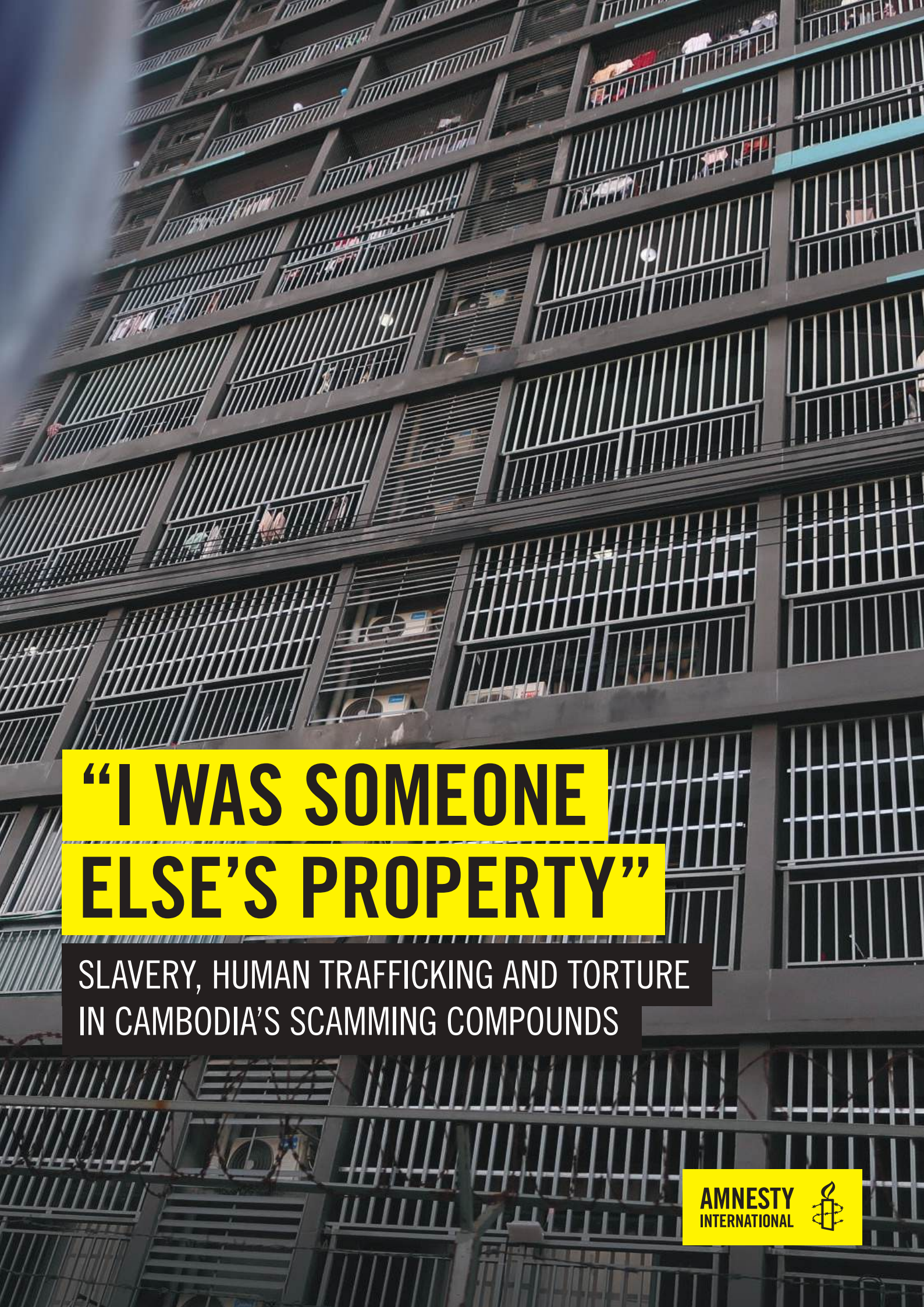

"I WAS SOMEONE ELSE'S PROPERTY"

SLAVERY, HUMAN TRAFFICKING AND TORTURE IN CAMBODIA'S SCAMMING COMPOUNDS

AMNESTY INTERNATIONAL

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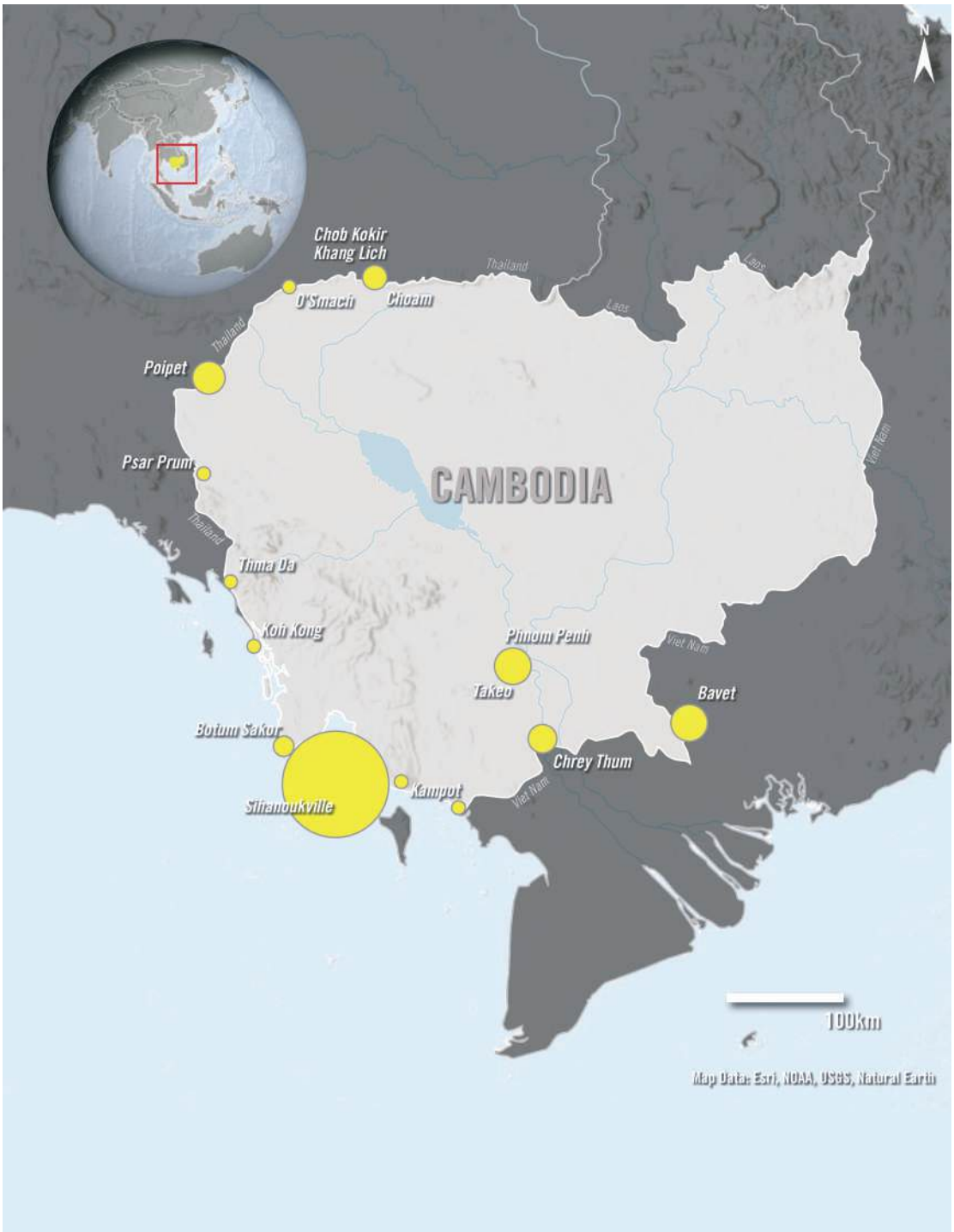
Glossary

BOSSES AND MANAGERS	These terms are often used interchangeably by those interviewed to indicate individuals who exercised power over them, indicating a hierarchy within the compounds. Nevertheless, someone identified as a "boss" or "manager" is not necessarily the actual head of the operations.
FORCED CRIMINALITY	This term has the same legal definition as forced labour, which makes no distinction between legal and illegal labour, and is treated in this report as a sub-category of forced labour. However, it is used in this report to highlight the fact that, in many cases, individuals were forced to engage in criminal behaviour, rendering the victim/survivor more vulnerable to threats of exposing said activity to state authorities by their exploiter.
ORGANIZATIONS	This term refers to groups in Cambodia, Viet Nam, Thailand, Malaysia or other locations in the region, and which advocate for assistance and rescue of victims/survivors from the scam industry. While these organizations are not affiliated to any government, they may include member(s) of a state agency acting in their personal capacity. The term is purposefully vague to protect the identities of such groups.
REGULAR AND IRREGULAR MIGRATION ROUTES	These terms refer to the ways that people enter and exit countries. "Regular" migration refers to routes that involve government regulation – for example, airports that have border crossings where visas and passports or other documentation are checked by government authorities. "Irregular" migration refers to entry and exit points into a country where government regulation is lacking or does not follow a legal process – for example, where a person enters a country without having their passport or visa checked by government authorities.
SCAM	An online scam is a deceptive or fraudulent scheme conducted over the internet, aiming to trick individuals into revealing personal or financial information and/or to steal money or property.
SCAMMING COMPOUNDS	Scamming compounds are locations where Amnesty International has determined that online scamming or online gambling operations are likely being run, and where trafficked persons or migrant workers involved directly or indirectly in such operations are subjected to deprivation of liberty and/or other human rights abuses carried out primarily by organized criminal actors. Scamming compounds can range from a small building to a set of buildings in a clearly delineated compound. These locations may house other businesses such as casinos, hotels or restaurants.
SUSPICIOUS LOCATIONS	Locations in which Amnesty International identified a range of security features similar to those observed at the scamming compounds.
VICTIMS AND SURVIVORS	The words "victim" and "survivor" refer to any individual who suffered any of the human rights abuses identified in this report. The terms are used interchangeably.

Map



The map above shows the spread of compounds in Cambodia. Larger circles indicate areas with a higher density of compounds, such as Sihanoukville with 22 compounds, while the smaller circles show towns where only one or two scamming compounds could be verified.

1 EXECUTIVE SUMMARY

> ***"I tried to escape … but they found me…"***
>
> Lisa, interviewed by Amnesty International in 2025.

Lisa was only 18 when she left her mother's home in Thailand. She was looking for work during a break from school. "[The recruiters] said I would work in administration… they sent pictures of a hotel with a swimming pool… the salary was high… I didn't know how to swim but I still want[ed] to be in the pool."[2] Lisa never saw the pool that she was promised. She was taken across a river into Cambodia by human traffickers at night. She spent 11 months in Cambodia and was transferred, against her will, to seven different scamming compounds – locations where she and others were forced to conduct online scams – before being released in early 2025. During her time in these compounds, she was not allowed to leave, and security guards were tasked with monitoring her movement and that of others.

Lisa was never paid for her labour and was forced to work on scams under threat of violence by her Thai and Chinese managers. She wanted to escape even if it meant risking death. She tried to escape twice; both times she was caught by staff from the compound. The second time, "[t]hey took me back to the dark room… there were four men… three of them held me down while the boss hit me on the soles of my feet with a metal pole… They told me that if I don't stop screaming, they're going to keep hitting [me] until I stop." When asked how she felt during her time in Cambodia, she said: "I wanted to go to home. I wanted to see my mother."

Lisa is one of thousands of survivors who have been subjected to similar abuses in Cambodia's scamming compounds. In this report, Amnesty International identifies the existence of at least 53 scamming compounds, defined as locations where online scamming or gambling is likely occurring, and where one or more trafficked persons or migrant workers involved directly or indirectly in such operations are subjected to deprivation of liberty and/or other human rights abuses carried out primarily by organized criminal actors. Amnesty International also identifies 45 suspicious locations with security features similar to those observed at confirmed scamming compounds.

This report concludes that human trafficking, forced labour, child labour, torture and other ill-treatment, deprivation of liberty and slavery are being carried out on a mass scale in scamming compounds located across the country. Significantly, it finds that, while the main perpetrators of the abuse are organized criminal groups, the Cambodian state has grossly failed to take adequate steps to stop the widespread human rights abuses despite being made aware of such abuses – in many cases, repeatedly. The state's failure to comply with its international legal obligations and responsibilities demonstrates acquiescence and points to complicity in these human rights abuses.

The scamming compound outside of Phnom Penh (PP09), where Lisa was forcibly transferred to and then tortured in 2025. Photo taken in 2023. © Amnesty International.

METHODOLOGY

Between September 2023 and May 2025, Amnesty International interviewed 58 survivors of scamming compounds, who reported being held in 31 different compounds, spread across 16 towns and cities in Cambodia, with 18 survivors reporting being held in more than one compound. In addition, Amnesty International reviewed records of 365 victims collected by organizations. Most of these victims were rescued by Cambodian authorities from sites where Amnesty International independently confirmed that human rights abuses had taken place. Amnesty International also interviewed 10 international and national organizations and spoke with more than 20 witnesses who lived or worked in, or in close proximity to, the scamming compounds, including security guards, taxi drivers, residents and small business owners.

Amnesty International delegates visited 52 of the 53 scamming compounds and 43 of the 45 suspicious locations identified in this report. The organization also relied on satellite imagery analysis, extensive media reports, UN agency reports, prison infrastructure guidelines and research, social media posts, government records and a range of other secondary sources to identify scamming compounds and suspicious locations. Annex I includes a profile for each of the scamming compounds with a breakdown of the evidence relied on for each determination. Annex II includes a list of all sites classified as suspicious locations.

SCAMMING COMPOUNDS

Almost all of the 423 victims whom Amnesty International interviewed and/or collected evidence on were kept within a restraining physical space – which multiple interviewed survivors described as a prison – during their time in the scamming industry. According to Amnesty International's findings, almost all 53 scamming compounds identified in this report had physical and organizational security features intended to confine people inside.

All of the scamming compounds investigated by Amnesty International had fencing, walls or another type of enclosure to mark the exterior perimeter. Perimeter walls usually had barbed wire or razor wire and, in some limited cases, what appeared to be electric fencing. None of the scamming compounds were accessible to the wider public, with guarded gates or entry/exit barriers preventing access to the site.

Almost all compounds used security personnel, with testimony indicating that the role of security guards went far beyond contributing to perimeter security; in many instances, perpetrating the abuse suffered by victims. Amnesty International documented and observed the presence of security guards in significant numbers and in multiple locations, with some survivors reporting dozens and up to hundreds of guards at the compounds in which they were confined. Eight scamming compounds included guard posts or probable guard positions in the interior of the compounds, while, in two cases, interior-facing guard towers were observed. At least 19 scamming compounds employed security guards or other people in possession of electric shock or stun batons, handcuffs and/or, in at least three cases, firearms, according to testimony from survivors.

HUMAN RIGHTS ABUSE

Most of the people interviewed by Amnesty International were likely enslaved, with almost all of them trafficked into compounds where they were forced to work on scams or in related jobs or else tortured and deprived of their liberty. Amnesty International interviewed nine children who had been trafficked to scamming compounds, forced to work, deprived of their liberty, enslaved and, in four cases, subjected to torture or other ill-treatment.

The abuses often overlapped and compounded each other – creating a climate of fear that enabled managers to exert control over people confined inside the compounds. Many of the abuses exacerbated or made possible further abuses. For example, the use of torture and other ill-treatment by compound bosses made deprivation of liberty easier to perpetrate because it sent a message to people inside the compound that attempts to escape would result in serious harm. Some compounds even had specific rooms – often known as "dark rooms" – which were designated places for torture.

HUMAN TRAFFICKING AND FORCED LABOUR

According to their testimonies, the experiences of all but one of the survivors interviewed by Amnesty International indicate that they are survivors of human trafficking for the purpose of labour or other exploitation in Cambodia. This included them being subjected to deceptive recruitment tactics; threats of violence; and/or the use of irregular migration routes, such as crossing boundaries by boats and traversing rivers and jungles so that traffickers could sell people into compounds where they were then confined and exploited. Once inside the

scamming compounds, almost everyone interviewed had been subjected to forced labour under the threat of violence if they failed to carry out sufficient work. This included the children interviewed, all of whom were victims of human trafficking.

TORTURE AND OTHER ILL-TREATMENT

Forty-five of the 58 survivors that Amnesty International interviewed had suffered torture or other ill-treatment. More than a quarter of survivors reported hearing or witnessing torture or other ill-treatment but not being directly subjected to it. More than a third of survivors reported being directly subjected to torture or other ill-treatment. In all cases except one, the torture and other ill-treatment described was carried out by compound managers or bosses. Testimony from survivors indicates that torture and other ill-treatment was used as a method of control and to discipline people within the compounds. In 10 cases, survivors and witnesses were told by the compound bosses or managers that torture and other ill-treatment was enacted because they, or others, had tried to contact police, embassies or family members to help them escape or had otherwise had their escape plans discovered.

"Dark rooms" were used in several compounds as places of punishment for people who did not or could not work or meet work targets, or who contacted the authorities. Electric shock batons were described by survivors as being used by guards and managers against people confined in the compounds, including children.

DEPRIVATION OF LIBERTY

Every survivor interviewed by Amnesty International had suffered unlawful deprivation of liberty; an essential element to enslaving victims. The deprivation of liberty also made other crimes easier to perpetrate and allowed for and exacerbated the abuses that survivors were subjected to. The experiences of survivors are reflected in the design and use of the physical space of scamming compounds. Survivors reported that "escape was impossible", describing cages and features "like a prison cell". In some cases, compounds not only looked like prisons, but appeared to have no other explanation than that they were purpose-built and designed to deprive people of their liberty.

SLAVERY

Thirty-two of the 58 survivors interviewed reported being sold into compounds, witnessing the sale of other people or described being threatened by managers with being sold to another compound. Whether people were sold to or between compounds or were indebted to the compounds/companies for which they worked, the complete control that compound bosses and managers exercised over survivors evinces the exercise of the powers attached to the right of ownership, by removing all autonomy from the confined person. Those interviewed were imprisoned in buildings with guards and design features that prevented their escape, told where to sleep, where, how and when to work, what they could and could not do and when, subjected in many cases to punishments that amounted to torture or other ill-treatment, and given little or no un-monitored contact with the outside world.

INTERNATIONAL LEGAL FRAMEWORK

The scamming industry is run by a network of transnational, criminal groups. However, without the consent or acquiescence of the Cambodian state, these non-state actors would be unable to perpetuate the abuses that this report has documented. In this context, under international human rights law, the Cambodian state has a duty to ensure that no one is held in slavery or servitude, or required to perform forced labour; is obligated to protect persons, including children, from economic exploitation; must prevent, prohibit, investigate and prosecute acts of torture; must effectively "investigate, prosecute and adjudicate trafficking, including its component acts and related conduct, whether committed by governmental or non-State actors"; must identify victims of trafficking and provide remedy; and must implement measures to ensure that "rescue" operations of trafficked persons do not further harm their rights and dignity.

STATE RESPONSE TO THE SCAMMING INDUSTRY CRISIS

The Cambodian government has principally reported on actions it has taken to address the scamming industry through its National Committee to Combat Human Trafficking (NCCT), the national mechanism responsible for implementing laws, policies and plans to combat human trafficking. In addition, the government has established a number of working groups, task forces and commissions as part of these efforts.

The NCCT has described having "taken drastic measures to strengthen national process[es] to counter the online scams, online gambling and human trafficking with significant results". In its May 2025 letter to Amnesty International, the NCCT explained that, between "2024 and early 2025, Cambodian authorities received a total of 3,553 intervention requests from foreigners, involving 6,584 individuals from 33 different nationalities. Out of these, 1,762 requests were found, representing 3,008 foreigners from 22 nationalities, while 335 requests, corresponding to 791 foreigners, could not be located. Notably, 1,456 requests were deemed irregular because they lacked identification for the requester, a specific address, or any contact information for further inquiries. Nevertheless, Cambodian authorities continue to investigate these cases." It also noted how between 2024 and 2025, Cambodian authorities conducted crackdowns on a total of 28 locations.

Despite the actions reported by the NCCT, Amnesty International found the Cambodian state's response to be grossly inadequate. The state's failure to comply with these obligations and responsibilities is analysed through four separate but overlapping categories of acts or omissions:

- The Cambodian state has failed to effectively investigate scamming compounds and the human rights abuses taking place therein, including slavery, human trafficking, forced labour, child labour, unlawful deprivation of liberty, and torture and other-ill treatment;
- The Cambodian state has failed to promptly and effectively identify, assist and protect victims of trafficking and to avoid further harming their rights and dignity;
- The Cambodian state has consented or acquiesced to the torture and other ill-treatment taking place at scamming compounds; and
- The Cambodian state has failed to regulate security companies and tools of torture and other ill-treatment.

CAMBODIA'S FAILURE TO EFFECTIVELY INVESTIGATE

The Cambodian state has failed to effectively investigate scamming compounds and the human rights abuses taking place therein, including slavery, human trafficking, forced labour, child labour, unlawful deprivation of liberty and torture and other-ill treatment. In particular, and as it relates to the 53 scamming compounds identified by Amnesty International:

- More than a third, or 20, of the compounds were the subject of one or more police/military interventions, but Amnesty International documented human rights abuses continuing to take place at these locations even after such interventions;
- About a third, or 18, appeared to not have been investigated by the government as of the date of publication;
- Less than a third, or 13, appeared to have been subject to some level of intervention or investigation and Amnesty International was unable to determine whether human rights abuses continued to take place; and
- Only two appeared to have been shut down after state intervention.

In the 20 cases where Amnesty International was made aware of a state intervention, evidence indicates that the police or military operations either resulted in removals of victims/survivors from compounds or appeared to involve investigations or "raids", or both. However, in all 20 cases, Amnesty International documented human rights abuses occurring at the compounds after the police or military operations. In nine of the 20 cases the government intervened two or more times; with the maximum number of documented cases of police intervention at one compound being at least four.

The pattern of state intervention observed by Amnesty International in these cases indicates that, when the police or military intervened, they tended to rescue only one or a small number of individuals, and only in response to a request for help. Most problematically, even when state-led interventions like police "rescues" took place, they were largely controlled by scamming compound bosses or managers and did not result in the closure of the compound. In many of the "rescues", instead of entering the compound and investigating, the police would simply meet a boss, manager or security guard at the gate, who would hand them the individual(s) who had requested the rescue.

For example, Lisa, whose story is mentioned above, told Amnesty International she was tortured at a compound outside Phnom Penh (PP09) in early 2025. However, a year earlier, a survivor, who Amnesty International interviewed, said they were trafficked and confined there in mid-2024. In the following 12 months, (1) an international media outlet described the site as a scamming compound after speaking with seven victims (October 2024); (2) more than 1,000 foreign nationals were reportedly detained by police at the compound (October 2024); (3) a Cambodian media outlet reported that 25 foreign nationals had been sent to court for questioning after the raid (November 2024); and (4) an organization reported a further rescue of an individual, likely a victim of human rights abuses, from the same site (early 2025).

Accordingly, when Lisa arrived at this compound in early 2025, it had already been the subject of previous human trafficking allegations, public reporting on human trafficking and violence and state intervention, including "rescues", in at least two instances. According to Lisa, this scamming compound had security features in place such as highly securitized walls to prevent escapes and rooms that were designated for torture and other ill-treatment. Lisa said that she lay in one of these rooms for weeks after she was tortured because she could no longer walk.

THE CAMBODIAN STATE HAS FAILED TO EFFECTIVELY INVESTIGATE SCAMMING COMPOUNDS AND THE HUMAN RIGHTS ABUSES TAKING PLACE THEREIN

Most survivors interviewed gave stories that indicated similar systemic corruption and collusion across different cities and provinces of Cambodia. These accounts indicate that the police were aware of the human rights abuses taking place at scamming compounds and failed to put an end to such abuses, in breach of their obligations under international law.

CAMBODIA'S FAILURE TO IDENTIFY VICTIMS OF HUMAN TRAFFICKING

In addition, the state also failed to promptly and effectively identify, assist and protect victims of human trafficking, often temporarily detaining them in immigration detention centres after failing to identify them as victims of human trafficking. Inside detention centres they were asked to pay for food, slept on the floor and were not told for how long they would be detained. Alongside rescue group testimony, Amnesty International documented at least three cases showing that most survivors of scamming compounds spend two to three months in detention centres or police stations after being "rescued". Although police may require time to investigate allegations of human trafficking, the survivors and local organizations reported that victims were not questioned in detail about their experiences and the length of detention appeared arbitrary.

CAMBODIA'S ACQUIESCENCE TO TORTURE

This report shows that the Cambodian government acquiesced to the torture and other ill-treatment taking place at scamming compounds. Where torture and other ill-treatment occurs but is not directly committed by state actors, the authorities can still be responsible if they knew or had reasonable ground to believe it was occurring or failed to exercise due diligence to investigate, prosecute and punish non-state perpetrators.

Cambodian authorities have been aware that torture and other ill-treatment has occurred and continues to occur as a result of the many police led "rescues" and state interventions at scamming compounds across the country, in addition to media and NGO reporting. Given that the authorities were well informed of allegations of torture and other ill-treatment, they were placed under an obligation to investigate these locations and prosecute individuals for perpetrating torture and other ill-treatment. However, as indicated above, two thirds of scamming compounds identified by Amnesty International have either not been investigated or have been investigated and torture or other ill-treatment nonetheless continued to take place with near impunity.

CAMBODIA'S FAILURE TO REGULATE TOOLS OF TORTURE AND OTHER ILL-TREATMENT

Based on the testimony collected by Amnesty International, the use of electric shock batons was and remains widespread at scamming compounds. In at least 19 out of 53 compounds, survivors said they were tortured using electric shock batons or saw electric shock batons in the possession of bosses, managers or security guards. In this context, the Cambodian government has failed to prohibit the acquisition and use of the primary documented tools for torture and other ill-treatment occurring at the scamming compounds – the direct-contact electric shock baton. Cambodia has failed to enact legislation that would prohibit the use and sale of inherently abusive law enforcement equipment, in line with recommendations of the UN Special Rapporteur on torture and other cruel, inhuman or degrading treatment or punishment.

Amnesty International shared these findings with the government of Cambodia. On 26 May 2025, the NCCT wrote but did not substantively respond to the findings of human rights abuse set out in this report. Further, the NCCT neither acknowledged nor responded to the list provided by Amnesty International of 53 scamming compounds (Annex I) and 45 suspicious locations (Annex II).

The NCCT did, however, note that "[f]rom the beginning of 2024 to 2025, Cambodian authorities conducted crackdowns on a total of 28 locations" (without defining crackdowns), and explained that "authorities promptly search for individuals who request intervention, often with the cooperation of the premises' owner". It also stated that they had "forwarded to court" 19 cases and "apprehended" "92 ringleaders and accomplices from 6 nationalities". It also clarified that "information received is not considered as formal complaint that necessitates a criminal investigation".

CONCLUSION

In this report, Amnesty International documents the alarming human rights crisis taking place within the scamming industry in Cambodia since 2022. It has identified at least 53 scamming compounds where human rights abuses have taken place or continue to occur, including human trafficking, torture and other ill-treatment, forced labour, child labour, deprivation of liberty and slavery. Amnesty International has also shown a pattern of failed state behaviour which has allowed serious abuses to flourish. The government's woefully ineffective response and failure to meet its obligations to adequately prevent and investigate the scamming crisis demonstrates its acquiescence and points towards complicity in the human rights abuses taking place.

Cambodia must urgently step up its efforts to address this crisis to ensure that no other people seeking job opportunities, like Lisa, end up trafficked into a scamming compound, forced to work, tortured and deprived of their liberty. It must investigate and shut down all scamming compounds and properly identify, assist and protect all victims and provide support and remedy to them. Other states must also provide support to their nationals both when they are identified as victims in Cambodia and also on their return.

KEY RECOMMENDATIONS

TO THE CAMBODIAN GOVERNMENT

- Take urgent steps to identify and eradicate public sector involvement in human trafficking and preventing and reducing corruption and bribery in all their forms. All public officials suspected of being implicated in trafficking and/or corruption that facilitates trafficking should be investigated and prosecuted in accordance with due process and fair trial standards.
- Urgently conduct thorough and effective investigations into each of the scamming compounds identified and the human rights abuses detailed in Annex I.
- Urgently conduct thorough and effective investigations into the suspicious locations identified in Annex II.
- During and/or following these investigations, publicly report on the progress made in, and results of, these investigations, including on the number and nature of prosecutions and convictions of recruiters, brokers and scamming operators relating to the abuse and crimes found to have taken place at the scamming compounds.
- Ensure accurate and timely identification of victims and potential victims of human trafficking for all forms of exploitation, including forced criminality, to facilitate access to justice, assistance and remedy.
- Prohibit the production, promotion, transfer and use of all direct-contact electric shock weapons and equipment developed for law enforcement including, but not limited to, stun guns and electric shock batons.

TO THE GOVERNMENTS OF COUNTRIES WHOSE NATIONALS ARE BEING TRAFFICKED INTO CAMBODIA, INCLUDING BUT NOT LIMITED TO CHINA AND THE MEMBER STATES OF ASEAN

- Assess whether the existing legal framework is adequate and, where necessary, develop and strengthen it to ensure an adequate legal framework on trafficking by amending or adopting legislation in accordance with international standards to ensure, among other things, that the crime of trafficking, and practices covered by its definition, are precisely defined in national law and the human rights protection of trafficked persons is effectively built into anti-trafficking legislation.
- Ensure that embassies are sufficiently resourced to provide information and urgent support to migrants in distress in Cambodia, including providing consular staff with appropriate training in responding to requests for information and assistance from trafficked persons.

TO ALL OTHER STATES INCLUDING THOSE WHOSE NATIONALS ARE BEING SCAMMED

- Foreign governments should use all powers at their disposal to compel the Cambodian government to act – including but not limited to investigating individuals and charging them with the international crimes of enslavement and torture and other ill-treatment.

2 METHODOLOGY

The purpose of this report is to document and demonstrate that slavery, human trafficking, forced labour, child labour, torture and other ill-treatment, and deprivation of liberty are being carried out on a massive scale in the scamming industry across Cambodia. The report also demonstrates that the Cambodian state has grossly failed to take adequate steps to put a stop to the widespread human rights abuse despite being made aware of such abuse – in many cases, repeatedly. To establish this, Amnesty International has relied on a wide range of primary and secondary sources to identify 53 scamming compounds where such abuse has taken place and 45 additional locations that Amnesty International considers to be suspicious because of the presence of certain security features.

2.1 TESTIMONY FROM VICTIMS/SURVIVORS, ORGANIZATIONS AND WITNESSES

Amnesty International conducted in-person and remote interviews with 58 survivors from scamming compounds in Cambodia. Of the 58 survivors interviewed, 43 were male and 15 were female. Nine of the 58 were child survivors, of which six were male and three were female. These survivors are of seven nationalities: 24 Thai survivors, 20 Chinese survivors, six Malaysian survivors, three Bangladeshi survivors, two Vietnamese survivors, one Indonesian survivor, one Taiwanese survivor and one Ethiopian survivor. Survivors reported being held in 31 different scamming compounds, spread across 16 towns and cities in Cambodia, with 18 survivors reporting being held in more than one compound.

Amnesty International informed all interviewees about the nature and purpose of the research and how the information would be used. Researchers obtained oral consent from each person prior to the interview. No incentives were provided to interviewees in exchange for sharing their testimonies.

Interview questions were focused on the experiences of the survivors, including experiences on their journeys to Cambodia, their experiences while being confined, as well as their experience of rescue/escape and repatriation. While some survivors shared information about the scamming activities they were involved in while confined, this was not the primary focus of the interviews. Questions about scamming activities may have exacerbated fears that survivors would be prosecuted for their roles in scams. In many cases, the survivors had not been repatriated at the time of the interview and were awaiting help from their embassies to leave Cambodia. Many felt unsafe because they were outside of their home countries and still in the country where they had been abused.

In order to verify the information provided by the survivors, especially when it concerned the locations where they said they were confined, Amnesty International relied on photographs, text messages and other digital evidence provided by interviewees,[1] historical satellite imagery of the sites, social media posts from companies operating in or in close proximity to the scamming compounds, and Telegram messages between individuals and groups involved in rescue operations. In 42 cases of those interviewed, Amnesty International was able to determine with certainty the scamming compound in which they had been located at the time that they suffered human rights abuse(s).

1 It was often not possible to get information from their cell phones which may have shown their precise location, because mobile phones were confiscated – or their contents deleted – before or during the rescue process or phones were taken by compound managers or traffickers before or during their confinement and deprivation of liberty. In many cases, survivors were not able to show on a map where they were at the time of the abuses but through the use of descriptions of journeys and nearby landmarks, as well as photographs, Amnesty International was able to locate almost all of scamming compounds where survivors were held.

All survivors have been given pseudonyms to protect their identities. Some details given by survivors have been left out of this report as they could be used to identify them and could put them or others at risk.

In addition to survivor interviews, Amnesty International reviewed records shared by international and local organizations of 365 individuals who were either "rescued" by state authorities or escaped from scamming sites. Due to the risk to the organizations, the groups are referred to as "organization [#]".

Of these 365 individuals, Amnesty International had access to written statements from 33 victims of scamming operations in Cambodia that were recorded by three organizations.[2] Amnesty International reviewed these statements and, where possible, corroborated them with information obtained from interviews conducted by Amnesty International with survivors. In addition, documents, pictures, location sharing and other information provided by the organization was used to verify the statements. Amnesty International also interviewed lawyers, outreach officers and managers of the organization and reviewed internal policies and documents that outlined the organization's procedures for taking on human trafficking cases. The 33 victim statements were used to corroborate evidence obtained from interviews Amnesty International conducted directly, and to support allegations that a specific location was a scamming compound. They are not directly cited in this report.

Second, Amnesty International had access to a collection of evidence including victim statements, interview notes, text messages, maps and photographs from a further 81 victims. Several organizations shared this information[3] and some of it was independently verified by Amnesty International. This evidence was used to geolocate locations where victims were confined and to corroborate allegations of torture and other ill-treatment.

2 Information shared to Amnesty International by organization 2, 8 and 11, 2025; on file with Amnesty International.
3 Information shared to Amnesty International by organizations 1, 4, 6, 8 and 11, 2025; on file with Amnesty International.

Finally, Amnesty International had access to records that included information relating to 251 rescues or escapes which took place from mid-2022 to mid-2023.[4] Amnesty International independently interviewed four survivors from these 251 rescues or escapes, and reviewed locations and pictures provided by the survivors. Amnesty International also reviewed the processes relied upon by the organization to identify survivors and rescues, including by conducting in-depth interviews with rescuers and managers of the organization. Based on this information, Amnesty International is confident that the information pertaining to the 251 additional recorded rescues or escapes is credible. This evidence was used to support allegations that a location was a scamming compound.

Separately, Amnesty International interviewed 13 national and regional organizations, which provided information about the scamming industry in Cambodia and regionally.

Amnesty International also spoke with over 20 witnesses who lived or worked in or in close proximity to the scamming compounds, including security guards, taxi drivers, residents and small-business owners. To protect their security, none of these witnesses are named in this report.

Amnesty International faced several challenges in obtaining access to victims and survivors to conduct interviews. Some survivors did not want to talk to Amnesty International; others were only willing to speak off the record or after they had left Cambodia. Some survivors to whom Amnesty International spoke feared retribution either by compound managers or local authorities. In other cases, survivors were too traumatized to talk. Several organizations have reported that many victims required psychological and other medical support and were not able to be interviewed. Additionally, some survivors said they did not want to share their stories because of fear of prosecution in their home countries.

2.2 IDENTIFICATION OF SCAMMING COMPOUNDS

In addition to survivor and victim statements, Amnesty International relied on site visits, satellite imagery analysis, wide-ranging media reports, United Nations (UN) agency reports, prison infrastructure guidelines and research, social media posts, Cambodian government records and a range of other secondary sources to identify scamming compounds and suspicious locations. Annex I includes a profile for each of the scamming compounds with a breakdown of the evidence relied upon for each determination. Annex II includes a list of all sites classified by Amnesty International as suspicious locations. Each location was assigned a code that corresponds to a geographic area and a number (for example, a site in or near the Cambodian capital, Phnom Penh, would be given the code “PP” and a numeric code, like “01”). See Annex I for a list of all codes and scamming compounds.

Between December 2023 and May 2025, Amnesty International delegates visited 52 of the 53 scamming compounds and 43 of the 45 suspicious locations between one and 10 separate times each. Delegates approached compounds from a variety of directions, attempting, where possible, to circle each compound and identify physical security features (such as walls and cameras) and organizational security features (such as security guards and their positioning throughout the compound).

Security permitting, delegates took photographs of the locations and spoke with people who were present near the sites, including, in a few instances, security personnel guarding the entrances to the compounds.

4 Information shared to Amnesty International by organization 1.

In addition, Amnesty International drew on satellite imagery to confirm the locations, dates of construction and general layout of compounds along with any changes to the areas visible from above. Where possible, the security features of the scamming compounds and suspicious locations were observed and compared to other similar buildings.

Amnesty International used photo-mapping platforms, which capture ground-level images from publicly accessible roads, to find images of the exteriors of some of the scamming compounds.

Amnesty International also relied on other secondary sources, including international, regional and national news reports; reports from the United Nations Office on Drugs and Crime (UNODC), the mandate of which includes supporting states "in facing threats and impact of drugs and crime";[5] and posts on social media sites such as Telegram, where anonymous users reported locations where relatives were being – or had been – confined, often with images of locations. Amnesty International is indebted to journalists in the region whose extensive reporting on the scamming industry in Cambodia provided useful contextual information for this report.

Amnesty International's lists of scamming compounds and suspicious locations are not exhaustive. In identifying these sites, researchers were limited in several ways. First, visiting each site, which was necessary to obtain evidence of security features, was not always possible because of security risks. Second, even when site visits were possible, unless Amnesty International was able to observe security features and/or obtain primary or secondary evidence of human rights abuse(s) taking place at that location, the location was not identified as a scamming compound or suspicious location. Third, as noted above, it was difficult to find survivors who were willing to speak on the record. Accordingly, sites that fulfilled neither of these requirements (a documentable human rights abuse or physical and organizational features that facilitate such an abuse) are not named or identified in this report. However, based on survivor testimony and interviews with several organizations, Amnesty International believes that human rights abuses are taking place in many more scamming industry locations across Cambodia.

Finally, the research includes publicly available information on state interventions and investigations, however it is possible that other interventions and investigations did occur that are not captured in this report. As noted below, the state was provided with the opportunity to respond and provide further information on state interventions in relation to the scamming compounds and suspicious locations identified by Amnesty International but declined.

2.3 STATE RESPONSIBILITY

The Cambodian government has reported on some of the actions it has taken to address the scamming industry through its National Committee to Combat Human Trafficking (NCCT), the national mechanism responsible for implementing laws, policies and plans to combat human trafficking. The NCCT publishes an annual report, as well as an Anti-Trafficking National Action Plan every five years. These regular publications provide some data on numbers of complaints, victims, suspects and others. In addition, the government has established working groups, task forces and committees that may, on occasion, report actions taken in the context of the scamming industry.

5 UNODC, "Mandate", https://www.unodc.org/romena/en/mandate.html (accessed on 6 May 2025).

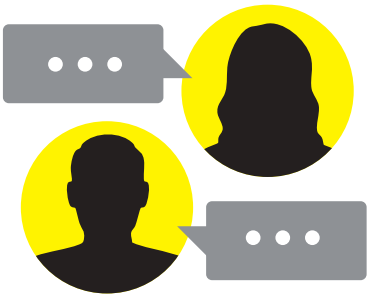
On 12 May 2025, Amnesty International sent a summary of the report, Annex I and Annex II to the Cambodian government. The NCCT responded on 26 May 2025. Where relevant, their response is included in the text. In addition, a copy of the NCCT's letter can be found in Annex III of this report.

2.4 CORPORATE ACTORS

The primary actors responsible for the human rights abuse perpetrated at scamming compounds are organized, criminal groups. These actors rely on a network of companies for their scamming operations. This report is not focused on these corporate actors. Therefore, no companies involved directly or indirectly in the scamming operations are named or identified in this report. In addition, while other companies may have been operating near or at the scamming compounds and suspicious locations listed in this report (see Annexes I and II), Amnesty International is not naming or identifying them and therefore not alleging in any way that such companies are linked to the human rights abuse documented in this report.

2.5 ACKNOWLEDGEMENTS

This report would not have been possible without the bravery of survivors and victims who shared their stories with Amnesty International; many organizations who have rescued or helped to rescue thousands of victims; and fearless journalists who have reported on human rights abuses across the scamming industry. Voice of Democracy (VoD) in Cambodia was the leading news outlet focusing on this work and many civil society groups, [6] including Amnesty International,[7] decried its closure by the Cambodian government in February 2023.[8] Since then, many organizations have told Amnesty International that the scamming industry has continued to flourish unreported across Cambodia.[9]



6 Cambodia League for the Promotion and Defense of Human Rights, "Media and civil society groups deeply disturbed by government's decision to revoke VoD's media license and the sexual harassment of a female reporter", 13 February 2023, https://www.licadho-cambodia.org/pressrelease.php?perm=509

7 Amnesty International, "Cambodia: Shuttering 'Voice of Democracy' outlet is attempt to slam door on independent media", 13 February 2023, https://www.amnesty.org/en/latest/news/2023/02/cambodia-shuts-down-voice-democracy-media/

8 See VoD's investigative feature, "Enslaved", for the most comprehensive reporting on the issue up until its closure: VoD, "Enslaved: an investigation" (various dates), https://vodenglish.news/enslaved/

9 Amnesty International interviews with organizations 3, 4, 5, 6, 7, 8, 9, 10 and 13, 2024, 2025.

3 BACKGROUND

The growth of scamming operations in Southeast Asia can be traced back to the rise of casinos and online gambling in the region, particularly in the 1990s and 2000s. As gambling became illegal in mainland China, Chinese criminal groups invested heavily in casinos and hotels in Southeast Asian countries, including Cambodia, Laos and Myanmar. However, as a result of the COVID-19 pandemic lockdowns and strict border controls, criminal organizations sought new areas for profit, repurposing their existing infrastructure and networks towards online scamming operations.[10] As countries in the region opened up following the pandemic measures, traffickers exploited people's economic distress and desperation to find alternative livelihoods.[11] Cambodia, jointly with Myanmar and Laos, is consistently identified as one of the primary hotspots for scamming operations and human trafficking.

3.1 SCAMMING OPERATIONS IN CAMBODIA

In the mid- to late-2010s, Cambodia experienced a surge in online gambling operations largely fuelled by Chinese investment and tourism. During this period, casinos, hotels and resorts were built in Cambodian cities such as Sihanoukville, followed by an influx of Chinese criminal networks in the gambling sector. In mid-2019, likely because of pressure from China, Cambodia banned online gambling.[12] Criminal organizations, already present in Cambodia and with access to or ownership of real estate interests, repurposed their operations towards online scamming. Unused casino and hotel spaces became hubs for these activities.[13] According to the UNODC, since 2020, scamming operations have continued to grow in Cambodia, fuelled by weak law enforcement and financial oversight, governance gaps and corruption.[14]

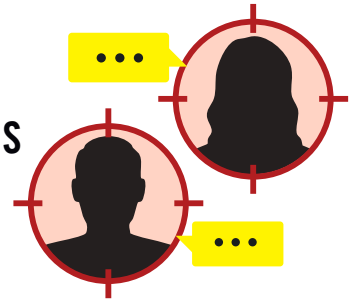
In late 2021 and early 2022, news outlets brought significant international attention to the large-scale scamming operations in Cambodia. This early reporting highlighted cities including Sihanoukville as burgeoning centres for online scamming operations and exposed human rights abuses including the trafficking of individuals, often but not always from neighbouring Southeast Asian countries and China, who were lured with promises of high-paying jobs and then forced to work in scamming compounds under threat of violence. In September 2021, news outlet Nikkei Asia provided first-hand accounts of torture and other ill-treatment and rescue operations from previously unreported scamming locations.[15] In July 2022, Al Jazeera released a documentary connecting the compound operations to Cambodia's elite.[16] ProPublica's investigations highlighted the direct link between online scam

10 OHCHR, "Online scam operations and trafficking into forced criminality in Southeast Asia: recommendations for a human rights response", 2023, https://digitallibrary.un.org/record/4020504?v=pdf, p. 6.
11 OHCHR, "Online scam operations and trafficking into forced criminality in Southeast Asia" (previously cited), p. 6.
12 OHCHR, "Online scam operations and trafficking into forced criminality in Southeast Asia" (previously cited), p. 6.
13 United States Institute of Peace, "Transnational Crime in Southeast Asia: A Growing Threat to Global Peace and Security", May 2024, p. 31.
14 According to Transparency International, Cambodia scored less than 24 out of 100 on the last three corruption indexes – ranking it 158th out of 180 countries on its corruption perceptions index. Transparency International, *Corruption Perceptions Index*, https://www.transparency.org/en/cpi/2023/index/khm (accessed on 31 March 2025); see also U.S. Department of State, 2024 Trafficking in Persons Report: Cambodia, 24 June 2024, https://www.state.gov/reports/2024-trafficking-in-persons-report/cambodia/
15 Nikkei Asia, "Cyber slavery: inside Cambodia's online scam gangs", 1 September 2021, https://asia.nikkei.com/Spotlight/The-Big-Story/Cyber-slavery-inside-Cambodia-s-online-scam-gangs
16 Al Jazeera, "Forced to scam: Cambodia's cyber slaves" (Video), 2022, https://www.aljazeera.com/program/101-east/2022/7/14/forced-to-scam-cambodias-cyber-slaves

BETWEEN 2023 AND 2025

THOSE WHO REPORTED OR SPOKE OUT PUBLICLY ABOUT THE SCAMMING COMPOUNDS

FACED SERIOUS RISKS



operations, particularly so-called "pig butchering" scams,[17] and widespread human trafficking, torture and other ill-treatment and other human rights abuses.[18] International and local news outlets, especially VoD, uncovered dozens of compounds and documented government raids, escapes by survivors and deaths of victims.[19] News stories were published almost daily during this period, with victim accounts from inside the compounds describing forced labour, being subjected to torture and other ill-treatment when they failed to meet scamming targets and confinement in prison-like buildings where they were violently attacked if they tried to escape.[20] By September 2022, in a letter addressed to the Cambodian government, several UN Special Procedures mandate holders indicated they had received information suggesting that more than 100,000 people had been trafficked to Cambodia for the purposes of forced labour, forced criminality and sexual exploitation.[21]

In response to the UN Special Procedures' letter, the Cambodian government claimed to have "taken drastic measures... with significant results".[22] It reported having investigated scamming operations, rescued trafficked individuals, arrested suspects, closed a handful of business sites and provisionally shut down locations. But it also significantly downplayed the crisis and the UN allegations, stating that, "[o]nly 19 out of the 104 cases [investigated] involved extortion and confinement. The rest entailed labor disputes, debt settlement, job switches without consent, discontent with living and working conditions, and missing family members."[23]

From late 2022 onwards, the Cambodian government continued to rescue victims and conduct raids of scamming sites, without reporting transparently or in significant detail.[24] Meanwhile, media reports continued to document the government's failure to put an end to the scamming industry, finding instead the continued proliferation of these operations.

Between 2023 and 2025, those who reported or spoke out publicly about the scamming compounds faced serious risks. Prominent and well-known rescuers and human rights defenders were arrested in 2022.[25] In 2023, VoD was forcibly closed in what organizations saw as retaliation for its in-depth

17 "Pig butchering" refers to scams where victims are duped into falling in love or befriending a person who then steals money from them over a period of time and typically through investments that build up before they lose a large sum of money. For a breakdown of how this often works, see ProPublica, "How human traffickers force victims into cyberscamming", 13 September 2022, https://www.propublica.org/article/human-traffickers-force-victims-into-cyberscamming

18 ProPublica, "How human traffickers force victims into cyberscamming" (previously cited).

19 Special Procedures Joint Communication, No. AL KHM 2/2022, 20 September 2022.

20 Special Procedures Joint Communication, No. AL KHM 2/2022, 20 September 2022.

21 Special Procedures Joint Communication, No. AL KHM 2/2022, 20 September 2022.

22 Permanent Mission of the Kingdom of Cambodia to the United Nations Office and other International Organizations at Geneva, Response to the Joint Communication No. AL KHM 2/2022 dated 20 September 2022, 15 November 2022 (No:2022/11/657), p. 4.

23 Permanent Mission of the Kingdom of Cambodia, Response to the Joint Communication No. AL KHM 2/2022 (previously cited), p. 3.

24 See Chapter 7 State Responsibility.

25 Voice of Democracy English, "Wife says trafficking rescuer sentenced to two years in prison", 30 August 2022, https://vodenglish.news/wife-says-trafficking-rescuer-sentenced-to-two-years-in-prison/

and continued reporting on the scamming crisis.[26] A leading journalist investigating the scamming compounds was arrested in October 2024 with civil society and human rights organizations assessing his arrest and the charges against him as retaliation for reporting on scamming compounds.[27]

3.2 TYPES OF SCAMMING OPERATIONS

Scamming operations typically involve running online schemes aimed at defrauding people. In all cases, the ultimate end is to seek profit.

SCAMMING OPERATIONS TYPICALLY INVOLVE RUNNING ONLINE SCHEMES AIMED AT

DEFRAUDING PEOPLE

Survivors told Amnesty International that they were forced to contact people using social media platforms and begin conversations.[28] Some of these conversations were then used to begin fake romances.[29] "Pig-butchering" scams, where scammers build trust with their victims before financially exploiting them, have been well-documented by the media but are not the only defrauding operations being run at scamming compounds in Cambodia. Other survivors described scams involving the use of fraudulent websites to steal information or sell products that would never be delivered, or scams to encourage investment in a certain enterprise.[30] Survivors also described being told to write up fraudulent documents – such as police notifications – that could be used to intimidate and trick people.[31] Sometimes, the survivors were also being exploited as part of the scam itself. In one compound in the city of Poipet, for example, survivors were kept in a room for most of the day and brought out only to have their faces filmed and photographed so that the managers could open bank accounts in Thailand[32] – presumably for use in money laundering.

26 Amnesty International interview with organizations 3, 4, 8 and 9, 2024, 2025.
27 Amnesty International, "Cambodia: charges against journalist highlight clampdown on press freedom", 2 October 2024, https://www.amnesty.org/en/latest/news/2024/10/cambodia-charges-against-journalist-highlight-clampdown-on-press-freedom/
28 Amnesty International interviews with Gelila, Daniel, Diep and Siti, 2023, 2024 and 2025; Information provided by organization 8, 2022; on file with Amnesty International.
29 Amnesty International interviews with Gelila, Daniel, 2023, 2025; Information provided by organization 8, 2022; on file with Amnesty International.
30 Amnesty International interviews with Bolin, Gang, Yeruo, 2024.
31 Amnesty International interview with Elias, 2024.
32 On file with Amnesty International.

4 LEGAL FRAMEWORK

4.1 SLAVERY

4.1.1 DEFINITION AND PROHIBITION OF SLAVERY

The prohibition of slavery and the slave trade is a peremptory norm of international law. It has been universally accepted by the international community and cannot be derogated from under any circumstances.[33]

The 1926 International Convention to Suppress the Slave Trade and Slavery (the Slavery Convention) defines slavery as "the status or condition of a person over whom any or all of the powers attaching to the right of ownership are exercised".[34] The 1956 Supplementary Convention on the Abolition of Slavery, the Slave Trade, and Institutions and Practices Similar to Slavery, to which Cambodia is a state party, builds on this, setting out four overarching practices considered "similar to slavery" – debt bondage, serfdom, forced marriage, and the trafficking of children for exploitation.

The Rome Statute of the International Criminal Court (ICC) – which Cambodia ratified in 2002 – similarly defines the act of "enslavement" as "the exercise of any or all of the powers attaching to the right of ownership over a person" and designates it a crime against humanity "when committed as part of a widespread or systematic attack directed against any civilian population, with knowledge of the attack".[35]

Slavery is also prohibited under Article 8 of the International Covenant on Civil and Political Rights (ICCPR) to which Cambodia is a party.

4.1.2 CONTROL EQUATING TO DE FACTO OWNERSHIP

The legal definition of slavery has been interpreted broadly by domestic and international courts which have often relied on indicators that show control or power equating to de facto ownership.[36]

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33 United Nations, Report of the International Law Commission Seventy-third session (18 April–3 June and 4 July–5 August 2022), https://legal.un.org/ilc/reports/2022/english/a_77_10_advance.pdf, Chapter IV, pp. 9-16.

34 International Convention to Suppress the Slave Trade and Slavery (1926), Article 1.

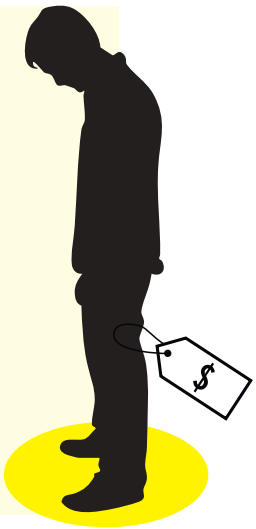
35 Rome Statute of the International Criminal Court (1998), Article 7(1)(c).

