribery and corruption, financial crimes and environmental and societal issues, including wildlife trafficking. Specific regulatory oversight aimed at preventing wildlife trafficking has been issued in recent years, including guidance from:

- UN General Assembly (UN General Assembly Resolution 73/343)
- International Consortium on Combating Wildlife Crime (ICWC)
- Financial Action Task Force
- ASEAN

More stringent laws with higher penalties for wildlife trafficking crimes are also beginning to gain traction in several countries in Africa, Latin America and in Hong Kong and China.

Being associated with wildlife trafficking, and vis-à-vis, transnational organized crimes, even when it is an unintentional association, is detrimental for business continuity, brand reputation and shareholder value. Businesses typically face a one-two punch when a sanctions, bribery and corruption or money laundering violation tied to wildlife trafficking occurs. First come the expenses incurred from the regulatory penalties, enforcements, personal liabilities and required remediation activities. A business must also manage the supply chain and operations disruptions, loss of brand affinity and erosion of investor, employee and consumer trust — indirect costs that inflict long-term performance impacts and last well beyond the initial fines and penalties.

The connections to wildlife trafficking crimes creating these costly compliance and reputational risk vulnerabilities may be well-concealed within

an organization’s critical relationships and supply chains — exposing a business to unintended complicity in facilitating illegal wildlife trade. Transnational criminal organizations profiting from illegal wildlife trade utilize technologies, networks and payment systems that span beyond any one country or region. Transactions and front-end activities linked to wildlife trafficking are often discretely dispersed within legitimate business activities and relationships. Many wildlife trafficking supply chains are based in cash until transportation and shipping come into play, further complicating the ability to operate with a level of risk visibility needed to adhere to anti-money laundering compliance, Know Your Customer, Know Your Business and Customer Identification Program protocols.

The interconnected supply chains and elusive relationships that are inherent to wildlife trafficking crimes make it very complex for individual business organizations to spot and isolate the suspicious behaviors and transaction anomalies that indicate wildlife trafficking risk.

- Front or shell companies are mainly used in both source and destination countries by criminals for illegal wildlife trade (IWT).²⁴
- Registered breeders are known to launder wild animals through their facilities, contributing to the difficulty in pinpointing illicit transactions and illegal activities.²⁵
- Corruption is a major enabler for IWT. Corrupt facilitators enable the illegal trade in wildlife to occur by accepting bribes, issuing fake or forged Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) permits or licenses — or simply turning a blind eye to illegal activities.²⁶
- Syndicates frequently rely on a network of complicit officials, including custom officials, immigration or port personnel, across source, transit and destination countries in order to avoid detection.²⁷ Both petty and grand corruption are common in wildlife trafficking.

Shareholder and consumer expectations about corporate accountability and global citizenship is also simultaneously escalating and influencing more investment and purchasing decisions.

73%

of investors

report factoring a brand’s social and environmental efforts into their investing decisions²⁰

70%

of consumers

want to know how the brands they support are addressing social and environmental issues²¹

46%

of consumers

pay close attention to corporate social responsibility (CSR) when making purchase decisions²²

80%

of consumers

say they would tell friends and family about a brand’s CSR efforts²³



How collaborative efforts are showing success in combating wildlife trafficking



Five years of progress in preventing illegal wildlife trafficking

The frontline effort to prevent wildlife trafficking is gaining ground with stronger focus on public and private collaborations to track and thwart trafficking and proactively fight these crimes. The bank-led United for Wildlife Financial Taskforce is at the epicenter of these efforts and playing a crucial role in disrupting wildlife trafficking and working to end the illegal wildlife trade, by using existing systems to detect money laundering and proceeds of illegal goods. Founded in October 2018 with 19 bank members, the Financial Task Force now numbers more than 60 bank and financial institution members covering six of the seven continents. This global presence and cooperative effort enable non-government organizations (NGOs), private entities and regional government agencies to approach wildlife trafficking investigations from a more coordinated level of visibility across critical financial transactions, relationships and supply chains.