36 For example, the International Criminal Tribunal for the former Yugoslavia (ICTY) examined the international crime of enslavement in the *Kunurac* case of 2001. In its consideration of the case, the ICTY trial chamber surveyed broadly the international law and jurisprudence available and provided the following list of indications of slavery, anchoring the concept of enslavement in both ownership and control: "Indications of enslavement include elements of control and ownership; the restriction or control of an individual's autonomy, freedom of choice or freedom of movement; and, often, the accruing of some gain to the perpetrator. The consent or free will of the victim is absent. It is often rendered impossible or irrelevant by, for example, the threat or use of force or other forms of coercion; the fear of violence, deception or false promises; the abuse of power; the victim's position of vulnerability; detention or captivity, psychological oppression or socio-economic conditions. Further indications of enslavement include exploitation; the exaction of forced or compulsory labour or service, often without remuneration and often, though not necessarily, involving physical hardship; sex; prostitution; and human trafficking." ICTY, *Prosecutor v. Dragoljub Kunarac, Radomir Kovac and Zoran Vukovic,* case IT-96-23-T & IT-96-23/1-T, Trial Chamber judgment, 22 February 2001, https://www.refworld.org/jurisprudence/caselaw/icty/2001/en/18198, para. 542. In 2008, the Australian High Court clarified that in determining whether a situation amounted to slavery it was important to consider: "the capacity to make a person an object of purchase, the capacity to use a person and a person's labour in a substantially unrestricted manner, and an entitlement to the fruits of the person's labour without compensation commensurate to the value of the labour." See High Court of Australia, *R v. Tang*, HCA 39 (Gleeson CJ, Gummow, Kirby, Hayne, Heydon, Crennan and Kiefel JJ), 2008, paras 26 and 50. See also *Rantsev v. Cyprus and Russia* 2010 Application no. 25965/04 and International Criminal Court (ICC), *The Prosecutor v. Dominic Ongwen*, case ICC-02/04-01/15, Trial Chamber ix, 2021, https://www.icc-cpi.int/sites/default/files/CourtRecords/CR2021_01026.PDF, especially at para. 2712. In December 2024, the ICC published a new policy on the crime of slavery which advocates a broad reading of the definition of slavery and enslavement, providing an expansive list of indices that demonstrate exercise of the powers attaching to the rights of ownership. See: ICC, *Policy on Slavery Crimes*, 2024, https://www.icc-cpi.int/sites/default/files/2024-12/policy-slavery-web-eng.pdf, paras 68-69.

This jurisprudence, as well as legal scholars and UN bodies, has noted the importance of interpreting the definition of slavery broadly,[37] in a manner that recognizes the evolution from historical, chattel slavery.[38]

Indicators of slavery may include:

- The ability to sell, buy or loan a person;
- Control of a person's movement and physical environment;
- Measures taken to confine them or prevent escape;
- Use of psychological control, intimidation, threat of violence or coercion;
- Use of torture or other cruel, inhuman or degrading treatment;
- Subjection to forced labour, often without pay;
- Abuse of a vulnerability, such as the person's migration status;
- Exploitation, usually involving some gain for the perpetrator.[39]



In considering the definition of slavery in her 2017 report, Urmila Bhool, the then UN Special Rapporteur on slavery, referred to "control tantamount to possession":

> ***"That definition relates not only to the de jure status of slavery, but the de facto condition of slavery; it is not restricted to legal ownership – a status that has been abolished worldwide – but to a lived condition in which one individual exercises over another powers that are similar to or attach themselves to the right of ownership. A situation of de facto slavery implies that a person can exercise over another 'any or all' of the powers attached to ownership in circumstances where control tantamount to possession is present; that type of control constitutes a prerequisite for any de facto exercise of the powers attaching to ownership."***[40]

She further noted that, while there is a hierarchy in international law between slavery and other forms of exploitation – such as debt bondage and other practices considered similar to slavery – these practices can amount to slavery "when extreme forms of labour exploitation occur in the context of the exercise of powers tantamount to ownership over human beings, reducing them to commodities".[41]

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37 See for example: ICTY, *Prosecutor v. Dragoljub Kunarac, Radomir Kovac and Zoran Vukovic,* case IT-96-23 & IT-96-23/1-A, Appeal judgment, 12 June 2002, https://www.refworld.org/jurisprudence/caselaw/icty/2002/en/40004, para. 112.

38 Chattel slavey is what is often known as "traditional slavery" whereby a person is legally owned by another. While laws that historically permitted slavery have been abolished worldwide, more than half of the world's countries do not have legislation that explicitly criminalizes slavery and other exploitation. See: World Economic Forum, "Slavery is still legal in 94 countries - how can we change that?", 19 February 2020, https://www.weforum.org/stories/2020/02/slavery-not-a-crime-in-half-the-countries-of-world-new-research/

39 See for example, ICTY, *Prosecutor v. Dragoljub Kunarac, Radomir Kovac and Zoran Vukovic*, Trial Chamber judgment (previously cited); ICC, *The Prosecutor v. Dominic Ongwen*, (previously cited); *Rantsev v. Cyprus and Russia* 2010 Application no. 25965/04; and International Criminal Court (ICC), *Policy on Slavery Crimes*, (previously cited), paras 68-69.

40 Special Rapporteur on contemporary forms of slavery, including its causes and consequences (UN Special Rapporteur on slavery), Report, 2 August 2017, UN Doc. A/HRC/36/43, para. 9.

41 UN General Assembly, Contemporary forms of slavery, including its causes and consequences, 10 July 2018, UN Doc. A/73/139, para. 13.

Similarly, the ICC notes that human trafficking may (but will not always) constitute enslavement if it involves the exercise of ownership-like powers by traffickers over their victims.[42]

4.1.3 DOMESTIC LAW

Domestically, Cambodia has criminalized the act of enslavement and rendered it a crime against humanity where it is committed as "part of a widespread or systematic attack directed against any civilian population."[43] The punishment for crimes against humanity in Cambodia is life imprisonment.[44]

Given the overlap between slavery and many other serious human rights abuses documented in this research – and noting these abuses and violations may sometimes themselves be indicators of slavery – the rest of this chapter explores these concepts individually.

4.2 HUMAN TRAFFICKING

4.2.1 DEFINITION AND PROHIBITION OF HUMAN TRAFFICKING

The UN Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children (Palermo Protocol), which was adopted in 2000 and to which Cambodia is a state party, defines human trafficking as constituting three elements:

1. An "action": that is, the recruitment, transportation, transfer, harbouring or receipt of persons;
2. A "means" by which that action is achieved (threat or use of force or other forms of coercion, abduction, fraud, deception, abuse of power or a position of vulnerability, and the giving or receiving of payments or benefits to achieve consent of a person having control over another person); and
3. A "purpose" (of the action/means): specifically, exploitation.[45]

All three elements must be present to constitute "trafficking in persons".[46] The only exception is when the victim is a child, in which case the "means" requirement is no longer an element of the crime.[47]

42 International Criminal Court, Rome Statute, July 2002, https://www.icc-cpi.int/sites/default/files/2024-05/Rome-Statute-eng.pdf and footnote 11 in The Elements of Crimes, which was adopted in 2000 to aid interpretation and application of the Rome Statute. The Elements of Crimes adopted at the 2010 Review Conference are replicated from the Official Records of the Review Conference of the Rome Statute of the International Criminal Court, Kampala, 31 May -11 June 2010 (International Criminal Court publication, RC/11); See also: ICC, *Policy on Slavery Crimes*, (previously cited), para. 70.

43 Cambodian Criminal Code (2010), Article 188(3).

44 Cambodian Criminal Code (2010), Article 189.

45 "'Trafficking in persons' shall mean the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs". See: Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, Supplementing the United Nations Convention against Transnational Organized Crime (Palermo Protocol), Article 3(a).

46 See UNODC, "Issue paper: The concept of 'exploitation' in the Trafficking in Persons Protocol", 31 December 2015, https://migrationnetwork.un.org/resources/concept-exploitation-trafficking-persons-protocol, p. 5.

47 Palermo Protocol, Article 3(c).

The agreed definition of trafficking in persons further states that consent to the intended exploitation is irrelevant where any of the means of trafficking have been used.[48]

The Palermo Protocol obliges states parties to take a comprehensive approach to prevent, suppress and punish human trafficking, to protect and assist victims, and to promote cooperation between states in order to do so.[49] It provides an agreed legal definition of trafficking that frames human trafficking as a criminal justice issue.[50] However, trafficking in persons is also a serious violation of human rights and the promotion and protection of these rights must be central to any anti-trafficking initiative.

Following adoption of the Palermo Protocol, the Office of the UN High Commissioner for Human Rights (OHCHR) published the Recommended Principles and Guidelines on Human Rights and Human Trafficking (Recommended Principles and Guidelines) to provide practical, rights-based guidance for states.[51] The Recommended Principles and Guidelines affirm the primacy of human rights and call on states to ensure that anti-trafficking measures do not adversely affect human rights.[52] Guideline 5.6 calls on states to implement "measures to ensure that 'rescue' operations do not further harm the rights and dignity of trafficked persons".[53]

Principle 13 of the Recommended Principles and Guidelines notes that: "States shall effectively investigate, prosecute and adjudicate trafficking, including its component acts and related conduct, whether committed by governmental or non-State actors".[54]

4.2.2 DOMESTIC LAW

Domestically, Cambodia adopted the Law on the Suppression of Human Trafficking in Cambodia (2008) with the aim of implementing the Palermo Protocol "or other international instruments or agreements with regard to human trafficking that the Kingdom of Cambodia has ratified or signed".[55]

The law breaks down the constituent elements of trafficking into distinct and separate offences, including among others, "unlawful removal", "unlawful recruitment for exploitation", "the act of selling, buying or exchanging a person", and "transportation with purpose". The offences carry penalties ranging from two to 20 years' imprisonment, depending on the purpose of the criminal act, the age of the victim, and the nature of the offender.[56]

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48 Palermo Protocol, Article 3(b).

49 Palermo Protocol, Article 2.

50 The Palermo Protocol sits outside of the human rights machinery of the UN, with the UNODC. Negotiations on the text of the Palermo Protocol focused, in part, on whether human trafficking "should be approached primarily as a crime and border control issue or as a matter of states' obligations under international law to safeguard trafficked persons' human rights." Janie Chuang, "The United States as global sheriff: using unilateral sanctions to combat human trafficking", 2006, Michigan Journal of International Law, Volume 27, Issue 2, https://repository.law.umich.edu/cgi/viewcontent.cgi?article=1188&context=mjil, p. 441, (citing Bridget Anderson and Julia O'Connell Davidson, *Trafficking – A Demand Led Problem?*, 2002, https://gaatw.org/publications/The%20Demand%20Side%20part1.pdf, pp. 16-18).

51 OHCHR, Recommended Principles and Guidelines on Human Rights and Human Trafficking: Report of the United Nations High Commissioner for Human Rights (Addendum), 2002, UN Doc. E/2002/68/Add.1.

52 OHCHR, Recommended Principles and Guidelines on Human Rights and Human Trafficking (previously cited), Principle 3: Anti-trafficking measures shall not adversely affect the human rights and dignity of persons, in particular the rights of those who have been trafficked, and of migrants, internally displaced persons, refugees and asylum-seekers.

53 OHCHR, Recommended Principles and Guidelines on Human Rights and Human Trafficking (previously cited), Guideline 5.6.

54 OHCHR, Recommended Principles and Guidelines on Human Rights and Human Trafficking (previously cited), Principle 13.

55 Law on the Suppression of Human Trafficking in Cambodia (2008), Article 1.

56 Law on the Suppression of Human Trafficking in Cambodia (2008), Article 13 provides a definition for selling, buying or exchanging a person, which Article 14 prohibits and provides a punishment of imprisonment from two to five years. Article 15 provides that selling, buying or exchanging person for the purpose of profit-making or any form of exploitation is punishable by seven to 15 years' imprisonment. It further adds that, if the victim is a minor or the offence is committed by an organized group, the punishment of imprisonment shall be between 15 and 20 years. Article 19 criminalizes the receiving, harbouring or concealment of a person who has been unlawfully recruited, sold, bought, exchanged or transported for the purpose of profit-making against the will of the victim. This crime is punishable by imprisonment for seven to 15 years, or 15 to 20 years when the victim is a minor or the offence is committed by a public official who abuses their authority over the victim.

Chapter 3 of the law considers "Confinement" – meaning deprivation of liberty – as an offence. This is discussed in section 4.4 below on 'Unlawful Deprivation of Liberty', further demonstrating the intertwined relationship between slavery, human trafficking and confinement or deprivation of liberty.

4.3 FORCED LABOUR

4.3.1 DEFINITION AND PROHIBITION OF FORCED LABOUR

The Forced Labour Convention, 1930 (No. 29) of the International Labour Organization (ILO), ratified by Cambodia, defines forced labour as "any work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily".[57] The ILO has emphasized that "menace of penalty" refers not only to penal sanctions but also to various forms of coercion, such as threats, violence, retention of identity documents, confinement or non-payment of wages. The Convention does not exclude work that is illegal, such as scamming, from its definition of forced labour.[58]

Under the Protocol of 2014 to the Forced Labour Convention, states are required to begin making progress towards eradicating forced labour by educating the public and employers, ensuring comprehensive legislation to prevent forced labour, strengthening labour inspection regimes, protecting people from abusive and fraudulent recruitment practices, supporting due diligence in the public and private sector to address and respond to risks of forced labour, and addressing its root causes.[59]

The 2014 Protocol also requires states to take measures to identify victims and support their recovery and rehabilitation;[60] protect victims from punishment for criminal activities they were compelled to commit;[61] and to ensure access to effective remedies, irrespective of victims' legal status in the country.[62]

Finally, states are required to "cooperate with each other to ensure the prevention and elimination of all forms of forced or compulsory labour."[63]

Both the ICCPR and the International Covenant on Economic, Social and Cultural Rights (ICESCR) contain provisions to ensure that labour is performed freely,[64] with the ICCPR requiring that state authorities ensure that no one is held in slavery or servitude or required to perform forced or compulsory labour.[65] The ICCPR also obligates states to provide access to justice to persons whose rights have been abused and, in particular, to ensure an effective remedy is provided and enforced.[66]

57 ILO Forced Labour Convention No. 29, Article 2(1).
58 ILO Forced Labour Convention No. 29, Article 2(2).
59 Protocol of 2014 to ILO Forced Labour Convention No. 29, Article 2.
60 Protocol of 2014 to ILO Forced Labour Convention No. 29, Article 3.
61 Protocol of 2014 to ILO Forced Labour Convention No. 29, Article 4(2).
62 Protocol of 2014 to ILO Forced Labour Convention No. 29, Article 4(1).
63 Protocol of 2014 to ILO Forced Labour Convention No. 29, Article 5.
64 ICCPR, Article 8(3)(a); ICESCR, Article 6.
65 ICCPR, Article 8.
66 ICCPR, Article 2.

4.3.2 CHILD LABOUR

The Convention on the Rights of the Child, to which Cambodia is a state party, obliges states to protect children from economic exploitation,[67] including by protecting children from performing any work that is likely to be hazardous or to interfere with the child's education, or to be harmful to the child's health or physical, mental, spiritual, moral or social development.[68] States must adopt legislative, administrative, social and educational measures to ensure children's rights are not abused or violated. This includes fixing a minimum age or ages for employment, providing for appropriate regulation of hours and conditions of work and ensuring effective implementation to protect children from exploitation.[69] General Comment No. 16 (2013) of the Committee on the Rights of the Child recommends that states regulate business operations to "ensure safeguards to protect children from economic exploitation and work that is hazardous or interferes with their education or harms their health or physical, mental, spiritual, moral or social development."[70]

Furthermore, the ICCPR explicitly recognizes the right of every child to the protective measures required because of their age – such as measures against their exploitation due to their vulnerability as children.[71] The ILO Convention on the Worst Forms of Child Labour, 1999 (No. 182), ratified by Cambodia, prohibits any work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children.[72]

4.4 UNLAWFUL DEPRIVATION OF LIBERTY

4.4.1 DEFINITION AND PROHIBITION OF UNLAWFUL DEPRIVATION OF LIBERTY

Unlawful deprivation of liberty, sometimes referred to as confinement, is a possible element in situations of slavery, human trafficking, forced labour and torture and other ill-treatment – making these crimes easier by exerting control over a person's liberty and security. As such, deprivation of liberty is a key element and indicator of the human rights abuses that are the focus of this report.

Liberty and security of person are guaranteed by the Universal Declaration of Human Rights,[73] and by Article 9 of the ICCPR, which states that "[n]o one shall be deprived of his liberty except on such grounds and in accordance with such procedure as are established by law."[74] The prohibition of arbitrary deprivation of liberty is considered a peremptory norm of international law, which means it is binding on all states and cannot be subject to derogation.[75]

67 Convention on the Rights of the Child, Article 32.
68 Convention on the Rights of the Child, Article 32.
69 Convention on the Rights of the Child, Article 32.
70 Committee on the Rights of the Child, General Comment 16: State obligations regarding the impact of the business sector on children's rights, 17 April 2013, UN Doc. CRC/C/GC/16, para. 37.
71 ICCPR, Article 24.
72 ILO Convention 182 on the Worst Forms of Child Labour, Article 3.
73 Universal Declaration of Human Rights, Article 3.
74 ICCPR, Article 9.
75 WGAD, Report: *United Nations Basic Principles and Guidelines on the right of anyone deprived of their liberty to bring proceedings before a court.*, 4 May 2015, UN Doc. WGAD/CRP.1/2015, para. 11.

The UN Human Rights Committee's General Comment No. 35 on liberty and security of person states that:

> ***"States parties have the duty to take appropriate measures to protect the right to liberty of person against deprivation by third parties. States parties must protect individuals against abduction or detention by individual criminals or irregular groups, including armed or terrorist groups, operating within their territory. They must also protect individuals against wrongful deprivation of liberty by lawful organizations, such as employers, schools and hospitals. States parties should do their utmost to take appropriate measures to protect individuals against deprivation of liberty by the action of other States within their territory."[76]***

The Committee provides that deprivation of liberty "involves more severe restriction of motion within a narrower space than mere interference with liberty of movement".[77] It provides examples including, but not limited to, "police custody, *arraigo*, remand detention, imprisonment after conviction, house arrest, administrative detention, involuntary hospitalization, institutional custody of children and confinement to a restricted area of an airport, as well as being involuntarily transported."[78]

Similarly, the UN Working Group on Arbitrary Detention (WGAD) interprets its mandate to include the prohibition of instances in which "it is clearly impossible to invoke any legal basis justifying the deprivation of liberty."[79]

Article 11 of the ICCPR further clarifies that "[n]o one shall be imprisoned merely on the ground of inability to fulfil a contractual obligation".[80]

4.4.2 DOMESTIC LAW

Domestically, confinement is a criminal offence under the Law on the Suppression of Human Trafficking in Cambodia (2008). This law further entwines confinement with human trafficking, forced labour and enslavement. Under Article 21 of the law, confinement of a person without legal authority is punishable with between three and 10 years' imprisonment depending on the length of the confinement.[81] Where the crime of confinement is undertaken with aggravating circumstances, including torture and other ill-treatment or "barbarous acts", death of the confined person, or where the confinement was undertaken to obtain payment of a ransom, then the punishment is life imprisonment.[82]

Confinement is also a crime under Cambodia's Criminal Code, even when not accompanied by human trafficking or forced labour. Under Article 253, the unlawful confinement of a person is prohibited and punishable by imprisonment of between one and 10 years depending on the length of the confinement.[83] Confinement with aggravating circumstances, including torture and other ill-treatment or acts of cruelty, where confinement is committed to secure payment of a ransom, or where confinement is committed to demand fulfilment of a condition, is punishable by 15 to 30 years' imprisonment.[84]

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76 Human Rights Committee (HRC), General Comment 35 on Article 9 (Liberty and security of person), 16 December 2014, UN Doc. CCPR/C/GC/35, para 7.
77 HRC, General Comment 35 (previously cited), para. 5.
78 HRC, General Comment 35 (previously cited), para. 5.
79 UN Working Group on Arbitrary Detention, https://www.ohchr.org/en/about-arbitrary-detention
80 ICCPR, Article 11.
81 Law on the Suppression of Human Trafficking in Cambodia (2008), Article 21.
82 Law on the Suppression of Human Trafficking in Cambodia (2008), Article 22.
83 Cambodian Criminal Code (2010), Article 253.
84 Cambodian Criminal Code (2010), Article 254.

4.5 TORTURE AND OTHER ILL-TREATMENT

4.5.1 DEFINITION AND PROHIBITION OF TORTURE AND OTHER ILL-TREATMENT

Article 1 of the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (CAT), to which Cambodia is a state party, defines torture as:

> ***"any act by which severe pain or suffering, whether physical or mental, is intentionally inflicted on a person for such purposes as obtaining from him or a third person information or a confession, punishing him for an act he or a third person has committed or is suspected of having committed, or intimidating or coercing him or a third person, or for any reason based on discrimination of any kind, when such pain or suffering is inflicted by or at the instigation of or with the consent or acquiescence of a public official or other person acting in an official capacity. It does not include pain or suffering arising only from, inherent in or incidental to lawful sanctions."***[85]

According to Article 1(1) of CAT, an act constitutes torture if four elements are present: (1) intention, (2) infliction of severe physical or mental pain or suffering, (3) a purpose such as coercion, intimidation, obtaining information or a confession, or discrimination and (4) a degree of official involvement. In contrast, cruel, inhuman or degrading treatment or punishment ("other ill-treatment") is not defined under international law. In line with the position of many international and regional human rights monitoring bodies, Amnesty International considers that cruel, inhuman or degrading treatment or punishment may be defined negatively in relation to torture in that it lacks one or more of the above-mentioned elements of the torture definition.[86]

Article 16 of CAT applies the same language regarding "at the instigation of or with the consent or acquiescence of a public official or other person acting in an official capacity" to other acts of cruel, inhuman or degrading treatment or punishment which do not amount to torture.[87]

The UN Committee against Torture has addressed the question of state actors' consent and acquiescence to acts of torture and other ill-treatment perpetrated by non-state actors in its General Comment No. 2:

85 CAT, Article 1.

86 See: CAT, Article 16. See also: UN Committee against Torture, General Comment 2: Implementation of Article 2 by States Parties, 24 January 2008, UN Doc. CAT/C/GC/2, para. 10. For example, an act of ill-treatment would constitute cruel, inhuman or degrading treatment or punishment rather than torture if it lacks the required intention or the required purpose, or if the pain or suffering it causes is not "severe".

87 CAT, Article 16.

> ***"Where State authorities or others acting in official capacity or under colour of law, know or have reasonable grounds to believe that acts of torture or ill-treatment are being committed by non-State officials or private actors and they fail to exercise due diligence to prevent, investigate, prosecute and punish such non-State officials or private actors consistently with the Convention, the State bears responsibility and its officials should be considered as authors, complicit or otherwise responsible under the Convention for consenting to or acquiescing in such impermissible acts. Since the failure of the State to exercise due diligence to intervene to stop, sanction and provide remedies to victims of torture facilitates and enables non-State actors to commit acts impermissible under the Convention with impunity, the State's indifference or inaction provides a form of encouragement and/or de facto permission. The Committee has applied this principle to States parties' failure to prevent and protect victims from gender-based violence, such as rape, domestic violence, female genital mutilation and trafficking."***[88]

Therefore, where torture or other ill-treatment occurs but is not directly committed by state actors, the authorities can still be responsible if:

- The authorities knew that torture or other ill-treatment was occurring at a location; or
- The authorities did not know, but they should have known; or
- The authorities have failed to exercise due diligence to investigate, prosecute and punish non-state actors where accusations exist.

The UN Human Rights Committee (HRC) has also provided guidance on this issue, pointing in particular to the need for legislation by states to meet their duty under the ICCPR:

> ***"The aim of the provisions of article 7 of the International Covenant on Civil and Political Rights is to protect both the dignity and the physical and mental integrity of the individual. It is the duty of the State party to afford everyone protection through legislative and other measures as may be necessary against the acts prohibited by article 7, whether inflicted by people acting in their official capacity, outside their official capacity or in a private capacity."***[89]

88 UN Committee against Torture, General Comment 2 (previously cited), para. 18.
89 HRC, General Comment 20: Article 7 (Prohibition of Torture, or Other Cruel, Inhuman or Degrading Treatment or Punishment), 10 March 1992, para. 2.

4.5.2 THE TOOLS OF TORTURE AND OTHER ILL-TREATMENT

In 2023, the UN Special Rapporteur on torture and other cruel, inhuman or degrading treatment or punishment (Special Rapporteur on torture) published a list of items considered to be "inherently cruel, inhuman or degrading" based on either "(i) their technical specifications (design) such that they inflict pain or suffering, or are humiliating or debasing, that is, beyond the threshold permitted by the prohibition on torture and other ill-treatment; or (ii) because the purpose for which they are being used can be achieved by less harmful means, and hence their purpose is deemed to be illegitimate".[90] It includes direct-contact electric shock weapons, as the "electric charge is unnecessarily violent and cruel".[91]

Amnesty International considers direct-contact electric shock weapons, such as stun batons and stun guns, to be inherently abusive weapons. This is because they allow the user to easily apply extremely painful shocks by hand at the push of a button, including to very sensitive parts of the body such as the neck, throat, ears, underarms, groin and genitals, without long-lasting physical traces.[92] Direct-contact electric shock weapons and devices do not incapacitate individuals but deliver painful shocks. They have no legitimate law enforcement role that could not be achieved through less harmful means.[93]

As there is a substantial risk that the use of these weapons, as currently designed, can amount to arbitrary force, or to torture or other cruel, inhuman or degrading treatment or punishment, Amnesty International has previously concluded that they should never be used for law enforcement purposes and have no place in private security operations.[94] Furthermore, the lack of visible evidence of injury arising from direct-contact electric shock stun batons makes them appealing for torture and other ill-treatment as it allows perpetrators to hide their crimes with greater ease. The Manual on the Effective Investigation and Documentation of Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (the Istanbul Protocol) notes that, following electric shocks, "skin surfaces must be carefully examined because the lesions are not often easily discernible."[95]

4.5.3 DOMESTIC LAW

Domestically, Cambodia's Criminal Code criminalizes, but does not define, torture and other ill-treatment. Article 210 concerns torture and other ill-treatment and acts of cruelty, prescribing punishments of imprisonment from seven to 15 years.[96] Aggravating circumstances for torture and other ill-treatment raise the maximum punishment to 20 years' imprisonment, including when a victim is particularly vulnerable because of their age,[97] or when the motive is to prevent the victim from reporting an offence or seeking reparation for harm suffered,[98] or when the act is committed "against a victim or a civil party who reported an offence or [sought] reparation for harm suffered".[99]

Under Cambodia's Criminal Code, torture and other ill-treatment can be a crime against humanity when committed as part of a widespread or systematic attack directed against any civilian population.[100] Perpetrators found guilty are to be punished with life imprisonment.[101]

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90 UN Special Rapporteur on torture and other cruel, inhuman or degrading treatment or punishment (Special Rapporteur on torture), Interim report, 24 August 2023, UN Doc. A/78/324, Annex I, p. 12.
91 Special Rapporteur on torture, Interim report, 24 August 2023, UN Doc. A/78/324, Annex I, p. 12.
92 For an in-depth look at these tools, see: Amnesty International, *"I Still Can't Sleep at Night": The Global Abuse of Electric Shock Equipment* (Index: POL 30/8990/2025), 6 March 2025, www.amnesty.org/en/documents/pol30/8990/2025/en/
93 Amnesty International, "*I Still Can't Sleep at Night*" (previously cited), p. 5.
94 Amnesty International, *China's Trade in Tools of Torture and Other Ill-Treatment and Repression* (Index: ASA 17/042/2014), 23 September 2014, https://www.amnesty.org/en/documents/asa17/042/2014/en/, pp. 10-11.
95 Istanbul Protocol, para. 212.
96 Cambodian Criminal Code (2010), Article 210.
97 Cambodian Criminal Code (2010), Article 211(1).
98 Cambodian Criminal Code (2010), Article 212(1).
99 Cambodian Criminal Code (2010), Article 212(3).
100 Cambodian Criminal Code (2010), Article 188(6).
101 Cambodian Criminal Code (2010), Article 189.

4.6 REGULATING PRIVATE SECURITY ACTORS

4.6.1 USE OF PRIVATE SECURITY GUARDS

In the context of this report's findings, confinement and unlawful deprivation of liberty were often aided by the use of private security guards. Private security personnel are private citizens with no law enforcement powers. While they were employed to protect the property of the compound owners or managers, they have no lawful authority to deprive somebody of their liberty except in limited cases in order to hand a person suspected of committing a crime to the relevant state authorities.

The former UN Special Rapporteur on extrajudicial, summary or arbitrary executions has noted with respect to private security guards that the "power to exercise force is easily abused" and that, "[t]o avoid such abuses, those using force need to function within domestic legal frameworks on the use of force that comply with international human rights law and... appropriate mechanisms for accountability need to be in place."[102]

The Special Rapporteur further noted that "private security personnel have the same legal rights and responsibilities as ordinary citizens, but the level of their organization, their asserted expertise, and their preparedness to use force, all suggest that their conduct, particularly whether any use of force is reasonable and not excessive, should be judged *more strictly*."[103]

In line with recommendations made by the Special Rapporteur, the Cambodian authorities must require that all private security providers have vetting and training procedures that include human rights norms and principles; require private security providers to bring company policies in line with international norms and standards; implement a system of mandatory reporting of any harms caused by private security companies; ensure that private security personnel who are found to have unlawfully resorted to violence are criminally accountable; and ensure that there are no barriers to access to remedy for victims of corporate human rights abuse.[104]

4.6.2 DOMESTIC LAW

The Cambodian government regulates security companies under the Ministry of the Interior and General Commission of the National Police, in accordance with Sub-Decree No. 289 on private security management (2013).[105] Article 6 of Sub-Decree No. 289 provides that the General Commission of the National Police has the responsibility to, among other things, provide training to security agents on the specialized skills and laws in place.[106] It is not clear, however, how this works in practice and whether this includes training on misuse of violent force, unlawful arrest, confinement and the prohibition on torture and other ill-treatment. Security companies are also required to apply for permission to use "tools" for the purposes of safeguarding a location.[107]

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102 UN Special Rapporteur on extrajudicial, summary or arbitrary executions, Report on the right to life and the use of force by private security providers in law enforcement contexts, 6 May 2016, UN Doc. A/HRC/32/39, para. 51.

103 UN Special Rapporteur on extrajudicial, summary or arbitrary executions, Report on the right to life and the use of force by private security providers in law enforcement contexts (previously cited), para. 74 (emphasis added).

104 UN Special Rapporteur on extrajudicial, summary or arbitrary executions, Report: t*he right to life and the use of force by private security providers in law enforcement contexts*, 6 May 2016, UN Doc. A/HRC/32/39.

105 Sub-Decree No. 289 on private security management (2013), Article 5 (unofficial translation).

106 Sub-Decree No. 289 on private security management (2013), Article 6 (unofficial translation).

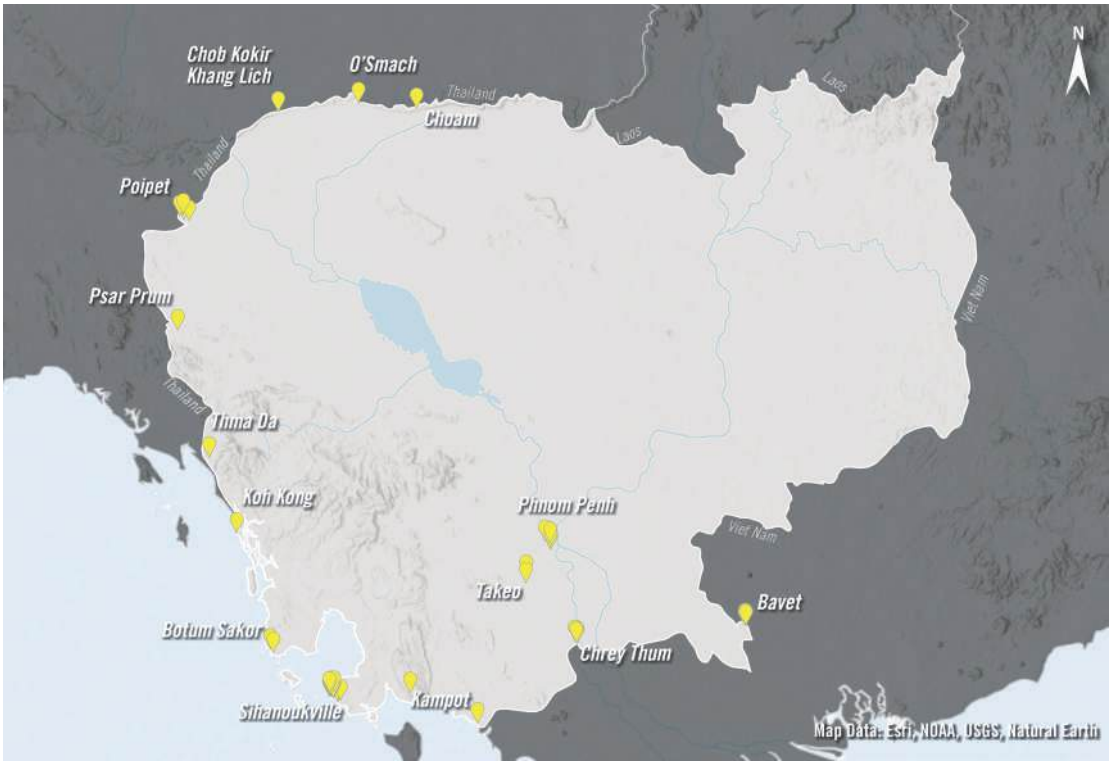
107 Sub-Decree No. 289 on private security management (2013), Article 13 (unofficial translation).

5 SCAMMING COMPOUNDS

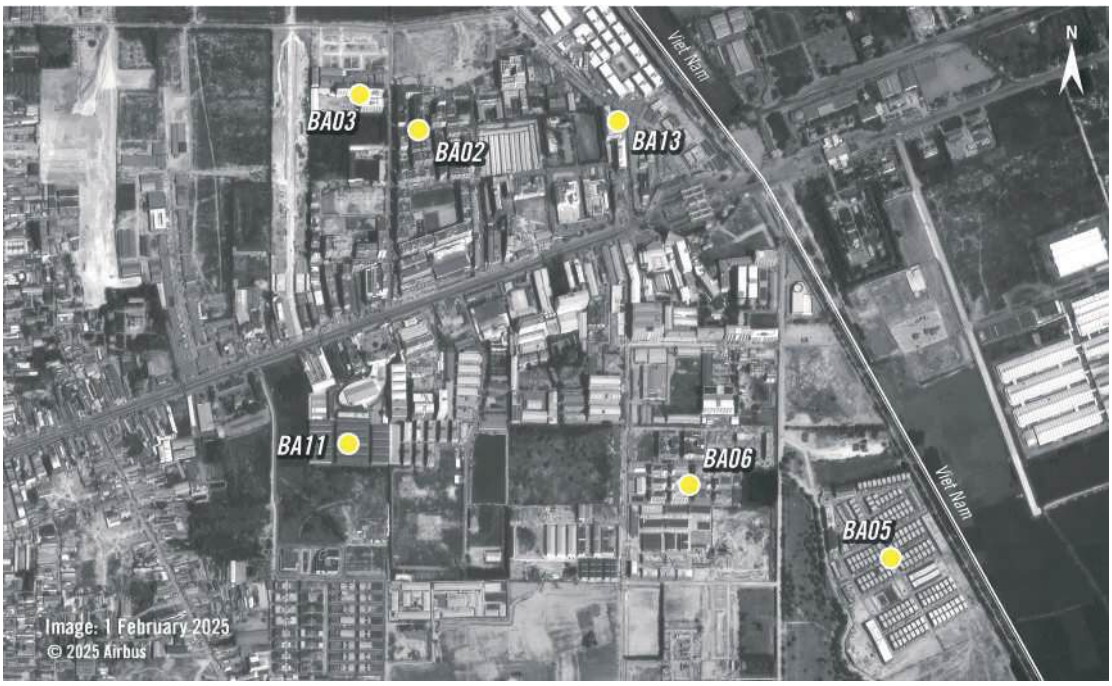
This report documents the multiple serious human rights abuses suffered by trafficked persons or migrant workers in the scamming industry in Cambodia, including slavery, human trafficking, forced labour, child labour, torture and other ill-treatment, and deprivation of liberty. The most common abuse documented by Amnesty International was deprivation of liberty. All 423 victims whom Amnesty International interviewed and/or collected evidence on were kept within a restraining physical space – which multiple interviewed survivors described as a prison – during their time in the scamming industry.

In almost all of the compound locations that Amnesty International was able to visit, delegates observed the presence of physical and organizational security features. Based on the assessment of these features, corroborated by primary and secondary evidence from survivors who were confined in these locations, Amnesty International was able to identify a non-exhaustive list of 53 "scamming compounds" across 16 towns and cities, many of which appear to have the capacity to hold thousands of people.

For the purposes of this report, Amnesty International defines these sites as locations from which online scamming or online gambling operations are likely being run, and where trafficked persons or migrant workers involved directly or indirectly in such operations are subjected to deprivation of liberty and/or other human rights abuses by organized criminal actors. Scamming sites can range from a small building to a set of buildings in a clearly delineated compound. All the locations featured in this report were used to confine people.



The map above shows the 53 scamming compounds documented by Amnesty International.



Overview of Bavet, highlighting the six scamming compounds documented by Amnesty International.

Overview of Sihanoukville, highlighting the 22 scamming compounds documented by Amnesty International.

TK01: Drone footage of a compound with high perimeter walls, security cameras, and security guards © Amnesty International 2025

5.1 CONCENTRIC CIRCLES OF SECURITY

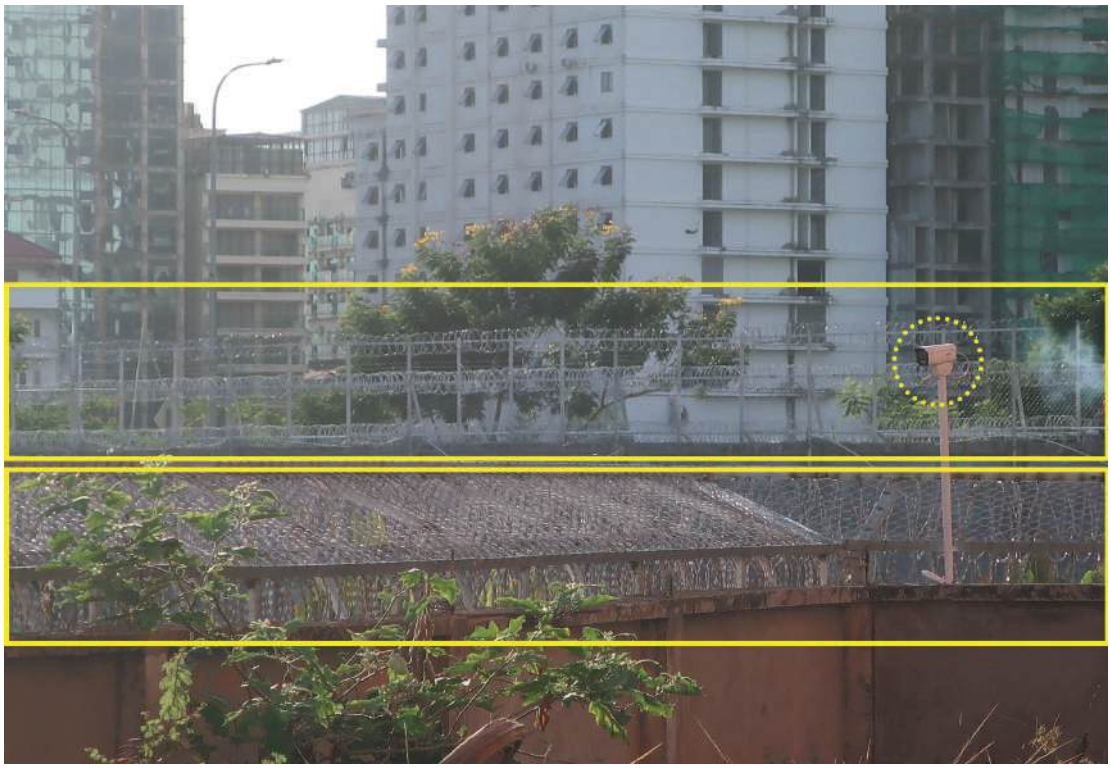
All the scamming compounds identified by Amnesty International had physical and organizational security features that resembled those of prisons;[108] the main intention being to keep people inside. [109]

The UNODC 2015 Handbook on Dynamic Security and Prison Intelligence, which provides guidance on how to ensure prison security, explains that physical security can include "the architecture of the prison buildings, the strength of the walls of those buildings, the bars on the windows, the doors and walls of the accommodation units, the specifications of the perimeter wall and fences, watchtowers" as well as "the provision of physical aids to security such as locks, cameras, alarm systems (internal and external), x-ray machines, metal detectors, radios, handcuffs" and others.[110]

108 In some cases, physical security features were not visible from the street level, but survivors described them inside the building where they were being confined. See Annex I profiles for SI11, SI21, SI35, SI43 and SI44 for examples of scamming compounds with limited visible security features on the perimeter wall.

109 Amnesty International was able to confirm that none of the sites identified in analysis as scamming compounds are actual prisons or correctional facilities. This was done by visiting almost all locations featured in the report and cross-checking the locations with existing public lists of Cambodian prisons and correctional facilities. Further, these locations were shared with the Cambodian government, giving them an opportunity to clarify if any locations were correctional facilities. The government did not respond to this query.

110 UNODC, *Handbook on Dynamic Security and Prison Intelligence*, 2015, https://www.unodc.org/documents/justice-and-prison-reform/UNODC_Handbook_on_Dynamic_Security_and_Prison_Intelligence.pdf



SI08, with its internally focused security cameras and razor wire that curves back into the compound, which local workers who constructed the fence described as looking "worse than a prison". © Amnesty International, 2024.

The UNODC Handbook introduces the concept of "concentric circles of security". The use of multiple "rings" or "layers" of security ensures that "even if one layer or element of security fails, prisoners will need to overcome a number of security measures to escape".[111] At each layer, there is an opportunity "to deter, detect, disrupt and delay a prisoner or intruder".[112] Physical barriers (walls, fences, gates and bars) and monitoring and surveillance systems (CCTV, movement detection systems, watchtowers and guard posts) can provide one or more layers. Organizational security, such as guards in a watchtower, can supplement or, depending on their location within the site, create additional layers of security.[113]

Like in prisons, the scamming compounds appeared to have at least two layers of security: the first located at the boundary of the compound – the "perimeter security" – and a second layer, as one moved inward through the site. Similar to the "prison estate [which] comprises a wide variety of buildings",[114] the scamming compounds varied significantly in terms of their overall structure with some appearing to be retrofitted buildings with prior purposes; while others were likely purpose-built, meaning that they appeared to have been built with an intention to deprive people of their liberty (for scamming operations or other purposes).[115] Security elements and the overall structure varied across compounds but Amnesty International was able to identify certain common features of the physical and organizational security of the compounds. These are described in turn below.

111 UNODC, *Handbook on Dynamic Security and Prison Intelligence* (previously cited).
112 UNODC, *Handbook on Dynamic Security and Prison Intelligence* (previously cited).
113 OHCHR, *Human Rights and Prisons: A Manual on Human Rights Training for Prison Officials*, Volume I, 2005, https://www.ohchr.org/sites/default/files/Documents/Publications/training11Add1en.pdf, p. 98.
114 UNODC, *Handbook on Dynamic Security and Prison Intelligence* (previously cited), p. 12.
115 See TD01, PP09, SI08, CT02, PP13, TK01.

Kandal Provincial Prison; a typical Cambodian prison. Note the presence of a security guard or police officer; the use of barbed or razor wire that is angled inwards (internally facing) to prevent or make it more difficult to climb the wall from the inside; the use of walls that are too high for an average person to easily climb; the presence of security cameras, especially cameras that are internally facing; and the use of lights on the perimeter of the prison. Image from © Camboja News.

5.2 PRIMARY LAYER OF SECURITY: THE PERIMETER

"... it's like a prison"[116]

Perimeter security refers to the measures implemented to protect the physical boundaries of a property or area. Civilian use of perimeter security generally aims to protect the outer boundaries of a residential compound, for example, against unauthorized access. However, the primary objective of perimeter security in scamming compounds – like in prisons – is to keep people inside and control their movements. All the scamming compounds identified in this report had perimeter security, comprising: (1) physical barriers (including fencing or walls and/or gates or barriers) and (2) monitoring systems (security personnel and/or surveillance cameras), that appeared to be designed for or at least capable of furthering the ability to confine individuals.

5.21 PHYSICAL BARRIERS – FENCING AND/OR WALLS

All the scamming compounds investigated by Amnesty International had fencing, walls or another type of enclosure to mark the exterior perimeter. In many cases, these walls were built to heights that could not be easily climbed by an average person.[117] The distance between the perimeter fencing and the interior buildings varied across the compounds, with some perimeter walls being directly adjacent to or even connecting to buildings, while in other cases walls were built several metres away from the buildings. The examples below show perimeter walls at two scamming compounds.

116 Amnesty International interview with Elias, 2024.
117 Protective Fencing, "Promax™ 358 3.0 Wide Anti-Climb Security Fencing", https://profence.com.au/prison-fencing/ (accessed 13 May 2025).

SI08: high perimeter walls that have been extended to make them higher using sheet metal. © Amnesty International, 2024.

SI15: with high walls, double-gate and security guards. © Amnesty International, 2024.

> ***"They had blood on their hands. And on their ankles and legs... they got it because they have to climb over the walls and there is barbed wire on those walls... they hide in the forest and the guards from the casino come to look for them."[118]***

At least 31 of the scamming compounds documented in this report had perimeter walls with barbed wire (wire with sharp, pointed barbs spaced along the strand) or razor wire (twisted metal strips or ribbons with sharp edges, creating an even more dangerous obstacle as compared to barbed wire).

In at least 15 cases, barbed or razor wire identified at compounds was excessive in volume when compared to other nearby buildings. Compounds used multiple rungs or rows of wire and/or had wire in unusual configurations and areas. One example is PP09, a compound in Poipet, where barbed or razor wire enveloped a lamp post located within the perimeter walls. This appeared to have been done to prohibit climbing the lamp post in order to scale a perimeter wall.[119] While, in most cases, the barbed or razor wire could both prevent individuals from escaping and intruders from entering (such as when placed on top of a perimeter wall), in at least 15 compounds it was inward facing or placed within perimeter walls, presumably with the sole intention of preventing individuals from escaping the site.

Several survivors interviewed by Amnesty International referenced barbed or razor wire on the walls as a deterrent that prevented them from being able to escape.[120]

> ***"It's like a prison. There's a wall at the back and there is barbed wire everywhere. It's all over."[121]***

The following examples show the excessive use of barbed or razor wire:

PP13: eastern perimeter wall is heightened and angled towards the interior with barbed or razor wire on the inside to prevent climbing. © Amnesty International, 2024.

118 Amnesty International interview with local resident, 2024.
119 Amnesty International delegates observed this during site visits during 2023 and 2024.
120 Amnesty International interviews with Sawat, Porameth and Bao, 2024.
121 Amnesty International interview with Porameth, 2024.

PP09: rungs of barbed wire on top of a perimeter fence. © Amnesty International, 2025

In some limited cases, what appears to be electric fencing was observed along walls or fences at scamming compounds. Electric fencing is a type of barrier that uses electric shocks to deter animals or people from crossing boundaries, combining a physical barrier with electrification.[122] Its use in Cambodia is rare, especially in urban settings. However, Amnesty International observed or was told about the use of electric fencing in at least three locations: CT05, BS04 and BA02.[123]

A survivor of BS04 took this photo from inside the compound showing electric wire that points inwards. © Private, 2024.

122 British Columbia Conservation Foundation, Electric Fencing Considerations, 30 May 2018, https://wildsafebc.com/wp-content/uploads/2018/06/WSBC-Electric-fence-guidelines-2018-06-01.pdf; Informed Systems LTD., Reinforcing Perimeter Security with Electric Security Fences, 2023, https://www.informedsystemsltd.com/electric-security-fences/'; A-1 Fence, Can Electric Fences Be Used in Homes?, 17 May 2022, https://www.a-1fenceproducts.com/blog/use-of-electric-fence-around-home/.

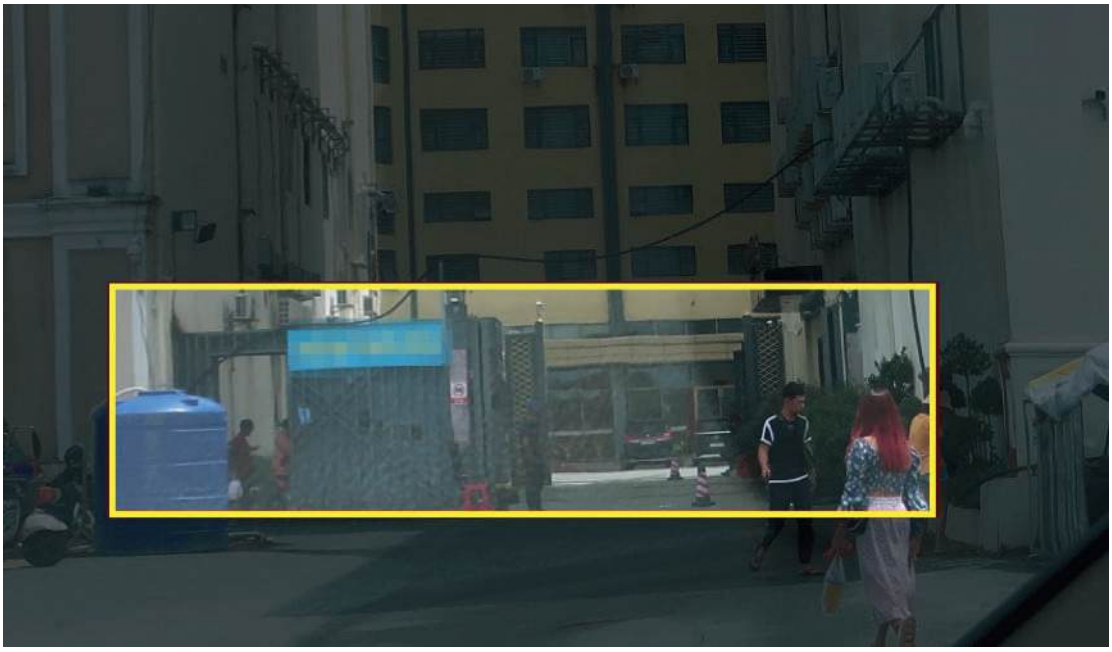
123 Amnesty International was able to confirm the fencing was electric fencing based on small signs that indicated it was electrified as well as similar characteristics and survivor testimony that reported the same.

5.2.2 PHYSICAL BARRIERS – GATES AND OTHER BARRIERS

None of the scamming compounds documented by Amnesty International were accessible to the wider public, with guarded gates or entry/exit barriers preventing access to the site unless authorized. In five instances, Amnesty International delegates attempted to enter the compounds through these entry points but were prevented from doing so by guards who informed them that they were not public spaces.[124] This was the case even in locations where there were businesses such as casinos within the perimeter walls.

In at least five cases, compounds appeared to have two-gate security entry systems.[125] Double gates enhance security by requiring passage through two guarded barriers, offering a more robust deterrent against unauthorized entry or exit compared to a single gate.[126]

PP04: gate with barbed wire on top, photograph supplied by survivor. © Private, 2025.



SI39: a double-gated entrance with multiple security cameras, flood lights, caged windows and guards. © Amnesty International, 2024.

124 Amnesty International field trip, 2024.
125 See BA02, BA06, KK01, PP09, SI39, SI42.
126 Jackson Fencing, "Single vs. Double Gates", https://www.jacksons-security.co.uk/blog/single-vs-double-gates#:~:text=If%20a%20single%20leaf%20gate,the%20other%20can%20be%20opened (accessed 13 May 2025).

5.2.3 MONITORING SYSTEMS – SECURITY PERSONNEL

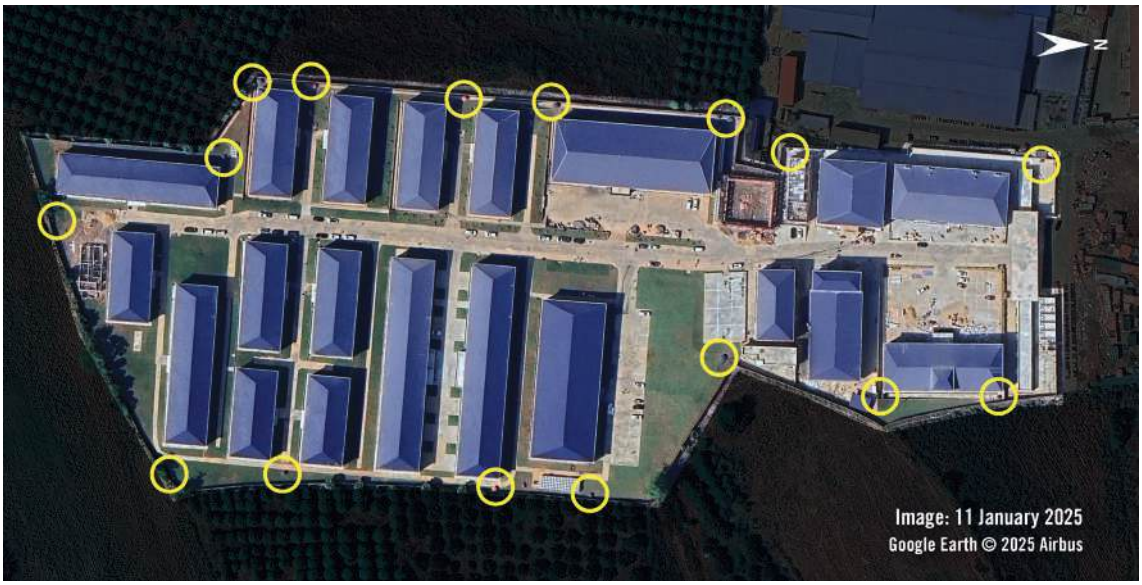
All the scamming compounds identified in this report included security personnel as an element of their perimeter security. Amnesty International documented and observed the presence of security guards in significant numbers and in multiple locations across each scamming compound. Some survivors reported that there were dozens, and even hundreds, of guards at the compounds in which they were confined.[127]

This use of security personnel is similar to that found in prisons. Prison systems have historically relied on security personnel within the prison and on the perimeter. As the UNODC explains: "Physical and procedural security arrangements are essential features of any prison, but they are not sufficient in themselves to ensure that prisoners do not escape. Security also depends on an alert group of staff who interact with, and who know, their prisoners".[128]

LOCATION OF SECURITY GUARDS

Amnesty International delegates observed guards at almost all gates of the 53 compounds visited. In some cases, more than 20 security guards were seen at or around these entry points.[129]

In addition, Amnesty International identified what appeared to be guard posts or probable guard positions through satellite imagery in the interior of eight compounds.[130] In some cases, these appeared to be mobile or temporary structures, including informal posts covered by a parasol, possibly to protect guards from extended sun exposure. In other cases, the posts appeared to be of a more permanent nature. These posts or positions were placed in multiple locations along the interior perimeter, often with overlapping fields of view to eliminate blind spots. In all cases, the shadows from these posts indicate that they were not taller than the perimeter walls and therefore did not have a line of sight to the outside of the perimeter as guard towers or taller structures would be. It is therefore reasonable to conclude that the primary role of the guard posts or positions in all eight scamming compounds was to monitor movements within the compounds, including possible attempts to breach the walls from the inside.



PSP01: compound with suspected guard posts - highlighted with yellow circles - at strategic locations within the perimeter wall.

127 Amnesty International interviews with Adam, Da and Van, 2024.
128 UNODC, *Handbook on Dynamic Security and Prison Intelligence* (previously cited), p. 29.
129 See SI01, SI02, SI12, SI40 and BS04.
130 See BA06, CT05, PP09, TK01, TD01, BS04, SI42 and SI12.

One or more guard towers, also referred to as watch towers, were observed in at least two scamming compounds.[131] Guard towers in prisons are designed to provide a high and secure vantage point for guards to observe and monitor a surrounding area. Many of the guard towers were fitted with flood lights directed towards the interior or along perimeter walls, and all the towers were facing inwards. Several guard towers had security cameras placed on them. Amnesty International delegates monitored two guard towers at SI12 ten times over a three-day period at various times of the night and day and found them continually occupied by guards who were facing inwards every time.[132] Given these features, it is reasonable to conclude that the primary purpose of the guard towers in scamming compounds is to monitor the activities within – rather than outside of – the perimeter walls.

SI42: a guard tower positioned on the north-east corner facing inwards and along the northern wall of the compound. © Amnesty International, 2024.

131 See SI12 and SI42.
132 Amnesty International site visit to SI12, late-2024.

SI12: guard towers positioned with line of sight facing inwards (left) and security guard facing into the compound (right)
© Amnesty International, 2024

ROLE OF SECURITY GUARDS

Survivor testimony indicated that the role of security guards went far beyond contributing to perimeter security; in many instances, they were involved in perpetrating the abuses suffered by victims.

According to testimony from survivors and witnesses as well as observations from Amnesty International delegates during site visits, security guards at scamming compounds were involved in a range of activities. These included securing the exit/entry gates; screening – and in some cases searching – vehicles or people who entered the compounds; monitoring the movement and behaviour of people confined within perimeter walls; supervising and escorting confined people within the compound; and taking proactive measures to prevent an escape from the compound, including responding to escape attempts, in many cases while carrying handcuffs and weapons including electric shock batons or guns. Testimony also indicated that security guards would often be fired or have their salaries cut if people escaped the compound at which they worked.[133]

133 Amnesty International interviews with organizations 2 and 4, 2024.

USE OF WEAPONS BY SECURITY GUARDS

According to survivors' testimony, security guards in at least 18 scamming compounds had possession of electric shock or stun batons and handcuffs. In at least three cases, security guards carried firearms.[134] According to Cambodian law, only military personnel or state agents are allowed to possess firearms.[135] Security guards in Cambodia are not allowed to carry electric shock batons unless given permission by local authorities.[136] Direct-contact electric shock devices can cause severe suffering, long-lasting physical disability and psychological distress, which can destroy an individual's sense of dignity.[137] Prolonged use can result in death.[138]

5.2.4 MONITORING SYSTEMS – SURVEILLANCE CAMERAS

At least 40 of the scamming compounds identified in this report had surveillance cameras embedded along their exterior perimeters and at access and entry points to enable constant monitoring of these areas. While many of these cameras had sight-lines of the exterior perimeter, in at least 25 cases, one or more cameras were directed towards the interior of the scamming compounds and there was a dearth of exterior-facing cameras that signalled the intention was only to monitor within the perimeter.

SI42: cameras in position to capture the northern perimeter wall. Note that the cameras are internally focused and appear aimed at filming the inside of the perimeter wall, rather than the exterior side. © Amnesty International, 2024.

134 Testimony from three survivors indicates that security guards are in possession of firearms at the SI02, SI08 and BA02 compounds.
135 Sub-Decree No. 289 on private security management (2013), Article 13.
136 Sub-Decree No. 289 on private security management (2013), Article 13.
137 For an in-depth look at the subject, see: Amnesty International, *"I Still Can't Sleep at Night"* (previously cited).
138 For an in-depth look at the subject, see: Amnesty International, *"I Still Can't Sleep at Night"* (previously cited).

5.3 SECOND AND ADDITIONAL LAYERS OF SECURITY

According to the concept of concentric circles of security, after the outer perimeter, internal layers can include the exterior buildings and the internal rooms. In the context of the scamming compounds, the perimeter wall is where Amnesty International observed most of the security features, in large part because delegates were not able to enter the compounds. However, some features from the second and additional internal layers of security that were visible and confirmed by testimony include bars or cages on windows, interior security cameras and the presence of security guards or managers/bosses controlling the movement of those inside buildings.

5.3.1 BARS OR CAGES ON WINDOWS

At least 29 scamming compounds had metal window bars or cages, permanently attached as security barriers for windows. The primary purpose of window bars is often to prevent unauthorized entry, and they are therefore generally used to secure windows on the lower stories of buildings, where access is easier from the outside. Amnesty International delegates recorded several unusual traits at scamming compounds and suspicious locations including bars on windows that were several stories up, as well as bars on windows only on certain stories.

PP09: caged windows and barbed or razor wire on internal walls. © Amnesty International, 2024.

KA01: caged windows behind high walls with three rungs of barbed or razor wire. © Amnesty International, 2024.

5.3.2 OTHER SECURITY FEATURES

> ***"It's impossible [to escape] because in front of the elevator door there will be six security guards waiting."[139]***

Survivors and witness accounts described the presence of security cameras throughout interior buildings or on inside walls.[140] Porameth told Amnesty International that any attempt to escape would be prevented by guards: "[T]here will be people there to pick you up – you can't just go out."[141] Bao said security guards patrolled the BS04 compound with electric shock batons,[142] and Haoyu explained that cameras were placed on the perimeter walls but were facing inwards "to see if anyone tried to escape."[143]

139 Amnesty International interview with Wittaya, 2024.
140 Amnesty International interviews with Haoyu and Da, 2024.
141 Amnesty International interview with Porameth, 2024.
142 Amnesty International interview with Bao, 2024.
143 Amnesty International interview with Haoyu, 2024.

TK01: high walls, double-wrung razor wire and cameras place along walls that face inwards. © Amnesty International, 2024.

5.4 SECURITY FEATURES IN PRACTICE AT THREE SCAMMING COMPOUNDS

Every scamming compound identified by Amnesty International included two or more of the security features described above. While any one security feature identified would not be enough to indicate that the site could be used to confine individuals, the totality of the evidence, which in all cases include primary and/or secondary evidence of human rights abuses, indicated that each of the 53 sites identified by Amnesty International is currently a scamming compound or has been used as such at some point since 2022. See Annex I for details relating to each compound.

The three examples below show how these features are used in individual compounds to deprive hundreds, if not thousands, of people of their liberty.

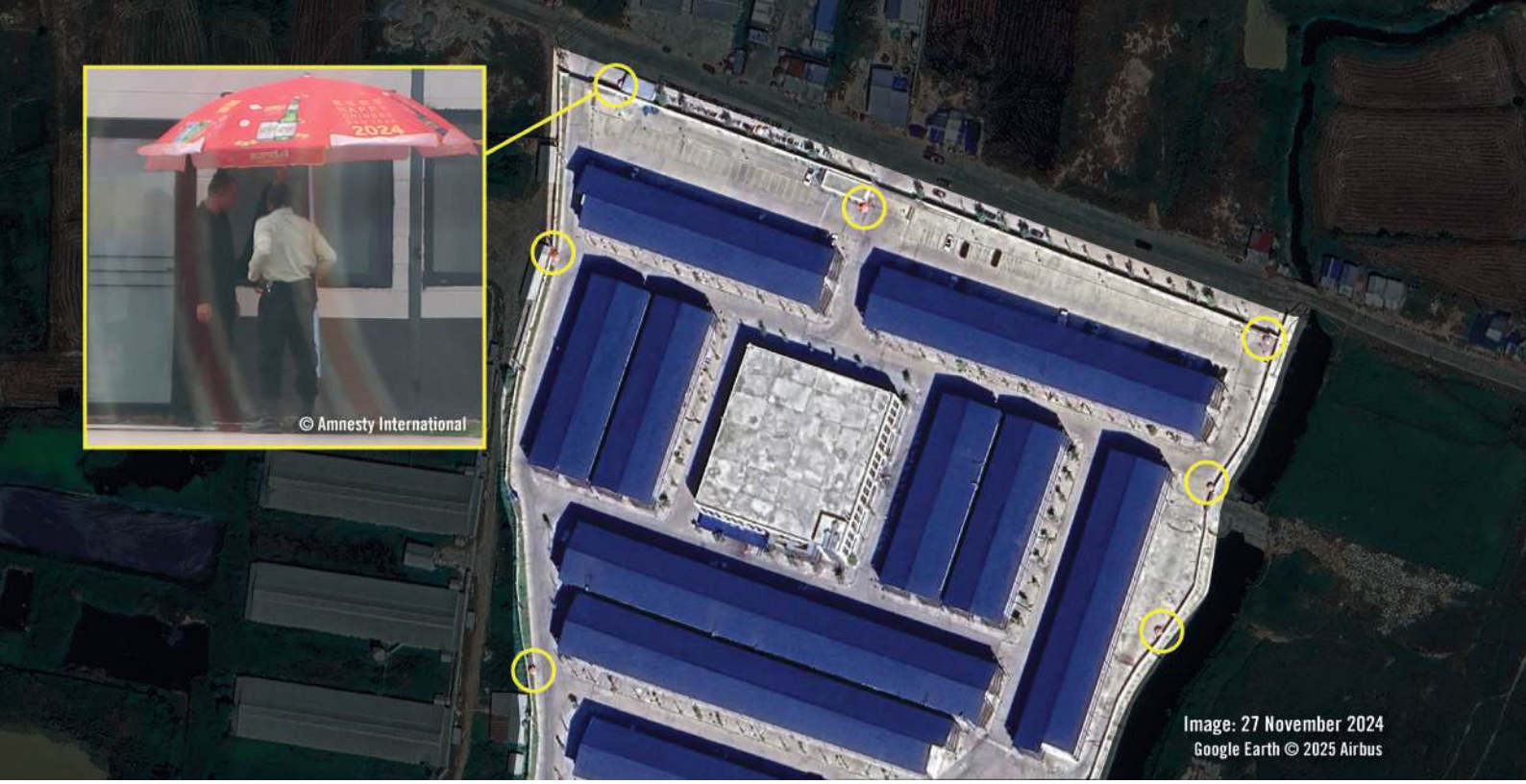
5.4.1 COMPOUND TK01

The TK01 compound is located less than an hour from Phnom Penh in Takeo province. It is located on a small country road in the middle of rice fields. Several security indicators suggest it is a purpose-built scamming compound, constructed between 2023 and 2024.[144] TK01 has high perimeter walls topped with two rungs of barbed or razor wire. Cameras on the walls are positioned to view along the inside of the perimeter. There is a notable absence of external-facing cameras.

There are three gates at the front entrance, two of which were closed when Amnesty International delegates visited the site in second half of 2024. More than 10 guards were present at the open gate.[145]

The buildings are at least six meters away from the perimeter walls, which prevents people jumping from a building over the wall. In addition, Amnesty International assesses that it is likely that the guard stations – marked with parasols and which can be seen in satellite imagery and highlighted in the image below – are positioned in such a way that allow for guards to monitor the perimeter and have sight-lines on buildings.

144 Amnesty International spoke with locals and viewed satellite imagery to confirm this in 2024.
145 Amnesty International site visit, 2024.



TK01: known and probable security guard positions visible in satellite imagery.

These features combine to create a highly secure perimeter. Secondary evidence collected by Amnesty International indicates that people were deprived of their liberty at this site in 2024 and 2025.[146]

5.4.2 COMPOUND SI08

SI08 is a scamming compound in Sihanoukville which has several security features indicating that it is used to confine people. Although SI08 is somewhat centrally located, it is not accessible to the public and its entrances are guarded. Amnesty International interviewed a survivor of this compound who reported being deprived of their liberty, subjected to torture and other ill-treatment, and sold to another compound in 2022.[147]

SI08: security cameras can be seen on the roofs, and bars on the balconies and windows. © Amnesty International, 2024.

146 See Annex I.
147 Amnesty International interview with Chao, 2024.

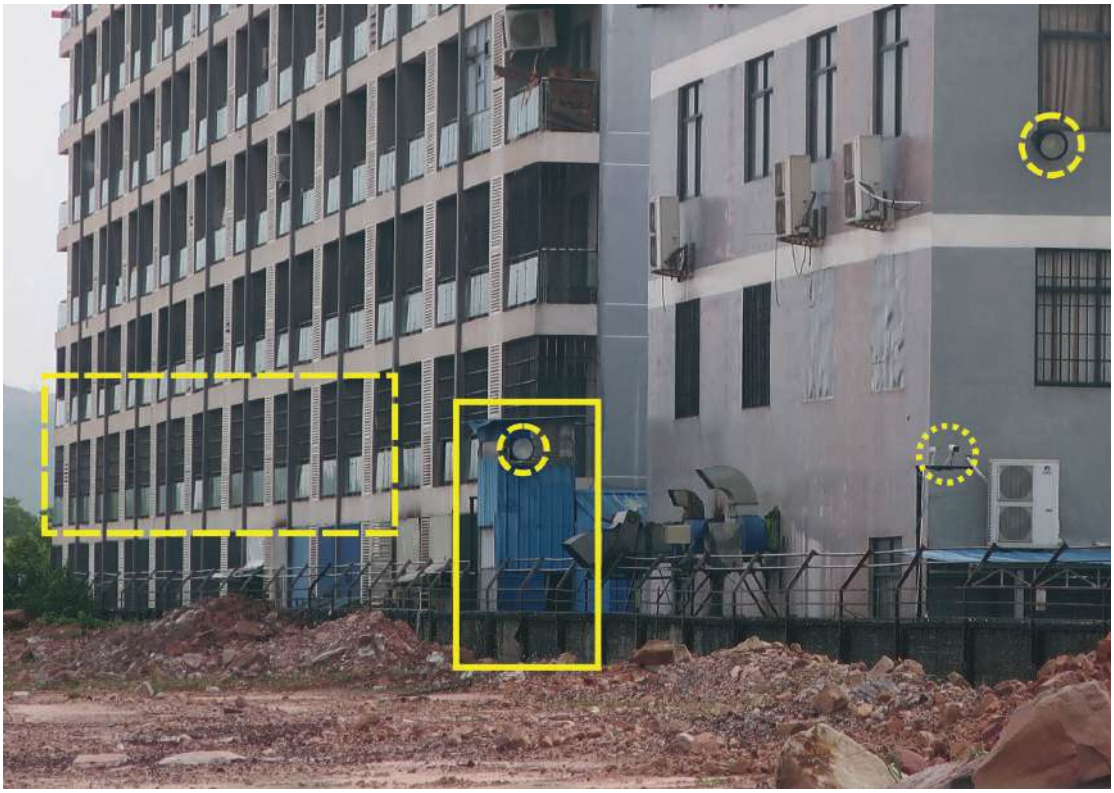
During Amnesty International's visit in September 2024, delegates observed that SI08 had caged-in balconies on external-facing sides of its buildings up to the sixth floor. Delegates also observed multiple security guards at each entrance. The perimeter security includes: security guards on both the inside and outside of gates; barbed wire, often in multiple rungs and on the inside of the perimeter to prevent climbing from inside; and security cameras positioned to film the inside of perimeter walls. Signs on the north-facing side of the building warn that photographs should not be taken.

SI08: entrance gate with guards, internally facing security cameras and razor wire that is placed on the inside of the compound perimeter wall. © Amnesty International, 2024.

5.4.3 COMPOUND SI42

SI42 is located in the middle of construction sites and has only one entrance/exit – which is guarded. The perimeters of scamming compound SI42 in Sihanouvkille are secured with guard towers, flood lights and security cameras. The compound has only one entry point; a double-gate system that could be used to prevent escapes and which was guarded by more than five security guards during Amnesty International site visits.[148] In addition, the buildings are equipped with caged-in windows on their lower-level exterior-facing sides. At the back and along the perimeter wall are three guard towers, each with flood lights positioned to illuminate the perimeter wall. The construction of the guard towers appears not to allow for observation of the exterior of the compound. Amnesty International interviewed one survivor of this scamming compound who was confined here in 2022. She provided photographs that corroborated her testimony and described living in a constant state of fear while confined at the site.[149]

148 Amnesty International site visit, late-2024.
149 Amnesty International interview with Gelila, 2024.



SI42: Perimeters secured with caged windows, a guard tower, flood lights and security cameras strategically positioned to face along the perimeter fence. © Amnesty International, 2024.

5.4 SUSPICIOUS LOCATIONS

In addition to (and often in close proximity to) the scamming compounds identified in this report, Amnesty International observed a range of similar physical and/or organizational security features at an additional 45 locations across Cambodia. However, as Amnesty International has not obtained corroborating testimonial evidence to indicate that human rights abuses took place in these locations, the list of locations in Annex II is presented as potential sites for further investigation.

Amnesty International shared these locations with the government of Cambodia on 12 May 2025. On 26 May 2025, the NCCT responded but neither acknowledged nor responded to the list provided of suspicious locations. The NCCT did not provide any indication that it, or other governmental agencies, will use the list as leads for further investigation.

6 HUMAN RIGHTS ABUSES AT SCAMMING COMPOUNDS

6.1 SURVIVING CAMBODIA'S SCAMMING COMPOUNDS

> ***"He said to me: 'You will not get out of here... not in one or two years.'"***
>
> Jin, a Chinese national confined at CT05, was beaten and shocked with electric shock batons while being forced to stand in a dark room for three days.[150]

Survivors of Cambodia's scamming compounds have endured and continue to endure the effects of multiple human rights abuses – including, but not limited to, slavery, human trafficking, forced labour, child labour, torture and other ill-treatment and deprivation of liberty.

However, to fully grasp the experience of a survivor of Cambodia's scamming compounds, it is important to understand the abuses as a fully interconnected experience. Survivors did not simply experience human trafficking *and then* forced labour, nor did they describe their confinement as separate from the torture and other ill-treatment they endured. Instead, the abuses often overlapped and compounded each other. Indeed, they sometimes endured all these abuses simultaneously. Many of the abuses exacerbated or made possible further abuses. For example, the use of torture and other ill-treatment by compound bosses made deprivation of liberty easier to perpetrate because it sent a message to people inside the compound that attempts to escape would result in serious harm. Meanwhile, deprivation of liberty and isolation from the outside world allowed torture and other ill-treatment to be committed with near impunity.

This chapter explores the human rights abuses both as stand-alone harms and as part of an intertwined series of harms that allowed for those running scamming compounds to exert extreme control over their victims to the point of enslavement. Amnesty International's analysis of survivor testimony found that almost all survivors of the scamming compounds had been subjected to a level of "control tantamount to possession" (see section 4.1.2 above) and therefore may likely be considered victims of slavery as defined under international law.

150 Amnesty International interview with Jin, 2024.

6.1.1 A CLIMATE OF FEAR

> ***"Please help. I cannot sleep."***[151]
>
> Amnesty International received messages from Daniel such as this one in 2025, pleading for help to remove him from KK01.

Many people at scamming compounds live in a constant climate of fear. From the moment a person arrives at the compound, they will have seen security guards carrying shock batons and handcuffs, multiple cameras mounted on walls, and fences covered in barbed wire; all while being told by bosses that they are not allowed to leave. A victim will often have their phone or passport taken by a manager upon arrival, if the traffickers who brought them to the compound have not already done so.[152]

Every person interviewed for this report was told by a boss, security guard, or another person in a position of power that they could not leave the compound once they entered. Many were told they owed a debt or had been sold to the compound.[153] Some were explicitly told they could not leave for years or met people inside who had been there for long periods of time.[154]

Arriving at their room, they found that they were sharing it with other victims, some of whom had been there for a long time and others who had been bought from other compounds.[155] They might have overheard, or read in the news about, the brutal beatings and the use of shock batons to torture people in dark rooms. At least 45 survivors interviewed by Amnesty International overheard, witnessed or were themselves subjected to torture and other ill-treatment while inside a compound.[156] A newly arrived victim might know, or might be told by their new room-mates, that their best hope of escaping is to

151 Amnesty International interview with Daniel, 2024.
152 Amnesty International interviews with Yathada, Jarayu and Porameth, 2024; Amnesty International interview with Adam and Ai, 2024.
153 Amnesty International interviews with Da, Van, Diep, Elias, Adam, Amir, Narong, Wittaya, Sawat, Pranee, Siti, Yathada, Jirayu, Porameth, Bolin, Fang, Jin, Ai, Jinda, Chun, Shi, Gang, Ping, Aiguo, Beihe, Aihan, Haoyu, Yeruo, Hongxi, Yutai and Bao, 2022, 2023 and 2024.
154 Amnesty International interviews with Jin, Ai, 2024.
155 Amnesty International interviews with Jin and Ai, 2024.
156 Amnesty International interviews with Gelila, Daniel, Chao, Jumpon, Krit, Chen, Da, Van, Diep, Elias, Adam, Amir, Narong, Wittaya, Sawat, Pranee, Siti, Yathada, Jirayu, Porameth, Bolin, Jin, Ai, Jinda, Shi, Ping, Beihe, Aihan, Aiguo, Haoyu, Hongxi, Yutai and Bao, 2022, 2023 and 2024; Information provided by organization 8, 2022; on file with Amnesty International.

contact the Cambodian police – but they will also likely have seen or heard of others being tortured for trying to escape. Nine people interviewed by Amnesty International said they were beaten by bosses after trying to escape from a compound.[157]

All of this occurs before they are even asked to carry out any work. In a foreign country where they often do not have the legal right to work, or even to remain without the support of an employer, these individuals are told to run scamming operations or conduct some other kind of work that rarely reflects what they were promised before leaving home. 'Forced criminality', a term for forcing someone to commit criminal acts, adds an additional layer of control by the exploiter – in this case the compound bosses. By forcing people to commit crimes, bosses can then threaten to report them to police for these crimes.[158] Victims also know that they may be prosecuted for conducting scamming work if they return to their home countries.[159] This makes the prospect of leaving even more remote, allowing the bosses to continue their exploitation.

"They brainwash you... We were constantly afraid to ask for a break."[160]

Those who ask to leave are told they cannot until they have paid their captors or worked to pay off their debts.[161] People respond differently to their limited options. Some attempt to call for help, by contacting their embassy or the police.[162] If they are found out, they are tortured, often taken away to dark rooms or beaten by the compound bosses and managers.[163] Guards were overheard discussing their work responsibilities as primarily to "catch and beat" people trying to run away from their compound.[164]

Some people try to work their way to freedom.[165] They work hard on online scams to impress their captors as a form of self-preservation.[166] But even this does not guarantee they will be freed, and survivors often told Amnesty International that the debts they were supposedly repaying to their bosses through work would be increased arbitrarily, becoming effectively unpayable.[167]

Those survivors who manage to leave are then often forced to deal with Cambodia's immigration detention system, which is described as "prison-like".[168] These detention centres were described by interviewees as lacking areas to sleep.[169] Detainees must pay for food and water,[170] and detention can last for months if a person does not have the right documents. As mentioned above, people who have been trafficked into the country or spent time in compounds are likely to have had their passports confiscated, extending their time in immigration detention.[171]

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157 Amnesty International interviews with Da, Amir, Wattaya, Pranee, Siti, Ai, Jinda, Hongxi and Yutai, 2024.
158 Amnesty International interviews with Van, Yeruo, 2024.
159 Amnesty International interviews with Hongxi, Prani, Sithi and Wittiya, 2024.
160 Amnesty International interview with Gelila, 2023.
161 Amnesty International interviews with Da, Van, Diep, Elias, Adam, Amir, Narong, Wittaya, Sawat, Pranee, Siti, Yathada, Jirayu, Porameth, Bolin, Fang, Jin, Ai, Jinda, Chun, Shi, Gang, Ping, Aiguo, Beihe, Aihan, Haoyu, Yeruo, Hongxi, Yutai and Bao, 2022, 2023 and 2024.
162 Amnesty International interviews with Hongxi, Prani, Sithi and Wittiya, 2024.
163 Amnesty International interviews with Da, Amir, Wattaya, Pranee, Siti, Ai, Jinda, Hongxi and Yutai, 2024.
164 Amnesty International field trip, mid-2024.
165 Amnesty International interviews with Da, Van, Diep, Elias, Adam, Amir, Narong, Wittaya, Sawat, Pranee, Siti, Yathada, Jirayu, Porameth, Bolin, Fang, Jin, Ai, Jinda, Chun, Shi, Gang, Ping, Aiguo, Beihe, Aihan, Haoyu, Yeruo, Hongxi, Yutai and Bao, 2022, 2023 and 2024.
166 Amnesty International interviews with Yutai and Ai, 2024.
167 Amnesty International interviews with Yutai and Ai, 2024.
168 Amnesty International interview with Ai, 2024.
169 Amnesty International interview with organizations 1, 2, 4, 5, 8, 10, 2024, 2025.
170 Amnesty International with Daniel, 2024; photos on file with Amnesty International from people inside immigration centres in Phnom Penh.
171 Amnesty International with Daniel, 2024, Amnesty International interviews with organizations 3 and 4, 2024.

News reports and survivors interviewed by Amnesty International frequently mentioned deaths inside the compounds or nearby.[172] One survivor described hearing a body hitting the roof of a lower building in what they presumed to be a fall from higher up in the compound.[173] Two children interviewed by Amnesty International had been told menacingly by their captors that people kill themselves "all the time in these places".[174]

This fear also permeates the immediate areas around the compounds – even though Cambodian nationals are not typically confined or forced to work within them. Cambodian villagers living nearby often expressed serious concern about discussing the compounds with Amnesty International.[175] A taxi driver who had transported trafficking victims and compound bosses for years told Amnesty International that he knew some of the guards from a compound in Phnom Penh but declined to make any introductions to Amnesty International delegates, saying he felt "too scared... they are cold-blooded men."[176]

The combined result of these elements is a climate of fear that pervades the scamming industry. It allows the exploiters and beneficiaries to exert complete control over the human beings who enter a compound. This control amounts to enslavement, and when coupled with the impunity that many compound beneficiaries have in Cambodia, clearly indicates that the government of Cambodia is failing, for a multitude of reasons, to respect, protect and fulfil the human rights of the thousands of victims of the scamming industry.

6.1.2 HUMAN TRAFFICKING

> ***"It was summer holidays, so school was done... I wanted to work in a factory in Jiang Xi, but the driver said he knows a factory in Naning province that is still open... My grandpa is sick, so my mom needs money, and the capital city pays more for its factories than the small town pays... They took our phones... I was taken to a seaside, then they put me on a speedboat... two or three hours later we got our phones back but we have no signal but I can see my location is very close to the Viet Nam border so I know we must be on the other side... two days later I was in Bavet [Cambodia] and they brought me inside to the compound and asked me to type on a computer."[177]***
>
> Haoyu, a 16-year-old boy from China, who was trafficked into a compound where he was forced to work, kicked by his manager and prevented from leaving.

Under the UN Palermo Protocol, human trafficking requires: (1) an "action" such as recruitment, transportation or receipt of persons; (2) a "means" by which that action is achieved, such as deception or the threat or use of force or other forms of coercion; and (3) exploitation.[178]

According to their testimonies, the experiences of all but one of the victims interviewed by Amnesty International indicate that they are survivors of human trafficking for the purpose of labour or other exploitation in Cambodia. This included them being subjected to deceptive recruitment tactics, threats of violence, and/or the use of irregular migration routes, such as crossing boundaries by boats, rivers and through jungles so that traffickers could sell them into compounds where they were then confined and exploited. In addition to interviewing adult survivors of human trafficking, Amnesty International

172 VoD, "Crimes in shadows: Sihanoukville's grisly reports, pressure on journalists", 11 March 2022, https://vodenglish.news/crimes-in-shadows-sihanoukvilles-grisly-reports-pressure-on-journalists/
173 Amnesty International interviews with Adam, 2024.
174 Amnesty International interview with Aihe and Beihe, 2024
175 Amnesty International field trip, 2023 and 2024.
176 Amnesty International interview with Driver 1, 2024.
177 Amnesty International interviews with Haoyu, 2024.
178 Palermo Protocol, Article 3(a).

interviewed nine children who had been trafficked and were separated from their families by deception and abduction, smuggled by traffickers across international borders and then confined inside compounds for the purposes of forced labour or to exact a ransom.

THE ACTION

Human trafficking requires an action, such as transporting a person, deceiving them into transporting themselves or recruiting them to a place to be exploited. The most common action documented in Amnesty International's interviews was recruitment to work in Cambodia, followed by transportation to compounds. Transport routes varied, with victims being trafficked from around the world to Cambodia. Two main routes used to transport (1) Thai and Myanmar-based victims and (2) Chinese victims were identified – but it is likely that many more routes exist. One survivor was trafficked from Africa.[179]

THE MEANS (RECRUITMENT)

Recruitment was often carried out over social media, where recruiters posted deceptive job advertisements to lure potential victims to Cambodia.[180] Job advertisements were posted to Facebook, Instagram and job websites. They were almost always vague and often offered unusually high salaries for the positions offered.[181] Some survivors told Amnesty International that, once they were held in the compounds, their job was to recruit more people online.[182] Others met their recruiters in person for the first time inside the scamming compounds.[183]

Chao, a Taiwanese man, told Amnesty International that he sent his resume to a recruitment site and was then contacted by a recruiter who told him that Cambodia was looking for engineers. He reported being told that Cambodia "was a developing country and they would probably need engineers with computer skills". He said: "After thinking about it for a while, I think maybe I would give it a try. So based on their advice, I bought a ticket and headed to Cambodia." After arriving in Cambodia, Chao, and some other Taiwanese people who had followed the same recruiter's advice, were taken by a company-organized taxi to the SI08 compound in Sihanoukville where Chao was forced to run scams and was subjected to torture and other ill-treatment.[184]

WORK IN Thailand

- Work in Thailand, Laos and Myanmar URGENT VACANCY
  Foreigners who speak Chinese and English
  any degree and certification recruitment.
  Only English speaker also can apply.
  office work
- **Other benefits**
  - Opportunity to be promoted with higher salary
  - Flight ticket will be provided by company and visa you can claim once you reach our company
  - All-inclusive 4 meals a day
  - Accommodation
  - Hotel Quarantine
  - Transportation
  - Provide daily necessities
- A contract of at least 1 years (it can be extended according to the wishes of employees).
- Required documents
  - 18-35 years old
  - English or Chinese (minimum high-intermediate)
  - Good team spirit, positive work attitude
  - Quick thinking, good at finding and solving problems
  - Fast typing skills in English
  - Any degree and diploma
  - Salary: $1200 to $1500 + incentive (depending on job performance).

Contact me in +66 [redacted]

- Don't miss this opportunity
- Thank you WORK IN Thailand

The job advertisement which was used to lure Gelila to Cambodia in 2022, shared with permission from survivor.

179 Amnesty International interview with Gelila, 2023.
180 Amnesty International interviews with Gelila, Shi, Jerayu, Rasa, Narong, Wittaya, Sawat, Pranee, Siti, Amir, Adam 2023, 2024.
181 Advertisements on file with Amnesty International; Amnesty International interviews with Gelila, Adam, Amir, Sawat 2023, 2024.
182 Amnesty International interview with Krit, 2024.
183 Amnesty International interview with Yeruo, 2024.
184 Amnesty International interview with Chao, 2024.

Sometimes recruiters went to great lengths to appear legitimate. Adam reported going to two interviews, including one in-person interview at an office in Kuala Lumpur, Malaysia, which he said made the company appear legitimate. He described how, when arriving at the SI02 compound, "I realized when I saw the gates and the security guards that I was trapped."[185]

In another case, Haoyu told Amnesty International that he responded to what he thought was a legitimate advertisement for a factory job on a Chinese job forum and was picked up by a car sent by the advertisers. Once he was in the car, the driver informed him that the job was no longer at the location advertised in China and he was driven to a town on the China-Viet Nam border and put on a boat to be trafficked to Cambodia.[186]

TRANSPORTATION

In most cases documented by Amnesty International, recruiters paid the cost of transportation to bring survivors into Cambodia and to the compounds. Survivors were transported in one of two ways: through an official port of entry, for example arriving by plane and passing through airport immigration control;[187] or by irregularly crossing the border without going through immigration control checkpoints. Irregular entry often occurred at night with survivors traversing jungles, rivers or rice fields,[188] and involved networks of human traffickers across Cambodia, China, Thailand and Viet Nam. Of the 58 survivors interviewed by Amnesty International, nine had had tickets for travel purchased for them by recruiters and were transported through official migration entry and exit points, apparently allowing them to obtain work visas in line with Cambodia's migration laws. In contrast, 48 survivors were transported into Cambodia via unofficial entry points, often via smuggling routes, which survivors understood to mean that they had entered Cambodia illegally.[189] Many described feelings of fear once they realised they were being taken across an international border. Because they are victims of human trafficking, Amnesty International does not view them as having entered Cambodia illegally.[190]

SOMETIMES RECRUITERS WENT TO GREAT LENGTHS TO APPEAR LEGITIMATE

185 Amnesty International interview with Adam, 2024.
186 Amnesty International interview with Haoyu, 2024.
187 Amnesty International interviews with Adam, Gelila, Daniel, Chao, Elias, 2023, 2024.
188 Amnesty International interviews with Bo, Wei, Jumpon, Krit, Chen, Da, Van, Rasa, Narong, Wittaya, Sawat, Pranee, Siti, Yathada, Jirayu, Porameth, Bolin, Fang, Jin, Ai, Jinda, Chun, Shi, Gang, Ping, Aiguo, Beihe, Aihan, Haoyu, Yeruo, Hongxi, Yutai and Bao, 2023, 2024.
189 Amnesty International interviews with Bo, Wei, Jumpon, Krit, Chen, Da, Van, Rasa, Narong, Wittaya, Sawat, Pranee, Siti, Yathada, Jirayu, Porameth, Bolin, Fang, Jin,Ai, Jinda, Chun, Shi, Gang, Ping, Aiguo, Beihe, Aihan, Haoyu, Yeruo, Hongxi, Yutai and Bao, 2023, 2024.
190 The treatment of victims of human trafficking by Cambodian authorities is described in greater detail in the 'State Responsibility' section.

In cases where transportation of survivors to the compounds was paid for by compound managers, the amount was then converted into a debt that survivors were told they would have to repay through their labour.[191] In many cases, traffickers or compound officials sent cars and used trafficking networks to transport people thousands of miles to Cambodia before confining them inside a compound.[192] Fang, a 23-year-old male who escaped from a compound in 2024, said he had initially applied for work in China. After getting into a car sent by the company to which he had applied, he was driven to the China-Viet Nam border and then into Viet Nam. Two other victims from the same compound corroborated Fang's story. Two days after arriving in Viet Nam, the group arrived in Bavet, a Cambodian city on the border with Viet Nam. Fang described how, near the border, "we got out of the car and onto motorbikes – there was no official checkpoint. Then I noticed the flag had changed and we are in Cambodia. The motorbike driver said we needed to stop for food and drove me inside the compound."[193]

Bao, a 37-year-old Chinese man, was similarly transported to the PP09 compound in 2024 after initially being offered a job in construction in a southern province of China. Traffickers told Bao to climb over a mesh fence to enter Viet Nam, after which he was transported in four separate cars before he arrived at the PP09 compound outside Phnom Penh. He was initially unsure whether he had left China until someone inside the compound told him where he was.[194]

TRAFFICKING BETWEEN COMPOUNDS INSIDE CAMBODIA

Survivors and witnesses described how traffickers had well-established networks in place throughout Cambodia for those who arrived via official migration entry and exit points.[195] A Cambodian taxi driver, Samrach, interviewed by Amnesty International said the compound networks were highly organized and moved people around frequently using taxi drivers. He described and showed chat groups where he and other taxi drivers were asked to pick people up from various locations, most of which he said were compounds engaged in scamming operations. Amnesty International was able to confirm that some of these locations were scamming operations. Most of the people he transported did not speak Khmer, the official language of Cambodia, and were not Cambodian nationals. Samrach described transporting them from the airport to compounds and also between compounds. Samrach confirmed many locations that Amnesty International had identified as scamming compounds and provided locations for two new sites to which he said he had taken people, and which he believed were scamming sites. Many of the areas to which Samrach was transporting people are not known for tourism or migrant worker industries. This included collecting people from northern areas such as O'Smach on the Cambodia-Thailand border, and driving them to southern areas such as Botum Sakor. In some cases, he described how people whom he believed to be compound managers would travel with a trafficked person to make sure they did not escape from the car.[196]

191 Amnesty International interviews with Adam, Gelila, Daniel, Chao, Elias, Bo, Wei, Jumpon, Krit, Chen, Da, Van, Rasa, Narong, Wittaya, Sawat, Pranee, Siti, Yathada, Jirayu,Porameth, Bolin, Fang, Jin,Ai, Jinda, Chun, Shi, Gang, Ping, Aiguo, Beihe, Aihan, Haoyu, Yeruo, Hongxi, Yutai and Bao, 2023, 2024.

192 Amnesty International interviews with Adam, Gelila, Daniel, Chao, Elias, Bo, Wei, Jumpon, Krit, Chen, Da, Van, Rasa, Narong, Wittaya, Sawat, Pranee, Siti, Yathada, Jirayu,Porameth, Bolin, Fang, Jin,Ai, Jinda, Chun, Shi, Gang, Ping, Aiguo, Beihe, Aihan, Haoyu, Yeruo, Hongxi, Yutai and Bao, 2023, 2024.

193 Amnesty International interview with Fang, 2024.

194 Amnesty International interview with Bao, 2024.

195 Amnesty International interviews with Gelila, Chao, 2023, 2024.

196 Amnesty International interview with Samrach, 2024.

Telegram group chats and advertisements by taxi drivers in these chats contain prices for transportation routes between towns and other locations that are not typical travel or tourism routes.[197] For example, advertisements show prices from Poipet to Chrey Thum. This is not a typical travel route; however, both locations are hotspots for scamming compounds.[198] Of the locations listed in chats, Sihanoukville, Koh Kong and Phnom Penh are tourists destinations with tourism industries. However, O'Smach, Poipet, Pailin, Thma Da and Bavet are not typically frequented by tourists but do house 22 compounds between them, some 40% of all the compounds identified in this report.

Narong, a Thai national, was 16 years old when he was confined at CT01 compound in 2022 after he refused to continue working. A manager told Narong he had to pay 100,000 Thai Baht (USD 2,886) to leave the compound, or continue working. When he did not leave his sleeping quarters to work, the managers came and told him they were releasing him and taking him to the police station. Narong described being forced into a car with one person sitting on either side of him and being transported by a Chinese driver to the BA13 compound in Bavet – more than 200km away – where he was further confined and forced to work on scamming operations.[199]

Amir, a Malaysian man, was transported by private boat from the SI15 compound in Sihanoukville to BS04, more than 50km across open water in the middle of the night.[200] The presence of back doors and closed gates at many compound locations may be further evidence that compounds are well prepared to conceal the transportation element of the trafficking of victims in and out of the compounds.[201]

Four other survivors reported being moved from the SI35 compound to the SI36 compound to avoid detection by authorities when managers suspected raids.[202] In interviews with these survivors, they described how bosses told them the company was being moved out of the casino to another building to avoid police raids.[203] Siti, a Malaysian man, and Pranee, a Thai woman, told Amnesty International that, in early 2022 following police visits to SI35, they were moved to SI36, about 200m away.[204] Pranee told Amnesty International that the bosses were "worried the police would return". At SI36 they did not take part in scam operations but were confined before being "sold" to other locations.[205]

TRAFFICKING ROUTES FROM CHINA TO CAMBODIA

Survivors from China typically told Amnesty International that they were transported to Yunnan or Guangxi province and then to Viet Nam before finally arriving in Cambodia.[206] Some such journeys occurred overland; however, five people said their journey involved boat trips from China to Viet Nam.[207] Other people's journeys involved climbing fences and traversing mountainous terrain on the China-Viet Nam border.[208] In none of these cases did survivors carry passports, sometimes because they did not realise they would be leaving China, and none travelled through an immigration check point.[209]

197 On file with Amnesty International.
198 Poipet and Chrey Thum collectively contain 16% of the compounds identified in this report, despite being relatively small border towns.
199 Amnesty International interview with Narong, 2024.
200 Amnesty International interview with Amir, 2024.
201 See Chapter 5 for more information on the physical and organizational security of compounds.
202 Amnesty International interviews with Siti and Pranee, Wittaya and Jinda, 2024.
203 Amnesty International interviews with Siti and Pranee, Wittaya and Jinda, 2024
204 Amnesty International interview with Siti and Pranee, 2024.
205 Amnesty International interview with Pranee, 2024.
206 Amnesty International interviews with Bo, Wei, Chen, Da, Jirayu, Bolin, Fang, Jin, Ai, Jinda, Chun, Shi, Gang, Ping, Aiguo, Beihe, Aihan, Haoyu, Yeruo, Hongxi, Yutai and Bao, 2024.
207 Amnesty International interviews with Amir, Beihe, Aihan, Hongxi and Yutai, 2024.
208 Amnesty International interviews with Ping, Aiguo, Yeruo, Bolin and Chun, 2024.
209 Amnesty International interviews with Beihe, Aihan, Bao, Hongxi and Haoyu, 2024.

Once inside Viet Nam, survivors described being transferred between cars until they reached the Cambodian border.[210] Others were told to ride on the back of a motorbike until they entered Cambodia.[211] Sometimes they did not know they were destined for Cambodia until they had crossed the border.[212]

Hongxi, a 19-year-old Chinese man, told Amnesty International how he was recruited to work in Cambodia in September 2024. At that point, a second recruiter warned him of kidnapping gangs and told him not to go. The second recruiter then bought Hongxi and his friend flights to Yunnan province. Hongxi had assumed they would then fly to Phnom Penh, Cambodia, but instead they were picked up by a taxi and driven to a port. There, Hongxi was ushered onto a small boat with 14 other people. The boat arrived in Viet Nam later that evening. From there it took three days and three nights to get to Cambodia, during which traffickers required them to change cars twice. When they arrived at the Cambodian border, Hongxi was ordered onto the back of a motorbike and taken to Bavet. He was taken to a waiting area with seven other people, including his friend, all of whom had come with him from Viet Nam. The others were taken away to different locations, and Hongxi and his friend were taken across the street by a compound manager to the BA13 compound. On arrival, he was told he had been bought for USD 4,500 and that he now owed this amount to the compound manager.[213]

TRAFFICKING ROUTES FROM THAILAND TO CAMBODIA

In interviews with survivors trafficked from Thailand to Cambodia, most had crossed at the Aranyaprathet-Poipet border.[214] One survivor described a boat journey from Thailand to Cambodia via a different border crossing point.[215] A total of 22 survivors told Amnesty International that they had crossed through forested areas or across a small river to enter Cambodia from Thailand.[216] Amnesty International interviewers asked questions regarding the size of the river, the description of the area near the border crossing, and how long it took to drive from one location to another to assess the veracity of these testimonies.

Pranee, a Thai woman, was trafficked to Cambodia via the Aranyaprathet-Poipet border in December 2022. She recalled being picked up at midnight with other people from the Thai side and dropped off in a jungle area where two Cambodians led her on a walk for around an hour before she got in a car.[217]

210 Amnesty International interviews with Beihe, Aihan, Bao, Hongxi, Ping, Aiguo, Yeruo, Bolin, Chun and Haoyu, 2024.
211 Amnesty International interview with Aiguo and Van, 2024.
212 Amnesty International interviews with Beihe, Aihan and Hongxi, 2024.
213 Amnesty International interview with Hongxi, 2024.
214 Amnesty International interviews with Rasa, Narong, Wittaya, Sawat, Jirayu, Porameth, Pranee, Jinda, Jumpon and Krit, 2024.
215 Amnesty International interview with Yutai, 2024.
216 Amnesty International interviews with Rasa, Narong, Wittaya, Sawat, Jirayu, Porameth, Pranee, Jinda, Jumpon, Krit, Thapol, Pattara, Munin, Chanai, Yollada, Ratikarn, Kin, Disorn, Panda, Lisa, Sila, Nadol, 2024, 2025.
217 Amnesty International interview with Siti and Pranee, 2024.

> ***"I saw a big sign, a big Cambodia beer sign and that's how I know that we're in Cambodia. We stopped and there were three cars waiting for us there and then we all of us got separated in two different car[s] for different compan[ies]. In Phnom Penh we need to change to another car and then drive to Sihanoukville. And when we arrived there, there were one Chinese person and two Thai person there to pick us up."[218]***

Yathada is a Thai woman who was told by recruiters that she would be working in administration. In 2024, Yathada was taken to a border crossing at night and asked to walk across a small river. She told Amnesty International, "I was scared. It's like a canal, but because I couldn't swim, they put this… plastic container... They told me to get into it and then there will be people on the other side who drag me over to the other side." After crossing into Cambodia, she was put into a car which she said did not have a registration plate. She was driven a short distance to the PO16 compound in Poipet where her face was scanned, in what were likely attempts to open bank accounts in Thailand.[219]

Two Thai men, Jirayu and Porameth, were trafficked to the same compound as Yathada in 2024. Both men said they were left in a field in Thailand and told to walk across it. On the other side were Cambodians waiting on motorbikes who drove them into PO16 compound. There, they were confined and had their faces scanned by the compound operators to open bank accounts in Thailand.[220]

TRANSPORTATION BETWEEN MYANMAR AND CAMBODIA

Two survivors reported being transferred to or from Myanmar. Yutai, a Chinese man, told Amnesty International that he was trafficked from compounds in Myanmar via car and boat into the TD series of compounds in Thma Da, Cambodia. Yutai said he did not go through any immigration check points. He was able to describe travel times and some of the compounds he entered in Cambodia and could identify buildings from pictures that Amnesty International delegates showed to him.[221]

218 Amnesty International interview with Pranee, 2024.
219 Amnesty International interview with Yathada, 2024.
220 Amnesty International interview with Jirayu and Porameth, 2024.
221 Amnesty International interview with Yutai, 2024.

Chao, a Taiwanese man, described being sold into SI08 compound. Chao's testimony included descriptions of the buildings, guards and people inside that matched with Amnesty International's documentation of the site. Upon being told by a manager that he had to work at SI08 for at least two years or pay USD 30,000 to secure his release, Chao said he accepted his situation and began working. He eventually began to think about escaping but his plan was discovered by the managers, who took him to a room, beat him, and told him that he would be sold to a compound in Myanmar. Chao provided evidence to Amnesty International that he had escaped when the driver transporting him tried to smuggle him into Thailand on the way to Myanmar.[222]

Amnesty International also interviewed one survivor of Myanmar's scamming compounds, Rasa, who was not trafficked to Cambodia but who had been confined in two compounds in Myanmar. Rasa said that, in Myanmar, she had seen whiteboards with people's names written underneath locations including "Cambodia" and "Sihanoukville".[223]

Hongxi described how, while working at the BA13 compound in Bavet in 2024, his boss told him he had previously worked in compounds in Myanmar. His boss said he would have killed Hongxi rather than just beaten him if they had been in Myanmar rather than Cambodia, and claimed to have "killed many people there".[224]

THE MEANS

> ***"When we got out of the car there were guards. It made us realize that what they said about work was to lure us here, and we couldn't do anything because we were locked up. There were people there to watch us. We are in a different country, we can't do anything that shows resistance."[225]***

Based on evidence gathered for this report, the means by which people are trafficked into the scamming compounds is primarily through deception, threat or use of violence, and exploitation of their vulnerability. Every survivor that Amnesty International interviewed reported feeling deceived and/or threatened by violence at some point during their experience.

DECEPTION

Deception was the most common tactic used to recruit people into coming to Cambodia. Deceptive job advertisements were reported by almost all of the survivors interviewed by Amnesty International.[226] Survivors interviewed by Amnesty International were told they would be working in numerous professions, including in bars, restaurants and casinos, and as engineers, professional gamers and administrators. Only two survivors were aware that they were going to work in the scamming industry.[227]

Jinda, a Thai woman who was confined at the SI35 compound in Sihanoukville, was told by her recruiter that she was going to be working as an administrator in a casino. When she arrived at the site, she saw it was a casino, but she was quickly taken up to the fifth floor where her identity card was confiscated and the door was locked behind her.[228]

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222 Amnesty International interview with Chao, 2024.
223 Amnesty International interview with Rasa, 2024.
224 Amnesty International interview with Hongxi, 2024.
225 Amnesty International interview with Krit, 2024.
226 Amnesty International interviews with Gelila, Daniel, Chao, Bo, Wei, Jumpon, Krit, Chen, Da, Van, Diep, Elias, Adam, Amir, Rasa, Narong, Wittaya, Sawat, Pranee, Siti, Yathada, Jirayu, Porameth, Bolin, Fang, Jin, Ai, Jinda, Shi, Gang, Ping, Aiguo, Beihe, Aihan, Haoyu, Yeruo, Hongxi, Yutai and Bao, 2023 and 2024.
227 Amnesty International interviews with Daniel, Gang, 2024.
228 Amnesty International interview with Jinda, 2024.

THREAT OR USE OF VIOLENCE OR EXPLOITATION OF VULNERABILITY

Many survivors described to Amnesty International how their migration to work in scam compounds in Cambodia had resulted from the vulnerable position in which they had been placed due to deception. Sometimes this resulted from the threat of force or from fear of arrest. People transported by car often described this as being a situation from which they could not easily escape. A Thai man described being forced into a car and then forced to change cars several times before he arrived at the PO16 compound in Cambodia. There, he was told not to talk to anyone inside, not to use his phone, and that he would be taken to a "dark room" if he disobeyed managers.[229]

Another survivor, a 14-year-old boy, described how his trafficker became more aggressive towards him as soon as they started to drive him away from his hometown.[230] In other cases, people were placed in cars with other people that they thought may have been traffickers.[231] Some survivors reported fearing what might happen if they tried to escape during the trip.[232]

The vulnerability of survivors increased as they crossed international borders. At that point, they faced the risk of being arrested for irregular entry. Many of the survivors described having no way to communicate with locals because their phones were confiscated or could not connect to international networks.[233]

Finally, at the compounds, survivors were deprived of their liberty under threat of violence. This is expanded upon below in section 6.1.7 on 'Unlawful Deprivation of Liberty', which describes how physical, organizational and psychological barriers were used by compounds to abuse survivors and keep them confined.

THE PURPOSE

In almost all cases documented by Amnesty International, the purpose of trafficking victims to the compounds was for labour exploitation in the scamming industry. In some cases, this meant survivors were given training and a script to directly undertake scamming.[234] In other cases, they were put to work in other jobs at the compound such as administration[235] or food delivery.[236]

There is little doubt that the survivors of trafficking who were interviewed by Amnesty International were brought to the compounds to assist in the running of scamming operations. But that is not the only work that victims may be undertaking in these locations. Numerous other businesses coexist alongside, and appear to be linked to, the scamming industry. These include the sex worker industry and the online gambling industry, both of which may also be using victims of human trafficking.

229 Amnesty International interview with Nadol, 2025.
230 Amnesty International interview with Haoyu, 2024.
231 Amnesty International interviews with Yeruo and Haoyu, 2024.
232 Amnesty International interviews with Haoyu, Yeruo, Hongxi, Ping and Aiguo, 2024.
233 Amnesty International interviews with Beihe, Aihan, Bao, Hongxi, Ping, Aiguo, Yeruo, Bolin, Chun and Haoyu, 2024.
234 Amnesty International interview with Haoyu, 2024.
235 Amnesty International interview with Shi, 2024.
236 Amnesty International interview with Haoyu, 2024.

NO WILLING VICTIMS

The UN definition of trafficking in persons states that consent to the intended exploitation is irrelevant where any of the means of trafficking have been used, including threat or use of violence or other forms of coercion, abduction, fraud, deception, abuse of power or a position of vulnerability.[237]

Amnesty International interviewed two people who were aware that they were going to be working in scamming operations. Amnesty International nonetheless considers them to be victims of human trafficking because of the threat or use of violence and other means of coercion used against them in the compounds.[238] For example, Gang described how he went to Cambodia fully aware that he would be working in the scamming industry. Once he arrived, he said his phone was taken and smashed and he was beaten. He was moved between compounds and finally told he could not leave unless he paid a fee of USD 25,000. While Gang knew that the work involved scamming people, and that the compounds sometimes involved violence, he was not told that he would be subjected to any of these abuses, nor that he would not be able to leave the compound where he worked.[239] As such, Amnesty International's assessment is that he is a survivor of human trafficking for forced labour.