“Through the Financial Taskforce’s consortium and global connections we’ve helped expand the focus of wildlife trafficking investigations to encompass the financial elements underpinning the crimes,”

shares Geraldine Fleming, financial taskforce manager, United for Wildlife. “Instead of the investigative efforts ending at the point of a seizure, now a seizure is a starting point to go deeper and connect the source and destination countries with the players and transactions involved in the trafficking trail all the way through to the monetization of the crime. Our taskforce members are an integral resource for facilitating information sharing and collaboration across the cross sections between the NGOs, government agencies and private entities like transport companies.”

	 Law Enforcement Investigations	 Interdictions and Seizures	 Arrests	 Employees Trained
October 2023	610	285	484	111k
June 2023	583	272	427	106k
March 2023	550	239	346	105k
October 2022	496	224	312	103k
July 2022	454	192	254	101k
January 2022	325	153	142	97k
November 2021	288	147	124	91k
July 2021	241	138	97	91k
April 2021	198	130	69	88k
February 2021	155	120	49	82k
November 2020	120	112	38	77k
July 2020	100	112	38	70k
January 2020	70	108	32	68k
May 2019	52	19	22	49k
February 2019	49	12	22	40k
November 2018	41	7	22	35k
July 2018	32	6	8	32k

The growing global footprint of the Financial Taskforce is raising awareness about the modes of operation and strategic tactics employed by the transnational criminal organizations involved in wildlife trafficking crimes. In the five years since their beginning, the Financial Taskforce is gaining critical momentum by contributing intelligence and resources that are moving law enforcement investigations forward toward arrests and convictions that disrupt and deter illegal wildlife trafficking. A financial investigation into wildlife

trafficking can typically take two to three years to reach a successful conclusion. The increasing trajectory of arrests and convictions for wildlife crimes is expected to continue on an upward trend as more investigations come to fruition.

The Financial Taskforce is continuously building awareness about the preventative role financial institutions and private entities can play in taking proactive measures to prevent wildlife trafficking.

“One of the biggest achievements of the Financial Taskforce is for the majority of our members across six continents dealing with illegal wildlife trade and responding to cases of illegal wildlife trade is now business as usual in most of those banks,”

says Robert Campbell, head of United for Wildlife. “Taking direct action within their internal processes and contributing investigative intelligence as a resource is now purpose-built into our members’ corporate ethos. Together, we are leading a

collaborative approach to tackle wildlife trafficking head on.”

The taskforce is enlarging their membership by reaching out to more regional, local and national banks who may be more exposed to poaching syndicates or trafficking networks. They are also continuing their focus on education and awareness about the societal and environmental perils of wildlife trafficking and the financial pathways transnational crime rings are using to monetize wildlife crimes.

- Kruger National Park saw a 46% decline in rhino poaching incidents in 2022 (following the identification of a network of corrupt officials through financial analysis, successful arrests and prosecutions for poaching and money laundering).²⁸
- Teo Boon Ching, a Malaysian national, pleaded guilty in the U.S. district court to one charge of conspiracy to commit wildlife trafficking of at least 219kg of rhinoceros horns with an estimated value of about US\$2 million. He was sentenced to 18 months in jail. Teo was known to authorities as a “Godfather” in a two-decade long international conspiracy for large-scale wildlife trafficking of rhinoceros horn, elephant ivory and pangolin scales.²⁹
- Lin Yunhua a Chinese national who is allegedly a leader of an African wildlife trafficking syndicate known as the Lin-Zhang gang, received a 14-year jail sentence, after he was convicted of three wildlife crimes in Malawi.³⁰
- Malawian authorities have sent 14 people to prison in connection with the trafficking syndicate, including Lin’s wife and son-in-law. Lin’s daughter was also arrested in December 2020 for alleged money laundering offenses.³¹
- An eight-count U.S. indictment handed down in November 2022 charges two officials of the Cambodian Forestry Administration, Ministry of Agriculture, Forestry and Fisheries; the owner/founder of a major primate supply organization and its general manager; and four of its employees with smuggling and conspiracy to violate the Lacey Act and the Endangered Species Act for their roles in illegally bringing wild long-tailed macaques into the United States.³²
- Law enforcement, prosecutors and government agencies mention that financial flows have now become one of the primary points of their investigations, as they can expose wider networks, aid in identifying and prosecuting syndicate leaders and lead to longer sentences for those convicted of wildlife trafficking crimes.³³