It is possible that other people in the compounds are there willingly, at least to some extent, according to interviewees and local organizations.[240] However, they may still be victims of human trafficking if they were deceived about the conditions in which they would be working or if any other means, such as threat of violence, were subsequently used to ensure their exploitation. In all of the cases documented by Amnesty International, deception and threat of violence were used even when survivors knew in advance what kind of work they would be engaged in.

People who enter the scamming industry with knowledge of the work they will be doing may also become victims of other abuses that occur within the compounds, such as forced labour, torture and other ill-treatment or enslavement. Daniel was freed from a compound in 2023. Despite being fully aware of the violence and the climate of fear that existed in the compounds, Daniel told Amnesty International that he willingly returned to work in another scamming compound because he needed money and could not find work in his home country. His return to the compound initially went well for him, he said, and he made money while working at a compound where he was free to leave and was not physically abused. However, after some months, he was "sold" by his boss to another compound, where he was confined and placed at risk of torture and other ill-treatment.[241] Daniel's case exemplifies the dangers of the scamming industry, whether or not it is purportedly 'voluntary'. His case shows the risks inherent in an industry that treats humans like property and which operates outside of the normal confines of officially registered and regulated commercial activities.

237 Palermo Protocol, Article 3(b).
238 Amnesty International interviews with Daniel and Gang, 2024.
239 Amnesty International interview with Gang, 2024.
240 Amnesty International interviews with organizations 1, 2, 3, 4, 8 and 10, 2024.
241 Amnesty International interview with Daniel, 2024.

6.1.3 TRAFFICKING IN CHILDREN

Amnesty International interviewed nine children who were survivors of Cambodia's scamming compounds; six boys and three girls.[242] Five of the survivors came from China, three were Thai, and one was Vietnamese. The youngest were 14 years old.[243] Amnesty International also interviewed organizations who confirmed they had rescued children from compounds.[244] In one case, a rescuer showed interview notes to Amnesty International confirming that they had rescued a Vietnamese child from the CT03 compound.[245]

All the children whom Amnesty International interviewed described being brought to Cambodia by people with links to the compounds where they were confined.[246] As mentioned above, the question of consent is irrelevant to determining whether trafficking has occurred in the case of children, regardless of whether any of the "means" of trafficking were used. Nonetheless, in the cases of those interviewed, the children were deceived by traffickers to get into cars or boats, and abuse of power was used to ensure none tried to escape. The position of power over the children which was held by the adult traffickers was enough to dissuade any of the children from attempting to escape.[247] Yeruo, a 14-year-old boy from China, was trafficked to a compound in Sihanoukville in 2024. A recruiter told Yeruo he would be paid USD 1,570 per month for a job in China. Yeruo took a bus from his home city to Guangxi, before being collected with three other people by a person in a car. Four days later he arrived in Cambodia after transferring between cars and being driven through Viet Nam by Vietnamese drivers.[248]

> ***"We never stopped, we slept in the car and only got out to go to the bathroom – we eat in the car. I asked for a hotspot to speak to my family, but they refused to provide... the driver said there will be a checkpoint, so everyone pretend to be sleeping. The driver left the car, I did not bring any identity card because I thought the job was in China."[249]***

Yeruo was never paid for his work and ended up losing money after his family had to pay his traffickers and enslavers to release him.[250]

Beihe, a 14-year-old girl, and Aihan, a 15-year-old girl, were trafficked in 2024.[251] Amnesty International interviewed the girls together, at their request. During the interview, both girls identified a compound from pictures, described the buildings, and accurately described its location in relation to other buildings.[252] Beihe and Aihan were trafficked from China through Viet Nam and into Cambodia. When they arrived at the compound, they were met by a man who knew their trafficker and had fake identification documents with their photos on them. The girls said that the man gave them the documents and they noticed that their years of birth had been changed to 2005, making them appear to be adults. At this point, the man threatened them not to tell anyone inside the compound that they were under 18 years of age.

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242 Amnesty International interviews with Yeruo, Haoyu, Aihan, Beihe, Chun, Sawat, Narong and Van, 2024.
243 Amnesty International interviews Yeruo and Aihan, 2024.
244 Amnesty International interviews with organizations 1, 2, 3, 8 and 10, 2024.
245 Amnesty International interviews with organization 8.
246 Amnesty International interviews with Yeruo, Haoyu, Aihan, Beihe, Chun, Sawat, Narong and Van, 2024.
247 Amnesty International interviews with Yeruo, Haoyu, Aihan, Beihe, Chun, Sawat, Narong and Van, 2024.
248 Amnesty International interview with Yeruo, 2024.
249 Amnesty International interview with Yeruo, 2024.
250 Amnesty International interview with Yeruo, 2024.
251 Amnesty International interview with Haoyu, 2024
252 Amnesty International interviews with Beihe and Aihan, 2024

> ***He told us we would never go back to China if we told anyone we were under 18. He threatened us.***[253]

Both girls were subjected to psychological torture and other ill-treatment by managers, including being shown videos of other people being tortured and being told that they would be tortured or possibly killed if their families did not pay for their release.[254]

Van, a Vietnamese boy, was trafficked to a compound in Bavet in 2023 after entering Cambodia through a jungle path in the middle of the night. Van, who was 15 years old at the time, described how he and his friend were told they had been sold to the compound after they had entered it believing they would be given jobs. Van discovered that his friend had trafficked him into the site, possibly knowing they would be confined there. Van spent a year inside the compound and was subjected to torture and other ill-treatment by bosses in a room that was known to people in the compound to be set up for this purpose.[255]

BA11

BA11 is a scamming compound in Bavet. Amnesty International interviewed seven survivors from the compound,[256] including three children.[257] Two organizations confirmed to Amnesty International that people had been released or escaped from BA11 after they had requested to be rescued.[258] The children interviewed said that compound managers were aware of their ages, and then took advantage of the fact they were removed from the safety of their families and society by recruiters. These recruiters delivered them to the site and exposed them to a dangerous and criminal work environment as well as psychological and physical torture and other ill-treatment.[259]

In the summer holidays of 2024, Haoyu, a teenage Chinese boy, was looking for a summer job to help his family afford medical costs for his grandfather. Haoyu was looking for work in a factory, something he had done previously. He applied for a job on the site and was picked up by a car, ostensibly sent by the factory, to take him to an interview. The job Haoyu had applied for was for a factory in Jiang Xi. Once he was in the car, however, the driver said that the factory had gone bankrupt but there was another factory in Naning province that was still open. After Haoyu agreed to go to the factory in Naning, the driver's tone changed.[260]

> ***"I told the driver I need to buy something and I don't have clothes, so I want to stop but the driver tells me to be quiet. After picking up more people the driver took all of our phones. The other guys looked a bit older and I thought they might be traffickers, so I don't dare to escape or talk to them."***[261]

253 Amnesty International interview with Beihe, 2024
254 Amnesty International interviews with Beihe and Aihan, 2024.
255 Amnesty International interview with Van, 2024.
256 Amnesty International interviews with Bo, Wei, Fang, Gang, Beihe, Aihan and Haoyu, 2024.
257 Amnesty International interviews with Beihe, Aihan and Haoyu, 2024.
258 Amnesty International interview with organizations 1 and 6, 2024.
259 Amnesty International interviews with Gang, Beihe, Aihan and Haoyu, 2024.
260 Amnesty International interview with Haoyu, 2024.
261 Amnesty International interview with Haoyu, 2024.

After entering Viet Nam by boat, Haoyu was taken to Bavet in Cambodia and dropped off at the compound. Haoyu identified the compound from photographs shown to him by Amnesty International and described the location of guard checkpoints which were confirmed by Amnesty International site visits in 2024 and by satellite imagery. One inside the compound, Haoyu told the manager he did not know how to type. The manager gave him two weeks to learn to type, and in the meantime he was taken to the kitchen and forced to be a food delivery boy. Because he made frequent deliveries to buildings in the compound, he was able to describe the exact locations of buildings, which corresponded to maps of the compound in the possession of Amnesty International.[262] Haoyu said he was kicked by his manager when he made a mistake at the restaurant. He also witnessed the likely torture of another person in the compound when he delivered food to a room. He told Amnesty International he "heard screaming from inside. I was so scared they would torture me that I left the food right there and ran away."[263]

During the research, Amnesty International regularly engaged with organizations and individuals involved in rescues. In September, Amnesty International was informed that two Chinese boys aged 16 had been trafficked into Cambodia and their whereabouts were unknown. Later, it was confirmed by organizations that one of the boys had died inside a compound in Chrey Thum.[264]

The testimony gathered by Amnesty International suggests a highly sophisticated and intricate system in which people are deliberately trafficked into compounds for the benefit of people connected to that compound. Nonetheless, Amnesty International interviewed two children who were trafficked into compounds where the staff were seemingly not expecting them. Chun, a 15-year-old Chinese girl, was trafficked to a compound which refused to take her – indicating the lack of an agreement between the traffickers and the compound to which she was allegedly being sold. Chun was then sold to another compound.[265]

262 Amnesty International interview with Haoyu, 2024.
263 Amnesty International interview with Haoyu, 2024.
264 Amnesty International interviews with organizations 3 and 6, 2024.
265 Amnesty International interview with Chun, 2024.

The second case involved Haoyu's experience of being trafficked to BA11 compound. When Haoyu arrived, a man from inside the casino emerged and appeared confused to see Haoyu. Whether premeditated or not, the compound managers took him inside, forced him to work and confined him against his will.[266]

6.1.4 FORCED LABOUR

> ***"If you don't make your quota, you will be sent to another place".[267]***

Under international law, forced or compulsory labour is defined as encompassing two key elements: work for which the person has not offered themselves voluntarily, and which is extracted under threat of a penalty.[268] Survivors of the scamming industry reported being forced to run scams, which they often did as a way to protect themselves from harm and in the hope that it would buy their freedom. Only two of the people interviewed by Amnesty International said they had voluntarily submitted themselves to working in the scamming industry; both were eventually sold into slavery.[269]

The ILO provides a list of indicators of forced labour that includes:

- Abuse of vulnerability
- Deception
- Restriction of movement
- Isolation
- Physical and sexual violence
- Intimidation and threats
- Retention of identity documents
- Withholding of wages
- Debt bondage
- Abusive working or living conditions
- Excessive overtime

All the survivors interviewed by Amnesty International experienced forced labour. Many survivors reported experiencing several, and in some cases all, of the above indicators.

Survivors interviewed by Amnesty International often described having had their vulnerability taken advantage of, being deceived, and having their identity documents retained during the trafficking phase, as documented above. They were isolated and subjected to physical violence at the hands of their employers and managers in the compounds. These abuses are covered in the 'Torture and Other Ill-treatment' section that follows. Restrictions on their movement and their abusive working or living conditions are largely covered by the section on 'Unlawful Deprivation of Liberty', and debt bondage is covered by the section on 'Slavery'. This section therefore covers the remaining indicators - intimidation and threats, withholding of wages, and excessive overtime.

266 Amnesty International interview with Haoyu, 2024.
267 Amnesty International interview with Sawat, 2024.
268 ILO Forced Labor Convention No. 29, Article 2(1).
269 Amnesty International interviews with Daniel and Gang, 2024.

INTIMIDATION AND THREATS

Life inside a compound meant exposure to violence, threats, intimidation and fear for all but two survivors interviewed – both of whom were later placed in compounds where violence and fear were the norm.[270] Survivors were regularly threatened by their superiors that they would be hurt if they tried to escape. Their only options were to pay a "fee" to leave, or do the work. This resulted in many survivors telling Amnesty International that they "had no choice" but to work.

> ***"If you didn't meet your targets, you would be shocked for three seconds [by an electric shock baton]."[271]***

Managers and bosses frequently told survivors that they would be beaten if they did not work. Forty-five survivors interviewed by Amnesty International either witnessed other people being physically hurt by guards or managers inside the compounds or were hurt themselves.[272] This is expanded upon in the section on 'Torture and Other Ill-treatment' below. The threat of violence undoubtedly forced victims to work hard.

Other threats were also used to coerce victims to work. Two cousins who were trafficked into Cambodia from China reported being told they would be sold after refusing to work at the CH01 compound in Oddar Meanchey province. Ping and Aiguo described being beaten in an office and later locked in a room while their manager waited to sell them to another compound.[273]

In a separate threat, survivors were sometimes told they would be arrested by police for undertaking illegal activities such as being in Cambodia without a valid visa or undertaking scamming operations. Van, a 16-year-old boy from Viet Nam, was told he would be arrested by police if he did not carry out scamming work.[274]

While the ILO Forced Labour Convention does not prohibit all compulsory work or service, its definition does not exclude protection from being forced to undertake illegal work.[275] In fact, in the cases documented by Amnesty International, the fact that the labour included criminal work, primarily scamming and fraud, exacerbated the position of vulnerability and created an additional threat that could be used by compound managers against survivors. This was primarily because survivors were often keenly aware that the work they had been forced to do was criminal and they feared being charged with criminal offences, either by Cambodian authorities or in their home countries. Yeruo, for example, was told by a manager at SI16 compound that he would be arrested by the police because of his illegal work and entry into Cambodia.[276] Hongxi, confined at the BA13 compound, was told by his manager that, if he tried to escape or contact the police, the manager would send photos of Hongxi running scams to the Chinese police whom, he said, would then arrest Hongxi for scamming.[277]

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270 Amnesty International interviews with Daniel and Gang, 2023 and 2024.
271 Amnesty International interview with Adam, 2024.
272 Amnesty International interviews with Gelila, Daniel, Chao, Jumpon, Krit, Chen, Da, Van, Diep, Elias, Adam, Amir, Narong, Wittaya, Sawat, Pranee, Siti, Yathada, Jirayu, Porameth, Bolin, Jin, Ai, Jinda, Shi, Ping, Beihe, Aihan, Aiguo, Haoyu, Hongxi, Yutai, Bao, Thapol, Pattara, Munin, Chanai, Yollada, Ratikarn, Kin, Disorn, Lisa, Sila, Nadol and Manzur, 2023, 2024 and 2025.
273 Amnesty International interviews with Ping and Aiguo, 2024.
274 Amnesty International interview with Van, 2024.
275 ILO Forced Labor Convention No. 29, Article 2(1).
276 Amnesty International interview with Yeruo, 2024.
277 Amnesty International interview with Hongxi, 2024.

WITHHOLDING OF WAGES AND EXCESSIVE OVERTIME

At least 50 of the 58 people interviewed by Amnesty International reported that they were not paid at all for their work in the scamming compounds, suggesting the model is primarily based on unpaid labour. This is further evident in the way survivors were treated as property by the compounds (see section on 'Slavery' below), and how in some cases their "debts" to the company continued to increase the longer they worked.[278] The people who reported that they were paid wages explained that the pay was below what they had been promised by recruiters.[279]

Four survivors reported that their managers used overtime work as a penalty when they did not meet work targets.[280] Many survivors reported working hours that were considered excessive, such as more than 10 hours a day.[281] Gelila worked more than 16 hours a day.[282] Others reported working excessive and irregular hours that prevented normal sleep schedules.[283]

6.1.5 CHILD LABOUR

Article 32 of the UN Convention on the Rights of the Child, to which Cambodia is a state party, protects against child labour, including protection against children "performing any work that is likely to be hazardous or to interfere with a child's education, or to be harmful to the child's health or physical, mental, spiritual, moral or social development". Under Article 32, abuses can also arise from the hours and conditions of work, when they are excessive or could interfere with the health of a child.

Child labour was reported by or inferred from the testimony of eight children that Amnesty International interviewed.[284] The work that children were forced to do was hazardous by its very nature. Children were kept in the same buildings as adults, including sleeping quarters, and witnessed violence within the compounds.[285] Children were also exposed to other illegal activities within the compounds including the drug trade and the possession of illegal weapons by compound owners. Children also witnessed and/or were subjected to torture and other ill-treatment. In five cases, children were tortured or otherwise ill-treated directly, either by being subjected to physical violence, including being beaten,[286] shocked with electric shock batons,[287] or placed in isolation in dark rooms,[288] or were subjected to psychological torture and other ill-treatment by being exposed to the torture and other ill-treatment of others, and to immediate threats of torture and other ill-treatment.[289] In seven cases, children told Amnesty International that the traffickers and the managers of the compounds were aware of their ages.[290] Children were not able to access their right to education because they were removed from their home countries and confined within compounds.

278 Amnesty International interview with Ai, 2024; Amnesty International interviews with organizations 1, 2, 3, 6, 2024.
279 Amnesty International interview with Elias and Daniel, 2024.
280 Amnesty International interviews with Van, Diep, Gang and Sawat, 2024.
281 Amnesty International interviews with Van, Diep, Gang, Gelila, Daniel and Sawat, 2023 and 2024.
282 Amnesty International interview with Gelila, 2024.
283 Amnesty International interviews with Diep, Gang and Sawat, 2024.
284 Amnesty International interviews with Van, Narong, Chun, Beihe, Aihan, Haoyu and Yeruo, 2024.
285 Amnesty International interviews with Van, Narong, Beihe, Aihan, Haoyu and Yeruo, 2024.
286 Amnesty International interview with Haoyu, 2024.
287 Amnesty International interviews with Van and Narong, 2024.
288 Amnesty International interviews with Van and Narong, 2024.
289 Amnesty International interviews with Aihan and Beihe, 2024.
290 Amnesty International interviews with Van, Narong, Chun, Beihe, Aihan, Haoyu and Yeruo, 2024.

6.1.6 TORTURE AND OTHER ILL-TREATMENT

Article 1 of CAT, to which Cambodia is a state party, describes torture as:

"any act by which severe pain or suffering, whether physical or mental, is intentionally inflicted on a person for such purposes as obtaining from him or a third person information or a confession, punishing him for an act he or a third person has committed or is suspected of having committed, or intimidating or coercing him or a third person, or for any reason based on discrimination of any kind".

Torture and other ill-treatment was reported by 45 of the 58 survivors that Amnesty International interviewed.[291] Twenty-five survivors reported hearing or seeing torture or other ill-treatment occurring, but not being directly subjected to it.[292] In some instances, the witnessing of torture or other ill-treatment amounted to psychological torture or other ill-treatment in itself, as it was done purposefully to elicit a sense of fear in the observer.[293] Twenty-two survivors reported that torture and other ill-treatment was carried out against them directly.[294] In all cases except one,[295] the torture or other ill-treatment described was carried out by managers or bosses.

TORTURE AND OTHER ILL-TREATMENT AS A METHOD OF CONTROL AND DISCIPLINE

Testimony from survivors indicates that torture and other ill-treatment was used, and is likely still used, as a method of control and to discipline people within the compounds. Survivor accounts demonstrate that the violence carried out within the compounds was perpetrated for several purposes: to prevent information leaking out of compounds, to extract the maximum amount of labour, and to intimidate people and amplify the climate of fear that caused many survivors to hesitate in contacting the police, rescue groups or embassies. In line with CAT (see Chapter 4), the intention requirement for torture includes that torture be "inflicted on a person for such purposes as obtaining from him or a third person information or a confession, [or] punishing him for an act he or a third person has committed or is suspected of having committed".[296]

The fear of torture and other ill-treatment helped to prevent victims filing complaints about their treatment in the compounds and allowed compound bosses and beneficiaries to further exploit their labour. In some cases, survivors told Amnesty International that torture and other ill-treatment was carried out to elicit a faster payment for their release,[297] or to pressure people to learn or improve skills needed for the work, such as typing.[298]

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291 Amnesty International interviews with Gelila, Daniel, Chao, Jumpon, Krit, Chen, Da, Van, Diep, Elias, Adam, Amir, Narong, Wittaya, Sawat, Pranee, Siti, Yathada, Jirayu, Porameth, Bolin, Jin, Ai, Jinda, Shi, Ping, Beihe, Aihan, Aiguo, Haoyu, Hongxi, Yutai, Bao, Thapol, Pattara, Munin, Chanai, Yollada, Ratikarn, Kin, Disorn, Lisa, Sila, Nadol and Manzur, 2023, 2024 and 2025.

292 Amnesty International interviews with Gelila, Daniel, Krit, Chen, Adam, Narong, Pranee, Siti, Yathada, Jirayu, Porameth, Ai, Jinda, Thapol, Pattara, Munin, Chanai, Yollada, Ratikarn, Kin, Disorn, Lisa, Sila, Nadol and Manzur, 2023, 2024 and 2025.

293 Amnesty International interview with Beihe and Aihan, 2024.

294 Amnesty International interview with Chao, Jumpon, Da, Van, Diep, Elias, Amir, Wittaya, Sawat, Bolin, Jin, Shi, Ping, Beihe, Aihan, Haoyu, Hongxi, Aiguo, Yutai and Bao, 2023 and 2024.

295 Amnesty International interview with Jumpon, 2024. Jumpon said that the perpetrators of the acts of torture and other ill-treatment committed against him were Cambodian security guards.

296 CAT, Article 1.

297 Amnesty International interview with Beihe and Aihan, 2024.

298 Amnesty International interviews with Bao and Jin, 2024.

In 10 cases, survivors and witnesses were told by the compound bosses or managers that torture and other ill-treatment was enacted because they, or others, had tried to contact police, embassies or family members to help them escape or had had their escape plans discovered by compound bosses or managers.[299]

Wittaya, a Thai man in his forties who was moved from the SI35 compound to the SI36 compound, was subjected to torture or other ill-treatment for seeking help. "They held the phone in front of my face, showing the evidence that I messaged people asking for help," he said. Wittaya was punched in the face, shocked with electric shock batons and kept in isolation while his captors told him they were trying to sell him to another compound.[300] His niece, his niece's partner and another Thai survivor who were also held at the same compounds witnessed the torture or other ill-treatment and corroborated Wittaya's story.[301]

Torture and other ill-treatment can be any act that "is intentionally inflicted on a person for such purposes as... intimidating or coercing him or a third person."[302] This form of torture or other ill-treatment was widespread and reported by almost all the survivors Amnesty International interviewed. Siti and his partner described being inside the SI35 compound office when a Vietnamese person was beaten by compound bosses.[303]

Siti: "Yeah, it's really inhuman... They just keep beating [the Vietnamese person] until their body was like the purple. Ten of them, or eight of them... and then using the, how to say that? Like dumbbell, dumbbell. Yeah, to hit his leg or something like that or hit his body or something. And then the electric baton, like, keep shocking. Hold on the body, yeah."

Amnesty International researcher: "How long did it last?"

Siti: "Ohh around like 20 until 30 minutes. Yeah. Keep beating. Yeah, around like that... beat the Vietnamese until he can't scream, can't get up until he, like, laying down a day until like no energy or something like that."

299 Amnesty International interviews with Da, Amir, Wattaya, Pranee, Siti, Ai, Jinda, Hongxi and Yutai, 2023 and 2024.
300 Amnesty International interview with Wittaya, 2024.
301 Amnesty International interviews with Pranee, Siti and Jinda, 2024.
302 CAT, Article 1.
303 Amnesty International interview with Siti and Pranee, 2024.

Amnesty International researcher: "And do you remember what happened after that?"

Siti: "Ohh, [the Vietnamese person was] just locked up at the room... And then the boss tell me that they wait until another compound want to buy him. So we can't get out at all, and the Thai supervisor also told me that this building belongs to the people with a lot of influence in the country. And if I or if we think about doing anything, uh, they are going to dump us in a boat."

Amnesty International researcher: "What does that mean, 'dump in a boat'?"

Siti: "Umm, it's like, it's like if you do anything bad they are going to do the same to us like to the person who got beaten, who were hit, with the dumbbell and because the building itself is closer to the sea as well."[304]

Instances of torture and other ill-treatment, including beatings like the one described above, were reported regularly in the testimony from survivors. James, a 19-year-old Malaysian man who was confined at a site believed to be SI22, recounted a story of a person who tried to escape. James said the person was caught by security guards and taken to "the jail" – a separate location within the compound. James did not witness what happened to this person, but said that, every few nights, he could hear screams and cries for help from "the jail".[305] Despite many compounds having rooms specifically designated as places for conducting torture and other ill-treatment, many such acts were carried out in front of witnesses, and only one compound was described as having a designated room with possible sound-proofing.[306]

Accounts from survivors interviewed by Amnesty International closely mirrored the stories collected from compound survivors by other organizations.[307] In fact, every group to which Amnesty International spoke said that it regularly saw victims from the compounds who had experienced violence that resembled torture and other ill-treatment.[308] The patterns of violence amounting to torture and other ill-treatment in the compounds were further borne out in the accounts of journalists who documented, and continue to document, the experiences of survivors.[309] Injuries, which survivors said were from electric shock batons, were documented by Amnesty International, and similar descriptions were provided by organizations and journalists.[310]

The fact that the tools and methods for committing torture and other ill-treatment are almost identical across more than 30 locations lends further credibility to survivor testimony and suggests patterns of criminality and an organized approach to torture and other ill-treatment within Cambodia's scamming compounds.

304 Amnesty International interview with Siti, 2024.
305 Information provided by organization 8, 2022; on file with Amnesty International.
306 Amnesty International interview with Elias, 2024.
307 Amnesty International interviews with organizations, 1, 2, 3, 4, 8 and 11, 2024.
308 Amnesty International interviews with organizations, 1, 2, 3, 4, 8 and 11, 2024.
309 See also: VoD, "Enslaved: an investigation" (previously cited); Al Jazeera, "Forced to scam: Cambodia's cyber slaves" (previously cited).
310 Amnesty International interviews with organizations 1, 2, 3, 4, 8 and 11, 2024 and 2025; Images on file with Amnesty International.

METHODS OF TORTURE AND OTHER ILL-TREATMENT

Torture and other ill-treatment methods varied but included psychological torture and other ill-treatment, stress positions, isolation, the use of "dark rooms" or rooms specifically designated for torture and other ill-treatment, and the threat of gender-based violence. This list is not exhaustive.

PSYCHOLOGICAL TORTURE AND OTHER ILL-TREATMENT

Psychological torture and other ill-treatment was directly reported by several survivors. It is likely, however, that all of the survivors who witnessed torture and other ill-treatment were subjected to a form of psychological torture or other ill-treatment designed to instil fear of breaking the compound rules. Chao, a Taiwanese man confined in the SI08 compound, told Amnesty International he was forced to subject other people to torture and other ill-treatment and described being told to shock people with electric shock batons if they did not meet their work goals. In addition, Chao told Amnesty International that he witnessed the beating of a man who tried to escape and said it was recorded by managers to spread fear.[311]

Gelila, an Ethiopian woman, was confined at three Sihanoukville compounds in 2022 and 2023 where she said she heard screaming at night and saw the guards carrying electric shock batons. She said the managers "brainwash you – they call you useless, they say your parents need you to make them money – we were constantly afraid to ask for a break." Gelila further described her experience as one of constant fear, even though she was never subjected to physical torture or ill-treatment herself.[312]

Even children were not spared the psychological impact of being subjected to torture or other ill-treatment. Sawat, a 17-year-old Thai boy who was confined in BA03, witnessed torture and other ill-treatment. He told Amnesty International that he saw someone in the compound have their arm broken by a boss. Sawat said that, when managers wanted to beat someone, they would "drag them right in front of everybody when everybody was gathering and then they will start hitting the person with a really long metal stick, like [a] really thick long metal stick in front of everyone."[313] The psychological impact of witnessing such acts can amount to torture or other ill-treatment.

In 2024, on their second day at a compound, managers learned that 14-year-old Beihe and 15-year-old Aihan were under 18 years of age. As a result, a boss told them they needed to pay a "transport fee" of USD 15,000 to go back to China. The two girls were then forced to watch videos of torture and other ill-treatment, and were threatened with similar treatment if their families could not find the money to secure their release. In addition, the boss told them that "people kill themselves all the time in here." The girls interpreted this as a threat.[314]

STRESS POSITIONS, RESTRAINTS AND ISOLATION

Bao, a 37-year-old man from China, was trafficked to PP09 compound before being "sold" and trafficked again to BS04 compound in September 2024. After contacting relatives for help, Bao said he was taken to a boss. He told the boss he wanted to go home. Two people held him as he was beaten, kicked and shocked with electric shock batons. Bao said he was tied to a bed to prevent him from escaping and spent 20 consecutive days in this condition. Bao showed Amnesty International clothes with what he said were blood stains from being beaten.[315]

311 Amnesty International interview with Chao, 2024.
312 Amnesty International interview with Gelila, 2023.
313 Amnesty International interview with Sawat, 2024.
314 Amnesty International interview with Beihe and Aihan, 2024.
315 Amnesty International interview with Bao, 2024.

Other survivors reported the use of handcuffs during torture and other ill-treatment. Yutai, a 22-year-old Chinese man, reported being kept handcuffed in a room overnight at PSP04 compound in Pailin after compound bosses discovered that he was trying to escape. They reportedly told him it was "to prevent him trying to kill himself".[316] Bolin, a 27-year-old Chinese man, told Amnesty International that he was handcuffed before being shocked with an electric shock baton and beaten with a plastic stick at least once a week for several weeks.[317] Van, a 16-year-old Vietnamese boy, reported being handcuffed and subjected to torture or other ill-treatment in a dark room at a Bavet compound.[318]

Wittaya, a 40-year-old Thai man, reported that he and other people had water poured and thrown on them while they were in a cold, air-conditioned room. Wittaya said this was done to make people work harder.[319]

DARK ROOMS

> ***"He gave me the food and said: 'This will be your last meal'."[320]***

Nineteen people told Amnesty International that the compound in which they were held had a room or rooms specifically designed as a place for punishment.[321] These rooms were sometimes referred to as "dark rooms" but sometimes did not have a name.[322] Such designated punishment rooms should be identifiable to police during a search of the premises based on victim testimony. Many of them are described as being without light and lacking other features compared to other rooms in the compound, such as office equipment or other equipment. At least one "dark room" was reported to have sound-proofing.[323]

316 Amnesty International interview with Yutai, 2024.
317 Amnesty International interview with Bolin, 2024.
318 Amnesty International interview with Van, 2024.
319 Amnesty International interview with Wittaya, 2024.
320 Amnesty International interview with Sawat, 2024.
321 Amnesty International interviews with Jin, Jumpon, Chen, Van, Diep, Amir, Adam, Narong, Wittaya, Sawat, Pranee, Siti, Yathada, Jirayu, Porameth, Elias, Jinda, Bao and Ai, 2024.
322 Amnesty International interviews with Jin, Jumpon, Chen, Van, Diep, Amir, Adam, Narong, Wittaya, Sawat, Pranee, Siti, Yathada, Jirayu, Porameth, Elias, Jinda, Bao and Ai, 2024.
323 Amnesty International with Elias, 2024.

Lisa, who had spent 10 months inside scamming compounds, wanted to escape even if it meant she did not survive in 2025.[324] After attempting to escape from PP09, her bosses caught her and "[t]hey took me back to the dark room… there were four men… three of them held me down while the boss hit me on the soles of my feet with a metal pole… They told me that if I don't stop screaming, they're going to keep hitting until I stop." Lisa provided medical records of her injuries to Amnesty International that corroborated her story and identified the "cloud gates" of the PP09 compound.[325]

Sixteen-year-old Van reported being taken by his boss and another person to a "meeting room" on the 10th floor of a building in the BA02 compound in 2024 when he couldn't keep up with the work. Van told Amnesty International he was then handcuffed, beaten and shocked with an electric baton in a room that was known among workers to be designated for carrying out torture and other ill-treatment. He described the room as being dark and empty apart from some cubicles. Van said he knew that other people were tortured in the room.[326]

According to Jin, a Chinese man, the CT05 compound has detached units for use as torture rooms, away from the main buildings where scamming work takes place. Jin said he was taken to one of these detached units in the second half of 2024 after compound bosses grew frustrated that he did not know how to type on a keyboard.

> ***"They gave me a few days but I couldn't learn how to do it [typing]. Then they beat me and had me stand up for three days – then they asked me to type again – but I still can't so they beat me again."***

Jin was taken to a dark room without windows, detached from the main building. He described it as a cabin where others were also kept and tortured. There was a toilet inside so he did not have to leave the room. Jin said the Chinese bosses had electric batons and metal and wooden poles, which they used to beat people in the room, including him. He was locked in the room for seven days, only receiving food once a day.

> ***"They want money when they beat me. [He shows two scars – one on his stomach, the other on his arm]. These are from electric shock – they do it until the electricity runs out. Last time they beat me, they did it for several hours."***

Eventually, Jin was released from the compound. He believes that his captors realized that he was genuinely unable to type and was not trying to avoid work.[327]

Jumpon, a Thai man, reported being tortured in a dark room in a compound in Poipet. Jumpon told Amnesty International that he was dragged into a dark room by Cambodian security guards who beat him, shocked him with electric batons and put a cloth bag over his head. He said he could not remember how long he was kept in the room, but guessed it was for one or two days. He reported passing out from pain many times.[328]

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324 Amnesty International interview with Lisa, 2025.
325 Amnesty International interview with Lisa, 2025.
326 Amnesty International interview with Van, 2024.
327 Amnesty International interview with Jin, 2024.
328 Amnesty International interview with Jumpon, 2024.

Sawat, a 17-year-old Thai boy, was taken into a dark room in BA03 compound. Sawat described how, inside the dark room, he was asked by managers if he wanted to confess to anything. Sawat described being beaten by several managers and forced to confess to stealing money before being told he would be stripped and forced to jump off the building. After some time, a manager brought Sawat a meal and told him "this will be your last meal". Then the manager gave him three options. He could pay a ransom to leave, he could stay in this room until he starved to death, or he could have his hands, arms and legs broken and then be turned over to the Cambodian police. Sawat escaped his captors when they left him to think over this decision. He told Amnesty International that he jumped from the eighth floor onto another building next to the compound.[329] During a site visit, Amnesty International was able to corroborate that the building he landed on was in the location he stated, and it was reasonable to think he could have survived such a jump.[330] Nevertheless, Sawat incurred serious injuries in his desperation to escape. He provided evidence that he was treated for these injuries after escaping.[331]

GENDER-BASED VIOLENCE

Two threats of gender-based violence were reported to Amnesty International. At the BA05 compound, Elias reported having a plastic bag placed over his head before being threatened with a knife placed between his legs. Elias said his captors then told him to follow their orders or they would gang-rape his wife, who was also being held at the compound.[332]

TOOLS OF TORTURE AND OTHER ILL-TREATMENT

ELECTRIC SHOCK BATONS

The use of electric shock batons in the commission of torture and other ill-treatment was reported by 15 survivors.[333] In 12 additional cases, survivors reported seeing people inside the compounds with electric shock batons.[334] Ten survivors gave detailed descriptions of the shock batons and there was consistency in their descriptions despite survivors having been held in different locations.[335] They described the batons as being 30cm to 50cm long, black, with electrodes at the end activated by a button near the handle.[336] This suggests that the compounds are using electric shock batons, as opposed to stun guns or projectile electric shock weapons in direct-contact mode, to commit torture and other ill-treatment.

Electric shock batons deliver variable shocks, depending on a variety of factors including voltage and amperage, the length of time for which they are applied, the physical condition of the victim and environmental conditions – such as if the victim's skin is wet in the place of application.[337] While manufacturers argue that their products are not lethal, deaths have been associated with their use.[338]

329 Amnesty International interview with Sawat, 2024.
330 Amnesty International field trip, mid-2024.
331 Amnesty International interview with Sawat, 2024.
332 Amnesty International interview with Elias, 2024.
333 Amnesty International interviews with Chao, Jumpon, Da, Van, Diep, Elias, Amir, Wittaya, Sawat, Bolin, Jin, Shi, Ping, Yutai and Bao, 2024.
334 Amnesty International interviews with Gelila, Daniel, Beihe and Aihan, Hongxi, Ping, Aiguo, Adam, Abu, Lisa, Thapol and Pattara, 2024 and 2025.
335 Amnesty International interviews with Beihe and Aihan, Ping and Aiguo, Gang, Jin, Bao, Yutai, Thapol and Pattara, 2024, 2025.
336 Amnesty International interviews with Beihe and Aihan, Ping and Aiguo, Gang, Jin, Bao and Yutai, 2024.
337 Amnesty International, *"I Still Can't Sleep at Night"* (previously cited), p. 15. See also: Richard E. Nisbett and Stanley Schachter, "Cognitive manipulation of pain", Experimental Social Psychology, Volume 2, 1966, https://www.acritch.com/media/papers/nisbett-schachter-1966-cognitive-pain.pdf; Bernard Tursky, "Physical, physiological, and psychological factors that affect pain reaction to electric shock", Psychophysiology, 1973, https://onlinelibrary.wiley.com/doi/pdf/10.1111/j.1469-8986.1974.tb00830.x; and Robert T. Green, "The absolute threshold of electric shock", British Journal of Psychology, Volume 53, Issue 2, May 1962, https://bpspsychub.onlinelibrary.wiley.com/doi/abs/10.1111/j.2044-8295.1962.tb00817.x, pp. 107-115.
338 Amnesty International USA, *Excessive and Lethal Force? Amnesty International's Concerns About Deaths and Ill-Treatment Involving Police Use of Tasers* (Index: AMR 51/139/2004), 30 November 2004, https://www.amnesty.org/en/documents/amr51/139/2004/en/

Amnesty International considers direct-contact electric shock weapons, such as stun batons and stun guns, to be inherently abusive.[339] This is because it is easy for a person to use such a weapon to apply extremely painful shocks by hand at the push of a button, including to very sensitive parts of the body, without necessarily leaving long-lasting physical traces.[340] This ease allows for repeated shocks to be administered. Direct-contact electric shock weapons and devices do not incapacitate individuals but deliver painful shocks. They have no legitimate law enforcement role that could not be achieved through less harmful means. These devices can cause severe suffering, long-lasting physical disability and psychological distress which can destroy an individual's sense of dignity. Prolonged use can even result in death. Given the substantial risk that the use of these weapons, as currently designed, can amount to arbitrary force, torture or other cruel, inhuman or degrading treatment and punishment, their use and trade should be prohibited for law enforcement and private security purposes.

Direct-contact electric shock weapons, or electric shock batons, are considered by the Special Rapporteur on torture to be "inherently cruel, inhuman or degrading based on either (i) their technical specifications (design) such that they inflict pain or suffering, or are humiliating or debasing, that is beyond the threshold permitted by the prohibition on torture and other ill-treatment; or (ii) because the purpose for which they are being used can be achieved by less harmful means and hence their purpose is deemed to be illegitimate."[341]

The reported use of electric shock batons, and their presence in the compounds where they are carried by security guards and/or other persons, is further evidence that compound officials intended, and continue to intend, to use torture and other ill-treatment. Although they could be used as defensive weapons, in interviews with survivors, drivers and experts Amnesty International found no evidence of batons being used in this way. Indeed, the testimony of survivors and organizations interviewed in this report suggests they are primarily used for compliance and punishment as a tool of torture and other ill-treatment.[342]

HANDCUFFS

Several compounds employ guards that carry handcuffs or use handcuffs to detain people for the purposes of torture and other ill-treatment. Three survivors reported being subjected to torture or other ill-treatment when handcuffed or by being handcuffed.[343]

339 Amnesty International, *China's Trade in Tools of Torture and Other Ill-Treatment and Repression*, (previously cited), pp. 10-11.
340 Amnesty International, *China's Trade in Tools of Torture and Other Ill-Treatment and Repression*, (previously cited), pp. 10-11.
341 Special Rapporteur on torture, Interim report, 24 August 2023, UN Doc. A/78/324, Annex I, p. 12.
342 Amnesty International interviews with Gelila, Chao, Jumpon, Da, Van, Diep, Elias, Amir, Wittaya, Sawat, Bolin, Jin, Shi, Ping, Yutai, Bao and Hongxi, 2024; Amnesty International interviews with organizations 1, 2 and 3, 2024.
343 Amnesty International interviews with Van, Bolin and Yutai, 2024.

6.1.7 UNLAWFUL DEPRIVATION OF LIBERTY

> ***"No one wants to be there for long, but no one can escape either, because if we try to escape then we would die."***[344]

Unlawful deprivation of liberty (sometimes referred to as 'confinement' or simply 'deprivation of liberty') was experienced by every survivor that Amnesty International interviewed. It was an essential element to the enslavement of survivors. The deprivation of liberty also made other crimes easier to perpetrate and allowed for and exacerbated the abuses to which survivors were subjected.

Unlawful deprivation of liberty is prohibited under Article 9 of the ICCPR: "No one shall be deprived of his liberty except on such grounds and in accordance with such procedure as are established by law." Article 11 of the ICCPR clarifies that "[n]o one shall be imprisoned merely on the ground of inability to fulfil a contractual obligation". Domestically, the Cambodian government views "confinement" as a criminal offence and has linked it with human trafficking.[345]

DESIGN TO CONFINE

The experiences of survivors are reflected in the design and use of the physical space of scamming compounds. Survivors reported that "escape [from compounds] was impossible", describing cages and other features that are "like a prison cell."[346] In some cases, compounds not only looked like prisons, but appeared to have been designed and purpose-built to serve the purpose of depriving people of their liberty.[347]

ESCAPES AND ESCAPE ATTEMPTS

Heavily securitized perimeters were set up primarily to prevent escape. Escape attempts have been documented frequently from compounds across Cambodia. In August 2022, videos captured dozens of people attempting to escape the CT01 compound in Chrey Thom, a town along the Cambodia-Viet Nam border.[348] In the videos, people can be seen running out of the compound gates as security guards attempt to grab them and hit them with poles and sticks. Some escapees then jumped into the river outside the compound and attempted to swim to Viet Nam. It was later reported that 42 Vietnamese people reached Viet Nam from this escape.[349]

In another case from January 2025, according to a media report, workers stormed out of a location presumed to be the OS01 compound.[350] Near this location, Amnesty International interviewed a local resident who claimed to have witnessed "many" escapees with blood on their hands and legs, hiding in the nearby forest.[351]

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344 Amnesty International interview with Sawat, 2024.
345 Law on the Suppression of Human Trafficking in Cambodia (2008), Article 21.
346 Amnesty International interview with Wittaya, 2024.
347 See TD01, PP09, SI08, CT02, PP13, TK01.
348 VoD, "Dramatic escape at Koh Thom Casino triggers gov't denial", 19 August 2022, https://vodenglish.news/dramatic-escape-at-koh-thom-casino-triggers-govt-denial/
349 Khmer Times, "Escaped exploited Vietnamese workers implicate compatriots", 28 August 2022, https://www.khmertimeskh.com/501140048/escaped-exploited-vietnamese-workers-implicate-compatriots/#google_vignette
350 CamboJA News, "O'Smach resort, long linked to cyber scams and sanctioned by US, sees worker revolt amid anti-trafficking gaps", 9 January 2025, https://cambojanews.com/osmach-resort-long-linked-to-cyber-scams-and-sanctioned-by-us-sees-worker-revolt-amid-anti-trafficking-gaps/
351 Amnesty International interview with witness, OS01, 2024.

Amnesty International spoke to multiple witnesses of escape attempts from different compounds.[352] Several survivors tried to escape; some succeeded. Krit, who was confined at the PO10 compound in 2023, planned his escape with others who were confined alongside him. They set fire to a room and escaped during the panic.[353] Amnesty International interviewed nearby residents who confirmed there was a fire at the site during the dates reported by Krit.[354] News reports also confirm Krit's story.[355]

Chao, a survivor of the SI08 compound, told Amnesty International that he became aware of a weakness in a perimeter wall which he and other victims intended to exploit in order to escape. Before he could escape, Chao's plan was uncovered by bosses. He was taken to a room where he was subjected to torture or other ill-treatment, and subsequently "sold" to a compound in Myanmar.[356]

SECURITY GUARDS WITH WEAPONS

According to survivor testimony, security guards had a key role in securing compounds and deterring escape. Van reported seeing many security guards holding rifles inside the BA02 compound in Bavet.[357] At the SI02 compound in Sihanoukville, Adam saw guards carrying guns. Adam described the weapons as black machine guns and identified a model known to be in circulation in Cambodia.[358] Amir also reported seeing guards carrying guns at the SI15 compound in Sihanoukville and the BS04 compound in Koh Kong.[359]

Security guards at compounds carried other weapons including batons, electric batons, pepper spray, sticks and handcuffs. At least seven survivors reported that guards carried batons or sticks,[360] with five others saying that guards or managers in the compounds had handcuffs.[361] Several survivors reported seeing guards carrying and using electric shock batons (see section on 'Electric Shock Batons' above).[362] The presence of these weapons indicates that force could be used against anyone who tried to leave the compounds.

In the PO18 compound, guards used electric shock batons as tools of control and to elicit fear. Two survivors reported that they were confined to a single room during their stay at the site. Guards would enter their room multiple times an hour waving an electric shock baton and triggering the mechanism to create a distinctive sound. One of the survivors began to cry when she recounted the sound it made and said that the guards did this to prevent escapes. A guard would search people's possessions in what they believed was an attempt to find phones that could be used to ask for help from outside. The survivors said that the room was occupied by Thai people, including children who cried during these searches.[363]

352 Amnesty International interviews with witnesses 1 and 2, 2024; Amnesty International interviews with Krit, Chao, Diep, Siti and Pranee, 2024; Information provided by organization 8, 2022; on file with Amnesty International.
353 Amnesty International interview with Krit, 2024.
354 Amnesty International interviews with nearby residents, 2024.
355 Nation Thailand, "Nine Thais 'set fire to Cambodian casino to escape murderous call centre gang'", 19 December 2023, https://www.nationthailand.com/thailand/general/40033938
356 Amnesty International interview with Chao, 2024.
357 Amnesty International interview with Van, 2024.
358 Amnesty International interview with Adam, 2024.
359 Amnesty International interview with Amir, 2024.
360 Amnesty International interviews with Narong, Sawat, Siti, Pranee, Jinda, Bolin, Jin, 2024
361 Amnesty International interviews with Van, Diep, Wittaya, Yutai, Haoyu, 2024.
362 Amnesty International interviews with Thapol and Pattara, Adam, Amir, Van and Diep, 2024 and 2025.
363 Amnesty International interview with Thapol and Pattara, 2025.

6.1.8 SLAVERY

"I was someone else's property at the time".[364]

The Slavery Convention of 1926 defines slavery as the condition in which a person is treated as property – with powers of ownership exercised over them.[365] This can include the buying and selling of people, as well as total control over their life and labour.[366] The 1956 Supplementary Convention further expands this to include practices *similar* to slavery, such as being forced to work for a debt that can never realistically be paid off.[367]

In total, 23 of the 58 survivors interviewed reported being sold into compounds, witnessing the sale of other people, or being threatened by managers that they would be sold to another compound.[368] This included survivors confined in compounds during the years 2022, 2023, 2024 and 2025.

A Vietnamese woman, Diep, was told by her boss that she had been sold to him: "[H]e told me I was sold here for USD 3,000." Upon arriving at the compound, Diep overheard her Chinese recruiter and another man, who later turned out to be her boss, bartering over the price for delivering her to the compound. Diep would later be sold twice more to different companies within the OS01 compound.[369]

Shi, a Chinese woman, reported being sold from CT05 compound to the BS04 compound in 2024. She said she saw her boss make the deal with another boss. "He paid USD 7,000. I heard him say that number to the other boss", Shi told Amnesty International. She then overheard the two bosses talking about her health before she was told to get into a car and was driven to the BS04 compound.[370]

Even in cases where survivors did not report people being directly bought and sold, the lines were often blurred. As mentioned above, slavery is not limited to the selling and purchasing of people. Instead, the exercise of "powers attaching to the right of ownership" can be determined by analysing the presence of several indicators, principally centred around elements of control and ownership.

The indicators can include:

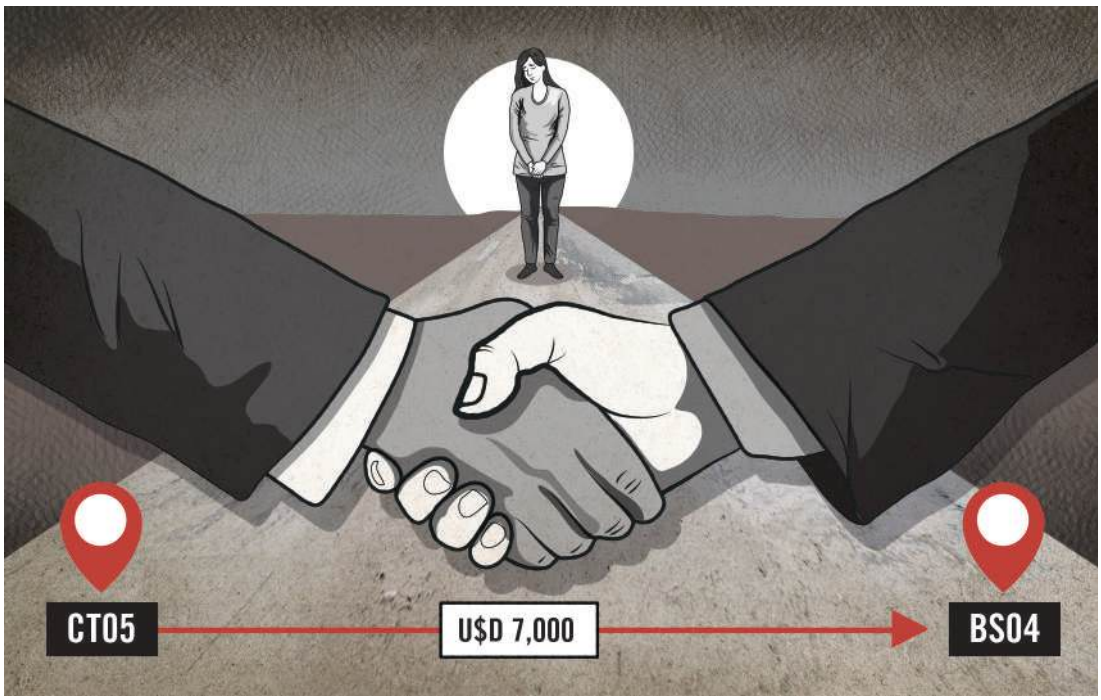
- The restriction or control of an individual's autonomy, freedom of choice or freedom of movement;
- The accruing of some gain to the perpetrator, the threat or use of violence or other forms of coercion, the fear of violence, deception or false promises;
- The abuse of power, the victim's position of vulnerability, detention or captivity, psychological oppression or socio-economic conditions, exploitation;
- The exaction of forced or compulsory labour or service, often without remuneration and often involving physical hardship and human trafficking.[371]

364 Amnesty International interview with Chao, 2024.
365 International Convention to Suppress the Slave Trade and Slavery, Article 1.
366 ICTY, *Prosecutor v. Dragoljub Kunarac, Radomir Kovac and Zoran Vukovic*, Trial Chamber judgment (previously cited), para. 542.
367 Supplementary Convention on the Abolition of Slavery, the Slave Trade, and Institutions and Practices Similar to Slavery, Article 7(c).
368 Amnesty International interviews with Gelila, Daniel, Chao, Jumpon, Krit, Van, Diep, Adam, Amir, Narong, Sawat, Pranee, Yathada, Jirayu, Jin, Ai, Chun, Shi, Yeruo, Hongxi, Yutai and Bao, 2023 and 2024.
369 Amnesty International interview with Diep, 2024.
370 Amnesty International interview with Shi, 2024.
371 ICTY, *Prosecutor v. Dragoljub Kunarac, Radomir Kovac and Zoran Vukovic*, Trial Chamber judgment (previously cited), para. 542; See: Chapter 4: Legal Framework for a detailed breakdown of the relevant jurisprudence on signs related to slavery.

Many of these indicators overlap and play into one another and other human rights abuses. This interplay is presented in the earlier sections of this report. It is important to note that slavery is constituted by the power relations that exist – it is not simply seen in terms of purchasing and selling humans, nor a legal right to ownership over a person – a right which is no longer recognized in international law.

One survivor described himself as "someone else's property", suggesting he had no freedom inside the SI08 compound. He described spending weeks being held against his will and being watched by his captors while he planned his escape. He told Amnesty International that he had no choice over his actions in the compound.[372]

Jumpon, a Thai survivor, told Amnesty International that the compound managers did not use the word "sell" when they threatened him, but told him he would be moved to another compound, which he interpreted as a amounting to him being "sold".[373] Movement between compounds or between groups within compounds was reported by 21 survivors interviewed.[374] The fact that survivors were able to accurately describe compound features and travel routes and identify pictures of the compounds is strong evidence suggesting they spent time in more than one compound. Four survivors told Amnesty International they were moved between three or more compounds during their time in Cambodia.[375] Survivors reported that "being sold" or moved between compounds was used as a threat and was something that they feared.[376]



372 Amnesty International interview with Chao, 2024.
373 Amnesty International interview with Jumpon, 2024.
374 Amnesty International interviews with Gelila, Daniel, Amir, Narong, Wittaya, Sawat, Pranee, Siti, Yathada, Jirayu, Porameth, Jin, Ai, Jinda, Chun, Shi, Gang, Yutai, Bao and Lisa, 2023 and 2024.
375 Amnesty International interviews with Gelila, Yutai and Chun, 2023 and 2024.
376 Amnesty International interviews with Chao, Bo and Wei, 2024.

> ***"I cannot sleep."***[377]

Almost every survivor interviewed by Amnesty International reported living in a constant state of fear while in the compounds.[378] One man said he could not remember anything from his time being transported to the compound by car because he was so worried about his situation.[379]

The dehumanization of survivors as "possessions" was sometimes evident in the way that compounds would release or sell people when they could not exploit them. Shi had health conditions that prevented her from undertaking scamming work in CT05 compound. She said these health conditions resulted in her being sold. She described how her boss falsely told the manager from BS04 compound that "she could work" and was in good health.[380] It is highly likely that her CT05 boss knew Shi might be punished for being unable to work in the BS04 compound,[381] demonstrating how little regard he had for her compared to how much money she was worth.