Positioning your business to play a proactive role in preventing wildlife trafficking



Taking a stand against wildlife trafficking starts with raising institutional awareness about the business continuity, societal and environmental impacts of these crimes by illustrating the true extent of concerning interconnections and overlaps that exist within an illegal wildlife trafficking organization. Transactions are often a convergence point of illegal wildlife trafficking activity, but many times payments are small or concealed in legitimate business activity. Making a commitment to improve risk visibility across every component of supply chains and key business relationships is a great first step. Assessing payment flows across multiple types of platforms can also be valuable. Increasing transparency around the basic tenets of Know Your Customer and Know Your Business and removing enterprise siloes to capture a consistent and clear view of customers and suppliers better positions an organization to help prevent wildlife trafficking.

- Institutionalize financial workflows, red flags and key risk indicators
- Conduct ongoing monitoring against current sanctions, PEP and adverse media intelligence

- Increase clarity into core investments and lending practices
- File Suspicious Activity Reports to document trafficking risks
- Review asset management guidelines
- Build synergies between the Environmental Societal and Corporate Governance (ESG) function and procurement team
- Promote and participate in private-public partnerships

Advanced technologies can help simplify the workload of adding more scrutiny into compliance and operations workflows

- Artificial Intelligence and Machine Learning support a more nuanced look into transactions, behaviors and relationships
- Digital identity intelligence adds real-time insight into device, location and behaviors that may signal suspicious activity or transaction anomalies

The universal threats to global security, economic stability and environmental health posed by wildlife trafficking and the transnational crimes it continues to fund demand a unified and coordinated response. Recent successful wildlife crimes prosecutions and building legislative momentum toward codifying more stringent and wider-reaching wildlife trafficking laws demonstrate that cross-sector collaborative efforts toward combating illegal wildlife trade are beginning to reach critical mass. Understanding the financial trails underpinning wildlife trafficking supply chains is helping to effectively pierce the veil of opacity surrounding these crimes and beginning to drive valuable progress in disrupting the revenue streams, transport and trade tied to illegal wildlife trafficking. The concepts of environmental sustainability and survival reach well beyond corporate citizenship and core values — yet restoring the balance begins with collaborative efforts to reinforce and multiply the gains of individual impacts.

- A combination of individuals and businesses facilitate trade at all levels, from local middlemen dealing in small quantities, or corrupt officials taking advantage of bribes, to small-scale exporters seeking extra profits by including a consignment of the illegal goods in their regular activities.³⁴
- The primary detection control noted by the financial institutions was the screening of clients and parties to a transaction against adverse media databases. Some financial institutions emphasized the use of existing transaction monitoring technology to identify suspicious transactions that could potentially relate to illegal wildlife trade (IWT).³⁵
- Characteristics of these payments (tied to accounts being investigated for IWT) were round amounts, large amounts, cash deposits and withdrawals conducted from various locations in South Africa, card purchases abroad, casino spend and money remittances described as gifts.³⁶

Consider joining us in taking a direct
stand against wildlife trafficking

To learn more, please visit:

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About United for Wildlife

Founded by Prince William and The Royal Foundation in 2014, United for Wildlife aims to make it impossible for traffickers to transport, finance or profit from illegal wildlife products. By working collaboratively with the transport and finance sectors, building key partnerships with law enforcement and NGOs, and sharing information and best practices across the sectors, and across borders, United for Wildlife is disrupting this criminal network globally. www.unitedforwildlife.org.

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