The case of Jin, also from CT05 compound, is described above. Jin was subjected to torture or other ill-treatment for being unable to type. Following this experience, Jin was released through the front door of the compound, onto the street, without any of his possessions. Jin's description of leaving the compound was not one of gaining his freedom, but of being discarded.[382]

Bao, a Chinese man who was also unable to type, was beaten and shocked with electric batons for not being able to work and wanting to go home. He told Amnesty International that after many instances of torture and other ill-treatment he was brought to the boss. The boss told him that he was being sold to another compound, but as time went by and he was not moved, he assumed he could not be sold because he could not type.[383] The boss then beat him, and Bao described feeling that the torture or other ill-treatment he received on this occasion was different to previous instances:

> ***"I feel like the boss doesn't care anymore. I can't type. So, he can beat me to death. They won't lose anything [if I die]."***[384]

DEBT BONDAGE AS SLAVERY

Yutai, a 22-year-old Chinese survivor, considered the blurred line between debt bondage and him being essentially 'owned' by the compound. He told Amnesty International that, while he did not hear the term "sell" or "sale", he did overhear his boss negotiating his price with another boss. He said that, when the bosses talked directly to him, they would frame the discussion as a situation of debt, telling him that he owed them money in order to leave.[385]

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377 Amnesty International interview with Daniel, 2024.
378 Amnesty International interviews with Gelila, Daniel, Chao, Jumpon, Krit, Chen, Da, Van, Diep, Elias, Adam, Amir, Narong, Wittaya, Sawat, Pranee, Siti, Yathada, Jirayu, Porameth, Bolin, Jin, Ai, Jinda, Shi, Ping, Beihe, Aihan, Aiguo, Haoyu, Hongxi, Yutai, Bao, Thapol, Pattara, Munin, Chanai, Yollada, Ratikarn, Kin, Disorn, Panda, Lisa, Sila, Nadol, Abdul, Abu and Manzur, 2023, 2024 and 2025.
379 Amnesty International interview with Nadol, 2025.
380 Amnesty International interview with Shi, 2024.
381 Punishment inside the compounds for failure to complete work is routine – see the 'Torture and other ill-treatment' section of this report.
382 Amnesty International interview with Jin, 2024.
383 Amnesty International interview with Bao, 2024.
384 Amnesty International interview with Bao, 2024.
385 Amnesty International interview with Yutai, 2024.

It was unclear whether any of the debts described could actually be worked off or repaid, or whether working off the debt would guarantee a victim's freedom. On the contrary, some survivors described how their debts were apparently arbitrarily increased by the compound bosses, despite them having worked for months on the understanding that this would clear their debt and lead to their release. Ai, a 24-year-old Chinese man, described his situation inside the SI02 compound:

> ***"I asked [the boss] if I can get out in six months, if my debt of USD 5,000 is repaid by then. After six months they told me I owed USD 20,000."[386]***

Amnesty International and organizations[387] were often unable to get clear information on how debts were calculated. Many seemed arbitrarily incurred, such as "floor fees", which were mentioned by a Chinese survivor named Chen who was confined at the SI02 compound.[388] The meaning of "floor fees" is unclear but may refer to debt incurred by the victim for wear-and-tear of the floor where the person is working. Other debts seem to have accrued through punitive measures, such as fines imposed by compound managers for going to the toilet, or not meeting work output targets.[389] Chen said that people could leave if they paid "compensation for the ticket money, visa fees, floor wear-and-tear fees, and the dormitory fees."[390] However, many of the survivors interviewed by Amnesty International had been deceived into enslavement in the compounds because they already had financial difficulties. Only one survivor interviewed was in a financial position to buy their own freedom.[391]

Chao was told he had been sold into the SI08 compound and would have to work for at least two years or pay USD 30,000 for his freedom.[392] In the case of Ai, his debt continued to rise despite him believing that he was working to pay it off.[393] In other cases, the debts appeared to be nothing more than ransoms, as compound managers attempted to hold survivors, including children, captive until their families sent money for their release. Children Beihe and Aihan were confined to a compound. Their parents were contacted and asked to pay USD 15,000 each to secure their release.[394] Organizations working on the issue of trafficking into scamming compounds also suggested that the debts represented further exploitation in the form of a ransom.[395]

Whether people were sold to or between compounds or were indebted to the compounds/companies for which they worked, the complete control that compounds had over survivors evinces the exercise of the powers attached to the right of ownership, by removing all autonomy from the confined person. Those interviewed were imprisoned in buildings with guards and design features that prevented their escape; told where to sleep; where, how and when to work; what they could and could not do; and when they could do it. They were, in many cases, subjected to punishments that amounted to torture or other ill-treatment. They also had almost no un-monitored contact with the outside world. Compounds were so effective at confining people that many victims who contacted organizations could not be located.[396] Victims often had their phone use monitored or completely restricted by compound managers, and rescuers reported contacting victims who said that they could not turn on location services because their phones would not permit it, and thereby not allowing their phones to be located.[397]

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386 Amnesty International interview with Ai, 2024.
387 Amnesty International interviews with organizations 4 and 7, 2024.
388 Amnesty International interview with Chen, 2024.
389 Amnesty International interview with Diep, 2024.
390 Amnesty International interview with Chen, 2024.
391 Amnesty International interview with Yeruo, 2024.
392 Amnesty International interview with Chao, 2024.
393 Amnesty International interview with Ai, 2024.
394 Amnesty International interview with Beihe and Aihan, 2024.
395 Amnesty International interviews with organisation 1, 2, 3 ,4, 8, 2024, 2025.
396 Amnesty International interviews with organizations 1, 2, 3, 6, 7, 8 and 9, 2024.
397 Amnesty International interviews with organizations 1, 2, 3, 6, 7, 8 and 9, 2024.

7 STATE RESPONSIBILITY

The scamming industry is run by a network of transnational criminal groups. However, without the consent or acquiescence of the Cambodian state, these non-state actors would be unable to perpetuate the abuses documented in this report. Therefore, the focus of this chapter is on the primary duty bearer, the state of Cambodia, which has failed to take adequate steps to address the numerous and widespread human rights abuses documented above despite being made aware of these abuses, in many cases repeatedly.

7.1 STATE RESPONSIBILITY

As detailed in Chapter 4, the Cambodian state: has a duty to ensure that no one is held in slavery or servitude, or required to perform forced labour;[398] is obligated to protect children from economic exploitation;[399] must prevent, prohibit, investigate and prosecute acts of torture;[400] must effectively "investigate, prosecute and adjudicate trafficking, including its component acts and related conduct, whether committed by governmental or non-State actors";[401] must identify trafficking victims and provide remedy; and must implement measures to ensure that "rescue" operations of trafficked persons do not further harm their rights and dignity.[402] This is all in keeping with the general duty under international human rights law that states must ensure the protection of the rights of "all individuals in their territory and subject to their jurisdiction."[403] The UN Human Rights Committee provides that "the positive obligations on States Parties to ensure [ICCPR] rights will only be fully discharged if individuals are protected by the State, not just against violations of [ICCPR] rights by its agents, but also against acts committed by private persons or entities that would impair the enjoyment of [ICCPR] rights in so far as they are amenable to application between private persons or entities."[404]

The Cambodian state's failure to comply with these obligations and responsibilities is analysed through four separate but overlapping categories of acts or omissions. This section will document how Cambodia has:

- failed to effectively investigate scamming compounds and the human rights abuse taking place therein, including slavery, human trafficking, forced labour, child labour, unlawful deprivation of liberty and torture and other-ill treatment;
- failed to promptly and effectively identify, assist and protect trafficking victims and to avoid further harming their rights and dignity;
- consented or acquiesced to the torture and other ill-treatment taking place at scamming compounds; and
- failed to regulate security companies and tools of torture and other ill-treatment.

398 ICCPR, Article 8.
399 Convention on the Rights of the Child, Article 32.
400 CAT, Article 1.
401 OHCHR, Recommended Principles and Guidelines on Human Rights and Human Trafficking (previously cited), Principle 13.
402 OHCHR, Recommended Principles and Guidelines on Human Rights and Human Trafficking (previously cited), Guideline 5.6.
403 HRC, General Comment 31: The Nature of the General Legal Obligation Imposed on States Parties to the Covenant, 26 May 2004, UN Doc. CCPR/C/21/Rev.1/Add. 13, para. 10, citing Articles 26 and 27 of the Vienna Convention on the Law of Treaties.
404 HRC, General Comment 31 (previously cited), para. 8.

7.1.1 STEPS TAKEN BY THE CAMBODIAN GOVERNMENT TO ADDRESS THE SCAMMING INDUSTRY

The Cambodian government has principally reported on actions it has taken to address the scamming industry through the NCCT. In addition, the government has established working groups,[405] task forces[406] and commissions[407] that may, on occasion, report actions taken by these bodies in the context of the scamming industry. Finally, national and international media reports publish news relating to state action, which include, when relevant, police or military-led operations into scamming compounds.

According to the NCCT, which responded to a letter from Amnesty International in May 2025, it is "responsible for combating human trafficking, providing leadership on policy and technical support without directing operations."[408] It further explained that "[s]ince the end of 2022, Cambodian authorities have been accepting various types of information from both Cambodian citizens and foreigners who wish to seek intervention based on different victimization situations."[409] It also noted that:

> ***"In general, authorities promptly search for individuals who request intervention, often with the cooperation of the premises' owner. This effort aims to locate the person as quickly as possible for humanitarian reasons. Therefore, the information received is not considered as a formal complaint that necessitates a criminal investigation. Once the individual related to the intervention request is located, authorities conduct a physical examination to assess initial victimization. Following this, the authorities proceed with interviews to determine any potential human trafficking victimization in accordance with the Palermo Protocol, while implementing necessary measures based on the findings."*** [410]

The letter clarifies that from 2024 to early 2025, the procedure for dealing with these requests is managed by a task force that "forwarded [the requests for interventions] to capital and provincial police departments through the National Police's operational team against transnational smuggling network."[411]

405 For example, the Ministry of Justice continued to operate a special working group to monitor and investigate reports of large human trafficking operations in "high risk" areas, including Preah Sihanouk, Banteay Meanchey, Oddar Meanchey, Svay Rieng, Takeo and Kandal provinces. See entry on "Cambodia" in US Department of State, *2024 Trafficking in Persons Report*, 2024, https://www.state.gov/reports/2024-trafficking-in-persons-report/cambodia/

406 For example, in January 2025, Prime Minister Hun Manet announced the formation of the Inter-Ministerial Task Force Committee to fight online scamming operations and to rescue victims and pursue legal procedures.

407 For example, in February 2025 the Cambodian government created the Commission for Combating Online Scams, a high-level task force chaired by Prime Minister Hun Manet, tasked with implementing strategies to prevent, suppress and combat online scams. See: Khmer Times, Cambodia establishes Commission to combat online scams, led by Prime Minister Hun Manet", 25 February 2025, https://www.khmertimeskh.com/501644649/cambodia-establishes-commission-to-combat-online-scams-led-by-prime-minister-hun-manet/

408 See Annex III, NCCT letter to Amnesty International, 26 May 2025.

409 See Annex III, NCCT letter to Amnesty International, 26 May 2025.

410 See Annex III, NCCT letter to Amnesty International, 26 May 2025.

411 See Annex III, NCCT letter to Amnesty International, 26 May 2025.

The NCCT also provided data relating to complaints received and investigations conducted by the Cambodian government:

"In 2024 and early 2025, Cambodian authorities received a total of 3,553 intervention requests from foreigners, involving 6,584 individuals from 33 different nationalities. Out of these, 1,762 requests were found, representing 3,008 foreigners from 22 nationalities, while 335 requests, corresponding to 791 foreigners, could not be located. Notably, 1,456 requests were deemed irregular because they lacked identification for the requester, a specific address, or any contact information for further inquiries. Nevertheless, Cambodian authorities continue to investigate these cases.

[…]

From January 1, 2025, to April 30, 2025, Cambodian authorities received 1,232 requests for intervention from 2,076 foreigners (23 different nationalities). Out of these, 595 requests were validated, involving 947 foreigners from 15 nationalities. Among these cases, five foreigners were identified as victims of confinement, which led to the arrest of 19 suspects from two nationalities (12 Chinese and 7 Myanmar), and the closure of two (business operation) locations.[412]

Finally, the NCCT noted that, from the beginning of 2024 to 2025, Cambodian authorities conducted crackdowns on a total of 28 locations. They located 5,340 foreigners from 21 different nationalities, with 19 cases being forwarded to court. Additionally, 92 ringleaders and accomplices from 6 nationalities were apprehended (49 from China, 5 from Vietnam, 20 from Indonesia, 3 from Thailand, 6 from India, and 9 from Myanmar). Among the above 28 locations included 10 locations in Preah Sihanouk Province, 5 in Banteay Meanchey Province, 4 in Svay Rieng Province, 3 in Phnom Penh, 1 in Kandal, 1 in Tbong Khmum, 1 in Pailin, 1 in Battambang, 1 in Pursat, and 1 in Mondulkiri Province. From the 1,762 requests for intervention received during this time, authorities identified 13 cases of human trafficking, with 81 involving foreigners.[413]

In this context, the NCCT letter outlines their procedures for investigating a location, noting specifically "[t]he procedure for investigating a location is based on the law in force and aims to avoid disrupting legitimate businesses. If individual perpetrators are found to be involved and the owner of the location was unaware, the responsibility falls upon the suspect, who must then follow court procedures."[414] The letter also clarifies that "authorities promptly search for individuals who request intervention, often with the cooperation of the premises' owner."[415]

On 30 May 2025, the Secretary of State at the Ministry of Interior, announced that the government had shut down "47 online scam operations in the past two years".[416] It is unclear what "operations" refers to as no further details were provided. He also stated that they had taken action against 4,840 individuals involved in online scams and human trafficking and that, among the apprehended, only 214 were officially identified as victims of human trafficking, while the remainder were classified as perpetrators or accomplices in various scams and trafficking operations.

412 National Committee for Counter Trafficking, *Response to to the Request for Comment and Information from Amnesty International TG ASA 23/2025.6702 dated 26 May 2025.*

413 See Annex III, NCCT letter to Amnesty International, 26 May 2025.

414 See Annex III, NCCT letter to Amnesty International, 26 May 2025.

415 See Annex III, NCCT letter to Amnesty International, 26 May 2025.

416 Khmer Times, "Cambodia wages war on online scams, thousands arrested in ongoing efforts", 3 June 2025, https://www.khmertimeskh.com/501693950/cambodia-wages-war-on-online-scams-thousands-arrested-in-ongoing-efforts/

7.1.2 FAILURE TO EFFECTIVELY INVESTIGATE SCAMMING COMPOUNDS

The Cambodian government's investigation of scamming compounds has been grossly inadequate and failed to prevent or put a stop to the human rights abuses – including slavery, human trafficking, forced labour, child labour, torture and deprivation of liberty – taking place on a mass scale across the country since 2022. This is despite widespread reporting on the issues by journalists and NGOs and thousands of rescues recorded by organizations, among others.

> ***In some cases, Amnesty International obtained evidence indicating that the police or military were aware of the human rights abuses taking place at scamming compounds and appeared to have colluded with those perpetrating the abuses, allowing such harm to continue mostly with impunity.***

Based on evidence collected by Amnesty International, including from organizations working on rescue efforts, it appears that, at the time of publication of this report, the Cambodian government was continuing to investigate or respond to human trafficking only, or primarily, reactively; that is, in response to specific reporting or requests for intervention by third parties.[417] However, even when the government did respond to such requests, Amnesty International found that these investigations were neither thorough nor independent and, in more than half of the cases, did not result in putting an end to the human rights abuses at those scamming compounds.

As detailed in Annex I, according to evidence obtained by Amnesty International, public reporting and other information made accessible to the organization, of the 53 scamming compounds identified in this report:

- **Over a third, or 20, were the subject of one or more police/military interventions, but Amnesty International documented human rights abuse continuing to take place at these locations even after such interventions[418];**
- **About a third, or 18, appeared to not have been investigated by the government as of the date of publication[419];**
- **Less than a third, or 13, appeared to have been subject to some level of intervention or investigation and Amnesty International was unable to determine whether human rights abuse continued to take place[420]; and**
- **Only two appeared to have been shut down after state intervention.[421]**

> ***Significantly, Amnesty International's findings as detailed in Annex I indicate that the Cambodian state's response to human rights abuses in the scamming compounds has been grossly inadequate, demonstrating acquiescence and pointing to complicity in abuses.***

417 Amnesty International interviews with organizations 1, 2, 8, 9 and 10, 2024 and 2025.
418 See SI02, SI15, SI16, SI22, TD01, BS04, BA02, CT05, BA13, SI08, SI12, KA02, OS02, OS01, CT01, KK01, SI01.
419 See PP04, SI42, CH01, PSP01, SI33, PO16, BA03, CT03, BA06, SI32, SI20, SI11, CT02, SI39, SI21, SI44.
420 See KA01, S136, BA11, PP09, PO10, BA05, SI35, SI45, SI04, PP12, SI37, SI48, PP13, S143.
421 See SI43 and KA01.

PATTERN OF STATE INTERVENTION

In the 20 compounds where Amnesty International was made aware of a state intervention, evidence indicated that the police or military operations either resulted in removals of survivors from compounds or appeared to involve investigations, "raids", or both. However, in all of the 20 cases, Amnesty International documented human rights abuses occurring at the compounds after the police or military operations. In 9 of these 20 cases the government intervened two or more times. The highest documented number of separate police interventions at one site was four.

The pattern of state intervention observed by Amnesty International indicates that, when the police or military intervened, they tended to rescue only one or a small number of individuals, and only in response to a request for help. Several organizations interviewed confirmed and showed evidence to Amnesty International that police operations were mostly targeted to collect a single person (or at times, a group of people) who had asked to be released, or had managed to contact an organization.[422] According to the testimony, the Cambodian government processed these requests on an individual basis, often asking victims or their families to provide evidence of their location and identity before organizing a "rescue".

However, even when state-led interventions did take place, evidence obtained by Amnesty International indicates that they were frequently coordinated by scamming compound bosses or managers. For example, Jeffrey, a Malaysian man, reported being confined at two Sihanoukville-based compounds in 2021. He described seeing the police arrive at one of these compounds at least three times after several people asked for help from the police. Instead of entering the compound and investigating further, the police would simply talk with the management and then leave. Each time following the police visit, the person whom Jeffrey believed had asked for help would be taken to the "jail", or a dark room, to be punished. Jeffrey believed they were being punished for contacting the police.[423]

In another case, Siti explained how he called for help via a rescue group after being sold to the SI01 compound. He described being removed from SI01 compound in 2023 during a police operation while others who had also been subject to serious human rights abuses remained confined. He told Amnesty International that the police arrived at the gate and asked the compound guards or managers to let him out. He said the police waited at the gate for him to be brought down and did not enter the compound to assess whether other potential victims were present.[424] At the time of Siti's rescue from the SI01 compound, at least eight news stories had already been published on the human rights abuses occurring at the site, and at least 10 people had been rescued from the compound, the majority of which would likely have involved the police.[425]

Adam's account is similar. When police arrived at the SI02 compound where he was confined, his manager took Adam's his phone and checked its content. The manager then spoke to victims, including Adam, in a private room away from the police and attempted to intimidate them including by asking questions about who contacted the police. Adam had contacted an organization which, in turn, contacted the Cambodian authorities to seek his release along with that of several other people in the compound.

> ***Adam told Amnesty International that he did not see the police until he was handed over to them at the compound gate, and he did not see them search the compound for other potential victims. At the time the police "rescued" Adam, at least four news reports had already alleged human rights abuses occurring at SI02, with at least 26 victims being rescued from the site before Adam.[426]***

422 Amnesty International interviews with organizations 1 and 2, 2024.
423 Information provided by organization 8, 2023.
424 Amnesty International interview with Siti, 2024.
425 See Annex I for a timeline of the SI01 compound and the failures of Cambodian authorities to effectively investigate and close the location.
426 Amnesty International interview with Adam, 2024.

Amir told Amnesty International that he contacted the police after being sold from the SI15 compound to the BS04 compound, where he was beaten and confined. When the police arrived, they told him he had to stay because he had signed a contract.[427] Amir was eventually released with the help of the Cambodian authorities.

> ***However, Amnesty International interviewed three other survivors who had been sold to the BS04 compound and then subjected to forced labour and torture or other ill-treatment at the site, including beatings and electric shocks, more than 12 months after Adam's release, pointing to the ineffectiveness of the state's intervention in stopping serious abuses.[428]***

Amnesty International obtained testimonial evidence indicating that police failings suggest collaboration or coordination between compound bosses and the police and possibly collusion. For example, Amnesty International interviewed two survivors whose testimony suggests police and compound managers had ongoing relationships that prevented police independence. Gelila and Daniel said they were moved via bus immediately before a government "crackdown" that took place in Sihanoukville.[429]

In Gelila's case, she described being put on a bus and moved from SI42 compound to Phnom Penh in the middle of the night.[430] Her boss then told her they were going to Thailand. Gelila showed Amnesty International photos and videos of buses with people queuing inside the SI42 compound, which she alleged showed the mass exodus of people before the crackdown took place.[431] Amnesty International was able to confirm the location and probable dates of the videos.

In another example, Diep, a Vietnamese woman confined at OS01, said she saw a Telegram group chat on her boss's phone that appeared to be used for her bosses to coordinate with the Cambodian police. Diep said she saw images of people from the compound and names being shared in the group chat. Diep told Amnesty International that the police in O'Smach, the town where OS01 is located, "work for the compound and will report requests for help back to the compound bosses". When she made her own request to be rescued, she submitted her name and location to the police and was approached by her bosses soon afterwards. They asked her if she wanted to stay at the compound or go to jail. She interpreted this to mean that Cambodian police had informed her bosses of her request to be rescued.[432]

Most survivors interviewed had surprisingly similar experiences. Hongxi, who was confined at the BA13 compound in Bavet, was beaten by a boss after being accused of contacting the police. He said his manager broke a beer bottle over his head and said, "this is for sending the location to the police".[433] Hongxi could not understand how the boss knew he had sought help from the police. Da, a Chinese national who was confined at BS04, was also beaten after his manager discovered that he had contacted Cambodian police.[434] Ai, a Chinese man who was confined at one of the TD series of compounds in Bavet, said that his manager would tell everyone to stay indoors when the police were at the compound.[435] Pranee, a Thai woman confined at SI35, told Amnesty International that her boss would tell her and others to "make money so that we can pay the protection fee."[436] This "protection fee" was described as a payment to police to avoid state intervention in the compound's illegal operations.

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427 Amnesty International interview with Amir, 2024.
428 Amnesty International interviews with Amir, Da, Chun and Bao, 2024.
429 Amnesty International interviews with Gelila and Daniel, 2022.
430 Amnesty International interview with Gelila, 2022
431 On file with Amnesty International.
432 Amnesty International interview with Diep, 2024.
433 Amnesty International interview with Hongxi, 2024.
434 Amnesty International interview with Da, 2024.
435 Amnesty International interview with Ai, 2024.
436 Amnesty International interview with Pranee, 2024.

These cases took place in different cities and across different provinces of Cambodia – indicating that the corruption and collusion are systemic and not limited to one location. These accounts indicate that the police were well aware of the human rights abuses taking places at the compounds and took no steps to end the abuses, in breach of their obligations under international law.

Lisa, a young Thai woman, reported being tortured at PP09 in early 2025. Amnesty International interviewed another survivor who was trafficked to this same site in mid-2024. On 23 October 2024, an international media outlet described the site as a scamming compound after speaking with seven victims.[437] The next day, more than 1000 foreign nationals were detained by police at the scamming compound.[438] A month later, in November 2024, a national media outlet reported 25 foreign nationals were sent to court for questioning after the raid.[439] However, a few months later, in early 2025, an organization reported a rescue of an individual, likely suffering from human rights abuse, made from this same site.[440] This means that when Lisa arrived at PP09 in early 2025, it had already been the site of previous human trafficking allegations, public reporting on human trafficking and violence and state intervention in at least two instances.[441] According to Lisa, this scamming compound had security features in place including highly securitised walls to prevent escapes and rooms that were designated for torture and other ill-treatment. Lisa said that she lay in one of these rooms for weeks after she was tortured because she could not walk.

In one of the most extreme cases, hundreds of people were the subjects of "rescues" – most involving the police – as well as escapes that took place between October 2022 and January 2025 from OS01 and OS02 compounds in O'Smach.[442] Yet, as of the date of publication, Amnesty International was unable to find any evidence that the sites have been closed.

In another case, the BS04 site is a well-known compound where human rights abuses have been reported for years.[443] The first news report in June 2022 documented a father trying to get his confined son released from the compound.[444] Amnesty International interviewed five survivors who had been confined and subjected to torture and other ill-treatment at the BS04 site since June 2022, with news reports documenting further abuses, and foreign embassies publicly asking the Cambodian government to help get their citizens released from the compound.[445] Data provided by organizations, news reports and survivors indicates that at least 26 people were rescued from the site between 2022 and 2025.[446] Most, if not all, of these rescues involved local authorities, typically the police, entering the compound to remove the individual asking for help.[447] Yet, as of the date of publication, there was no indication that the site had been closed.

437 KBS News,"직접 가본 캄보디아 '범죄도시' …한국인 납치되는 이유는?", ["Cambodia's 'crime city' that I visited in person… The reason why Koreans are being kidnapped"], 23 October 2024, https://www.youtube.com/watch?v=l_AzoduLZnc (in Korean)
438 Camboja News, "1,000 Foreign workers found in raid on suspected Kampong Speu scam compound", 25 October 2024, https://cambojanews.com/1000-foreign-workers-found-in-raid-on-suspected-kampong-speu-scam-compound/
439 Khmer Times, "Foreigners sent to court after major raid on foreign compound", 4 November 2024, https://www.khmertimeskh.com/501584628/foreigners-sent-to-court-after-major-raid-on-foreign-compound/
440 Information provided by organization 1 on file with Amnesty International.
441 See Annex I on PP09 for a complete list of the incidents and security features at the site.
442 See Annex I on OS01 and OS02 for a list of incidents in which people were either removed from the site by police or traffickers or escaped.
443 See Annex I on BS04 for a full breakdown of the incidents that involved police rescues and news reports on the compound.
444 Global Anti-Scam Organization, "Trafficked Taiwanese rescued from a scam company in Cambodia... was it worth it?", 15 June 2022, https://www.globalantiscam.org/post/is-human-trafficking-victim-still-a-victim-in-the-end; VoD, "Rescue reveals scam compound at Koh Kong's UDG", 24 August 2022, https://vodenglish.news/rescue-reveals-scam-compound-at-koh-kongs-udg/
445 See Annex I on BS04 for a full breakdown of the incidents that involved police rescues and news reports on the compound.
446 Data provided by organization 1, see also Annex I, BS04 profile.
447 Amnesty International interview with organization 1.

FAILURE TO IDENTIFY, ASSIST AND PROTECT VICTIMS, AND TO AVOID FURTHER HARM

As a state party to the Palermo Protocol, Cambodia is obliged to protect and assist victims of human trafficking. Article 6 requires that states ensure legal support for victims in relation to criminal proceedings against offenders, and "consider implementing measures to provide for the physical, psychological and social recovery of victims of trafficking in persons" including,

"(a) Appropriate housing;

(b) Counselling and information, in particular as regards their legal rights, in a language that the victims of trafficking in persons can understand;

(c) Medical, psychological and material assistance;

(d) Employment, educational and training opportunities."[448]

In addition, states must consider the special needs of children,[449] and provide for the "physical safety of victims of trafficking in persons while they are within its territory."[450]

The NCCT, in responding to the UN Special Procedures' letter in 2022, explained that "[t]hose identified by the authorities [as human trafficking victims] are not penalized on the immigration ground. Instead, due care is provided to them at a safe place. Cambodia's repatriation process is lenient, and [victims] receive consular assistance of the respective embassies and a timely notification for a proper travel arrangement."[451] It further described its victim identification process as "friendly" and stated that it "allowed [human trafficking] victims to describe their facing situation [sic] in order to surely identify them for proper services."[452]

However, neither of these descriptions align with testimony from survivors nor that of local organizations which have been involved in more than a thousand rescues from scamming compounds in Cambodia between 2021 and 2025.[453] None of the organizations described the victim identification process as "friendly" or providing "proper services". Instead, they described the detention and processing of survivors by police once they left compounds as so "dangerous" that the organizations often tried to circumvent the victim identification process fearing it would cause further harm to victims.[454]

Victims who went through the government processes routinely found themselves detained in immigration detention centres.[455] According to testimony from survivors and organizations, the length of detention at these sites ranged from two to three months and often involved being moved between two or three different sites, including local police stations and official government immigration detention centres. The conditions of detention were frequently wholly inadequate and lacking in basic facilities and services, such that they failed to meet the criteria outlined in Article 6 of the Palermo Protocol.

448 Palermo Protocol, Articles 6(2) and 6(3).
449 Palermo Protocol, Article 6(4).
450 Palermo Protocol, Article 6(5).
451 Permanent Mission of the Kingdom of Cambodia, Response to the Joint Communication No. AL KHM 2/2022 (previously cited).
452 Permanent Mission of the Kingdom of Cambodia, Response to the Joint Communication No. AL KHM 2/2022 (previously cited).
453 Amnesty International interviews with organizations 1, 2 and 3, 2024.
454 Amnesty International interviews with organizations 1, 3, 4 and 5, 2024.
455 Amnesty International interviews with Daniel, Adam and Da, 2024; Amnesty International interviews with organizations 1, 2 and 3, 2024 and 2025.

For example, images shared with Amnesty International by compound survivors of immigration detention centres and police stations in which they were held show beds with no bedding.[456] Some survivors who went through this process said they were kept in small rooms with up to 20 other people.[457] The average amount of time that survivors spent in immigration detention was 12 weeks.[458] During this time, they were not allowed to leave their small rooms; had to pay for their food and water;[459] and were not provided with legal or psychological support.[460] Several victims told Amnesty International that they did not have enough money to buy food and water, and that only the most basic food was provided to them twice daily. In addition, some survivors had to sleep on the floors of their cells.

Officials did not inform detainees of the expected duration of their detention, causing their mental health to suffer.[461] While some of those interviewed by Amnesty International said they were able to speak with their embassies, others said their embassies refused to speak to them or were not responsive.[462] No one to whom Amnesty International spoke had been identified by the Cambodian police as a victim of human trafficking, despite testimony collected by Amnesty International indicating that this was likely to be the case.[463]

Survivors routinely questioned the motives of the Cambodian police who rescued them, with several suggesting that the police did not want to identify them as victims of human trafficking and held biases against them.[464] Local and international groups working on the issue agreed that Cambodian police were often unwilling or unable to identify victims of human trafficking largely because of corruption and their efforts to downplay the scamming compound crisis.[465]

Daniel, who was confined at BS04, was sent to a local police station in Koh Kong for four days before being transferred to the Koh Kong provincial police station where he was detained for a further seven days. He was then detained at the Ministry of the Interior in Phnom Penh for 20 days and then for a further 20 days at the Phnom Penh immigration detention centre.[466] Although police may require time to investigate allegations of human trafficking, the survivors and rescue groups reported that victims were not questioned in detail about their experience, and said that the length of detention, although uniform, seemed to be arbitrary.[467]

Moreover, the Cambodian government often allowed "rescued" victims to avoid immigration detention for a fee. Amnesty International delegates witnessed Cambodian authorities agreeing to allow victims to pay to avoid immigration detention and leave the country.[468] In at least one case, these fees did not correspond to any known fee provided by Cambodian legislation and were most likely a bribe.[469] This case was not isolated, according to an organization involved.[470]

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456 On file with Amnesty International.
457 Amnesty International interviews with four victims, 2023 and 2024.
458 Amnesty International interviews with organizations 1, 3, 4 and 5, 2024; Amnesty International interviews with four victims during 2023 and 2024.
459 Amnesty International interview with Daniel, Adam and Da, 2024; Amnesty International interviews with organizations 1, 2 and 3, 2024 and 2025.
460 Amnesty International interviews with organizations 1, 3, 4 and 5, 2024; Amnesty International interviews with four victims during 2023 and 2024.
461 Amnesty International interview with Daniel, Adam and Da, 2024 and 2025.
462 Amnesty International interview with Daniel, Adam and Da, 2024 and 2025.
463 Amnesty International interview with Daniel, Adam and Da, 2024 and 2025.
464 Amnesty International interviews with organizations 1, 3, 4 and 5, 2024; Amnesty International interviews with four victims, 2023 and 2024; Amnesty International interview with Elias, 2024.
465 Amnesty International interviews with organizations 1 and 3, 2024.
466 Amnesty International interview with Da, 2024.
467 Amnesty International interview with Daniel and Da, 2024; Amnesty International interviews with organizations 1, 2 and 3, 2024.
468 Amnesty International field trips in 2023 and 2024.
469 On file with Amnesty International.
470 On file with Amnesty International.

7.1.3 STATE ACQUIESCENCE AND CONSENT TO TORTURE AND OTHER ILL-TREATMENT

Amnesty International has documented how torture or other ill-treatment was inflicted on victims or was witnessed by them in more than half of the compounds documented.[471] In the cases documented in this report, only one involved the act of torture and other ill-treatment being instigated by a public official – a security guard who was alleged to be a member of the Cambodian military.[472] In all other cases, the act of violence was carried out by managers, bosses and security guards within the compound who are not believed to be Cambodian officials.

Where torture and other ill-treatment occurs but is not directly committed by state actors, the authorities can still be responsible if they knew or had reasonable ground to believe torture or other ill-treatment was occurring or failed to exercise due diligence to investigate, prosecute and punish such non-state actors.[473]

Cambodian authorities have been aware for years that torture and other ill-treatment is occurring at scamming compounds across the country. Cambodian authorities have also been involved in hundreds of "rescues", many of which involved survivors interviewed by Amnesty International who had suffered torture or other ill-treatment. 45 of the 58 survivors interviewed for this report told Amnesty International they had witnessed and/or been subjected to torture or other ill-treatment.

Because the state authorities were well-informed of allegations of torture and other ill-treatment, they were then placed under an obligation to investigate these locations and prosecute those individuals responsible. However, as indicated above, two thirds of scamming compounds identified by Amnesty International have either not been investigated, or have been investigated and yet torture or other ill-treatment nonetheless continued to take place. In addition, as the government has not publicly reported on prosecutions, convictions or other criminal penalties imposed on those suspected of torture (and other related crimes, including human trafficking), it is impossible to ascertain whether the Cambodian government has indeed successfully investigated and brought prosecutions against any perpetrators following these operations.

FAILURE TO PROHIBIT THE USE OF INHERENTLY ABUSIVE EQUIPMENT

Based on the testimonies collected by Amnesty International, the use of electric shock batons was widespread at scamming compounds. In at least 20 out of 53 compounds, the presence and/or use of electric shock batons was documented by survivors, including as a tool of torture.

The Cambodian government has failed to prohibit the acquisition and use of the primary documented tool for torture and other ill-treatment occurring at the scamming compounds – the direct-contact electric shock baton. Further, Cambodia has failed to enact legislation that would prohibit the use and sale of inherently abusive law enforcement equipment, despite recommendations from the UN Special Rapporteur on torture.

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471 See Annex I for details on each compound and the human rights abuses that are documented.

472 Amnesty International interview with Jumpon, 2024.

473 According to the Committee against Torture, the terms "consent" and "acquiescence" in Articles 1 and 16 of CAT are to be interpreted as ensuring that states will also be responsible for acts committed by non-state actors (private individuals) where they have failed to take steps to adequately protect against such acts and prevent them. The Committee against Torture has noted that where "[s]tate authorities or others acting in official capacity or under colour of law, know or have reasonable grounds to believe that acts of torture or ill-treatment are being committed by non-State officials or private actors and they fail to exercise due diligence to prevent, investigate, prosecute and punish such non-State officials or private actors consistently with the Convention, the State bears responsibility and its officials should be considered as authors, complicit or otherwise responsible under the Convention for consenting to or acquiescing in such impermissible acts" (UN Committee against Torture, General Comment 2 (previously cited), para. 18.)

7.1.4 STATE FAILURE TO ADEQUATELY REGULATE PRIVATE SECURITY ACTORS

As outlined in the section 6.1.7 on 'Unlawful Deprivation of Liberty', the use of security guards to control the movement of people confined within the compounds was evident at all 53 compounds included in this report.

In line with recommendations made by the UN Special Rapporteur on extrajudicial, summary or arbitrary executions, the Cambodian authorities should: require that all private security providers have vetting and training procedures that include human rights norms and principles; require private security providers to bring company policies in line with international norms and standards; implement a system of mandatory reporting of any harms caused by private security companies; ensure that private security personnel who are found to have unlawfully resorted to violence are criminally accountable; and ensure that there are no barriers to access to remedy for victims of corporate human rights abuse.[474]

Under Cambodian domestic legislation, private security companies are also required to apply for permission to use tools for the purposes of safeguarding a location.[475] It is unclear what "tools" refers to in this article; however, testimony from three survivors indicates security guards are in possession of firearms at the SI01, SI08 and BA03 compounds.[476] Because security guards are private individuals and not military personnel, they are banned under Cambodian law from possessing firearms.[477] In addition, 23 survivors reported seeing guards carrying electric shock batons at 19 compounds. There are few reasonable situations in which security guards could use handcuffs and likely no legal situations in which security guards could possess electric shock batons. Moreover, the use of electric shock batons is inherently inhumane, and there are no legal situations that would allow for security guards to carry a firearm.[478] These findings therefore either indicate that regulations are not preventing the use of tools that could be used for torture and other ill-treatment or that security companies are not reporting their use of these tools, as required under Cambodian regulations.[479] Even if security companies are not reporting the use of electric shock batons to relevant authorities, authorities should be monitoring carefully the use of any tools and practices that could easily be misused to harm people, and should have confiscated any such tools found during investigations at scamming compounds. As the Special Rapporteur on extrajudicial, summary or arbitrary executions has noted, the power to use force is easily abused.[480]

474 UN Special Rapporteur on extrajudicial, summary or arbitrary executions, Report on the right to life and the use of force by private security providers in law enforcement contexts (previously cited).
475 Sub-Decree No. 289 on private security management (2013), Article 13.
476 Amnesty International interviews with Chao, 2024.
477 Law On The Management of Weapons, Explosives and Ammunition, Article 4.
478 Sub-Decree No. 289 on private security management (2013), Article 16.
479 See Sub-Decree No. 287, Article 13.
480 UN Special Rapporteur on extrajudicial, summary or arbitrary executions, Report on the right to life and the use of force by private security providers in law enforcement contexts (previously cited).

8 CONCLUSION AND RECOMMENDATIONS

8.1 CONCLUSION

This report documents the alarming human rights crisis that is taking place within the scamming industry in Cambodia since 2022. Amnesty International has identified at least 53 scamming compounds where human rights abuses have taken place or continue to occur, including human trafficking, torture and other ill-treatment, forced labour, child labour, deprivation of liberty and slavery. Amnesty International has also shown a pattern of failed state behaviour which has allowed serious abuses to flourish. The government's woefully ineffective response and failure to meet its obligations to adequately prevent and investigate the scamming crisis demonstrates its acquiescence and points towards complicity in the human rights abuses taking place.

Cambodia must urgently step up its efforts to address this crisis to ensure that no other people seeking job opportunities, like Lisa, end up trafficked into a scamming compound, forced to work, tortured and deprived of their liberty. It must investigate and shut down all scamming compounds and properly identify, assist and protect all victims and provide support and remedy to them. Other states must also provide support to their nationals both when they are identified as victims in Cambodia and on their return.

8.2 RECOMMENDATIONS

TO THE CAMBODIAN GOVERNMENT

With respect to the scamming compounds and suspicious locations identified by Amnesty International:

- Take urgent steps to identify and eradicate public sector involvement in human trafficking and to prevent and eliminate corruption and bribery in all their forms. All public officials suspected of being implicated in trafficking and/or corruption that facilitates trafficking should be investigated and prosecuted in accordance with due process and fair trial standards;
- Urgently conduct thorough and effective investigations into each of the scamming compounds identified and the human rights abuses detailed in Annex I;
- Urgently conduct thorough and effective investigations into the suspicious locations identified in Annex II;
- Ensure that recruiters, brokers, scamming operators, security companies and anyone else suspected of serious human rights abuses connected to scamming operations are investigated. Where there is sufficient admissible evidence, ensure that they are prosecuted in fair trials and held accountable;
- During and/or following these investigations, publicly report on the progress made in, and results of, these investigations, including on the number and nature of prosecutions and convictions of recruiters, brokers and scamming operators;

- Implement a proactive investigation regime that does not only rely on victim testimony or complaints (for example using combined intelligence, surveillance and other investigatory techniques);
- Ensure that all related and future investigations into human rights abuse in the context of scamming operations and related victim identification and release operations are proactive in addition to reactive;

With respect to the protection of victims of human trafficking and forced criminality:

- Ensure accurate and timely identification of victims and potential victims of trafficking for all forms of exploitation, including forced criminality, to facilitate access to justice, assistance and remedy. This should include:
  - Guaranteeing the principle of non-punishment of trafficked persons, including for forced criminality and immigration-related offences, as soon as there are reasonable grounds to believe that a person has been trafficked or as soon as a trafficking defence has been raised. This should include implementing specific legislation on the non-punishment principle, providing training to state authorities, and ensuring that trafficked persons are never held in immigration detention or other forms of custody;
  - Providing early and continuing support and assistance, including legal advice and safe access to shelter, psychological and material assistance, to trafficked persons, irrespective of their migration status or ability or willingness to cooperate in investigations;
  - Ensure child victims of human trafficking are rapidly identified and dealt with separately from adults in relation to laws, policies, programmes and interventions, given the particular physical, psychological and psychosocial harm suffered by children who have been trafficked. Ensure that the child's best interests are considered paramount at all times;
  - Provide effective access to remedies and ensure that trafficked persons can remain safely in the country to pursue justice and reparations;
- Work with migrants' countries of origin to protect all migrants from abusive and fraudulent recruitment practices and regulate labour recruiters and other intermediaries effectively;

With respect to the provision and acquisition of law enforcement equipment:

- Prohibit the production, promotion, transfer and use of all direct-contact electric shock weapons and equipment developed for law enforcement including, but not limited to, stun guns and electric shock batons.
- Prohibit the use and carrying of electric shock batons by private security companies in particular and conduct raids on locations where electric shock batons are likely to be stored.
- Immediately prohibit the sale of electric shock batons for law enforcement or private security purposes to Cambodia.

With respect to the attacks on independent media:

- Fully comply with its international human rights obligations as stated in the UN Declaration on Human Rights Defenders, in relation to the rights of journalists and other human rights defenders (individuals and organizations) to carry out their activities in a safe and enabling environment and without fear of violence, threats or any form of reprisal coming from state or non-state actors. This should include giving explicit and public recognition and support for their crucial role in exposing scamming compounds, refraining from imposing undue restrictions on their human rights, as well as putting in place all the necessary measures (in law and practice), in consultation with those affected, to ensure their effective and comprehensive protection from any threats and attacks as a consequence of their work on scamming compounds.
- Allow Voice of Democracy and other news outlets to recommence operations and carry out their activities without undue restrictions on their human rights, including the rights to freedom of expression and freedom of association.

TO THE GOVERNMENTS OF COUNTRIES WHOSE NATIONALS ARE BEING TRAFFICKED INTO CAMBODIA, INCLUDING BUT NOT LIMITED TO CHINA AND MEMBER STATES OF THE ASSOCIATION OF SOUTHEAST ASIAN NATIONS (ASEAN)

- Assess whether the existing legal framework on trafficking is adequate and, where necessary, develop and strengthen it by amending or adopting legislation in accordance with international standards to ensure, among other things, that the crime of trafficking, and practices covered by its definition, are precisely defined in national law and that the human rights protection of trafficked persons is built into anti-trafficking legislation effectively.
- Ensure that embassies are sufficiently resourced to provide information and urgent support to migrants in distress in Cambodia, including by providing consular staff with appropriate training in responding to requests for information and assistance from trafficked persons.

TO MEMBERS OF ASEAN

- Facilitate the ASEAN Intergovernmental Commission on Human Rights to receive and respond to human rights complaints from states, civil society organizations and other stakeholders in regard to online scam operations.
- Implement the ASEAN Member States and the People's Republic of China Regional Cooperation Roadmap to Address Transnational Organized Crime and Trafficking in Persons Associated with Casinos and Scam Operations in Southeast Asia.
- Develop a centralized database covering Southeast Asian states that provides a mechanism for storing and sharing important information and data on trafficking for forced criminality (number of victims and their nationalities; details of suspected offenders; number and progress of investigations; number and progress of prosecutions; and court case reports).

- Enhance international cooperation in criminal matters to address operations of transnational organized criminal groups facilitating trafficking in persons through existing multilateral mechanisms, including the UN Convention against Transnational Organized Crime, the ASEAN Treaty on Mutual Legal Assistance in Criminal Matters, and existing bilateral agreements among Southeast Asian states.
- Foreign governments should use all powers at their disposal to compel the Cambodian government to act – including, but not limited to, investigating individuals and charging them with the international crimes of enslavement and torture and other ill-treatment.

TO ALL OTHER STATES, INCLUDING THOSE WHOSE NATIONALS ARE BEING SCAMMED

- Foreign governments should use all powers at their disposal to compel the Cambodian government to act – including, but not limited to, investigating individuals and charging them with the international crimes of enslavement and torture and other ill-treatment.

ANNEX I
SCAMMING COMPOUNDS

DESCRIPTION OF KEY ITEMS IN ANNEX

This Annex includes a "profile" for each site that Amnesty International has determined to have been or be a scamming compound as of the date of publication. For the purposes of this report and Annex, scamming compounds are defined as locations where Amnesty International has determined that online scamming or online gambling operations are likely being run, and where trafficked persons or migrant workers involved directly or indirectly in such operations are subjected to deprivation of liberty and/or other human rights abuses carried out primarily by organized criminal actors.

Amnesty International has made this determination on the basis of the "totality of the circumstances"[481], a common law and civil law legal standard that requires courts or judges to consider all relevant facts, circumstances and contributing factors surrounding a particular situation, rather than relying on a single factor or a bright-line. The evidence included for each profile is typically comprised of primary and secondary evidence which, jointly, have allowed Amnesty International to conclude that a certain location was at some point or is at the time of publication a scamming compound.

Coordinates: The coordinates included in each profile are of the entry point to, what appears to be the entrance gate/door of, or the approximate location of the entrance of, the compound. Evidence considered in identifying the coordinates include, but is not limited to, geolocation based on photos taken by a survivor at the actual building while they were confined; a location identified by a survivor when shown photos of the site; site visits by Amnesty International delegates; and/or satellite imagery.

Satellite image: A satellite image is used to show each compound. A yellow box highlights the general area of the compound based on the coordinates described above.

Timeline: The timeline provides a (noncomprehensive) selection of events from primary and secondary sources that provide relevant information on the scamming compound, including whether human rights abuse took place at the site, instances of state (military, police or otherwise) intervention, Amnesty International site visits, evidence relating to "rescues" or escapes and others.

Physical and organizational security features: Amnesty International collected evidence indicating that these security features were present at the scamming compound as of a certain date through site visits, use of photo-mapping platforms, satellite imagery and other sources.

Human rights abuse: This section outlines the key human rights abuses that occurred at the compound according to information obtained by Amnesty International.

State responsibility: This section summarises the determination by Amnesty International of the acts or omissions of the Cambodian state that indicate its failure to respect, protect and fulfil certain human rights.

Note: For security purposes, precise dates and details relating to testimony provided to Amnesty International are not always included.

481 Cornell Law School, totality of circumstances, June 2024, https://www.law.cornell.edu/wex/totality_of_circumstances

TABLE OF SCAMMING COMPOUNDS

Included below is a table that lists the scamming compounds profiled in Annex I. This list was provided to the Cambodian government on 12 May 2025. On 26 May 2025, the National Committee to Combat Human Trafficking, Cambodia's national mechanism responsible for implementing laws, policies and plans to combat human trafficking, responded to Amnesty International's letter. Unfortunately, it neither acknowledged nor responded in any way to the list of scamming compounds or the allegations of human rights abuse provided below. As a result, the research findings are limited to publicly available information on state interventions and investigations accessed by Amnesty International. It is possible that other interventions and investigations took place that are not captured in this Annex.

RED Over a third, or 20 compounds, were the subject of one or more police/military interventions, but Amnesty International documented human rights abuse continuing to take place at these locations even after such interventions;

ORANGE Over a third, or 18 compounds, appeared to not have been investigated by the government as of the date of publication;

YELLOW Less than a third, or 13 compounds, appeared to have been subject to some level of intervention or investigation and Amnesty International was unable to determine whether human rights abuse continued to take place; and

GREEN Only two compounds appeared to have been shut down after (likely) state intervention.

	ID Number	Coordinates	Human rights abuses	State responsibility	Page
Bavet					
1	**BA02**	11.0762, 106.1663	Human trafficking, forced labour, child labour, torture and other-ill treatment, deprivation of liberty, enslavement	State authorities intervened in October 2021, October 2022 and January 2023; human rights abuse documented in mid-2024.	112
2	**BA03**	11.0782, 106.1635	Human trafficking, forced labour, child labour, torture and other-ill treatment, deprivation of liberty, enslavement	State authorities intervened in early 2024; site appears to still be in operation as of mid-2024.	116
3	**BA05**	11.0698, 106.1752	Human trafficking, forced labour, torture and other-ill treatment, deprivation of liberty, enslavement	State authorities intervened in early 2024; human rights abuse documented in early 2025.	118

	ID Number	Coordinates	Human rights abuses	State responsibility	Page
4	**BA06**	11.0694, 106.1700	Deprivation of liberty (including of children)	State authorities intervened in early 2022; site appears to still be in operation as of mid-2024.	120
5	**BA11**	11.0715, 106.1636	Human trafficking, forced labour, child labour, torture and other-ill treatment, deprivation of liberty, enslavement	Possible investigations and arrests by state authorities in early 2025.	123
6	**BA13**	11.0771, 106.1698	Human trafficking, forced labour, child labour, torture and other-ill treatment, deprivation of liberty, enslavement	State authorities intervened in 2023; human rights abuses documented in late 2024.	126
Botum Sakor					
7	**BS02**	10.8886, 103.1461	Deprivation of liberty	State authorities intervened in late 2024; human rights abuse documented in early 2025.	128
8	**BS04**	10.9087, 103.1278	Human trafficking, forced labour, torture and other-ill treatment, deprivation of liberty, enslavement	State authorities intervened at the site at least four times between 2022 to 2023; human rights abuse documented in early 2025.	130
Choam					
9	**CH01**	14.3432, 104.0568	Human trafficking, forced labour, torture and other-ill treatment, deprivation of liberty,	Human rights abuse documented in 2024; unclear if any state authority investigation has taken place.	133

	ID Number	Coordinates	Human rights abuses	State responsibility	Page
Chob Kokir Khang Lich					
10	CK01	14.3336, 103.1764	Deprivation of liberty (including of children)	Human rights abuse documented from January to June 2025: no information indicate state authorities have further investigated.	135
Chrey Thum					
11	CT01	10.9475, 105.0789	Human trafficking, forced labour, child labour, torture and other-ill treatment, deprivation of liberty, enslavement	State authorities intervened in 2021 and August 2022; human rights abuse documented in October 2022.	137
12	CT02	10.9515, 105.0685	Deprivation of liberty	No information indicating state authorities have investigated.	140
13	CT03	10.9587, 105.0735	Human trafficking, forced labour, child labour, deprivation of liberty, enslavement	State authorities intervened at the site around the time human rights abuse documented.	142
14	CT05	10.9656, 105.0622	Human trafficking, forced labour, child labour, torture and other ill-treatment, deprivation of liberty, enslavement	State authorities intervene in 2022 and 2024; human rights abuse documented in 2024 and 2025.	144
Kampot					
15	KA01	10.6347, 104.0170	Deprivation of liberty	Unclear if location was investigated by state authorities but appears abandoned as of December 2023.	147
16	KA02	10.4404, 104.4424	Deprivation of liberty	State authorities intervene in early 2022; site appears to be in operation as of late 2024.	149

	ID Number	Coordinates	Human rights abuses	State responsibility	Page
Koh Kong					
17	**KK01**	11.6429, 102.9142	Human trafficking, forced labour, deprivation of liberty	State authorities intervened in 2023; human rights abuse documented in 2024.	151
O'Smach					
18	**OS01**	14.4337, 103.7028	Human trafficking, forced labour, torture and other ill-treatment, deprivation of liberty, enslavement	State authorities likely intervened in 2022 and 2023; human rights abuse documented in 2024.	153
19	**OS02**	14.4325, 103.6979	Deprivation of liberty	State authorities likely intervened in 2022; human rights abuse documented in 2024.	156
Poipet					
20	**PO07**	13.6401, 102.5767	Human trafficking, forced labour, deprivation of liberty	No information indicating state authorities have investigated.	158
21	**PO10**	13.6658, 102.5665	Human trafficking, forced labour, deprivation of liberty, enslavement	State authorities pledge to investigate the site following abuses; no information indicating state authorities have investigated.	160
22	**PO16**	13.6285, 102.6109	Human trafficking, forced labour, deprivation of liberty, enslavement	State authorities may have intervened in 2025; human rights abuse documented in 2025.	162
23	**PO18**	13.6633, 102.5519	Human trafficking, forced labour, deprivation of liberty, enslavement	There is no information suggesting state authorities investigated this site.	164

	ID Number	Coordinates	Human rights abuses	State responsibility	Page
24	PO20	13.6714, 102.5751	Human trafficking, deprivation of liberty	There is no information suggesting state authorities investigated this site.	166
Phnom Penh and surrounding areas					
25	PP04	11.5404, 104.9074	Human trafficking, forced labour, torture and other ill-treatment, deprivation of liberty, enslavement	State authorities intervened in 2022; human rights abuse documented in 2025.	168
26	PP09	11.3758, 104.7547	Human trafficking, forced labour, torture and other ill-treatment, deprivation of liberty, enslavement	State authorities intervened in October 2024; human rights abuse documented in 2025.	170
27	PP13	11.5979, 104.8709	Human trafficking, forced labour, deprivation of liberty,	State authorities intervened in 2022; site appears to be in operation as of mid-2025.	173
28	PP23	11.5865, 104.9040	Deprivation of liberty	State authorities intervened in 2025; it is unclear whether the site is being further investigated.	175
Psar Prum					
29	PSP01	12.9341, 102.5395	Human trafficking, forced labour, torture and other ill-treatment, deprivation of liberty	There is no information suggesting state authorities investigated this site.	177
Sihanoukville					
30	SI01	10.5792, 103.5572	Human trafficking, forced labour, torture and other ill-treatment, deprivation of liberty, enslavement	State authorities intervened in 2022 and 2023; human rights abuse documented in 2025.	179

	ID Number	Coordinates	Human rights abuses	State responsibility	Page
31	SI02	10.5750, 103.5526	Human trafficking, forced labour, torture and other ill-treatment, deprivation of liberty, enslavement	State authorities intervened in 2022; human rights abuses documented in 2023.	183
32	SI04	10.5861, 103.5735	Deprivation of liberty	State authorities intervened in October 2022; human rights abuse documented in late 2024.	186
33	SI08	10.6089, 103.5326	Human trafficking, forced labour, torture and other ill-treatment, deprivation of liberty, enslavement	State authorities intervened in 2022; the site appears to be in operation as of late 2024.	188
34	SI11	10.6413, 103.5223	Deprivation of liberty	There is no information suggesting state authorities investigated this site.	191
35	SI12	10.6338, 103.5061	Deprivation of liberty	State authorities intervened in September 2022; the site appears to be in operation as of late 2024.	193
36	SI15	10.6268, 103.5029	Human trafficking, forced labour, deprivation of liberty	State authorities intervened in 2022; human rights abuse documented in 2024.	195
37	SI16	10.6240, 103.5024	Human trafficking, forced labour, child labour, deprivation of liberty, enslavement	It is unclear if state authorities investigated this site previously; human rights abuse documented in 2024.	197
38	SI20	10.6065, 103.5033	Deprivation of liberty	State authorities intervened at the location to make a rescue in late 2023; there is public information suggesting human rights abuse in late 2024.	199

	ID Number	Coordinates	Human rights abuses	State responsibility	Page
39	SI21	10.6148, 103.5178	Deprivation of liberty	State authorities intervened in late 2023.	201
40	SI22	10.6119, 103.5251	Human trafficking, deprivation of liberty	State authorities intervened in mid-2023.	203
41	SI32	10.6371, 103.5282	Deprivation of liberty	There is little information to suggest state authorities have investigated this location for deprivation of liberty.	205
42	SI33	10.6400, 103.5076	Human trafficking, forced labour, deprivation of liberty	No information suggesting state authorities investigated this site.	207
43	SI35	10.6099, 103.5172	Human trafficking, forced labour, torture and other ill-treatment, deprivation of liberty, enslavement	State authorities intervened in late 2021; human rights abuse documented in 2025.	209
44	SI36	10.6086, 103.5163	Human trafficking, forced labour, torture and other ill-treatment, deprivation of liberty, enslavement	State authorities intervened in July 2022.	211
45	SI37	10.6030, 103.5325	Deprivation of liberty	There is no information suggesting state authorities investigated this site.	213
46	SI39	10.6210, 103.5002	Deprivation of liberty	There is no information suggesting state authorities investigated this site.	215
47	SI42	10.5853, 103.5505	Human trafficking, forced labour, deprivation of liberty	There is no information suggesting state authorities investigated this site.	217
48	SI44	10.6059, 103.5275	Deprivation of liberty	It is unclear if state authorities investigated this site.	219

	ID Number	Coordinates	Human rights abuses	State responsibility	Page
49	SI45	10.6410, 103.5315	Deprivation of liberty	State authorities intervened at site in June 2022.	221
50	SI48	10.6219, 103.5056	Deprivation of liberty	State authorities intervened in 2022; the site appeared abandoned as of end of 2024.	223
51	SI50	10.6371, 103.5029	Human trafficking, forced labour, torture and other ill-treatment, deprivation of liberty	There is no information indicating state authorities investigated this site.	225
Thma Da					
52	TD01	12.1272, 102.7382	Human trafficking, forced labour, deprivation of liberty	State authorities intervened in late 2021, 2023 and 2024; human rights abuse documented in 2025.	227
Takeo					
53	TK01	11.3308, 104.7495	Deprivation of liberty	State authorities intervened in late 2024; human rights abuse documented in 2025.	231

BA02

Amnesty International considers **BA02** to be or have been a scamming compound.

LOCATION	Bavet, Svay Rieng province; 11.0762, 106.1663

TIMELINE	
7 October 2021	Khmer Cover TV reports that Svay Rieng Provincial Military Police rescued 13 Vietnamese individuals held captive at what could be BA02. One of the rescued survivors was reportedly 16 at the time.[482]
20 September 2022	Phnom Penh Post reports on a video dated 17 September that shows what appear to be many people running away from the BA02 compound area on a road that is geolocated to be an exit road from the site. The video also features security guards running in the same direction as the exiting people and one security guard holding a stick. In another part of the video, a security guard is seen dragging a person.[483]

482 Khmer Cover TV, "សមត្ថកិច្ចកងរាជអាវុធហត្ថខេត្តស្វាយរៀងរំដោះជនរងគ្រោះជនជាតិវៀតណាម១៣នាក់ពីក្រុមឧក្រិដ្ឋជនចាប់បង្ខាំងនៅក្នុងកាស៊ីម៉ុកបាយក្រុងបាវិត" ["Social news Svay Rieng Provincial Military Police rescue 13 Vietnamese victims from a gang of criminals held captive in Kasimok Bay, Bavet City"], https://web.archive.org/web/20230205001804/https://khmercovertv.com/article/3140.html (in Khmer)

483 Phnom Penh Post, "Svay Rieng police investigate latest casino 'escape'", 20 September 2022, https://web.archive.org/web/20230331191902/https://www.phnompenhpost.com/national/svay-rieng-police-investigate-latest-casino-escape

21 September 2022	The VN Express reports that it interviewed to two Vietnamese nationals involved in the 17 September incident. One woman referred to the incident as an escape and said she had been sold by other companies to the site. A man said he was forced to work 13 hours a day at the site and that he was frequently beaten.[484] It is not clear which site they were referring to, but the road is one of the only exit roads from BA02.
11 October 2022	Voice of Democracy (VOD) journalists report that three separate groups of tuk-tuks and motorbike drivers saw buses arriving and unloading people at suspected scam compounds throughout Bavet, with one driver saying he had seen "four to five buses ... arrive every night for a week or two, mostly stopping at the [BA02] compound." VOD reports the drivers said they knew the bus drivers and the buses were coming from Sihanoukville where a crackdown on scamming compounds was occurring.[485]
26 October 2022	A local tuk-tuk driver tells VOD reporters he had seen hundreds of people leaving three compounds, including BA02, daily for the past three days believed to be related to scamming compounds.[486]
27 October 2022	VOD reported that Svay Rieng provincial labor department Director Ou Sokhoeun said on 27 October 2022 that the national immigration and labor departments had a day earlier begun an inspection of compounds (believed to be the BA02 site), "a large area with around 30 buildings behind a casino of the same name [quote of VOD not Sokhoeun]". Bavet city police chief Em Sovannarith said hundreds of people had come out of the casino compounds, many of them crossing into Viet Nam through rice fields and across a stream rather than the official border gate, noting the "companies have allowed them to leave freely".[487]
20 December 2022	Nation Thailand reports that seven Thai victims had been confined by guards and behind electric wire walls at a Bavet location where they had their passports confiscated and were forced to work for more than 15 hours a day without breaks.[488] Cybers Scam Monitor suggests it was able to geolocate the live video to show the victims may have been confined in BA02.[489] Imagery from the Nation Thailand report supports this although Amnesty International was not able to review the video in its entirety.[490]

484 VnExpress, "Escapees from Cambodian casinos burst into tears after returning to Vietnam", 21 September 2022, https://web.archive.org/web/20230328171826/https://e.vnexpress.net/news/news/escapees-from-cambodian-casinos-burst-into-tears-after-returning-to-vietnam-4514080.html (accessed on 7 May 2025)
485 Voice of Democracy, "Echoes of Sihanoukville troubles in Cambodian border town", 11 October 2022, https://vodenglish.news/echoes-of-sihanoukville-troubles-in-cambodian-border-town/
486 Voice of Democracy, "Chaotic scenes in Bavet amid apparent exodus", 26 October 2022, https://vodenglish.news/chaotic-scenes-in-bavet-amid-apparent-exodus/
487 Voice of Democracy, "Bavet compound workers flee country through river, rice fields", 27 October 2022, https://vodenglish.news/bavet-compound-workers-flee-country-through-river-rice-fields/
488 The Nation, "7 Thais escape slave conditions at call centre in Cambodia", 20 December 2022, https://www.nationthailand.com/thailand/general/40023268
489 Cyber Scam Monitor, Cambodia: Bavet Moc Bai Casino, 31 January 2023, https://web.archive.org/web/20230323132422/https://cyberscammonitor.net/profile/bavet-moc-bai-casino/ (accessed on 7 May 2025)
490 The Nation, "7 Thais escape slave conditions at call centre in Cambodia", 20 December 2022, https://www.nationthailand.com/thailand/general/40023268

11 January 2023	VOD reports that authorities found 5,000 workers at the site believed to be BA02. According to Interior Minister Sar Kheng, the workers and businesses fled the compound. "We did not chase them or punish them. They realized they were doing wrong so they left. So it is fine. If we had arrested them, where is the prison to put them and food for them to eat?" he said. "We are in the process of solving it with each other."[491]
Mid-2024	Amnesty International interviewed a child-survivor, who was at the site at this time and was able to identify BA02 compound buildings from pictures taken from the exterior and said he was sold to the site and subjected to torture and confinement.[492]
Mid-2024	Amnesty International visits the site and documents security guards at the gates and other security features.

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,[493] satellite imagery and/or survivor testimony,[494] the compound, as of mid-2024, had the following security features:

- Perimeter fencing with barbed or razor wire.
- The use of electric fencing.[495]
- Internal-facing security cameras.
- Floodlights along perimeters.
- Security guards with firearms.[496]
- Security guards and guard posts at internal checkpoints.
- Cages or bars on windows.

491 Voice of Democracy, "Sar Kheng warns provinces against covering up human trafficking", 11 January 2023, https://vodenglish.news/sar-kheng-warns-provinces-against-covering-up-human-trafficking/
492 Amnesty International interview with survivor,2024.
493 Amnesty International site visit, mid-2024.
494 Amnesty International interview with survivor, 2024.
495 The Nation, "7 Thais escape slave conditions at call centre in Cambodia", 20 December 2022, https://www.nationthailand.com/thailand/general/40023268
496 Amnesty International interview with survivor, 2024.

HUMAN RIGHTS ABUSE

A child-survivor interviewed by Amnesty International said they spent months at this compound; they were lied to during recruitment; they were taken to a dark room where they were beaten, including with electric shock batons and while being hand-cuffed, after failing to meet certain scam-related work targets (including securing a sufficient number of "customers"); and they were monitored at all times by managers and guards with guns, leading them to believe they could not escape. The survivor described seeing and interacting with many other people at this site who were subjected to similar treatment – including seeing other people inside the "dark room" who were also being subjected to torture or other ill-treatment.

Based on this testimony, and in the context of other secondary evidence including media reports, Amnesty International determined that this survivor was trafficked to the site, their labor was exploited, they were deprived of their liberty, they were highly likely tortured and this extreme control exerted over them amounts to enslavement.

STATE RESPONSIBILITY

Despite seven news stories describing suspicious activities and human rights abuses between October 2021 and December 2022, as well as three operations by state authorities, Amnesty International documented human rights abuse at the compound in 2024 following the latest, publicly reported state intervention. There is no publicly available information indicating that state authorities have further investigated or shut down this compound.

BA03

Amnesty International considers **BA03** to be or have been a scamming compound.

LOCATION	Bavet, Svay Rieng province; 11.0782, 106.1635

TIMELINE	
In 2024	A child escaped from BA03 after being subjected to torture, confinement and threats on their life. They described to Amnesty International buildings that were near to the compound and provided photographs that corroborated their story.
First half of 2024	An organization says a person is released from this site with the assistance of local authorities.[497]
Mid-2024	Amnesty International visits the site and documents security guards at the gates and other security features.

497 Information provided by organization 1 on file with Amnesty International.

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,[498] satellite imagery and/or survivor testimony,[499] the compound, as of mid-2024, had the following security features:

- Perimeter wall with barbed or razor wire.
- Security guards at entry/exit gate.
- Security guards positioned on the exterior of the compound facing towards the compound perimeter.
- Bars or cages on windows.

HUMAN RIGHTS ABUSE

A child-survivor interviewed by Amnesty International said they spent months at this compound; they were lied to during recruitment and were first brought to another compound before being transferred to this site; they were taken to a "dark room" where they were beaten, after being accused of stealing money; they were monitored at all times by managers and guards and believed they could not escape because of the security guards. The survivor described seeing and interacting with many other people at this site who were subjected to similar treatment.

Based on this testimony, Amnesty International determined that this survivor was trafficked to the site, their labor was exploited, they were deprived of their liberty, they were subject to torture or other ill-treatment and this extreme control exerted over them amounts to enslavement.

STATE RESPONSIBILITY

Despite local authorities assisting a person to leave the site in 2024, there is no publicly available information indicating that state authorities have investigated or shut down this compound.

498 Amnesty International site visit, mid-2024.
499 Amnesty International interview with survivor, 2024.

BA05

Amnesty International considers **BA05** to be or have been a scamming compound.

LOCATION	Bavet, Svay Rieng province; 11.0698, 106.1752

TIMELINE	
March 2024	A survivor told Amnesty International he was removed from the BA05 site by state authorities. The survivor was able to describe the site, identify photographs of the location and provide video and photographic evidence to support some of his claims.
Mid-2024	Amnesty International visits the site and documents security guards at the gates and other security features.
First half of 2025	A child-victim is released from BA05 with assistance of local authorities.[500]

500 Information on file with Amnesty International.

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,[501] satellite imagery and/or survivor testimony,[502] the compound, as of mid-2024, had the following security features:

- Perimeter walls.
- Internal-facing security cameras.
- More than three security guards at the main entrance point.
- The use of cages on windows and balconies.
- Security guards that have weapons including shock batons.

HUMAN RIGHTS ABUSE

A survivor interviewed by Amnesty International said they spent several months at this compound; they were told they were being brought to work in a casino but were forced to work on scam-related jobs; they were taken to a "dark room" where they were beaten after refusing to work; they were monitored at all times by managers and believed they could not escape due to the presence of security guards. The survivor described seeing and interacting with many other people at this site who were subjected to similar treatment. The survivor was never paid.

Based on this testimony, Amnesty International determined that this survivor was highly likely trafficked to the site, their labor was exploited, they were deprived of their liberty and they were subjected to torture or other ill-treatment. Additionally, this extreme control exerted over them and amounts to enslavement.

STATE RESPONSIBILITY

Despite a survivor being removed from the compound by state authorities in 2024, Amnesty International documented human rights abuse at the compound in 2025 following the latest, publicly reported state intervention. There is no publicly available information indicating that state authorities have further investigated or shut down this compound.

501 Amnesty International site visit, mid-2024.
502 Amnesty International interview with survivor, 2024.

BA06

Amnesty International considers **BA06** to be or have been a scamming compound.

LOCATION	Bavet, Svay Rieng province; 11.0694, 106.1700

TIMELINE	
29 June 2022	News outlet Gia Lai documents and provides photo evidence of the release of a man from BA06 after his family pays a ransom when he was confined at the site.[503]
Mid-2022	An organization says that four children are being confined against their will in BA06.[504] The children were trafficked for the purposes of forced labour and are described as being concerned for their safety.
Mid-2022	An organization says that two people, one of whom is a child, are rescued by state authorities from this location. The organization says that both persons were trafficked to the site for the purposes of forced labour.[505]

503 Gia Lai Online, "Nhức nhối lừa bán lao động qua Campuchia: Chuộc người từ bên kia biên giới" ["The pain of labor trafficking to Cambodia: redeeming people from across the border"], 29 June 2022 , https://baogialai.com.vn/nhuc-nhoi-lua-ban-lao-dong-qua-campuchia-chuoc-nguoi-tu-ben-kia-bien-gioi-post93083.html (in Vietnamese).
504 Information provided by organization 11, on file with Amnesty International.
505 Information provided by organization 11, on file with Amnesty International.

24 October 2022	News outlet SMoney reports BA06 as a site where workers are confined and beaten.[506]
4 November 2022	News outlet ZNews reports speaking to witnesses who identify the BA06 site as a site that confines people. One witness who claims to work at the BA06 site said her job is to deceive Vietnamese people into coming to the site where they will then be indebted and forced to work the debt off or pay to secure their release from the site.[507]
22 May 2023	CCTV footage posted online captures a man attempting to run out of the gate of BA06 and being captured by security guards and returned to the site.[508]
Mid-2024	Amnesty International visits the site and documents security guards at the gates and other security features.

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,[509] satellite imagery and/or survivor testimony, the compound, as of mid-2024, had the following security features:

- Perimeter wall that has barbed or razor wire.
- Security guards at entrance/exit points.
- Double gates.
- Interior walls.
- Floodlights on perimeter walls.
- Heavy security guard presence at the site.
- Security cameras along perimeter areas.

506 Smony, "Rào thép gai bủa vây nơi lao động của người Việt tại Campuchia" ["Barbed wire fences surround Vietnamese workers' workplace in Cambodia", 24 October 2022, https://smoney.vn/rao-thep-gai-bua-vay-noi-lao-dong-cua-nguoi-viet-tai-campuchia-post686737.html (in Vietnamese).

507 Tri Thuc Electronic Magazine, "Cơn khát lao động tại thủ phủ cờ bạc Bavet" ["Labor shortage in gambling capital Bavet"], 4 November 2022, https://znews.vn/con-khat-lao-dong-tai-thu-phu-co-bac-bavet-post1359146.html (in Vietnamese).

508 Josimar, "Everyone who hears the name is afraid", 15 September 2023, https://josimarfootball.com/2023/09/15/everyone-who-hears-the-name-is-afraid/

509 Amnesty International site visit, mid-2024.

HUMAN RIGHTS ABUSE

Information from an organization indicates that at least six victims, five of which were children, were trafficked to this site for the purposes of forced labour in 2022. Information provided suggests they all were forcibly transferred to the site from another compound, indicating a possibility of slavery.

Several witnesses have provided evidence to news sources that BA06 was depriving people of their liberty, and one report documented the release of a Vietnamese man from the site. In addition, the CCTV footage from May 2023 provides evidence that guards may have been tasked with preventing people from leaving the site.

Based on the above evidence, when combined with the physical and organizational security features present, Amnesty International concludes this location has been used to deprive people of their liberty, including children.

STATE RESPONSIBILITY

Despite three news reports from 2022 suggesting the location was possibly implicated in human trafficking and deprivation of liberty, there is no publicly available information indicating that state authorities have further investigated or shut down this compound.

BA11

Amnesty International considers **BA11** to be or have been a scamming compound.

LOCATION	Bavet, Svay Rieng province; 11.0715, 106.1636

TIMELINE	
Early 2024	Three survivors interviewed by Amnesty International escape BA11 after being trafficked to the site for labor exploitation, confined at the site by security guards and told they would be "sold" to another compound if they did not do the scamming work.[510] All three identified the site by pictures provided by Amnesty International.
Mid-2024	Amnesty International visits the site and documents security features.
Second half of 2024	Amnesty International interviewed three children and one adult who were at this site in the second half of 2024. The children had been trafficked to the site and then confined there.[511] The adult had initially entered the compound to work there willingly, but was physically assaulted when he tried to leave.[512] The children were able to identify the site as BA11.

510 Amnesty International interview with survivor, 2024.
511 Amnesty International interview with survivor, 2024.
512 Amnesty International interview with survivor, 2024.

Mid-2024	Amnesty International visits the site and documents security features.
Second half of 2024	An organization says a group of victims is seeking help to leave the BA11 site.[513]
7 January 2025	Saigon News reports that Cambodian authorities arrested five individuals on human trafficking charges. The article says that authorities identified, amongst others, a casino likely located at the front of BA11 as a location where illicit activities under coercive measures took place.[514]
17 January 2025	Vietnamese news outlet NGHE AN 24H reports that debt collectors at a casino detained a man likely at a building in BA11 in November/December 2024 until he could repay his debts. The organized criminal group members allegedly called the man's wife demanding a ransom and threatening to kill the man. The man tried to escape, upon which the compound guards recaptured him. He was reportedly transferred out of the compound but was killed by his captors in the process.[515] The news report refers to a casino likely located at the front of BA11 as the site where this took place.[516] Amnesty International interviewed two children from BA11 who were threatened while their families' were told to pay ransoms to secure their release.[517]

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,[518] satellite imagery and/or survivor testimony,[519] the compound, as of mid-2024, had the following security features:

- Perimeter walls with barbed or razor wire.
- Internal-facing cameras placed along the perimeter walls.[520]

513 Information provided by organization 7, on file with Amnesty International.
514 Information provided by organization 1, on file with Amnesty International.
515 NGHE AN 24H, "Băng nhóm người Việt tại Campuchia cho vay tiền, sát hại dã man con bạc" ["Vietnamese gang in Cambodia lends money, brutally murders gamblers"], 17 January 2025, https://nghean24h.vn/bang-nhom-nguoi-viet-tai-campuchia-cho-vay-tien-sat-hai-da-man-con-bac-a742706.html (in Vietnamese) and Hai Duong Online Newspaper, "Hàng nghìn cảnh sát truy bắt nhóm tra tấn, phi tang xác con bạc" ["Thousands of police hunt for group that tortured and disposed of gambler's body"], 2 February 2025, https://baohaiduong.vn/hang-nghin-canh-sat-truy-bat-nhom-tra-tan-phi-tang-xac-con-bac-404304.html?fbclid=IwY2xjawKrw6RleHRuA2FlbQIxMABicmlkETEyQUZ4SXROc0Z3MDVwRUZoAR7jSDh8Wc11dat860Z9DuxwfKrZbB8dodc_tR32GgSShd3xFcefM1KSA1UuPA_aem_1Bln3Em-OdAIp2-43GDu3g (in Vietnamese)
516 NGHE AN 24H, "Băng nhóm người Việt tại Campuchia cho vay tiền, sát hại dã man con bạc" ["Vietnamese gang in Cambodia lends money, brutally murders gamblers"], 17 January 2025, https://nghean24h.vn/bang-nhom-nguoi-viet-tai-campuchia-cho-vay-tien-sat-hai-da-man-con-bac-a742706.html (in Vietnamese) and Hai Duong Online Newspaper, "Hàng nghìn cảnh sát truy bắt nhóm tra tấn, phi tang xác con bạc" ["Thousands of police hunt for group that tortured and disposed of gambler's body"], 2 February 2025, https://baohaiduong.vn/hang-nghin-canh-sat-truy-bat-nhom-tra-tan-phi-tang-xac-con-bac-404304.html?fbclid=IwY2xjawKrw6RleHRuA2FlbQIxMABicmlkETEyQUZ4SXROc0Z3MDVwRUZoAR7jSDh8Wc11dat860Z9DuxwfKrZbB8dodc_tR32GgSShd3xFcefM1KSA1UuPA_aem_1Bln3Em-OdAIp2-43GDu3g (in Vietnamese)
517 Amnesty International interview with survivor, 2024.
518 Amnesty International site visit, mid-2024.
519 Amnesty International interview with survivor, 2024.
520 Amnesty International interview with survivor, 2024.

- Many guards at the entrance and exit gates.[521]
- Guards with electric shock batons.[522]
- Bars on windows.

HUMAN RIGHTS ABUSE

Six of the seven survivors interviewed by Amnesty International said they spent between one day and several months at this compound; they were lied to during recruitment; two survivors saw guards in possession of electric shock batons; three were told they would be "sold" to another compound if they did not want to scam at this site; and all were forced, or attempts were made to force them, to scam or work in scam related jobs. In addition, one survivor reported they were monitored by cameras to prevent escape and six survivors believed they could not escape because of the security guards. Several survivors described seeing and interacting with many other people at this site who were subjected to similar treatment. One person said they were working at this site voluntarily, but they were still violently attacked by a manager when they tried to leave.

Based on this testimony, and in the context of other secondary evidence, Amnesty International determined that six of the seven survivors interviewed were victims of human trafficking and forced labour, and they were deprived of their liberty.

In three cases, the survivors interviewed by Amnesty International were children. Two of these children said they were made to watch videos of other people being subjected to torture or other ill-treatment and were threatened that they would be tortured or killed if their parents did not pay to have them released. Amnesty International concluded that forcing people to witness such acts, not least children, constitutes torture or other ill-treatment due to the significant harmful impact it will inevitably have. As well as being subjected to this treatment the children were confined against their will.

The third child interviewed by Amnesty International described being kicked by his boss and forced to work at the site, and witnessing acts of violence which made him fear that he would be violently attacked. In this case, Amnesty International concluded that the child was subjected to torture or other-ill treatment and forced labour, and, given the level of control exerted over him, that he was also enslaved while at the site.

STATE RESPONSIBILITY

Despite state authorities assisting victims to leave the site in 2024, it is unclear whether there has been further investigation into this site. A news report from 7 January 2025 suggests state authorities may have made arrests at the site, but it is unclear whether the site mentioned is the BA11 site.

521 Amnesty International interview with survivor, 2024.
522 Amnesty International interview with survivor, 2024.

BA13

Amnesty International considers **BA13** to be or have been a scamming compound.

LOCATION	Bavet, Svay Rieng province; 11.0771, 106.1698

TIMELINE	
Early 2023	A child interviewed by Amnesty International is released from the BA13 site with the assistance of state authorities. He described being "lied to" about work in Cambodia and was told, at the time he was brought to BA13, that he was being taken to the police station. Instead, he found himself in a car leaving another compound in Chrey Thum and ended up at BA13. Two other people in the car told him the compound he was going to had spent money to bring him there. The survivor was then confined and forced to work in scamming by guards who carried around electric shock batons.[523] The survivor described BA13's perimeter and entrance accurately and then identified the location from photos.
Mid-2024	Amnesty International visits the site and documents security guards at the gates and other security features.

523 Amnesty International interview with survivor, 2024.

September 2024	A survivor interviewed by Amnesty International is transported to BA13 after recruiters use deceptive job descriptions to lure him there. Once at the compound, the survivor was told he could not leave and beaten by a manager after he tried to contact police in China.[524] The survivor identified the BA13 site from photos.

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,[525] satellite imagery and/or survivor testimony,[526] the compound, as of mid-2024, had the following security features:

- Perimeter fence/wall with internal-facing barbed or razor wire.
- Sealed entrances/exits to create a perimeter.
- Internal-facing security cameras.
- Security guards with electric shock batons.
- Cages or bars on windows.

HUMAN RIGHTS ABUSE

Two survivors interviewed by Amnesty International, one of whom was a child, said they spent several months at this compound; they were lied to during recruitment; one of the survivors was beaten after they contacted the police; they were both forced to scam; they were monitored at all times by managers and believed they could not escape because of the presence of security guards. Both survivors described seeing and interacting with many other people at this site who were subjected to similar treatment.

Based on this testimony, Amnesty International determined that both survivors were highly likely trafficked to the site, especially the child; their labor was exploited; they were deprived of their liberty and one of them was subjected to torture or other ill-treatment. Additionally, the child survivor was told money had been spent to bring him to the compound and the control required to transfer and receive him against his will and then confine him as a child means he was highly likely enslaved.

STATE RESPONSIBILITY

Despite the state authorities being involved in the release of one of the survivors interviewed in 2023, a survivor reported being deprived of their liberty at the site as of late 2024. There was no publicly available information indicating that state authorities have further investigated or shut down this compound.

524 Amnesty International interview with survivor, 2024.
525 Amnesty International site visit, mid-2024.
526 Amnesty International interview with survivor, 2024.

BS02

Amnesty International considers **BS02** to be or have been a scamming compound.

LOCATION	Botum Sakor, Koh Kong province; 10.8886, 103.1461

TIMELINE	
Mid-2024	Amnesty International visits the site and documents security guards at the gates and other security features.
Late 2024	Four people are rescued from the site by local authorities.[527]
Early 2025	An organization shares information that a person is seeking to be rescued from BS02 after being tortured.[528]

527 Information on file with Amnesty International.
528 Information shared by organization 4, on file with Amnesty International.

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,[529] satellite imagery and/or survivor testimony, the compound, as of mid-2024, had the following security features:

- Perimeter wall/fence.
- Security guards at entrance area.

HUMAN RIGHTS ABUSE

Based on the rescues that indicate confinement was happening at the site as of mid-2025, and in combination with the physical and organizational security features present at the compound, Amnesty International concludes it is highly likely this site was depriving people of their liberty.

STATE RESPONSIBILITY

Despite four people being removed from the site after state authorities interventions in 2024, Amnesty International obtained information suggesting human rights abuses had taken place at the site in 2025.

529 Amnesty International site visit, mid-2024.

BS04

Amnesty International considers **BS04** to be or have been a scamming compound.

LOCATION	Botum Sakor, Koh Kong province, 10.9087, 103.1278

TIMELINE	
10 June 2022	VOD reports that a group of organizations and the father of a Taiwanese victim held at BS04 presented an official letter from Taiwanese diplomats requesting assistance from the Cambodian government regarding the trapped individual to the local authorities. After ransom payment and negotiation with the bosses of the compound, the trapped individual is released.[530]
22 August 2022	VOD reports the Philippines embassy in Phnom Penh requests Cambodian officials' help to rescue four people trapped in a compound in Botum Sakor. It is not clear which building the four people are trapped in but BS04 is one of two possible compounds that Amnesty International has identified in the project area. A Cambodian police official acknowledged that foreigners from two or three countries had requested rescues and that all of the requests for rescue came from an area that includes BS04. The police officials disputed whether people were confined at the site or not.[531]

530 Global Anti-Scam Organisation (GASO), "Trafficked Taiwanese rescued from a scam company in Cambodia... was it worth it?", 15 June 2022, https://www.globalantiscam.org/post/is-human-trafficking-victim-still-a-victim-in-the-end and Voice of Democracy, "Rescue reveals scam compound at Koh Kong's UDG", 24 August 2022, https://vodenglish.news/rescue-reveals-scam-compound-at-koh-kongs-udg/

531 Voice of Democracy, "Philippine embassy urges rescue from UDG, Americans rescued in Sihanoukville", 22 August 2022, https://vodenglish.news/philippine-embassy-urges-rescue-from-udg-americans-rescued-in-sihanoukville/

Mid-2022	An organization shares information suggesting four victims of trafficking for the purposes of forced labour are being deprived of their liberty at this site. The statement from one victim indicates violence, including electric shocks, is being used at the site and that one of the victims has been put into a "dark room" for five days.[532]
August – September 2022	An organization says rescues of 10 people from this location take place.[533]
Late 2022	A survivor interviewed by Amnesty International is freed from the site by Cambodian authorities after being transferred to the site from SI15 compound.[534]
Early 2023	An organization says two victims are rescued from this site with assistance from local authorities.[535]
July - September 2023	An organization says three victims are rescued from this site with assistance from local authorities.[536]
December 2023	A survivor interviewed by Amnesty International, is freed from the site by state authorities after being trafficked to the site on a false job promise.[537]
First half of 2024	An organization says three people are rescued from this site on two different occasions with assistance from Cambodian authorities.[538]
11 April 2024	The Straits Times interviews a Bangladeshi man who claims to have been confined at BS04 for approximately one month in 2022.[539]
Mid-2024	Amnesty International visits the site and documents security guards at the gates and other security features.
Mid-2024	A survivor interviewed by Amnesty International is freed from the site after being sold to the site from CT03.[540] Additionally, another survivor interviewed said they would have been sold to BS04 but were rescued along the route after their driver, and possible trafficker, refused to take them to the area because of its reputation for violence.[541]

532 Information provided by local organization 2 on file with Amnesty International.
533 Information provided by local organization 1 on file with Amnesty International.
534 Amnesty International interview with survivor, 2024.
535 Information provided by organization 1 on file with Amnesty International.
536 Information provided by organization 1 on file with Amnesty International.
537 Amnesty International interview with survivor, 2024.
538 Information provided by organization 1 on file with Amnesty International.
539 The Straits Times, "I was told to scam Singaporeans: Bangladeshi man who was trafficked to scam compounds", 11 April 2024, https://www.straitstimes.com/singapore/courts-crime/i-was-told-to-scam-singaporeans-bangladeshi-man-who-was-trafficked-to-scam-compounds
540 Amnesty International interview with survivor, 2024.
541 Amnesty International interview with survivor, 2024.

Late 2024	A survivor interviewed by Amnesty International is released by BS04 bosses after he was tortured for a series of days because he could not type on a computer keyboard.[542]
First half of 2025	An organization says a victim is rescued from this site with assistance from local authorities.[543]

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,[544] satellite imagery and/or survivor testimony,[545] the compound, as of mid-2024, had the following security features:

- Perimeter walls including sealed spaces to create a perimeter.
- Internally placed electric fencing on perimeter walls.[546]
- Guard huts that are strategically positioned on the outside facing into the compound.
- Many guards at different locations especially around the perimeter of the site.
- Guards or other people inside the compound with electric shock batons.
- Probable guard posts at strategic positions within the perimeter.

HUMAN RIGHTS ABUSE

Four survivors interviewed by Amnesty International spent months confined at BS04; were lied to during recruitment to the compound where they were then forcibly transferred to this compound; three of them were beaten, including with electric shock batons, for attempting to contact police; and all said they were forced to run online scams. Survivors all described seeing and interacting with many other people at this site who were subjected to similar treatment.

Based on this testimony, and in the context of other secondary evidence including media reports, as well as the extensive security features, Amnesty International has determined that these survivors were trafficked to the site for the purpose of forced labour, they were deprived of their liberty and in three cases they were subjected to torture or other ill-treatment. Cumulatively, considering the extreme control exerted over these four people, which included violence, these survivors were highly likely survivors of slavery.

STATE RESPONSIBILITY

Despite four news reports from 2022 to 2023 suggesting confinement and violence at the site; more than four different "rescue" operations that have resulted in at least 18 people being released from the site with the involvement of Cambodian authorities; Amnesty International documented human rights abuse at the compound in 2025. There is no publicly available information indicating that state authorities have further investigated or shut down this compound since then.

542 Amnesty International interview with survivor, 2024.
543 Information provided by organization 1 on file with Amnesty International.
544 Amnesty International site visit, mid-2024.
545 Amnesty International interview with survivor, 2024.
546 Photo shared by survivor on file with Amnesty International.

CH01

Amnesty International considers **CH01** to be or have been a scamming compound.

LOCATION	Choam, Preah Vihear province, 14.3432, 104.0568

TIMELINE	
Mid-2024	Amnesty International visits the site and documents security guards at the gates and other security features.
Second half of 2024	Amnesty International interviews two survivors of the CH01 compound. Both survivors reported being trafficked to, beaten and confined at the site in 2024 before escaping. Survivors were able to identify the site based on photographs and accurately described the journey to the site.[547]
End of 2024	An organization says they are assisting a victim from this compound.[548]
Early 2025	An organization says they are assisting a victim from this compound.[549]

547 Amnesty International interview survivors, 2024.
548 Information on file with Amnesty International
549 Information on file with Amnesty International

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,[550] satellite imagery and/or survivor testimony,[551] the compound, as of mid-2024, had the following security features:

- Perimeter walls with barbed or razor wire.
- Internal-facing security cameras placed along perimeter walls.
- Security guards at main gate.
- Sealed entrances/exits to create a perimeter.
- Internal walls and gates with additional guards.

HUMAN RIGHTS ABUSE

Two survivors interviewed by Amnesty International said they were lied to during recruitment; they were told to scam and when they refused were beaten in front of other workers and then deprived of their liberty by managers and guards who prohibited them from leaving.

Based on this testimony, and in the context of other secondary evidence, Amnesty International determined that these survivors were highly likely trafficked to the site to exploit their labor, they were deprived of their liberty and they were physically harmed by managers when they indicated they did not want to scam.

STATE RESPONSIBILITY

Multiple victims were released from this site or escaped from it, however there is no publicly available information indicating that state authorities have investigated or shut down this compound.

550 Amnesty International site visit, mid-2024.
551 Amnesty International interview with survivor, 2024.

CK01

Amnesty International considers **CK01** to be or have been a scamming compound.

LOCATION	Chob Kokir Khang Lich, Banteay Meanchey province; 14.3336, 103.1764

TIMELINE	
17 January 2025	Rappler.com reports that an Indonesian man was working in scamming operations at this location after being trafficked to Cambodia and becoming trapped.[552]
Throughout January and June 2025	Five people, some of whom were children, are rescued from this site with assistance from local authorities.[553]

552 Rappler, "Fake profiles, real victims: Inside a Cambodian compound targeting Americans", 17 January 202, https://www.rappler.com/newsbreak/investigative/fake-profiles-real-victims-cambodian-compound-targeting-americans/
553 Information on file with Amnesty International.

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Amnesty International was unable to visit the location during the research period.

HUMAN RIGHTS ABUSE

Based on five reported rescues, Amnesty International believes it is highly likely this site was used for depriving people of their liberty.

STATE RESPONSIBILITY

Despite five people being removed from the site after state authorities intervened in early 2025, as well as the news report from Rappler.com about this location, there is no publicly available information indicating that state authorities have investigated or shut down this compound.

CT01

Amnesty International considers **CT01** to be or have been a scamming compound.

LOCATION	Chrey Thom, Kandal province; 10.9475, 105.0789

TIMELINE	
Late 2021	Seven people are "rescued" by state authorities from this site.[554] Their statements indicate that during their time at CT01, they were subjected to the threat of torture, as well as physical violence, forced labour, deceitful advertising and human trafficking, forced overtime, no salary and confinement against their will.[555]
18-20 August 2022	42 people reportedly escape the CT01 compound and jump into the Binh Di river and swim to Viet Nam. In video footage, men with large sticks are seen chasing some of the people. A 16-year-old boy drowns trying to swim across the river.[556] Another person appeared to be recaptured by guards according to ZNews.[557] Amnesty International has confirmed the video is at CT01.

554 Information shared by organization 2 on file with Amnesty International.
555 Information shared by organization 2 on file with Amnesty International.
556 VN Express, "Teenage escapee from Cambodian casino found dead", 20 August 2022, https://e.vnexpress.net/news/news/16-year-old-escapee-from-cambodian-casino-found-dead-4501908.html
557 Tạp chí điện tử Tri thức, "40 người trốn khỏi casino ở Campuchia, bơi qua sông về Việt Nam" ["40 people escaped from casino in Cambodia, swam across river to Vietnam"], 18 August 2022, https://znews.vn/40-nguoi-tron-khoi-casino-o-campuchia-boi-qua-song-ve-viet-nam-post1346987.html?fbclid=IwAR30rv3skztRripTd69nsVNzO3Pj56XCdPjPs0uxgvV0ioubvrPCQx3OAaM (in Vietnamese)

23 August 2022	Cambodian police detain the manager of the casino located at CT01 for questioning.[558]
26 October 2022	A child survivor is confined at the site.[559]
8 December 2023	The UK government sanctions a company that reportedly operates at CT01,[560] "because it is responsible for, has engaged in, or has facilitated, activity that violates the right not to be subjected to torture or cruel, inhuman or degrading treatment or punishment or the right not to be held in servitude or required to perform forced or compulsory labour."[561]
Mid-2024	Amnesty International visits the site and documents security guards at the gates and other security features.

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,[562] satellite imagery and/or survivor testimony,[563] the compound, as of mid-2024, had the following security features:

- Perimeter wall with barbed or razor wire.
- More than five security guards at main gate.
- Internal-facing security cameras.

HUMAN RIGHTS ABUSE

A child-survivor interviewed by Amnesty International said they were confined at this compound before being transferred to another compound against their will; they were lied to during recruitment; and were told to run scams, which they eventually refused to do and were then forcibly transferred to another compound. The survivor was told they could not leave the compound. The survivor described seeing and interacting with many other people at this site who were subjected to similar treatment.

558 Tuoi Tre News, "Cambodia arrests Chinese manager at casino for forced labor on Vietnamese", 23 August 2022, https://tuoitrenews.vn/news/society/20220823/cambodia-arrests-chinese-manager-at-casino-for-forced-labor-on-vietnamese/68715.html
559 Amnesty International interview with survivor, 2024.
560 Office of Financial Sanctions Implementation HM Secretary, "Financial Sanctions Notice", 8 December 2023, https://assets.publishing.service.gov.uk/media/6572d548049516000d49be78/Notice_Global_Human_Rights_081223.pdf
561 Office of Financial Sanctions Implementation HM Secretary, "Financial Sanctions Notice", 8 December 2023, ttps://assets.publishing.service.gov.uk/media/6572d548049516000d49be78/Notice_Global_Human_Rights_081223.pdf, p 8.
562 Amnesty International site visit, mid-2024.
563 Amnesty International interview with survivor, 2024.

Based on this testimony, and in the context of other secondary evidence including media reports, Amnesty International determined that this survivor was trafficked to the site; their labour was exploited; they were deprived of their liberty; and the extreme level of control exerted over them, including the ability of their managers to transfer the person to another compound against their will and for money, indicates that their treatment highly likely amounted to slavery.[564]

STATE RESPONSIBILITY

Despite state authorities being involved in "rescues" from the site in 2021, a publicized mass break out in 2022[565] and the subsequent detention of the manager of a company operating at CT01,[566] a child survivor reported having been confined at the site two months later, in October 2022. In December 2023, a company at the site was sanctioned by the UK government for torture and forced labour,[567] but there is no publicly available information indicating that state authorities have further investigated or shut down this compound.

564 Amnesty International interview with survivor, 2024.

565 Tạp chí điện tử Tri thức, "40 người trốn khỏi casino ở Campuchia, bơi qua sông về Việt Nam" ["40 people escaped from casino in Cambodia, swam across river to Vietnam"] , 18 August 2022, https://znews.vn/40-nguoi-tron-khoi-casino-o-campuchia-boi-qua-song-ve-viet-nam-post1346987.html?fbclid=IwAR30rv3sktRripTd69nsVNzO3Pj56XCdPjPs0uxgvV0ioubvrPCQx3OAaM (in Vietnamese)

566 Tuoi Tre News, "Cambodia arrests Chinese manager at casino for forced labor on Vietnamese", 23 August 2022, https://tuoitrenews.vn/news/society/20220823/cambodia-arrests-chinese-manager-at-casino-for-forced-labor-on-vietnamese/68715.html

567 Office of Financial Sanctions Implementation HM Secretary, "Financial Sanctions Notice", 8 December 2023, https://assets.publishing.service.gov.uk/media/6572d548049516000d49be78/Notice_Global_Human_Rights_081223.pdf, p 8.

CT02

Amnesty International considers **CT02** to be or have been a scamming compound.

LOCATION	Chrey Thum, Kandal province; 10.9515, 105.0685

TIMELINE	
Second half of 2022	Seven people escape from this site.[568] Their statements indicate that during their time at CT02, they were subjected to forced labour, deceitful advertising and human trafficking, forced overtime, no salary and confinement against their will.[569]
31 August 2022	Tuoi Tre News reports that Vietnamese police in Hai Phong City have initiated criminal proceedings against a Vietnamese man accused of trafficking four teenagers to Cambodia to work at CT02. The report says four children were sent to a casino located at CT02, were forced to work on computers to cheat people, were paid a daily wage of US$20, were subject to heavy fines if failing to meet daily targets set by the casino or violating its internal regulations and were not allowed to get out of the workplace after work.[570]
Mid-2024	Amnesty International visits the site and documents security features.

568 Information shared by organization 2 on file with Amnesty International.
569 Information shared by organization 2 on file with Amnesty International.
570 Tuoi Tre News, "Man prosecuted for allegedly trafficking 4 Vietnamese teens to Cambodia", 31 August 2022, https://tuoitrenews.vn/news/society/20220831/man-prosecuted-for-allegedly-trafficking-4-vietnamese-teens-to-cambodia/68845.html

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,[571] satellite imagery and/or survivor testimony,[572] the compound, as of mid-2024, had the following security features:

- Perimeter walls with barbed or razor wire.
- Internal-facing security cameras.
- Security guards at entrance/exit points.
- Floodlights on perimeter walls.
- High probability of security guard posts that are strategically positioned internally along the perimeter.
- The use of cages or bars on windows.

HUMAN RIGHTS ABUSE

Amnesty International reviewed victim statements provided by a local organization from seven victims who said they were confined at the site in 2022. In combination with the news reports alleging human trafficking and forced labour at the site (including police operations and criminal charges to this effect), as well as the significant security features present, Amnesty International considers it highly likely this location was used to deprive people of their liberty.

STATE RESPONSIBILITY

Despite police in Viet Nam initiating criminal proceedings in August 2022 against a trafficker who sent children to this site or an associated site[573] there is no publicly available information indicating that state authorities have investigated or shut down this compound.

571 Amnesty International site visit, mid-2024.
572 Information shared by organization 2 on file with Amnesty International.
573 Tuoi Tre News, "Man prosecuted for allegedly trafficking 4 Vietnamese teens to Cambodia", 31 August 2022, https://tuoitrenews.vn/news/society/20220831/man-prosecuted-for-allegedly-trafficking-4-vietnamese-teens-to-cambodia/68845.html

CT03

Amnesty International considers **CT03** to be or have been a scamming compound.

LOCATION	Chrey Thum, Kandal province; 10.9587, 105.0735

TIMELINE	
Early 2024	A child-survivor told Amnesty International they were brought to CT03 in early 2024 under fraudulent job advertisements that promised a high salary. They were subjected to deprivation of liberty and forced labour. They were forcibly transferred to another compound where they were confined, enslaved and subjected to torture and other ill-treatment.
Early 2024	An organization says a person is rescued from this site with support from Cambodian authorities.[574]
Mid-2024	Amnesty International visits the site and documents security guards at the gates and other security features.

574 Information provided by organization 1, on file with Amnesty International.

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,[575] satellite imagery and/or survivor testimony,[576] the compound, as of mid-2024, had the following security features:

- Perimeter wall.
- Security guards at exit/entry gates.
- Security cameras facing internally along perimeter walls.
- Security guards with batons.

HUMAN RIGHTS ABUSE

A child-survivor interviewed by Amnesty International said they were deprived of their liberty at this compound by security guards who would not permit people to leave if they did not do scamming work; they were lied to during recruitment; they were forced to work and believed they could not escape due to the presence of security guards. The survivor described seeing and interacting with many other people at this site who were subjected to similar treatment.

Based on this testimony, Amnesty International determined that this survivor was highly likely trafficked to the site, their labor was exploited and they were deprived of their liberty. In addition, they were forcibly transferred to another compound and were highly likely subjected to control that amounted to enslavement.

STATE RESPONSIBILITY

Other than the "rescue" operation in early 2024, there is no publicly available information indicating that state authorities have further investigated or shut down this compound.

575 Amnesty International site visit, mid-2024.
576 Amnesty International interview with survivor, 2024.

CT05

Amnesty International considers **CT05** to be or have been a scamming compound.

LOCATION	Chrey Thum, Kandal province; 10.9656, 105.0622

TIMELINE	
Late 2022	An organization says five victims are rescued from this site with assistance of local authorities.[577]
12 February 2024	Radio Free Asia (RFA) reports having spoken with 14 local residents, some of whom worked at CT05 and that "they had witnessed security guards violently subduing escaped workers before returning them to ... [CT05]". In addition, residents told RFA that they "had seen security guards knock escapees to the ground with a car and tase them with electric cattle prods before driving them back to the compound." Residents said that CT05 offered "$50 [USD] bounties for returned escapees".[578]
September 2023	An organization says one victim is released from this site.[579]

577 Information provided by organization 1 on file with Amnesty International.
578 Radio Free Asia, "Torture, forced labor alleged at Prince Group-linked compound", 12 February 2024, https://www.rfa.org/english/news/cambodia/prince-group-investigation-02122024143012.html
579 Information provided by organization 1 on file with Amnesty International.

Early 2024	An organization helps a child leave the site where he was confined. The child reported being trafficked to the site, shocked with an electric shock baton and forced to run scams.[580]
Mid-2024	Amnesty International interviewed two survivors who said they were confined and forced to work at the CT05 location during early and mid-2024. In both cases, survivors were able to identify pictures of the CT05 location, rescuers were able to confirm that they were there and in one case a survivor accurately described the entrance gate.
Mid-2024	Amnesty International visits the site and documents security guards at the gates and other security features.
End of 2024	An organization says a victim was released from this site with the assistance of local authorities.[581]
First half of 2025	An organization says that two victims were released from this site on two different occasions with the assistance of local authorities.[582]

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,[583] satellite imagery and/or survivor testimony,[584] the compound, as of mid-2024, had the following security features:

- Perimeter walls with barbed or razor wire and electric fencing.
- Sealed entry/exit points.
- Internal-facing security cameras along perimeter walls.
- High probability of security guard posts that are strategically positioned internally along the perimeter.
- Floodlights along perimeter walls.
- Dozens of security guards.[585]
- Guards or other people in the compound in possession of electric shock batons.

580 Information provided by organization 8 on file with Amnesty International.
581 Information provided by organization 1 on file with Amnesty International.
582 Information provided by organization 1 on file with Amnesty International.
583 Amnesty International site visit, mid-2024.
584 Amnesty International interview with survivor, 2024.
585 Radio Free Asia, "Torture, forced labor alleged at Prince Group-linked compound", 12 February 2024, https://www.rfa.org/english/news/cambodia/prince-group-investigation-02122024143012.html

HUMAN RIGHTS ABUSE

Two survivors interviewed by Amnesty International said they spent between weeks and months at this compound; they were lied to during recruitment; and one of them reported overhearing their manager say they were "selling" them to the manager of another compound. Both people reported enduring physical violence at the hands of managers and for one of them, on multiple occasions, this included being taken to a "dark room" where they were beaten, including with electric shock batons. They said they could not escape because of the presence of guards, managers and walls that could not be climbed. The survivors described seeing and interacting with many other people at this site who were subjected to similar treatment – including seeing other people inside the dark room who were also being tortured or subjected to other ill-treatment.

Based on this testimony, and in the context of other secondary evidence including an in-depth media story on the site, Amnesty International determined that both survivors were highly likely trafficked to the site, their labor was exploited, they were deprived of their liberty, one of them was tortured and, due to the extreme control that managers had over them, which included subjecting them to violence in rooms for that purpose and transferring them to other locations against their will, they were enslaved.

STATE RESPONSIBILITY

Despite a survivor being removed from the compound by state authorities at the end of 2024, Amnesty International documented human rights abuse at the compound in 2025. There is no publicly available information indicating that state authorities have further investigated or shut down this compound.

KA01

Amnesty International considers **KA01** to be or have been a scamming compound.

LOCATION	Bokor Mountain, Kampot province, 10.6347, 104.0170

TIMELINE	
5 October 2022	CTS News reports speaking to one victim who was confined and shocked with an electric shock baton at a site where KA01 is located in July 2022.[586]
9 February 2023	Camboja reports that Taiwan National Police Agency's Criminal Investigation Bureau (CIB) told them in 2022 that Taiwanese victims had been trafficked to the KA01 compound. In addition, Humanity Research Consultancy reports that dozens of Taiwanese victims were held at KA01, were violently beaten and threatened with death if they spoke to the media.[587]
December 2023	Amnesty International delegates visit KA01, which appears to be abandoned and/or non-operational.

586 China Television System, "誆投資變詐騙 遭囚柬國波哥山!逃回台滿身傷" ["Imprisoned in Cambodia's Bokor Mountain for deceiving investors into fraud! Escaped to Taiwan with injuries"], 5 October 2022, https://news.cts.com.tw/cts/society/202210/202210052094538.html (in Simplified Chinese)

587 Camboja News, "Scams, human trafficking thrived at Bokor mountain behind tycoon's luxury hotel", 9 February 2023, https://cambojanews.com/scams-human-trafficking-thrived-at-bokor-mountain-behind-tycoons-luxury-hotel/

24 October 2024	Benar News reports speaking to a Vietnamese man who was confined in a compound in Bavet before being moved to KA01 where he was beaten and shocked with electric shock batons.[588]

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,[589] the compound, as of late-2023, had the following security features, or previously had the following noteworthy security features:

- A perimeter which was set up and disbanded after scamming operations appear to have come to an end in 2023.[590]
- Security guards posts along perimeter points which appeared to be no longer in use.[591]

HUMAN RIGHTS ABUSE

News reports strongly suggest that this location was a scamming compound which deprived people of their liberty. Satellite imagery and site visits confirmed that the site previously housed security fencing and guard posts that could have been used for this purpose. Based on this information, Amnesty International believes the site was previously a scamming compound but is no longer in operation.

STATE RESPONSIBILITY

Based on secondary evidence, it appears that the location was a scamming compound at least from October 2022 to February 2023. There is no publicly available information indicating that state authorities have further investigated or shut down this compound since then, although the location is currently abandoned.

588 Benar News, "Escaping from scam center on Cambodia's Bokor Mountain", 20 December 2024, https://www.benarnews.org/english/news/thai/scam-center-escape-12202024083549.html
589 Amnesty International site visit, late-2023.
590 Camboja News, "Scams, human trafficking thrived at Bokor mountain behind tycoon's luxury hotel", 9 February 2023, https://cambojanews.com/scams-human-trafficking-thrived-at-bokor-mountain-behind-tycoons-luxury-hotel/
591 Camboja News, "Scams, human trafficking thrived at Bokor mountain behind tycoon's luxury hotel", 9 February 2023, https://cambojanews.com/scams-human-trafficking-thrived-at-bokor-mountain-behind-tycoons-luxury-hotel/

KA02

Amnesty International considers **KA02** to be or have been a scamming compound.

LOCATION	Kampot province; 10.4404, 104.4424

TIMELINE	
24 May 2022	VOD profiles a Chinese national who said was detained and tortured in KA02. The victim's case gained attention after he posted on a Facebook live stream of the Prime Minister, saying "Hello Prime Minister Hun Sen, I am a Chinese. I was tricked into a scam park in Baima City, Kampot Province, forcing me to work in fraud, if I didn't work they would shock me with an electric baton, hit me with a stick, please help me, I really I don't want to die, please." The victim's case was dropped by police after they learned he had entered into a contract with a company operating at the site, with police claiming "There is no detention, it is just they do not allow him to get out."[592]
Mid-2024	Amnesty International delegates visit the site and interview two residents. The first recalls military police coming to their house two days earlier to ask if they had seen a woman who had run away from the KA02 site.[593] The second resident reported witnessing "several" Chinese nationals who had attempted to run away from the site. The second resident said he told foreign nationals to return to the KA02 site because otherwise the guards would find them and hurt them.[594]

592 Voice of Democracy, "A friend's journey attempting rescue from alleged slave compound", 24 May 2022, https://vodenglish.news/a-friends-journey-attempting-rescue-from-alleged-slave-compound/
593 Amnesty International interview with local resident 1, early-2024.
594 Amnesty International interview with local resident 2, early-2024.

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,[595] satellite imagery and/or witness testimony, the compound, as of mid-2024, had the following security features:

- Perimeter walls with excessive use of barbed wire on perimeter fence, possibly internal-facing.
- The use of cages or bars on windows.
- More than three security guards at entrance/exit points.

HUMAN RIGHTS ABUSE

Amnesty International has reviewed the allegations documented by VOD reporters, as well as the testimony of a local resident who said guards were depriving people of their liberty by catching people who left the site and hurting people inside the compound. When combined with the physical and organizational security features present at the site, Amnesty International concluded deprivation of liberty occurred at this location.

STATE RESPONSIBILITY

Despite a state intervention in 2022,[596] there is no publicly available information indicating that sate authorities have further investigated or shut down this compound.

595 Amnesty International site visit, mid-2024.

596 Voice of Democracy, "A friend's journey attempting rescue from alleged slave compound", 24 May 2022, https://vodenglish.news/a-friends-journey-attempting-rescue-from-alleged-slave-compound/

KK01

Amnesty International considers the **KK01 series of compounds** to be or have been scamming compounds.

LOCATION	Koh Kong, Koh Kong province; 11.6429, 102.9142

TIMELINE	
28 August 2023	The New York Times reports that a senior Cambodian police officer was told by a 23-year-old Vietnamese man that he jumped from a window to escape from a site in Cambodia's Koh Kong Province where he was running scamming operations. The NY Times also spoke with the deputy governor of Koh Kong, who confirmed 17 foreign nationals from India, China, Singapore, Malaysia, Indonesia and Thailand were rescued from this same site, which Amnesty International believes to be KK01 series of compounds, since January 2023.[597]
Mid-2024	Amnesty International visits the site and documents security guards at the gates and other security features.

597 New York Times, "They're forced to run online scams. Their captors are untouchable", 28 August 2023, https://www.nytimes.com/2023/08/28/world/asia/cambodia-cyber-scam.html

Late 2024	A survivor interviewed by Amnesty International is confined and later rescued by state authorities from the KK01 site by local authorities. The survivor provides photographs and videos that are geolocated to the likely location of one of the KK01 compounds.[598]

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,[599] satellite imagery and/or survivor testimony,[600] at least the compound a survivor was confined in, as of early-2025, had the following security features:

- Perimeter walls.
- Gates with security guards and internal gates with security guards.
- Internal-facing security cameras.
- Cages or bars on the windows.
- Guards with batons.[601]

HUMAN RIGHTS ABUSE

A survivor interviewed by Amnesty International said they spent months at KK01 after being "sold" from another site; they were forced to scam; they were monitored at all times by managers and believed they could not escape because of the security guards. The survivor described seeing and interacting with many other people at this site who were subjected to similar treatment.

Based on this testimony, and in the context of other secondary evidence including a media report, Amnesty International determined that this survivor was highly likely trafficked to the site, their labour was exploited, they were subjected to forced labour and deprived of their liberty.

STATE RESPONSIBILITY

Despite a news report describing the location as a scamming compound in 2023, and a survivor being removed from the compound by state authorities in 2024, there is no publicly available information indicating that state authorities have further investigated or shut down this compound.

598 Amnesty International interview with survivor, 2024.
599 Amnesty International site visit, mid-2024.
600 Amnesty International interview with survivor, 2025.
601 Amnesty International interview with survivor, 2024.

OS01

Amnesty International considers **OS01** to be or have been a scamming compound as of the date of publication.

LOCATION	O'Smach, Oddar Meanchey; 14.4337, 103.7028

TIMELINE	
15 October 2022	Khmer Times reports a rescue by "authorities" from the "O'Smach casino area" of 75 nationals from Vietnam, China, India, Malaysia and Indonesia, who are "believed to have been illegally trafficked into Cambodia".[602] The article does not name the casino. There are only two licensed casinos in O'Smach, which are in close proximity to each other, and which are linked to two scamming compounds, OS01 and OS02.
28 August 2023	The New York Times[603] reports interviewing a victim who said they were beaten after trying to leave the OS01 compound.[604]

602 Khmer Times, "75 foreigners rescued from casino", 18 October 2022, https://www.khmertimeskh.com/501170369/75-foreigners-rescued-from-casino/

603 New York Times, "They're forced to run online scams. Their captors are untouchable", 28 August 2023, https://www.nytimes.com/2023/08/28/world/asia/cambodia-cyber-scam.html#

604 Amnesty International spoke with the New York Times and confirmed the location referred to in the story was OS01.

Late 2023	An organization says that two victims are being deprived of their liberty and subjected to violence after being trafficked to the OS01 site.[605] Evidence was shared which showed the alleged location of the victims to be OS01.
24 November 2023	Al Jazeera reports following a bus that was transporting individuals (some of whom they interviewed and reported being trafficked and beaten) from OS01 to another location. The bus is stopped by state authorities in response to an urgent request for rescue.[606]
Mid-2024	Amnesty International visits OS01 and documents the presence of guards at gates.[607] One witness close to the site describes seeing, on multiple occasions, people who they said had escaped the site with blood on their hands and ankles, likely resulting from climbing over barbed or razor wire fences. The witness also describes seeing police and security guards on these occasions searching for and capturing the presumed escapees.[608]
June 2024	A survivor, who identified OS01 from Amnesty International photographs, says that in mid-2024 state authorities assisted in rescuing them from the compound after they sought help.[609]

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,[610] satellite imagery and/or survivor testimony,[611] the compound, as of mid-2024, had the following security features:

- Perimeter fencing/wall with barbed or razor wire, including internal-facing barbed or razor wire.
- At least two security guards at all entry/exit gates.
- Electric shock batons possessed by managers or guards inside the compound.[612]

605 Information shared by organization 11, on file with Amnesty International.
606 Al Jazeera, "'Just as scared': Cyberscam victims in Cambodia find no freedom in rescue", 24 November 2023, https://www.aljazeera.com/features/2023/11/24/just-as-scared-cyberscam-victims-in-cambodia-find-no-freedom-in-rescue
607 Amnesty International site visit, mid-2024.
608 Amnesty International interview with witness close to OS01, 2024.
609 Amnesty International interview with survivor, 2024.
610 Amnesty International site visit, mid-2024.
611 Amnesty International interview with survivor, 2024.
612 Amnesty International interview with survivor, 2024.

HUMAN RIGHTS ABUSE

A survivor interviewed by Amnesty International said they spent more than six months at this compound; they were lied to during recruitment; they overheard their recruiter say they were selling them to the manager of the compound; on multiple occasions, they were taken to a "dark room" where they were beaten, including with electric shock batons, after failing to meet certain scam-related work targets (including securing a sufficient number of "customers"); they were monitored at all times by managers and believed they could not escape. The survivor described seeing and interacting with many other people at this site who were subjected to similar treatment.

Based on this testimony, and in the context of other secondary evidence including media reports and evidence that other people have been deprived of their liberty at the site, Amnesty International determined that this survivor was highly likely trafficked to the site, their labor was exploited, they were deprived of their liberty, they were tortured and they were enslaved.

STATE RESPONSIBILITY

Despite repeated government interventions, including "rescues", all of which either occurred or were highly likely occurred at the OS01 scamming compound on three occasions from 2022 to 2023, as well as public news reports indicating the site is a scamming compound from the same period, Amnesty International documented human rights abuse at the compound in mid-2024. There is no publicly available information indicating that state authorities have further investigated or shut down this compound.

OS02

Amnesty International considers **OS02** to be or have been a scamming compound.

LOCATION	O'Smach, Oddar Meanchey province; 14.4325, 103.6979

TIMELINE	
19 October 2022	VOD reports that 75 foreign nationals are "rescued" from a location in O'Smach. O'Smach only has two casinos and is a very small border town where local people are very familiar with both locations and are familiar with scamming operations.[613] A local police official told VOD there had been repeated rescues of foreign nationals from two locations - believed to be OS01 and OS02 - and said they potentially were housing thousands of foreign workers.[614]
16 March 2024	Thai government officials write to the Oddar Meanchey Governor of Cambodia requesting help to return Thai nationals to Thailand from a location in O'Smach and describing their nationals as having been "tortured, forced to run up and down the building until they were exhausted ... electrocuted and beaten."[615] Amnesty International has viewed the rescue imagery from this group and found that, at least some of them, were originally confined at the OS02 site.

613 A site visit by Amnesty International delegation, May 2024.
614 Voice of Democracy, "Trafficking rescues reach Oddar Meanchey", 19 October 2022, https://vodenglish.news/trafficking-rescues-reach-oddar-meanchey/
615 On file with Amnesty International.

Mid-2024	Amnesty International visits the site and documents security guards at the gates and other security features.

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,[616] satellite imagery and/or survivor testimony,[617] the compound, as of mid-2024, had the following security features:

- Perimeter walls.
- Sealed entrances/exits to create a perimeter.
- Security guards at entrance/exit points.

HUMAN RIGHTS ABUSE

Amnesty International was present when a number of Thai nationals sought help from organizations, which led to their rescue. Messages and a photo that can be geolocated to the OS02 site shows that the people were at the site and they allege they were confined at the location, with supporting information from the Thai government suggesting that some were also subjected to torture or other ill-treatment. Therefore, in combination with the physical and organizational security features present at the site, Amnesty International considers it highly likely that OS02 was used to deprive people of their liberty.

STATE RESPONSIBILITY

Despite state authorities made aware that Thai victims of human trafficking and torture were at this location in 2024,[618] there is no publicly available information indicating that state authorities have investigated or shut down this compound.

616 Amnesty International site visit, mid-2024.
617 Amnesty International interview with survivor, 2024.
618 A letter from the Thai government was sent to the Governor of Oddar Meanchey in March 2024. This letter does not specify the OS02 site, but any interview with victims by Cambodian state authorities would have led them to uncover the previous site of their confinement before they were found by Cambodian and Thai police. Additionally, when Amnesty International delegates visited the location where the Thai government alleges the victims were being held, and which photos from the victims confirm, they were informed by locals that the site was owned by a police chief from O'Smach. Photos show that victims were at this second location. Therefore, the Cambodian state authorities are aware of the existence of the OS02 compound but there is no information that they have taken any further action to investigate or shut down the location.

P007

Amnesty International considers **P007** to be or have been a scamming compound..

LOCATION	Poipet, Banteay Meanchey province; 13.6401, 102.5767

TIMELINE	
Mid-2024	Amnesty International visits the site and documents security guards at the entrance and other security features.
Early 2025	A survivor interviewed by Amnesty International reports being deprived of their liberty at this site for less than a month.[619] They identify the area around the site and describe the compound accurately.

619 Amnesty International interview with survivor, 2025.

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,[620] satellite imagery and/or survivor testimony,[621] the compound, as of mid-2024, had the following security features:

- Perimeter created (no open access).
- Security guards.

HUMAN RIGHTS ABUSE

One survivor interviewed by Amnesty International said they spent less than a month at this location; they were lied to during recruitment; and they believed they could not escape because of security guards. When the survivor arrived at this site the security guards began to go behind them cutting off any possibly exit, eventually surrounding them, which they said was to prevent them from trying to leave.

Based on this testimony, Amnesty International determined that this survivor was highly likely trafficked to the site for the purpose of forced labour or identity theft, and they were deprived of their liberty.

STATE RESPONSIBILITY

There is no publicly available information indicating that state authorities have investigated or shut down this compound.

620 Amnesty International site visit, mid-2024.
621 Amnesty International interview with survivor, 2025.

PO10

Amnesty International considers **PO10** to be or have been a scamming compound.

LOCATION	Poipet, Banteay Meanchey province; 13.6658, 102.5665

TIMELINE	
19 December 2023	Nine people told Thai authorities they lit a fire to escape a casino in Poipet in close proximity to or at the PO10 compound and then crossed the border to enter Thailand.[622] Amnesty International interviewed one of the nine survivors who said they were involved in the escape.[623] Amnesty International also interviewed two residents in Poipet who confirmed there was a fire at PO10 on the dates the survivor confirmed.[624]
21 December 2023	According to the Khmer Times, Cambodian authorities pledge to investigate PO10 following the escape of nine Thai survivors. The news report says the group of survivors told the police that about 200 other Thai nationals were still confined at PO10.[625]
Mid-2024	Amnesty International visits the site and documents security guards at the gates and other security features.

622 The Nation, "Nine Thais 'set fire to Cambodian casino to escape murderous call centre gang'", 19 December 2023, https://www.nationthailand.com/thailand/general/40033938
623 Amnesty International interview with survivor, 2024.
624 Amnesty International interviews with local residents, May 2024.
625 Khmer Times, "Police to investigate casino call centre scam involving Thai victims", 21 December 2023, https://www.khmertimeskh.com/501410392/police-to-investigate-casino-call-centre-scam-involving-thai-victims/

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,[626] satellite imagery and/or survivor testimony,[627] the compound, as of mid-2024, had the following security features:

- Perimeter walls with barbed or razor wire.
- Security guards at both entrances and exits.

HUMAN RIGHTS ABUSE

A survivor interviewed by Amnesty International said they spent months at this compound; they were lied to during recruitment; they were tasked by managers with trying to deceive others into working at the compound; they reported witnessing other people being harmed by managers; and believed they could not escape because of the presence of security guards. The survivor described seeing and interacting with many other people at this site who were subjected to similar treatment.

Based on this testimony, and in the context of other secondary evidence including media reports, Amnesty International determined that this survivor was highly likely trafficked to the site, their labor was exploited and they were deprived of their liberty. In addition, the control exerted over them, including the fear of violence from managers that was witnessed, means they were likely a survivor of slavery.

STATE RESPONSIBILITY

Despite the news report of a fire and the related escape from the site in 2023, there is no publicly available information indicating that state authorities have further investigated or shut down this compound.

626 Amnesty International site visit, mid-2024.
627 Amnesty International interview with survivor, 2024.

PO16

Amnesty International considers **PO16** to be or have been a scamming compound.

LOCATION	Poipet, Banteay Meanchey province; 13.6285, 102.6109

TIMELINE	
Mid-2024	Amnesty International visits the site and documents security guards at the gates and other security features.
July 2024	Three survivors are confined at PO16 at this time and then transferred to other sites where they are able to escape/leave.[628]
Early 2025	A survivor told Amnesty International they were trafficked to PO16, exploited and deprived of their liberty, and later released in early 2025.[629]
Early 2025	Another survivor interviewed by Amnesty International was trafficked to PO16; was exploited and deprived of their liberty in early 2025; and was later released. The survivor described being told once that police were searching the compound, as a result of which, they were forcibly taken to another site.[630]

628 Amnesty International interview with survivors, 2024.
629 Amnesty International interview with survivor, 2025.
630 Amnesty International interview with survivor, 2025

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,[631] satellite imagery and/or survivor testimony,[632] the compound, as of mid-2024, had the following security features:

- Perimeter walls.
- Security guards with electric shock batons.

HUMAN RIGHTS ABUSE

Five survivors interviewed by Amnesty International said they spent less than a month at this compound before being released or transferred to another compound; they were lied to during recruitment; one of the survivors reported witnessing another person being taken to a room where they were beaten; they were all kept inside a single dormitory style room for the duration of their stay and only taken out by managers to have their faces photographed – which they think was done in order to open bank accounts or cryptocurrency wallets; they were monitored at all times by managers; and they reported seeing guards and other people with shock batons and so believed they could not escape. The survivors described seeing and interacting with many other people at this site who were subjected to similar treatment.

Based on this testimony, Amnesty International determined that the survivors were highly likely trafficked to the site, their identities were highly likely exploited, they were deprived of their liberty and subjected to ill-treatment.

STATE RESPONSIBILITY

One survivor described being forcibly moved away from the site while "police searched the location". However, the survivor was later forcibly returned to PO16 and further deprived of their liberty.[633] There is no publicly available information indicating that state authorities have further investigated or shut down this compound.

631 Amnesty International site visit, mid-2024.
632 Amnesty International interviews with survivors, 2024, 2025.
633 Amnesty International interview with survivor, 2025.

PO18

Amnesty International considers **PO18** to be or have been a scamming compound.

LOCATION	Poipet, Banteay Meanychey province; 13.6633, 102.5519

TIMELINE	
5 April 2023	VICE News reports that an insider, who provided evidence that they worked in the scamming industry in Cambodia, says the upper floors of a casino located at PO18 are "online rooms".[634] This phrase is commonly used to refer to places where scamming work is conducted.[635]
Mid-2024	Amnesty International visits the site and documents security guards at the entrance.
Early 2025	Two people interviewed by Amnesty International report being deprived of their liberty at this site for a few weeks in early 2025. The victims identified the building from photos and described the floor they were confined in while inside.[636]

634 Vice, "'Hell all over again': the frontline of an expanding human trafficking crisis", 5 April 2023, https://www.vice.com/en/article/thai-rescue-trafficking-cambodia/
635 Vice, "'Hell all over again': the frontline of an expanding human trafficking crisis", 5 April 2023, https://www.vice.com/en/article/thai-rescue-trafficking-cambodia/
636 Amnesty International interviews with survivors, 2025.

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,[637] satellite imagery and/or survivor testimony,[638] the compound, as of early-2025, had the following security features:

- Perimeter created (no open access).
- Security guards with electric shock batons.
- Security guards patrol rooms using electric shock batons while doing so.

HUMAN RIGHTS ABUSE

Two survivors interviewed by Amnesty International said they were confined for a few weeks at this location; they were lied to during recruitment and were transferred against their will to this compound; and they believed they could not escape because of the presence of security guards, who demonstrated the use of electric shock batons every hour to intimidate them. One survivor described seeing a man beaten inside the compound by a manager and security guards – the other survivor corroborated parts of this story.

Based on this testimony, and in the context of other secondary evidence including a media report, Amnesty International determined that these survivors were highly likely trafficked to the site for the purpose of identity fraud and they were deprived of their liberty. Additionally, the power exerted over them, which included not allowing them to leave the floor of the building they were confined to and threatening them hourly with electric shock batons, led Amnesty International to conclude they were highly likely survivors of slavery.

STATE RESPONSIBILITY

There is no publicly available information indicating that state authorities have investigated or shut down this compound.

637 Amnesty International site visit, mid-2024.
638 Amnesty International interview with survivors, 2025.

PO20

Amnesty International considers **PO20** to be or have been a scamming compound.

LOCATION	Poipet, Banteay Meanchey province; 13.6714, 102.5751

TIMELINE	
Mid-2024	Amnesty International visits the site and documents security guards at the gates and other security features. Amnesty International is shown the site by a driver who claimed it was a scamming compound based on them being asked to drive people around to locations and being able to identify other locations which Amnesty International confirmed were scamming compounds.
Late 2024/Early 2025	A survivor interviewed by Amnesty International is deprived of their liberty for a few weeks at PO20. They were brought there after escaping from another compound and were subsequently forcibly transferred to other compounds from this location.[639]

639 Amnesty International interview with survivor, 2025.

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,[640] satellite imagery and/or survivor testimony,[641] the compound, as of mid-2024, had the following security features:

- Perimeter wall with barbed or razor wire.
- Security guards.

HUMAN RIGHTS ABUSE

One survivor interviewed by Amnesty International said they spent a few days at this location; they were lied to during recruitment and were transferred against their will to this compound from another compound after they attempted to escape; they believed they could not escape because of security guards and were subsequently transferred against their will to another compound.

Based on this testimony, Amnesty International determined that this survivor was highly likely trafficked to the site for the purpose of forced labour and they were deprived of their liberty. The power exerted over them, which included transferring them to another site against their will, suggests the possibility that they were enslaved while at this site.[642]

STATE RESPONSIBILITY

There is no publicly available information indicating that state authorities have investigated or shut down this compound.

640 Amnesty International site visit, mid-2024.
641 Amnesty International interview with survivor, 2025.
642 Amnesty International interview with survivor, 2025.

PP04

Amnesty International considers **PP04** to be or have been a scamming compound.

LOCATION	Phnom Penh; 11.5404, 104.9074

TIMELINE	
21 September 2022	VOD reports that three people were trafficked to and detained at PP04.[643]
Second half of 2022	Two victims are trained for scamming at the PP04 site, based on evidence provided by an organization to Amnesty International. These individuals were not deprived of their liberty while at this site. Following this, both victims described being trafficked to Myanmar to a location where they were deprived of their liberty and forced to run scams.[644]
Early 2025	A Thai survivor interviewed by Amnesty International reported being confined and forced to run scams at the PP04 site. The survivor provided photographs of the site to Amnesty International.[645]
Mid-2025	Amnesty International visits the site and documents security features.

643 Voice of Democracy, "Learning to scam under the threat of tasers", 21 September 2022, https://vodenglish.news/learning-to-scam-under-threat-of-tasers/
644 Information provided by organization 2, on file with Amnesty International.
645 Amnesty International interview with survivor, 2025.

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,[646] satellite imagery and/or survivor testimony,[647] the compound, as of mid-2025, had the following security features:

- Perimeter walls with barbed or razor wire.
- Cages on some windows.
- Security guards in possession of electric shock batons.[648]

HUMAN RIGHTS ABUSE

Amnesty International interviewed a survivor of the site who said he was confined there in 2025, forced to run scams and taken to a room where they were beaten and subjected to electric shocks by security guards before being transferred against his will to another site. The survivor reported never being paid and being beaten by security guards after he refused to work .[649]

Based on this testimony, and in the context of other secondary evidence including a media report and several victim statements, this survivor was highly likely a victim of human trafficking for the purposes of forced labour and was deprived of their liberty. In addition, the survivor reported being subjected to torture or other ill-treatment at the site and given the level of effective control and exploitation exerted over him, he was highly likely enslaved.

STATE RESPONSIBILITY

Despite a VOD report that notes police assisted in the release of one victim and attended the compound in 2022, a survivor reported being deprived of their liberty and tortured at the site in early 2025. There is no publicly available information indicating that state authorities have further investigated or shut down this compound.

646 Amnesty International site visit, mid-2025.
647 Amnesty International interview with survivor, 2024.
648 Amnesty International interview with survivor, 2025.
649 Amnesty International Interview with survivor, 2025.

PP09

Amnesty International considers **PP09** to be or have been a scamming compound.

LOCATION	Kampong Speu province (close to Phnom Penh); 11.3758, 104.7547

TIMELINE	
Mid-2024	A survivor interviewed by Amnesty International spent two months confined at this compound before being "sold" to BS04 in around mid-2024.[650]
23 October 2024	KBS News reports speaking to seven victims of scam compounds, including PP09 and TK01.[651]
25 October 2024	according to CamboJa News, more than 1,000 foreign nationals are detained by police at the PP09 and TK01 sites.[652]

650 Amnesty International interview with survivor,2024.

651 KBS News, "직접 가본 캄보디아 '범죄도시'…한국인 납치되는 이유는?" ["Cambodia's 'Crime City' I Visited in person... Why are Koreans being kidnapped?"], 23 October 2024, https://www.youtube.com/watch?v=I_AzoduLZnc (in Korean)

652 Camboja News, "1,000 foreign workers found in raid on suspected Kampong Speu scam compound", 25 October 2024, https://cambojanews.com/1000-foreign-workers-found-in-raid-on-suspected-kampong-speu-scam-compound/

4 November 2024	Khmer Times reports that only 25 foreign nationals were sent to court for questioning after raids on the PP09 and TK01 compounds.[653]
9 December 2024	CamboJA News reports having spoken to a vendor operating outside PP09 after the police raids, who said that "the compound still operates as normal but there is even more restricted access in and out than it was before."[654]
Early 2025	A victim is rescued from the site with the assistance of local authorities.[655]
First half of 2025	Amnesty International interviews a survivor who describes being trafficked to the location for forced labour; and identifies the gates of the compound as well as the building within it where they were subjected to torture and other ill-treatment.[656]
Mid-2025	Amnesty International visits the site and documents security guards at the gates and other security features.

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,[657] satellite imagery and/or survivor testimony,[658] the compound, as of mid-2025, had the following security features:

- Perimeter walls with barbed or razor wire.
- Internal-facing security cameras placed on perimeter walls.
- High probability of security guard posts that are strategically positioned internally along the perimeter.
- Floodlights on perimeter walls.
- Cages or bars on windows.
- Unusual placement of barbed or razor wire – in this case around light posts that are inside the compound.
- More than six security guards at entrance/exit gates.
- The use of internal perimeter walls with barbed or razor wire.

653 Khmer Times, "Foreigners sent to court after major raid on foreign compound", 4 November 2024, https://www.khmertimeskh.com/501584628/foreigners-sent-to-court-after-major-raid-on-foreign-compound/
654 Camboja News, "Mystery raids: over 1,000 potential trafficking victims unaccounted for, 9 December 2024", https://cambojanews.com/mystery-raids-over-1000-potential-trafficking-victims-unaccounted-for/#:~:text=In%20the%20past%20two%20months,who%20were%20reportedly%20%E2%80%9Cdetained%E2%80%9D
655 Information on file with Amnesty International.
656 Amnesty International interview with survivor, 2025
657 Amnesty International site visit, mid-2024.
658 Amnesty International interview with survivors, 2024, 2025.

HUMAN RIGHTS ABUSE

Two survivors interviewed by Amnesty International said they were brought to this compound after being lied to during recruitment and believed they could not escape because of the presence of security guards. One survivor was told to type on a keyboard, likely to engage in scams, and was subsequently "sold" to another compound after it became apparent that they did not know how to use a computer.[659] The second survivor was sent to a "dark room" and tried to escape but was subsequently beaten with a metal pole.[660]

Based on this testimony, and in the context of other secondary evidence including media reports, Amnesty International has determined that both individuals are survivors of human trafficking for the purpose of labour exploitation and were deprived of their liberty. One survivor was a victim of torture and other ill-treatment at the site. One of them was forcibly transferred to another compound and the other was forcibly transferred to this compound from another compound. Given the control over survivors that managers at the compound had, which included transferring and receiving transferred people and using specific rooms for violence, Amnesty International has concluded they were survivors of slavery.

STATE RESPONSIBILITY

Despite police investigations at the compound in October 2024, Amnesty International documented human rights abuse at the site in 2025. There is no publicly available information indicating that state authorities have further investigated or shut down this compound.

659 Amnesty International interview with survivor, 2024.
660 Amnesty International interview with survivor, 2025.

PP13

Amnesty International considers **PP13** to be or have been a scamming compound.

LOCATION	Phnom Penh; 11.5979, 104.8709

TIMELINE	
In the second half of 2022	An organization says three victims are rescued with assistance of local authorities from this location.[661]
In the second half of 2022	A survivor of this location is rescued after assistance from local authorities. Amnesty International interviewed this survivor.[662]
Mid-2025	Amnesty International visits the site and documents security guards at the gates and other security features.

661 Information shared by organization 1 on file with Amnesty International.
662 Amnesty International interview with survivor, 2023.

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,[663] satellite imagery and/or survivor testimony,[664] the compound, as of mid-2025, had the following security features:

- Perimeter walls with internal-facing barbed or razor wire.
- Excessive amounts of barbed or razor wire.
- Internal-facing security cameras along perimeter walls.
- At least three security guards at the entrance/exit gate.
- Cages or bars on windows and balconies.

HUMAN RIGHTS ABUSE

A survivor interviewed by Amnesty International said they were confined at this compound; they were lied to during recruitment; they were monitored at all times by managers and believed they could not escape. The survivor described seeing and interacting with many other people at this site who were subjected to similar treatment.

Based on this testimony, testimony from local groups,[665] testimony from witnesses[666] and the physical and organizational security features at the site, which include internally facing barbed or razor wire on high perimeter fence lines, Amnesty International determined that this survivor was highly likely trafficked to the site, their labor was exploited and they were deprived of their liberty.

STATE RESPONSIBILITY

Despite state authorities assisting in the release of four people from the site in 2022, there is no publicly available information indicating that state authorities have further investigated or shut down this compound.

663 Amnesty International site visit, mid-2025.
664 Amnesty International interview with survivor, 2023.
665 Information shared by organization 1 on file with Amnesty International.
666 Amnesty International interview with local resident, 2024.

PP23

Amnesty International considers **PP23** to be or have been a scamming compound.

LOCATION	Phnom Penh; 11.5865, 104.9040

TIMELINE	
Mid-2024	An individual is rescued from PP23 with the assistance of local authorities.[667]
Mid-2025	Amnesty International visits the site and documents security guards at the gates and other security features.

667 Information on file with Amnesty International.

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,[668] and satellite imagery, the compound, as of mid-2025, had the following security features:

- Perimeter created (no open access).
- Security guards at entrance/exit.
- Double-gate system.

HUMAN RIGHTS ABUSE

Based on a rescue reported by an organization, and in combination with the physical and organizational security features present at the site, Amnesty International considers it likely that PP23 was used to deprive people of their liberty.

STATE RESPONSIBILITY

Despite a person being removed from the site by state authorities in 2024, there is no publicly available information indicating that state authorities have further investigated or shut down this compound.

668 Amnesty International site visit, mid-2025.

PSP01

Amnesty International considers **PSPO01** to be or have been a scamming compound.

LOCATION	Phsar Prum, Pailin province; 12.9341, 102.5395

TIMELINE	
Early 2024	A survivor interviewed by Amnesty International was trafficked from Myanmar to Cambodia via TD01 and arrived in PSP01 in early 2024. The survivor was able to describe the journey to the location and identified photographs of the main entrance and inside areas of PSP01.[669]
Mid-2024	Amnesty International visits the site and documents security guards at the gates and other security features.
First half of 2025	An organization says they were assisting a victim from this location.[670]

669 Amnesty International interview with survivor, 2024.
670 Information provided by organization 1, on file with Amnesty International.

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,[671] satellite imagery and/or survivor testimony,[672] the compound, as of mid-2024, had the following security features:

- Perimeter walls with internal-facing barbed wire.
- Internal-facing security cameras positioned along the perimeter walls.
- High probability of security guard posts that are strategically positioned internally along the perimeter in the south section.
- Floodlights on perimeter walls.
- More than four security guards at the main entrance gate.
- Bars on the windows of buildings.

HUMAN RIGHTS ABUSE

A survivor interviewed by Amnesty International said he was transported against his will from another country and then between other compounds before being brought to this site and likely subjected to torture and other ill-treatment.

Based on this testimony, and in the context of other secondary evidence including security features, Amnesty International determined that this survivor was highly likely trafficked to the site, they were deprived of their liberty and likely subjected to torture or other ill-treatment at the compound.

STATE RESPONSIBILITY

There is no publicly available information indicating that state authorities have investigated or shut down this compound.

671 Amnesty International site visit, mid-2024.
672 Amnesty International interview with survivor, 2024.

SI01

Amnesty International considers **SI0** to be or have been a scamming compound.

LOCATION	Sihanoukville, Preah Sihanouk province; 10.5792, 103.5572

TIMELINE	
In late 2021	An organization says that three people escaped from SI01. All three people reported being forced to work and not allowed to leave the compound. They also said they were "sold" to the site by managers.[673]
Early 2022	An organization is in contact with a victim who was "sold" to SI01 and is working at the site under the threat of violence.[674]
18 February 2022	VOD reports that a Chinese man is trafficked to Cambodia where he eventually ends up in SI01 and has his blood taken against his will.[675] The Chinese Embassy also released information appearing to confirm that the victim's blood was harvested.[676]

673 Information provided by organization 2, on file with Amnesty International.
674 Information provided by organization 2, on file with Amnesty International.
675 Voice of Democracy, "Trafficking victim alleges his blood was harvested in Sihanoukville", 17 February 2022, https://vodenglish.news/trafficking-victim-alleges-his-blood-was-harvested-in-sihanoukville/
676 Embassy of the People's Republic of China in the Kingdom of Cambodia, "驻柬埔寨使馆发言人关于中国公民被网赌集团圈养充当"血奴"案的谈话" [Spokesperson of the Chinese Embassy in Cambodia on the case of Chinese citizens being kept as "blood slaves" by online gambling gangs], 16 February 2022, http://kh.china-embassy.gov.cn/dssghd/202202/t20220216_10642854.htm (in Simplified Chinese)

18 February 2022	VOD reports that a Chinese man was kidnapped and later sold to SI01. VOD also reports that dozens of trafficking victims had told rescue groups of forced labor at the site.[677]
2 April 2022	Beijing Youth Daily reports that a Chinese man and woman were separately trafficked from two compounds to SI01. The man said that, upon his arrival, he was threatened with beating or killing as punishment. He noted the presence of a "small dark room" on each floor, containing electric batons, needles, pliers, ropes and handcuffs, and that the residential rooms were kept under strict surveillance. He reported that there were armed security guards inside and outside the building to guard against escape, and that free movement was not permitted. The woman reported that she was forced to work 12 hours each day, and that her entry and exit were strictly regulated. She noted that she had to "purchase" her own freedom from the company.
April – September 2022	An organization says that 10 victims are rescued with assistance of local authorities from this location.[678]
11 August 2022	Al Jazeera reports having spoken to two victims who had been trafficked to the SI01 site and "enslaved" there.[679]
26 August 2022	VOD reported on a Vietnamese victim who had been trafficked to SI01 where he was subjected to torture or other ill-treatment, forced to run scamming operations and confined against his will.[680]
3 September 2022	Mothership news reports that, based on the testimony of two victims of scam compounds, there were four Singaporean nationals at the SI01 site and described them as "victims".
19 September 2022	VOD reported speaking to workers at SI01 amidst crackdowns on compounds in Sihanoukville. One worker who was cutting down barbed wire noted that they had detained people at the site. A guard told the reporter that more than 1,000 people had left the compound days before.[681]

677 Voice of Democracy, "Victims allege Sihanoukville precincts with ties to major businesses are sites of scams, torture, detention", 18 February 2022, https://vodenglish.news/victims-allege-sihanoukville-precincts-with-ties-to-major-businesses-are-sites-of-scams-torture-detention/

678 Information provided by organization 1 on file with Amnesty International.

679 Al Jazeera, "Meet Cambodia's cyber slaves", 11 August 2022, https://www.aljazeera.com/features/longform/2022/8/11/meet-cambodia-cyber-slaves

680 Voice of Democracy, "Behind a slave rescue from a Cambodian scam operation", 26 August 2022, https://vodenglish.news/behind-a-slave-rescue-from-a-cambodian-scam-operation/

681 Voice of Democracy, "Eerie silence descends on notorious Sihanoukville scam compounds", 19 September 2022, https://vodenglish.news/eerie-silence-descends-on-notorious-sihanoukville-scam-compounds/

29 September 2022	VOD reported speaking to a security guard at SI01 who had worked to prevent escapes from the site.[682]
March 2023	A survivor tells Amnesty International that in February and March 2022 they are confined against their will at the SI03 location after being sold there from another location. At SI01 they reported hearing screaming from the use of shock batons and reported there being a "dark room" in the building that was used for torture.
8 December 2023	The UK government sanctions a company located at the site of SI01, for links to forced labor schemes.[683]
Late 2024	Amnesty International visits the site and documents security guards at the gates and other security features.
First half of 2025	Two victims are released from SI01 with assistance of local authorities.[684]

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,[685] satellite imagery and/or survivor testimony,[686] the compound, as of late-2024, had the following security features:

- Perimeter walls.
- Security guards with firearms and electric batons.[687]
- Cages or bars on externally facing windows and balconies.

682 Voice of Democracy, "Amid ongoing scam raids, Sihanoukville residents recall insecurity", 29 September 2022, https://vodenglish.news/amid-ongoing-scam-raids-sihanoukville-residents-recall-insecurity/
683 Foreign, Commonwealth & Development Office, Home Office, The Rt Hon Lord Cameron and "The Rt Hon James Cleverly MP, Press release: UK and allies sanction human rights abusers", 8 December 2023, https://www.gov.uk/government/news/uk-and-allies-sanction-human-rights-abusers
684 Information on file with Amnesty International.
685 Amnesty International site visit, mid-2024.
686 Amnesty International interview with survivor, 2024.
687 Amnesty International interview with survivor, 2024.

HUMAN RIGHTS ABUSE

A survivor interviewed by Amnesty International was brought to Cambodia under false pretenses for work that was not related to scamming and then confined in two other compounds in Sihanoukville before being "sold" to SI01 in February 2023. The survivor told Amnesty International they were confined at the site by armed guards, that there were security cameras "watching them" everywhere, and that they heard screaming. They reported being forced to run scamming operations at the site.

Based on their testimony, Amnesty International concluded that they were a survivor of human trafficking for the purposes of forced labour. Additionally, the extreme level of control exerted over them, including through the threat of violence from armed guards and the threat of torture or other ill-treatment as well as the forcible transfer to the site, means they were highly likely a survivor of slavery.

STATE RESPONSIBILITY

At least seven public news reports about torture, forced labor and confinement at the site were published from between 2021 and 2022, a company operating at the site in 2023 was sanctioned by the UK for human trafficking and forced labour, and several "rescue" operations were conducted by state authorities in the same period. Despite all of these actions – which would have made the state repeatedly aware of human rights abuse at SI01, Amnesty International documented human rights abuse at the compound in 2025. There is no publicly available information indicating that state authorities have further investigated or shut down this compound.

SI02

Amnesty International considers **SI02** to be or have been a scamming compound.

LOCATION	Sihanoukville, Preah Sihanouk province; 10.5750, 103.5526

TIMELINE	
17 February 2022	VOD reports that a Chinese man is trafficked to Cambodia, where he was taken to SI02. The man reports being instructed to conduct scamming operations, and when he refused, being beaten.[688]
April through September 2022	An organization records rescues of 26 people from the SI02 compound in at least three different rescue operations, all of which involve Cambodian authorities, after these individuals sought help to leave the site.[689]
2 April 2022	Beijing Youth Daily reports that a Chinese man, after a failed escape from another compound, was sold/trafficked to SI02 around June 2021. The alleged victim reported hearing "screaming at night". The news report alleges that "beating and killing people are common" at this compound.[690]

688 VOD, "Trafficking victim alleges his blood was harvested in Sihanoukville", 17 February 2022, https://vodenglish.news/trafficking-victim-alleges-his-blood-was-harvested-in-sihanoukville/

689 Information provided by organization 1, on file with Amnesty International.

690 Beijing Youth Daily, "不能赚钱或赎身，就会被倒卖：淘金者想要逃离西港"中国城" ["If you can't make money or redeem yourself, you will be resold: Gold diggers want to escape from Sihanoukville's "Chinatown""], 2 April 2022, https://app.bjtitle.com/8816/newshow.php?newsid=6129129&typeid=109&uid=1&did=&mood= (in Simplified Chinese).

Second half of 2022	A survivor is released from SI02 by police in the second half of 2022 and explains that, during the "rescue", the police entered the compound perimeter but did not go into the buildings where the victim had been held .[691]
March 2023	An ABC Australia reporter speaks with a Chinese man who says he was trafficked to and held at SI02 for several months. He describes feeling as though he was in jail and being deprived of sunlight.[692]
June 2023	An alleged victim of several compounds who spoke to Voice of America (VOA) in 2024 says he was sold to the SI02 compound in June 2023. He claims several of the buildings in the compound held trafficking victims from China, Indonesia, South Korea and Japan.[693]
Late 2023	State authorities intervene to remove a survivor from the SI02 compound. Amnesty International later interviews this survivor.[694]
Late 2024	Amnesty International visits SI02 and documents the presence of guards at gates.

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,[695] satellite imagery and/or survivor testimony,[696] the compound, as of September 2024, had the following security features :

- Perimeter fencing/wall.
- More than ten security guards posted at entrances/exits.
- Security guards with firearms (in 2022).
- Internal-facing security cameras.
- Bars or cages on windows.

691 Amnesty International interview with survivor, 2024.
692 ABC News, VIDEO: "Cambodia's cyber slaves", 15 March 2023, https://www.abc.net.au/news/2023-03-15/cambodias-cyber-slaves/102096904
693 VOA, "Scam victims say human trafficking still a problem in Cambodia", 9 March 2024, https://www.voanews.com/a/scam-victims-say-human-trafficking-still-a-problem-in-cambodia/7520511.html
694 Amnesty International interview with survivor, 2024.
695 Amnesty International delegates visited the site more than ten times from 2023 to 2024.
696 Amnesty International interview with survivor, 2024.

HUMAN RIGHTS ABUSE

A survivor interviewed by Amnesty International said they spent around six months at the compound; were lied to during recruitment; felt fear about what would happen if they did not work and felt forced to scam as a way of protecting themselves from violence; and witnessed the presence and use of electric shock batons, as well as guns being held by security guards at the compound, all of which led them to believe they could not escape.[697] Another survivor interviewed by Amnesty International described being lied to during recruitment and prevented from leaving the compound by guards and managers, as well as witnessing Malaysian nationals being locked in a dark room and beaten by a compound manager.[698] Both survivors described seeing and interacting with many other people at this site who were subjected to similar treatment, and one of those interviewed by Amnesty International was released from the site by state authorities, along with several other survivors.[699]

Based on this testimony, and in the context of other secondary evidence including media reports and documented rescues by organizations, as well as the extensive security features at the site, Amnesty International considers the survivors that it interviewed from this site to be survivors of human trafficking and forced labour. They were also deprived of their liberty and witnessed torture or other ill-treatment aimed at further restricting their liberty. Their treatment amounts to slavery.

STATE RESPONSIBILITY

Despite at least six news outlets publishing reports of confinement and abuse at SI02, as well as rescues of at least 25 people that involved local authorities leading up to 2023, Amnesty International documented human rights abuse at the compound at the end of 2023, following the latest state intervention. There is no publicly available information indicating that state authorities have further investigated or shut down this compound.

697 Amnesty International interview with survivor, 2024.
698 Amnesty International interview with survivor, 2024.
699 Amnesty International interview with survivor, 2024.

SI04

Amnesty International considers **SI04** to be or have been a scamming compound.

LOCATION	Sihanoukville, Preah Sihanouk province; 10.5861, 103.5735

TIMELINE	
October 2021	VOD interviews two victims who were sold to SI04 in October 2021, were detained by guards and witnessed "a man with a broken leg and a bruised back begging to be sold so that he could avoid further beatings" at the site.[700]
14 July 2022	Al Jazeera releases a documentary and news reports that include a victim who says he was sold to SI04.[701]
13 September 2022	Pro Publica publishes an article naming at least three people being held at SI04. One of the three survivors is the same survivor from Al Jazeera's 14 July documentary.[702]

700 Voice of Democracy, "Human trafficking's newest abuse: forcing victims into cyberscamming", 20 September 2022, https://vodenglish.news/human-traffickings-newest-abuse-forcing-victims-into-cyberscamming/

701 Al Jazeera, "Forced to scam: Cambodia's cyber slaves", 14 July 2022, https://www.aljazeera.com/program/101-east/2022/7/14/forced-to-scam-cambodias-cyber-slaves

702 Pro Publica, "Human trafficking's newest abuse: forcing victims into cyberscamming", 13 September 2022, https://www.propublica.org/article/human-traffickers-force-victims-into-cyberscamming

31 October 2022	According to Cambodia China Times, police raid SI04 and deport 65 Vietnamese nationals, described as "victims who have been tricked into coming to Cambodia in search of jobs with 'more money and less work' and are forced to work in fraudulent companies".[703]
Late 2024	A person sought help to leave the site according to an organization.[704]
Late 2024	Amnesty International visits the site and documents security guards at the gates and other security features.

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,[705] and satellite imagery, the compound, as of late-2024, had the following security features:

- Perimeter walls.
- Sealed entrances/exits to create a perimeter.
- High probability of security guard posts that are strategically positioned internally along the perimeter.
- Security guards at entrance/exit points.

HUMAN RIGHTS ABUSE

More than six people interviewed by multiple news agencies over more than a year reported being deprived of their liberty at the site with one victim reporting seeing violence inside the compound and police reporting victims were tricked into working at the site. In combination with the security features at the site, Amnesty International believes deprivation of liberty occurred at SI04.

STATE RESPONSIBILITY

Despite three news reports between October 2021 and September 2022 suggesting the site was a scamming compound, and a Cambodian police raid on SI04 in 2022, secondary evidence indicates that human rights abuse took place at this compound in 2024. There is no publicly available information indicating that state authorities have further investigated or shut down this compound.

703 Cambodia China Times, "在西港K99园区从事电诈 65名越南人被遣返回国" ["65 Vietnamese who engaged in cyber fraud in K99 Park in Sihanoukville were deported"], 31 October 2022, https://cc-times.com/posts/19643 (in Simplified Chinese).
704 Information provided by organization 1 on file with Amnesty International.
705 Amnesty International site visit, late-2024.

SI08

Amnesty International considers **SI08** to be or have been a scamming compound.

LOCATION	Sihanoukville, Preah Sihanouk province; 10.6089, 103.5326

TIMELINE	
Late 2022	A survivor was being transported to Myanmar from SI08 when they escaped. The survivor was interviewed by Amnesty International and said they were confined and then sold by the SI08 site. They provide evidence of how they escaped.
September-August 2022	An organization says 13 people were "rescued" from SI08 with assistance of local authorities.[706]
29 August 2022	VOD reports that the Cambodian Interior Ministry Spokesperson described a rescue of five Malaysians from the SI08 site.[707] The spokesperson noted the victims were forced to work 17-18-hour days and were not paid as agreed but classified the matter as a labor dispute.

706 Information provided by organization 1 on file with Amnesty International.
707 Voice of Democracy, "Authorities deny detention, torture after launching trafficking raids", 29 August 2022, https://vodenglish.news/authorities-deny-detention-torture-after-launching-trafficking-raids/

20 May 2024	According to Hindustan Times, approximately 150 Indian nationals stage a protest at SI08. Local authorities arrive at the site to investigate.[708]
20 May 2024	NDTV reports that 60 Indian nationals were rescued from SI08 after being recruited to the site by what the Indian embassy called "fraudulent employers".[709]
21 May 2024	CamboJA reports that police visited SI08, claiming that the protest held by the Indian nationals was a labor dispute and not related to online scamming.[710]
26 August 2024	The Cambodia China Times reports that a man fell from SI08, and that he was found by guards and returned to the compound.[711] Images show the security guards have batons.[712]
Late 2024	Amnesty International visits the site and documents security guards at the gates and other security features.
1 March 2025	Xigang Diary reports a man jumped from SI08 and is seriously injured, after which he is taken to the hospital.[713]

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,[714] satellite imagery and/or survivor testimony,[715] the compound, as of late-2024, had the following security features:

- Perimeter wall with internal-facing barbed or razor wire.
- Excessive use of barbed or razor wire on perimeter wall.
- More than five security guards at entrance/exits.
- Internal-facing cameras placed on perimeter walls.
- The use of double gates.
- Interior walls with internal-facing barbed or razor wire.
- Cages and bars on windows.

708 Hindustan Times, "360 Indian citizens working as 'cyber slaves' in Cambodia return home", 23 May 2024, https://www.hindustantimes.com/india-news/360-indian-citizens-working-as-cyber-slaves-in-cambodia-return-home-101716431762282.html
709 NDTV, "First batch of 60 Indians rescued from job scam in Cambodia return home", 23 May 2024, https://www.ndtv.com/india-news/first-batch-of-60-indians-rescued-from-job-scam-in-cambodia-return-home-5731231
710 Camboja News, "Police raid Jin Bei Casino, confirming it's a labor dispute not online scam ops", 21 May 2024, https://cambojanews.com/police-raid-jin-bei-casino-confirming-its-a-labor-dispute-not-online-scam-ops/
711 Cambodia China Times, "一中国男子从西港"金贝四娱乐城"坠落 被保安"架走" " [A Chinese man fell from the "Jinbei 4 Entertainment City" in Sihanoukville and was "carried away" by security guards], 26 August 2024, https://cc-times.com/posts/25828 (in Simplified Chinese).
712 Cambodia China Times, "一中国男子从西港"金贝四娱乐城"坠落 被保安"架走""[A Chinese man fell from the "Jinbei 4 Entertainment City" in Sihanoukville and was "carried away" by security guards], 26 August 2024, https://cc-times.com/posts/25828 (in Simplified Chinese).
713 Xigang Diary, "西港金贝4一中国男子坠楼" [A Chinese man fell from a building in Jinbei, Sihanoukville], 2March 2025, https://mp.weixin.qq.com/s?__biz=MzI2NTEzNDg1NA==&mid=2650116328&idx=2&sn=f333e72e347754a88f230a776f4de5e3&scene=21#wechat_redirect (in Simplified Chinese)
714 Amnesty International site visit, mid-2024.
715 Amnesty International interview with survivor, 2024.

HUMAN RIGHTS ABUSE

A survivor told Amnesty International he was recruited into working at SI08 under false pretenses, was confined by security guards at the site, was held in solitary confinement and shocked with electric shock batons and beaten after he made plans to escape. The survivor was told by managers that he was being "sold" to a compound in Myanmar before he escaped along the way.

Based on this testimony, and in the context of other secondary evidence including media reports and extensive security features, Amnesty International determined that this survivor was likely trafficked to the site, their labor was exploited, they were deprived of their liberty, they were tortured and, due to the extensive power over the survivor exhibited by managers who were able to sell him to somewhere in another country, they were likely enslaved as well.

There is no publicly available information indicating that state authorities have further investigated or shut down this compound.

STATE RESPONSIBILITY

Despite four public news reports about labour issues at the site between 2022 and 2024, as well as 13 people being released from the site by local authorities in 2022, there is no publicly available information indicating that state authorities have further investigated or shut down this compound.

SI11

Amnesty International considers **SI11** to be or have been a scamming compound.

LOCATION	Sihanoukville, Preah Sihanouk province; 10.6413, 103.5223

TIMELINE	
September 2021	According to a 2022 report from VOD, a 24-year-old is detained at SI11 before being sold to a different compound. He estimated there were more than 1,000 people held at this location while he was there. He claimed that there were guards around the compound, including stationed at every elevator inside the compound.[716]
15 October 2024	The Dial reports that an Indian national is detained at SI11 and forced to conduct scams.[717]
Late 2024	Amnesty International visits the site and documents security guards at the gates and other security features.

716 Voice of Democracy, "Victims allege Sihanoukville precincts with ties to major businesses are sites of scams, torture, detention", 18 February 2022, https://vodenglish.news/victims-allege-sihanoukville-precincts-with-ties-to-major-businesses-are-sites-of-scams-torture-detention/

717 The Dial, "Cambodia's billion dollar scam", 15 October 2024, https://www.thedial.world/articles/news/issue-20/cambodia-cyber-scams-human-trafficking

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,[718] and satellite imagery, the compound, as of late-2024, had the following security features:

- Perimeter walls/fence.
- Security guards at the entrance/exit gate.

HUMAN RIGHTS ABUSE

Two news reports implicate the location in scamming operations and confinement. In combination with the physical and organizational security features present at the site, Amnesty International considers it likely that SI11 was used to deprive people of their liberty.

STATE RESPONSIBILITY

Despite two news reports that suggest the site is implicated in deprivation of liberty and scamming, there is no publicly available information indicating that state authorities have investigated or shut down this compound.

718 Amnesty International site visit, late-2024.

SI12

Amnesty International considers **SI12** to be or have been a scamming compound.

LOCATION	Sihanoukville, Preah Sihanouk province; 10.6338, 103.5061

TIMELINE	
17 September 2022	VOD reports that authorities raided SI12, while investigating human trafficking, sex trafficking, torture and detention. Authorities reported that 141 foreigners – including 130 Chinese nationals and 11 Vietnamese nationals – had entered the country illegally and were sent to the national immigration department. The authorities also found that 262 foreigners were working without work permits and would be fined. Authorities also confiscated "$78,840 in cash, as well as 8,776 phones, 804 computers, 16 laptops, 36 passports, four pairs of handcuffs, 10 different electric shock tools and documents."[719]
Second half of 2024	An organization reported to Amnesty International that they had received a credible request for a rescue from this location.[720]

719 Voice of Democracy, "Eerie silence descends on notorious Sihanoukville scam compounds", 19 September 2022, https://vodenglish.news/eerie-silence-descends-on-notorious-sihanoukville-scam-compounds/
720 Information provided by organization 7, on file with Amnesty International.

Late 2024	Amnesty International site visits confirm presence of more than 10 security guards at the gate and perimeters, including security guards in guard towers that face internally.[721]

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,[722] and satellite imagery, the compound, as of late-2024, had the following security features:

- Perimeter walls/fences.
- Excessive use of barbed wire on perimeter fence.
- Internal-facing security cameras along perimeter walls.
- Two guard towers positioned and designed to be internally facing.
- More than 10 security guards at entrance/exit gate.
- Floodlights on perimeter walls.
- Cages or bars on external-facing windows and balconies.

HUMAN RIGHTS ABUSE

The request for rescue in 2024, combined with the security features at the site, including internal-facing guard towers, led Amnesty International to conclude this location was used to deprive people of their liberty as of late 2024.

STATE RESPONSIBILITY

Despite authorities raiding SI12 in September 2022 and reportedly shuttering the location,[723] the location appears to be in operation as of 2024. The request from a confined victim in the second half of 2024, as well as the security features observed at the site indicate that this site is still operational. There is no publicly available information indicating that state authorities have further investigated or shut down this compound.

721 Amnesty International site visit, late-2024.
722 Amnesty International site visit, late-2024.
723 Voice of Democracy, "Eerie silence descends on notorious Sihanoukville scam compounds", 19 September 2022, https://vodenglish.news/eerie-silence-descends-on-notorious-sihanoukville-scam-compounds/

SI15

Amnesty International considers **SI15** to be or have been a scamming compound.

LOCATION	Sihanoukville, Preah Sihanouk province; 10.6268, 103.5029

TIMELINE	
July-September 2022	An organization reports three people are rescued from the SI15 compound with the assistance of local authorities.[724]
Mid-2022	A survivor told Amnesty International they are deprived of their liberty at SI15, before being sold to the BS04 compound.[725]
Second half of 2022	A survivor told Amnesty International they are confined against their will at SI15 before being trafficked to Phnom Penh before they escaped. The survivor provided pictures of the site and identified other buildings at the site as well as the gate in photos provided by Amnesty International.[726]
Second half of 2024	An organization says a person is rescued with the assistance of local authorities from SI15.[727]

724 Information shared by organization 1 on file with Amnesty International.
725 Amnesty International interview with survivor, 2024.
726 Amnesty International interview with survivor, 2024.
727 Information shared by organization 1 on file with Amnesty International

Late 2024	Amnesty International visits the site and documents security guards at the gates and other security features.

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,[728] satellite imagery and/or survivor testimony,[729] the compound, as of late 2024, had the following security features:

- Perimeter walls with at least one wall with barbed or razor wire placed on top.
- Double-gate system for the main entrance/exit gate.
- Group of five or more security guards at the entrance/exit gate.
- Bars or cages on windows and balconies.

HUMAN RIGHTS ABUSE

Amnesty International interviewed two survivors who reported being forcibly taken to this location after being trafficked into to the country via fraudulent recruitment practices. At the SI15 site, both survivors were prohibited from leaving by managers, and both were transferred from SI15 to other compounds against their will. At these other sites, both survivors reported being forced to scam by managers under threat of violence or in fear of further punishment (including fear of being transferred to another site). Neither survivor was paid during their time at SI15 or any of the compounds they were at subsequently.

Based on this testimony, and in the context of other secondary evidence including media reports, Amnesty International determined that the survivors were trafficked to the site, where they were deprived of their liberty. Both survivors were then trafficked to other sites from this site. In one case, the survivor was then subjected to violence, including being hit with an electric shock baton.

STATE RESPONSIBILITY

Despite state interventions at SI15 in 2022, Amnesty International documented human rights abuse at this compound in 2024. There is no publicly available information indicating that state authorities have further investigated or shut down this compound.

728 Amnesty International site visit, late-2024.
729 Amnesty International interviews with survivors, 2023, 2024.

SI16

Amnesty International considers **SI16** to be or have been a scamming compound.

LOCATION	Sihanoukville, Preah Sihanouk province;10.6240, 103.5024

TIMELINE	
Second half of 2024	Amnesty International interviewed a child who said they had been trafficked to the SI16 site, identified pictures of the location (including the entrance), described being confined there and forced to scam.[730]
Late 2024	Amnesty International visits the site and documents security guards at the gates and other security features.

730 Amnesty International interview with survivor, 2024.

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,[731] satellite imagery and/or survivor testimony,[732] the compound, as of late 2024, had the following security features:

- Perimeter walls, at least one wall with barbed, or razor wire placed on top.
- Cages/bars on exterior facing windows.
- Security guards at one main security gate.
- Internal-facing cameras.

HUMAN RIGHTS ABUSE

A child-survivor interviewed by Amnesty International said they spent weeks at this compound; they were lied to during recruitment; their manager told them they had incurred a debt that would take months to pay off; they were forced to undertake scam-related work and believed, and were told by their manager, they could not escape.

Based on this testimony, and in the context of other secondary evidence including extensive security features, Amnesty International determined that this survivor was trafficked to the site, their labour was exploited, they were deprived of their liberty, they were exposed to dangerous working conditions for a child and they were highly likely enslaved via debt bondage and the control exerted over them as a vulnerable child.

STATE RESPONSIBILITY

Amnesty International documented human rights abuse at the compound in 2024. There is no publicly available information indicating that state authorities have investigated or shut down this compound since then.

731 Amnesty International site visit, late-2024.
732 Amnesty International interview with survivor, 2024.

SI20

Amnesty International considers **SI20** to be or have been a scamming compound.

LOCATION	Sihanoukville, Preah Sihanouk province; 10.6065, 103.5033

TIMELINE	
Late 2023	An organization says that a victim is rescued from SI20 with the assistance of local authorities. Amnesty International confirmed the location via images shared by the victim.[733]
8 August 2024	420India.com reports that they received photos from victims who were inside a casino located in SI20.[734]
Late 2024	Amnesty International visits the site and documents security features.

733 Information shared by organization 1 on file with Amnesty International.
734 The 420, "Jharkhand CID dismantles international cyber slavery network", 8 August 2024, https://the420.in/jharkhand-cid-dismantles-international-cyber-slavery-network/

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,[735] satellite imagery and/or survivor testimony,[736] the compound, as of late-2024, had the following security features:

- Perimeter wall/fence.
- Use of cages or bars on windows.
- Highly likely managers or security guards with electric shock batons.[737]

HUMAN RIGHTS ABUSE

A report from an organization suggests a victim was asking for help to leave this site and shared images that indicate they may have been harmed at the site. Additionally, at least one news source reported people were being deprived of their liberty at SI20. In combination with the physical and organizational security features present at the site, Amnesty International considers it likely that SI20 was used to deprive people of their liberty.

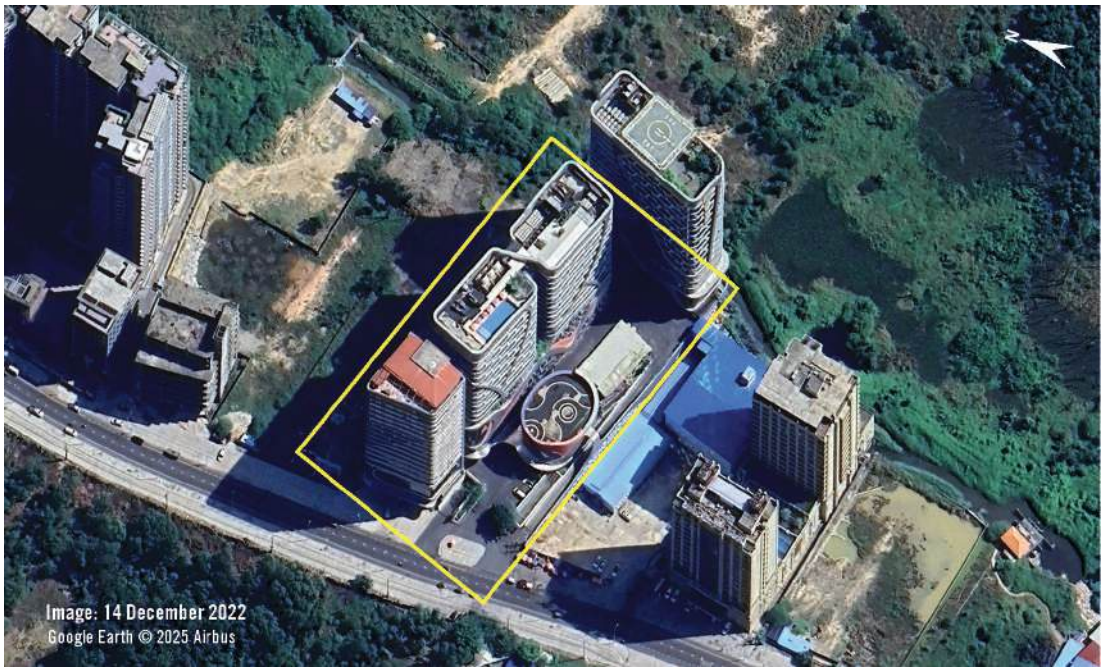
STATE RESPONSIBILITY

Despite local authorities being involved in the rescue of one person from this site in 2023, there is no publicly available information indicating that state authorities have further investigated or shut down this compound.

735 Amnesty International site visit, late-2024.
736 Information shared by organization 1 on file with Amnesty International.
737 Information shared by organization 1 on file with Amnesty International.

SI21

Amnesty International considers **SI21** to be or have been a scamming compound.



LOCATION	Sihanoukville, Preah Sihanouk province; 10.6148, 103.5178

TIMELINE	
End of 2023	An organization says a victim was confined and rescued from this site with the assistance of state authorities. The organization shared evidence from the victim that showed he was in one of the towers at SI21.[738]
Late 2024	Amnesty International visits the site and documents security guards at the gates and other security features.

738 Information shared by organization 1 on file with Amnesty International.

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,[739] and satellite imagery, the compound, as of late-2024, had the following security features:

- Perimeter created (no open access).
- Security guards.

HUMAN RIGHTS ABUSE

An organization provided evidence to Amnesty International that a victim was in one of the towers at the location and that they relied on state authority assistance to leave the site. As a result, Amnesty International concluded it is likely that the location was used to deprive a person of their liberty.

STATE RESPONSIBILITY

Despite state authorities assisting in the release of a victim from this location, there is no publicly available information indicating that state authorities have further investigated or shut down this compound.

739 Amnesty International site visit, late-2024.

SI22

Amnesty International considers **SI22** to be or have been a scamming compound.

LOCATION	Sihanoukville; Preah Sihanouk province; 10.6119, 103.5251

TIMELINE	
In 2023	An organization shares interview notes from a survivor which state they were confined at SI22 in 2023, before being moved to another location.[740]
April–June 2023	An organization says two rescues from SI22 took place with assistance of local authorities.[741]
Late 2024	Amnesty International visits the site and documents security guards at the gates and other security features.

740 Information provided by organization 8 on file with Amnesty International.
741 Information provided by organization 1 on file with Amnesty International.

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,[742] satellite imagery and/or survivor testimony,[743] the compound, as of May 2024, had the following security features:

- Security guards.
- Cages or bars on windows.

HUMAN RIGHTS ABUSE

Interview notes shared with Amnesty International by an organization indicate that a survivor was trafficked to this site for the purpose of labour exploitation and then confined against their will. They also witnessed others being taken somewhere else in the compound as punishment and then heard screams for help. A separate organization also reported that two victims were rescued at the site in 2023. Based on the victims' testimony, other records of confinement and the physical and organizational security features at the site, Amnesty International has concluded S122 was likely involved in human trafficking and deprivation of liberty.

STATE RESPONSIBILITY

Despite authorities assisting to secure the release of a victim from the site in 2023, there is no publicly available information indicating that state authorities have further investigated or shut down this compound.

742 Amnesty International site visit, late-2024.
743 Information provided by organization 8, on file with Amnesty International.

SI32

Amnesty International considers **SI32** to be or have been a scamming compound.

LOCATION	Sihanoukville, Preah Sihanouk province; 10.6371, 103.5282

TIMELINE	
Mid 2021	An organization says that around 30 people are confined at SI32 and told they are indebted and cannot leave. The organization provides pictures that victims took that show they were at the SI32 site.[744]
28 August 2023	Khmer Time reports that 15 foreign nationals are arrested in relation to violence at a casino located at the SI32 casino. During the arrests, officers also arrested people for the illegal possession of firearms.[745]
Late 2024	Amnesty International visits the site and documents security guards at the gates and other security features.

744 Information shared by organization 4 on file with Amnesty International.
745 Khmer Times, "Fighting foreigners arrested in Sville for casino violence", 28 August 2023, https://www.khmertimeskh.com/501350401/fighting-foreigners-arrested-in-sville-for-casino-violence/#google_vignette

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,[746] satellite imagery and/or survivor testimony,[747] the compound, as of late-2024, had the following security features:

- Perimeter wall.
- Internal-facing security cameras and security cameras that are positioned along perimeters.
- Security guards at entrance/exit points.
- Cages or bars on windows and balconies.

HUMAN RIGHTS ABUSE

Information shared by an organization indicates people were deprived of their liberty at the site in 2021. This information, in combination with the security features at the site, leads Amnesty International to conclude the site was likely used for deprivation of liberty

STATE RESPONSIBILITY

There is no publicly available information indicating that state authorities have further investigated or shut down this compound.

746 Amnesty International site visit, late-2024.
747 Information shared by organization 4, on file with Amnesty International.

SI33

Amnesty International considers **SI33** to be or have been a scamming compound.

LOCATION	Sihanoukville, Preah Sihanouk province; 10.6400, 103.5076

TIMELINE	
10 September 2021	Khmer Times notes the presence of trafficking and detention at SI33.[748]
20 June 2022	VOD reports witnessing a rescuer receiving messages from a person "detained" inside SI33 who alleged they had been sold there from SI01. VOD accompanied the rescuer to the police station to report the SI33 location.[749]
23 July 2022	VICE News interviews a man who was taken to SI33 and confined against his will there by men with guns. The victim reported being forced to run scams.[750]
2 August 2022	The Global Anti-Scam Organisation (GASO) writes that a victim of SI33 was recruited to the site under false pretences before being trapped at the site and forced to run scams.[751]

748 Khmer Times, "Bloody but unbowed: the China project ploughs on despite public scrutiny of highly disturbing claims of criminality", 10 September 2021, https://www.khmertimeskh.com/50932552/bloody-but-unbowed-the-china-project-ploughs-on-despite-public-scrutiny-of-highly-disturbing-claims-of-criminality/ and Amnesty International interviews with organizations 1, 2, 3, 8.

749 Voice of Democracy, "'How to help them?' volunteer stonewalled in scam worker rescues", 20 June 2022, https://vodenglish.news/how-to-help-them-volunteer-stonewalled-in-scam-worker-rescues/

750 Vice News, "From industrial-scale scam centers, trafficking victims are being forced to steal billions", 13 July 2022, https://www.vice.com/en/article/pig-butchering-scam-cambodia-trafficking/

751 Global Anti-Scam Organisation, "Victim sued for telling his experiences", 2 August 2022, https://www.globalantiscam.org/post/victim-sued-for-exposing-scammers

3 September 2022	Mothership news reports speaking to two scam compound victims, one of which said there were "well over a hundred" Singaporean victims inside SI33.[752]
Second half of 2022	A survivor was forcibly transferred to the site and confined after being trafficked to and confined at two other compounds. This survivor is later interviewed by Amnesty International..[753]
Late 2024	Amnesty International visits the site and documents security guards at the gates and other security features.

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,[754] satellite imagery and/or survivor testimony,[755] the compound, as of late-2024, had the following security features:

- Perimeter walls/fencing.
- At least six security guards at the main entrance gate.
- Caged or barred areas and windows.

HUMAN RIGHTS ABUSE

One survivor interviewed by Amnesty International described not being paid despite being forced to work at all locations they were confined at in Sihanoukville, including SI33. The survivor described a climate of fear that pervaded the workplace and said people were afraid even to ask to go to the bathroom. They were not allowed to leave while at SI33, and said they were forced to do the work out of sense of fear of what might happen if they did not do the work. The survivor was never paid.

In addition, they were moved between several sites against their will and were brought to Cambodia with the promise of a high paying job which did not include any information about doing scamming work or not being able to leave the work place/compound. Their passport was also confiscated by a boss who was running the scamming operations at SI33.

Based on this testimony, and in the context of other secondary evidence including media reports, Amnesty International determined that this survivor was highly likely trafficked to the site, their labor was exploited, they were deprived of their liberty while at the site. In addition, the transfer of the survivor between multiple compounds against their will suggests they were likely a survivor of slavery.

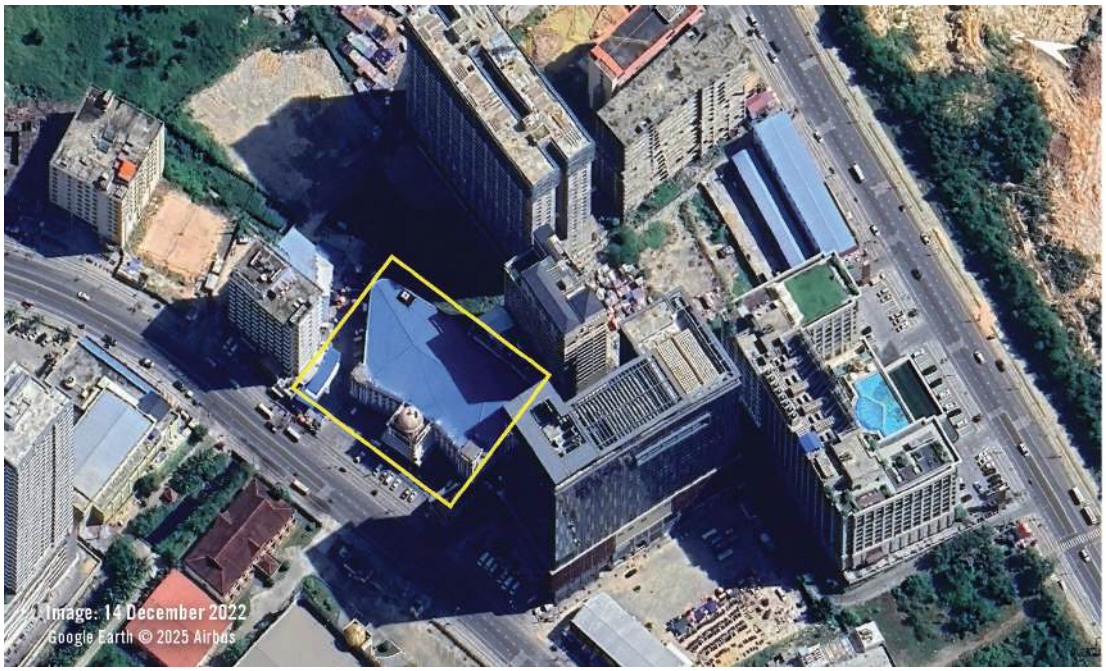
STATE RESPONSIBILITY

Despite four different public reports in 2021 and 2022 that the SI33 site was confining people and forcing them to run scam operations, there is no publicly available information indicating that state authorities have investigated or shut down this compound.

752 Mothership, "Are there S'poreans trapped in Cambodia by criminal syndicates to scam others?", 3 September 2022, https://mothership.sg/2022/09/scammed-singaporeans-stuck-cambodia/
753 Amnesty International interview with survivor, 2022.
754 Amnesty International site visit, mid-2024.
755 Amnesty International interview with survivor, 2024.

SI35

Amnesty International considers **SI35** to be or have been a scamming compound.



LOCATION	Sihanoukville, Preah Sihanouk province; 10.6099, 103.5172

TIMELINE	
December 2021	Four survivors interviewed by Amnesty International are trafficked to the site where they are confined against their will. At some point, a police raid occurs but the survivors are not able to escape and are moved from SI35 to SI36 by the managers of SI35 to avoid further police raids.[756] All survivors, despite being interviewed separately with one exception, were able to recount the same story with no inconsistencies and were able to identify all sites they were confined at.
11 October 2022	Media outlet Coconuts Bangkok reports that a Thai man was trafficked to Cambodia and confined at the SI35 site. He said he lived in constant fear before being taken to another site where he was assaulted with electric shock batons.[757]
Late 2024	Amnesty International visits the site and documents security guards at the gates and other security features.

756 Amnesty International interviews with survivors, 2024.
757 Coconuts, "Chinese scammers hold 'thousands' of Thais captive in Cambodia: police", 11 October 2022, https://coconuts.co/bangkok/features/chinese-scammers-hold-thousands-of-thais-captive-in-cambodia-police/

Early 2025	Two survivors were trafficked to the site under false pretenses for the purposes of labour exploitation. After a period of weeks the manager released them.[758]

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,[759] satellite imagery and/or survivor testimony,[760] the compound, as of late-2021, had the following security features:

- Internally placed security guards at elevators.
- Security guards or people with electric shock batons.

HUMAN RIGHTS ABUSE

Four survivors interviewed by Amnesty International said they spent several months at this compound where they were forced to scam; that were lied to during recruitment; witnessed the torture or other ill-treatment of other people within the site; were threatened with torture and murder if they attempted to contact police; and were confined inside the building by security guards and managers with electric shock batons, leading them to believe they could not escape.

Based on this testimony, Amnesty International determined that these survivors were highly likely survivors of human trafficking and forced labor. They were also deprived of their liberty and possibly subjected to torture or other ill-treatment through the exposure they were forced to endure of other people being subjected to beatings. Their treatment while at SI35 shows a high level of control exerted over them through death threats and violence. Further, because two of them were later forcibly transferred to other compounds, this indicates they were likely survivors of slavery.

In 2025, additional survivors were interviewed from this site. Both survivors had their passports confiscated and were forced to run scams for fear of not having their passports returned. They spent one month at the location and were not paid during this period. These survivors are victims of human trafficking and forced labour.

STATE RESPONSIBILITY

Despite a police raid in 2021 and news reports about torture at the site in 2022, Amnesty International documented human rights abuse at the compound in 2025. There is no publicly available information indicating that state authorities have further investigated or shut down this compound.

758 Amnesty International interviews with survivors, 2025.
759 Amnesty International site visit, late-2024.
760 Amnesty International interview with survivor, 2024.

SI36

Amnesty International considers **SI36** to be or have been a scamming compound.

LOCATION	Sihanoukville, Preah Sihanouk province; 10.6086, 103.5163

TIMELINE	
Late 2021/early 2022	Three survivors reported to Amnesty International that they are trafficked by compound bosses from SI35 to SI36 in late 2021 after police intervened at SI35. All three people said the transfer between the compounds was done to avoid further police intervention.[761]
11 July 2022	A Thai news agency, ข่าวเวิร์คพอยท์ 23, reports that on 21 June 2022 year, Thai police went into the site and arrested suspected "call center gang members", issuing 21 arrest warrants.[762] It is assumed from context that this was in conjunction with Cambodian police and, based on interviews with Thai organizations, that "call center gang members" are closely related to, or are the same groups, operating in the scamming industry.[763]

761 Amnesty International interviews with survivors, 2024.
762 ข่าวเวิร์คพอยท์ 23, Facebook Post: รวบ 4 แก๊งคอลเซ็นเตอร์ ผู้ต้องหา 74 คน ส่งกลับดำเนินคดี ["4 call center gangs arrested, 74 suspects sent back for prosecution"], 11 July 2022, and Workpoint Today, "ตำรวจ PCT ประสานกัมพูชาทลาย 4 แก๊งใหญ่คอลเซ็นเตอร์ รวบผู้ต้องหา 74 คน ส่งกลับไทยดำเนินคดี" ["PCT police coordinate with Cambodia to break up 4 major call center gangs, arrest 74 suspects, send them back to Thailand for prosecution"], 11 July 2022, https://workpointtoday.com/pct-2/ (in Thai)
763 Amnesty International interviews with organizations, 2024, 2025.

11 October 2022	One survivor of both SI35 and SI36 gave an interview to media outlet Coconuts Bangkok, describing confinement and violence at both sites.
Late 2024	Amnesty International visits the site.

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,[764] satellite imagery and/or survivor testimony,[765] the compound, as of May 2024, had the following security features:

- Cages around doors and elevators to prevent escape.
- Security guards or people with electric shock batons.

HUMAN RIGHTS ABUSE

Three survivors interviewed by Amnesty International said they spent several days at this compound where they were forced to scam; they were lied to during recruitment to the compound where they were prior to being moved to SI36 against their will; witnessed the torture and other-ill treatment of people within the site; and were threatened with torture and murder. One of the survivors interviewed was tortured at this site and confined inside the building by security guards and managers with electric shock batons.

Based on this testimony, Amnesty International determined that these survivors were highly likely survivors of human trafficking and forced labour. They were also deprived of their liberty, witnessed torture or other-ill treatment via the treatment of others, in addition to threats of torture and murder against them. Their treatment while at SI36 highly likely amounts to slavery and two survivors described being transferred to other compounds, including to the SI01 compound from the location.

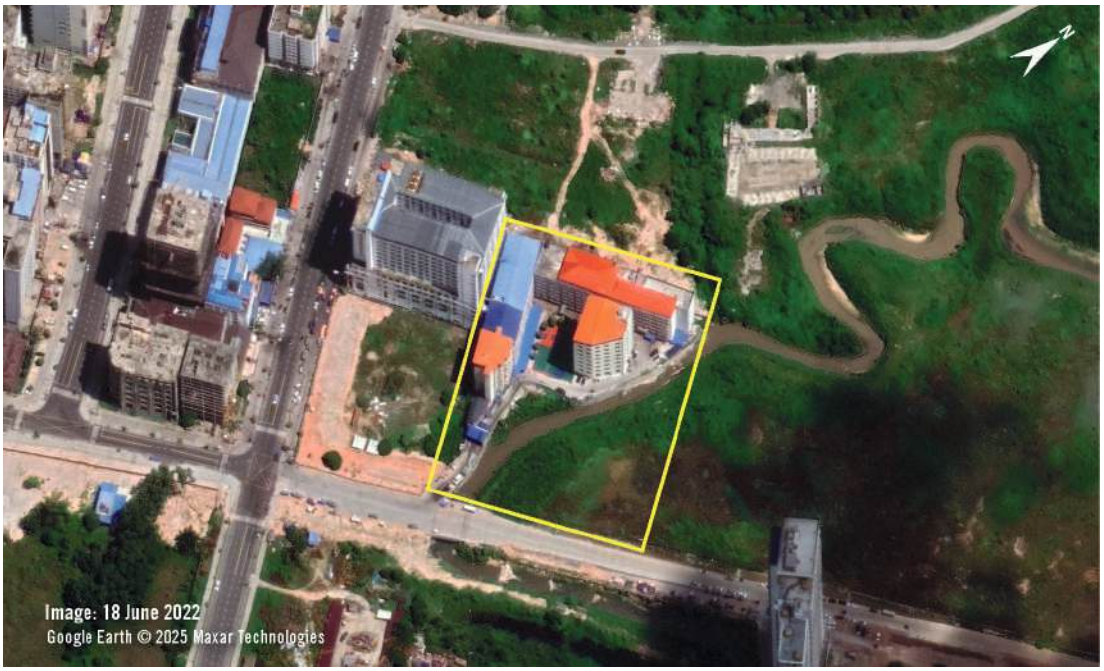
STATE RESPONSIBILITY

Despite a Thai and Cambodian police operation in 2022, victims deprived of their liberty at the site from around that time reported being forcibly moved by managers between sites to avoid police. Two of them were not rescued and were transferred to other sites. There is no publicly available information indicating that state authorities have further investigated or shut down this compound.

764 Amnesty International site visit, late-2024.
765 Amnesty International interview with survivor, 2024.

SI37

Amnesty International considers **SI37** to be or have been a scamming compound.



LOCATION	Sihanoukville, Preah Sihanouk province; 10.6030, 103.5325

TIMELINE	
Late 2021	An organization provides evidence indicating a person was confined to the SI37 site by security guards, they witnessed electric shock batons used against others at the site and they were threatened with being "sold" to another site.[766]
24 June 2022	VOD reports that, according to Thai police, 21 Thai people had been removed from two Sihanoukville scam compounds on 21 June, one of which was SI37 or a compound directly adjacent to SI37. The 21 Thai nationals were accused of working for romance and investment scam operations where they used Tinder or Line to find targets and trick them into making investments on a fraudulent platform. Thai police said the 21 Thai people were arrested based on Thai arrest warrants for public fraud, illegal assembly and money laundering.[767]

766 Information shared by organization 2, on file with Amnesty International.
767 Voice of Development, "Sihanoukville crime: 5 arrested for dealing guns, 21 Thais removed from scams", 24 June 2022, https://vodenglish.news/sihanoukville-crime-5-arrested-for-dealing-guns-21-thais-removed-from-scams/

15 June 2023	CamboJA News reports that a Chinese man who was murdered was linked to an "alleged scam operation." Photos from the police report about his death show a business card for the building in front of SI37, alongside other business cards and documents that name other alleged scamming compounds.[768]
Late 2024	Amnesty International visits the site and documents security guards at the gates and other security features.

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,[769] and satellite imagery, the compound, as of late-2024, had the following security features:

- Perimeter walls.
- At least three security guards at entrance/exit.
- Cages or bars on windows.

HUMAN RIGHTS ABUSE

Amnesty International reviewed a witness statement given to an organization that suggests a person was confined at this location. In addition, news reports, and information from the Thai police, suggest that the building right in front of SI37 is associated with scamming operations and human trafficking. Therefore, in combination with the physical and organizational security features present at the site, Amnesty International considers it likely that SI37 was used to deprive people of their liberty.

STATE RESPONSIBILITY

Despite three local news stories reporting on scamming operations, confinement and sales of people at SI37 or a building directly adjacent/in close proximity to SI37, there is no publicly available information indicating that state authorities have investigated or shut down this compound.

768 Camboja News, "Dead chinese man linked to alleged scam operation, Sihanoukville compound", 15 June 2023, https://cambojanews.com/dead-chinese-man-linked-to-alleged-scam-operation-sihanoukville-compound/
769 Amnesty International site visit, late-2024.

SI39

Amnesty International considers **SI39** to be or have been a scamming compound.

LOCATION	Sihanoukville, Preah Sihanouk province; 10.6210, 103.5002

TIMELINE	
10 May 2022	A Bangladeshi person claims that they were taken to SI39 alongside nine other people who had previously been detained at BS04. The person says they were forced to conduct scams for two different "companies" while at SI39. They claim that it was not possible to escape because "it was highly guarded by security personnel." [770]
Late 2022	An organization says a rescue from the site with the assistance of local authorities occurred and shares videos that corroborate the location as the place where a victim was seeking to be rescued from.[771]
Late 2024	Amnesty International visits the site and documents security guards at the gates and other security features.

770 Humanity Research Consultancy, "The horrible 5-month life in scamming compounds", 13 July 2024, https://www.humanity-consultancy.com/updates/the-horrible-5-month-life-in-scamming-compounds
771 Information shared by organization 1, on file with Amnesty International.

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,[772] and satellite imagery, the compound, as of late-2024, had the following security features:

- Perimeter walls with barbed or razor wire.
- More than five security guards at entrance/exit gates.
- Double gate system.
- Cages or bars on windows.
- Internal-facing security cameras.

HUMAN RIGHTS ABUSE

Amnesty International has geolocated imagery shared by a victim who was rescued from this site. In addition, Humanity Research Consultancy's blog post by a victim from this site suggests they were a victim of human trafficking and forced labour. Therefore, in combination with the physical and organizational security features present at the site, Amnesty International considers it highly likely that SI39 was used to deprive people of their liberty.

STATE RESPONSIBILITY

Despite state authorities being aware of two victims inside this location in 2022,[773] there is no publicly available information indicating that state authorities have further investigated or shut down this compound.

772 Amnesty International site visit, late-2024.

773 Humanity Research Consultancy, "The horrible 5-month life in scamming compounds", 13 July 2024, https://www.humanity-consultancy.com/updates/the-horrible-5-month-life-in-scamming-compounds; Information shared by organization 1, on file with Amnesty International.

SI42

Amnesty International considers **SI42** to be or have been a scamming compound.

LOCATION	Sihanoukville, Preah Sihanouk province; 10.5853, 103.5505

TIMELINE	
September 2022	A survivor interviewed by Amnesty International is brought to this site against their will for the purposes of scamming work. The survivor provided videos and pictures that proved they were at the site.[774]
October 2022	CyberScamMonitor reports a police raid at the site in October 2022, but says it appeared operational as of December 2022.[775]
Late 2024	Amnesty International visits the site and documents security guards at the gates, as well as security guard towers and other security features.

774 Amnesty International interview with survivor, 2024.
775 Cyber Scam Monitor, NEW CONTENT 2/7, 9 May 2023, https://x.com/CyberScamWatch/status/1655749819082702848 (accessed on 3 June 2025)

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,[776] satellite imagery and/or survivor testimony,[777] the compound, as of late-2024, had the following security features:

- A perimeter wall.
- Internal-facing security cameras along the perimeter walls.
- Multiple security guards at main gate.
- A double-gate system.
- Three guard towers that appear to only face inwards (into the compound area).
- Floodlights on guard towers on perimeters.

HUMAN RIGHTS ABUSE

A survivor interviewed by Amnesty International said they were confined at this compound; were lied to during recruitment that brought them to Cambodia, where they were subsequently moved between compounds against their will, including to SI42 compound; were kept in a state of fear by not being allowed to leave, not being paid and hearing other people in buildings scream; were forced to scam; were monitored at all times by managers and believed they could not escape. The survivor described seeing and interacting with many other people at this site who were subjected to similar treatment.

Based on this testimony, Amnesty International determined that this survivor was highly likely a victim of human trafficking for the purpose of labour exploitation and was deprived of their liberty. Given the extensive movement of the survivor between various locations, and the fact that they were never paid for their work, it is also likely they were a survivor of slavery.

STATE RESPONSIBILITY

There is no publicly available information indicating that state authorities have investigated or shut down this compound.

776 Amnesty International site visit, late-2024.
777 Amnesty International interview with survivor, 2024.

SI44

Amnesty International considers **SI44** to be or have been a scamming compound.

LOCATION	Sihanoukville, Preah Sihanouk province; 10.6058, 103.5275 (Note: the coordinates provided and satellite image included are approximate locations based on the information obtained)

TIMELINE	
16 September 2021	Reuters reports that a Nepalese teacher was confined at SI44.[778]
Early 2022	An organization says that it is in contact with a victim inside SI44 who was trafficked to the site for the purpose of forced labour. Their statement also includes descriptions of being beaten and subjected to torture and other ill-treatment before being "sold" from SI44 to SI01 .[779]
Mid 2022	An organization says two people are removed from the location with assistance from local authorities.[780]

778 Reuters, "FEATURE-Chinese scammers enslave jobless teachers and tourists in Cambodia", 16 September 2021 , https://www.reuters.com/article/cambodia-trafficking-unemployed-idUSL8N2PP21I/
779 Information provided by organization 2 on file with Amnesty International.
780 Information provided by organization 2 on file with Amnesty International.

Late 2022	An organization says one person is removed from SI44 with assistance from local authorities.[781]
11 August 2022	Al Jazeera publishes a documentary and article naming SI44 as a place where a 16-year-old was confined after being abducted and sold to TD01 and then forcibly transferred to SI44.[782]
13 September 2022	ProPublica reports a Chinese survivor and his brother were sold to SI44. While there, both men were confined and claimed to have witnessed guards beating another person. They were later sold to SI04.[783]
Late 2024	Amnesty International visits the site – there were no security features to observe from the exterior.

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

The compound has no notable security features that could be observed during site visits in 2024.

HUMAN RIGHTS ABUSE

Given information provided by an organization of at least four individuals seeking to be removed from the site and the many news reports alleging interviews with victims from this site, Amnesty International believes it is highly likely the site was depriving people of their liberty.

STATE RESPONSIBILITY

Despite three news reports suggesting this location was depriving people of their liberty, there is no publicly available information indicating that state authorities have further investigated or shut down this compound.

781 Information provided by organization 2 on file with Amnesty International.
782 Al Jazeera, "Meet Cambodia cyber slaves", 15 July 2022, https://www.aljazeera.com/features/longform/2022/8/11/meet-cambodia-cyber-slaves
783 Pro Publica, "Human trafficking's newest abuse: forcing victims into cyberscamming", 13 September 2022, https://www.propublica.org/article/human-traffickers-force-victims-into-cyberscamming

SI45

Amnesty International considers **SI45** to be or have been a scamming compound.

LOCATION	Sihanoukville, Preah Sihanouk province; 10.6410, 103.5315

TIMELINE	
14 November 2021	Beijing Youth Daily reports speaking to a man, who, immediately after escaping from another compound, reports being abducted from the side of the road and sold to SI45. He claims he is later sold from SI45 to SI01, from which he was rescued in December 2021.[784]
20 June 2022	18 victims are reportedly rescued from SI45 by Thai and Cambodian authorities, as reported by Thai PBS who spoke to one of the victims in 2023.[785]
11 August 2022	11 August 2022: Al Jazeera reports a former chef was detained and forced to work at SI45.[786]

784 Beijing Youth Daily, "不能赚钱或赎身，就会被倒卖：淘金者想要逃离西港"中国城"" ["If you can't make money or redeem yourself, you will be resold: Gold diggers want to escape from Sihanoukville's "Chinatown"], 2 April 2022, https://app.bjtitle.com/8816/newshow.php?newsid=6129129&typeid=109&uid=1&did=&mood= (in Simplified Chinese)

785 Thai PBS, White Sand ทุนจีนสี เทาแฝงสี หนุวิลล์, 2 February 2023, https://www.thaipbs.or.th/news/content/324169

786 Al Jazeera, "Meet Cambodia cyber slaves", 15 July 2022, https://www.aljazeera.com/features/longform/2022/8/11/meet-cambodia-cyber-slaves

29 September 2022	VOD reports speaking to a nearby resident who claims the location is like a "ghost building" with people and guards having left.[787]
Late 2024	Amnesty International visits the site and documents security guards at the gates and other security features.

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,[788] and satellite imagery, the compound, as of late-2024, had the following security features:

- Perimeter walls with barbed or razor wire, including internal-facing barbed or razor wire.
- Internal-facing security cameras along perimeter walls.
- Security guards at entrance/exit points.

HUMAN RIGHTS ABUSE

A man interviewed by Beijing Youth Daily reported that because he was unwilling to participate in the scamming operations, he was locked in a small dark room, handcuffed to an iron bed for three days, during which time he only ate one meal.[789] In addition, a 17-year-old told Thai PBS he was confined at the site.

Based on this secondary evidence, as well as the security features present at the site, Amnesty International believes that deprivation of liberty likely occurred at this location.

STATE RESPONSIBILITY

According to news reports, state authorities intervened at SI45. Following that, at least one public report indicated that the site may have been shut down or abandoned. However, a site visit in 2024 indicated that the location where SI45 was located had security guards and other security features. It is unclear whether at the time of the visit the site continued to be a scamming compound. There is no publicly available information indicating that state authorities further investigated or shut down this compound.

787 Voice of Democracy, "Amid ongoing scam raids, Sihanoukville residents recall insecurity", 29 September 2022, https://vodenglish.news/amid-ongoing-scam-raids-sihanoukville-residents-recall-insecurity/

788 Amnesty International site visit, late-2024.

789 Beijing Youth Daily, "不能赚钱或赎身，就会被倒卖：淘金者想要逃离西港"中国城" [If you can't make money or redeem yourself, you will be resold: Gold diggers want to escape from Sihanoukville's "Chinatown"], 2 April 2022, https://app.bjtitle.com/8816/newshow.php?newsid=6129129&typeid=109&uid=1&did=&mood= (in Simplified Chinese)

SI48

Amnesty International considers **SI48** to have been a scamming compound.

LOCATION	Sihanoukville, Preah Sihanouk province; 10.6219, 103.5056

TIMELINE	
End of 2022	An organization provides evidence that a victim was rescued from SI48 with assistance of state authorities. The survivor provided video and map markers as proof that they were confined at this location.[790]
As of late 2024	Amnesty International delegates visited the location, which appeared to be abandoned.[791]

790 Information shared by organization 1, on file with Amnesty International.
791 Amnesty International site visit.

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,[792] satellite imagery and/or survivor testimony,[793] the compound, as of late 2024, had the following security features:

- Security guards at entrance/exit points (no longer present as of late 2024).[794]
- Cages or bars on windows, including higher floors.

HUMAN RIGHTS ABUSE

A victim shared a video and a map reference as evidence they were at the location.[795] The video shows at least three security guards at an entrance and that the building has caged windows. The victim required a rescue by state authorities. Therefore, in combination with the physical and organizational security features present at the site, Amnesty International considers it likely that SI48 was used to deprive people of their liberty.

STATE RESPONSIBILITY

As of late 2024, the site appeared to be abandoned. There is no publicly available information that state authorities investigated this location beyond the rescue reported in 2022, but they may have been responsible for shutting down the site.

792 Amnesty International site visit, late-2024.
793 Information shared by organization 1, on file with Amnesty International.
794 Information shared by organization 1, on file with Amnesty International.
795 On file with Amnesty International.

SI50

Amnesty International considers **SI50** to be or have been a scamming compound.

LOCATION	Sihanoukville, Preah Sihanouk province; 10.6371, 103.5029

TIMELINE	
Late 2024	Amnesty International visits the site and documents security guards at the gates and other security features.
Early 2025	A survivor interviewed by Amnesty International reports being confined at this site for several weeks in early 2025. The survivor gave the name of the location, provided photographs and identified the building on a map. The survivor also provided evidence that they were physically harmed, which they said happened at the site.[796]
Early 2025	Another survivor interviewed by Amnesty International reported being kept at this site for less than a month in early 2025. The survivor provided the name of the location and identified the site from photographs.[797]

796 Amnesty International interview with survivor, 2025.
797 Amnesty International interview with survivor, 2025.

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,[798] satellite imagery and/or survivor testimony,[799] the compound, as of early-2025, had the following security features:

- Security guards.
- Security guards or other people with electric shock batons.

HUMAN RIGHTS ABUSE

One survivor interviewed by Amnesty International said they spent several weeks at this location, they were lied to during recruitment and they believed they could not escape because of security guards. When the survivor was not able to work, they were taken to a room and shocked with an electric shock baton.

Based on this testimony, Amnesty International determined that this survivor was highly likely trafficked to the site for the purpose of forced labour, and they were deprived of their liberty. They were likely subjected to torture or other ill-treatment by a manager at the site and provided evidence of injuries.

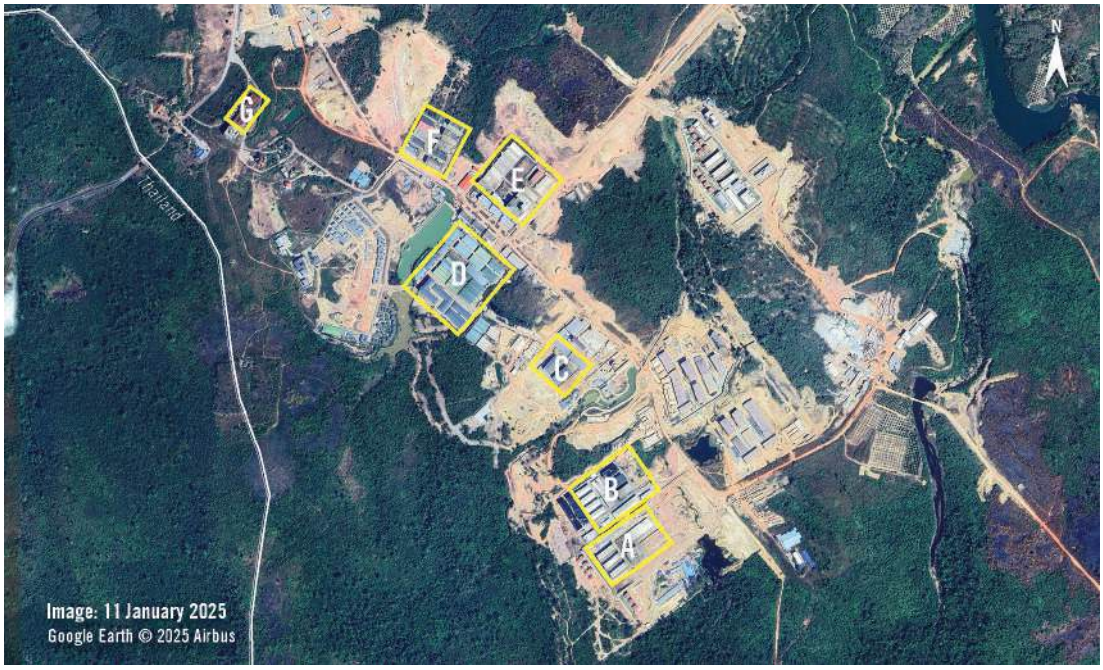
STATE RESPONSIBILITY

There is no publicly available information indicating that state authorities have investigated or shut down this location.

798 Amnesty International site visit, late-2024.
799 Amnesty International interview with survivor, 2025.

TD01

Amnesty International considers the **TD01 series of compounds** (TD01A, TD01B, TD01C, TD01D, TD01E, TD01F and TD01G), all of which are located within a special economic zone (SEZ), to be or have been scamming compounds.



LOCATION	Thma Da, Pursat province; 12.1272, 102.7382 (Note that the coordinates are placed on the main road that leads to many of the compounds)

TIMELINE	
8 November 2021	National Police statement says officers carried out a "handover" of a 23-year old Chinese victim with at a special economic zone located in Pursat.[800] It is not clear at which location the Chinese national was being confined, but at the time of their confinement only TD01F, TD01E and TD01G had been built.[801]
17 November 2021	VOD article covers the same victims' story in more detail, describing how he tried to kill himself after being confined, forced to work excessive hours and was threatened with being "sold".[802]

800 Voice of Democracy, "From timber to human trafficking: rescued victims allege major scam operations in tycoon's SEZ", 17 November 2021, https://vodenglish.news/from-timber-to-human-trafficking-rescued-victims-allege-major-scam-operations-in-tycoons-sez/

801 Google Earth, CNES/Airbus, DS_PHR1B_202201020344221_FR1_PX_E102N12_1002_02921, 2 January 2022

802 Voice of Democracy, "From timber to human trafficking: rescued victims allege major scam operations in tycoon's SEZ", 17 November 2021, https://vodenglish.news/from-timber-to-human-trafficking-rescued-victims-allege-major-scam-operations-in-tycoons-sez/

24 November 2021	National military police spokesperson Eng Hy said Cambodian and Thai authorities rescued 103 Thai nationals from a compound located in Pursat province SEZ and brought the individuals across the border into Thailand . At the time, there is only one SEZ in Pursat province.[803] It is not clear which location the Thai nationals had been "rescued" from but there is only one special economic zone in this province.
15 July 2022	Al Jazeera interviews three victims who said they were confined in compounds located in the SEZ in 2021. At the time of their confinement, only TD01F, TD01E and TD01G were built.[804]
22 November 2022	VOD reports that a "driver in the area said that around a month or two ago, buses arrived day and night bringing foreign workers from Sihanoukville" to the SEZ in Pursat. A street vendor confirmed the wave of arrivals. A different vendor said the compound was more locked down than before, and it was hurting her business. "Now they don't let them come out."[805]
September 2023	Amnesty International interviews a survivor who said they were trafficked for the purposes of forced labor from a compound in Sihanoukville to a compound in the Pursat province SEZ in 2023. They were forced to run scams and kept in a building which was guarded to prevent escape. Amnesty International is unable to confirm which location at the SEZ they were kept in due to a lack of imagery.
Second half of 2023	An organization says a victim was rescued with assistance of local authorities from TD01D.[806]
February 2024	A survivor interviewed by Amnesty International said they were trafficked from a compound in Myanmar to the SEZ in 2024. Although they never ran any scams at the site, they were confined against their will and would later be transferred to another location against their will in Pailin.[807] They provided a positive identification of the roads leading into the compounds' location, but Amnesty International could not conclude which specific building they were held in.[808]

803 Voice of Democracy, "Thai nationals rescued, repatriated from Pursat SEZ", 24 November 2021, https://vodenglish.news/thai-nationals-rescued-repatriated-from-pursat-sez/
804 Google Earth, CNES/Airbus, DS_PHR1B_202201020344221_FR1_PX_E102N12_1002_02921, 2 January 2022
805 Voice of Democracy, "Sar Kheng attacks police excuses in scam trafficking", 22 November 2022, https://vodenglish.news/sar-kheng-attacks-police-excuses-in-scam-trafficking/
806 Information provided by organization 1 on file with Amnesty International.
807 Amnesty International interview with survivor, 2024.
808 Amnesty International interview with Yutai, August 2024.

12 December 2024	The Washington Post reports that a Uighur man was "trapped inside a high-walled, barbed-wire compound for 10 weeks, working alongside others trafficked here and forced, often through beatings, to run online scams" at TD01 before being removed by Cambodian police and sent back to China.[809]
Mid-2024	Amnesty International visits the sites, specifically TD01D, TDO1E, TD01F, TDO1G, and documents security guards at the gates and other security features.
14 December 2024	Images shared to a Telegram group show more than a dozen cars, some of which may be police or military cars, at the compound in what could be a raid by state authorities.[810]
Second half of 2024	A victim is released with assistance of local authorities from TD01A.[811]
First half of 2025	A victim is released with assistance of local authorities from TD01B.[812]

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,[813] satellite imagery and/or survivor testimony,[814] the compound, as of mid-2024, had the following security features:

- Perimeter fencing with barbed or razor wire.
- Internal-facing barbed or razor wire.
- The presence of multiple guards at entrance/exit gates.
- The use of cages or bars on windows.
- Heavy use of security cameras.[815]
- Strategic positioning of probable guard posts within perimeter walls.

809 Washington Post, "He thought he had escaped Beijing's clutches only to vanish back into China", 12 December 2024, https://www.washingtonpost.com/world/interactive/2024/china-uyghur-muslim-genocide-cambodia-deportation/
810 On file with Amnesty International.
811 Information on file with Amnesty International.
812 Information on file with Amnesty International.
813 Amnesty International site visit, mid-2024.
814 Amnesty International interview with survivor, 2024.
815 An interview with a witness described a room where CCTV was being monitored by security guards.

HUMAN RIGHTS ABUSE

Two survivors interviewed by Amnesty International said they spent between months and days at this compound; they were lied to during recruitment and were transferred against their will to this compound; and they believed they could not escape because of security guards. One survivor described guards being stationed along a wall as a security measure preventing escape. One survivor reported being forced to scam and another reported not working at the site before being transferred against their will to another compound.

Based on this testimony, and in the context of other secondary evidence including extensive media reports, Amnesty International determined that these survivors were highly likely trafficked to the site for the purpose of exploiting their labor, and they were deprived of their liberty.

STATE RESPONSIBILITY

Despite four news stories describing human rights abuses between 2021 and the end of 2024, and three interventions by state authorities between 2021 and 2025 intended to "rescue" people from the site, Amnesty International documented human rights abuse at the compound in 2025. There is no publicly available information indicating that state authorities have further investigated or shut down this compound.

TK01

Amnesty International considers **TK01** to be or have been a scamming compound.

LOCATION	Takeo province; 11.3308, 104.7495

TIMELINE	
23 October 2024	South Korean news KBS reports speaking to seven victims of scam compounds and locates PP09 and TK01 as scam compound sites.[816]
25 October 2024	CamboJa News reports that more than 1000 foreigners were detained by police from PP09 and TK01 site after police intervention.[817]
4 November 2024	Khmer Times reports that only 25 foreigners were sent to court for questioning after raids on the PP09 and TK01 compound.[818]
Early 2025	A victim is rescued with assistance of local authorities from TK01.[819]
Mid-2025	Amnesty International visits the site and documents security guards at the gates, as well as on the roof of one building, and other security features.

816 KBS News, "직접 가본 캄보디아 '범죄도시'…한국인 납치되는 이유는?" ["Cambodia's 'Crime City' I visited in person... why are Koreans being kidnapped?"], 23 October 2024, https://www.youtube.com/watch?v=I_AzoduLZnc (in Korean)
817 Camboja News, "1,000 foreign workers found in raid on suspected Kampong Speu scam compound", 25 October 2024, https://cambojanews.com/1000-foreign-workers-found-in-raid-on-suspected-kampong-speu-scam-compound/
818 Khmer Times, "Foreigners sent to court after major raid on foreign compound", 4 November 2024, https://www.khmertimeskh.com/501584628/foreigners-sent-to-court-after-major-raid-on-foreign-compound/
819 Information on file with Amnesty International.

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,[820] satellite imagery and/or survivor testimony, the compound, as of mid-2025, had the following security features:

- Perimeter walls with barbed or razor wire.
- Internal-facing security cameras along perimeter walls.
- At least five security guards at the entrance gate.
- Probable use of guard posts internally at consistent locations along perimeter.

HUMAN RIGHTS ABUSE

Based on news reports that indicate deprivation of liberty is happening at the site, as well as a rescue from the site documented by an organization, and in combination with the physical and organizational security features present at the site, Amnesty International considers it likely that TK01 was used to deprive people of their liberty.

STATE RESPONSIBILITY

Despite police investigations in October 2024,[821] Amnesty International documented human rights abuse at TK01 in early 2025. There is no publicly available information indicating that state authorities have further investigated or shut down this compound.

820 Amnesty International site visit, late-2024.

821 Camboja News, "1,000 foreign workers found in raid on suspected Kampong Speu scam compound", 25 October 2024, https://cambojanews.com/1000-foreign-workers-found-in-raid-on-suspected-kampong-speu-scam-compound/

ANNEX II
SUSPICIOUS LOCATIONS

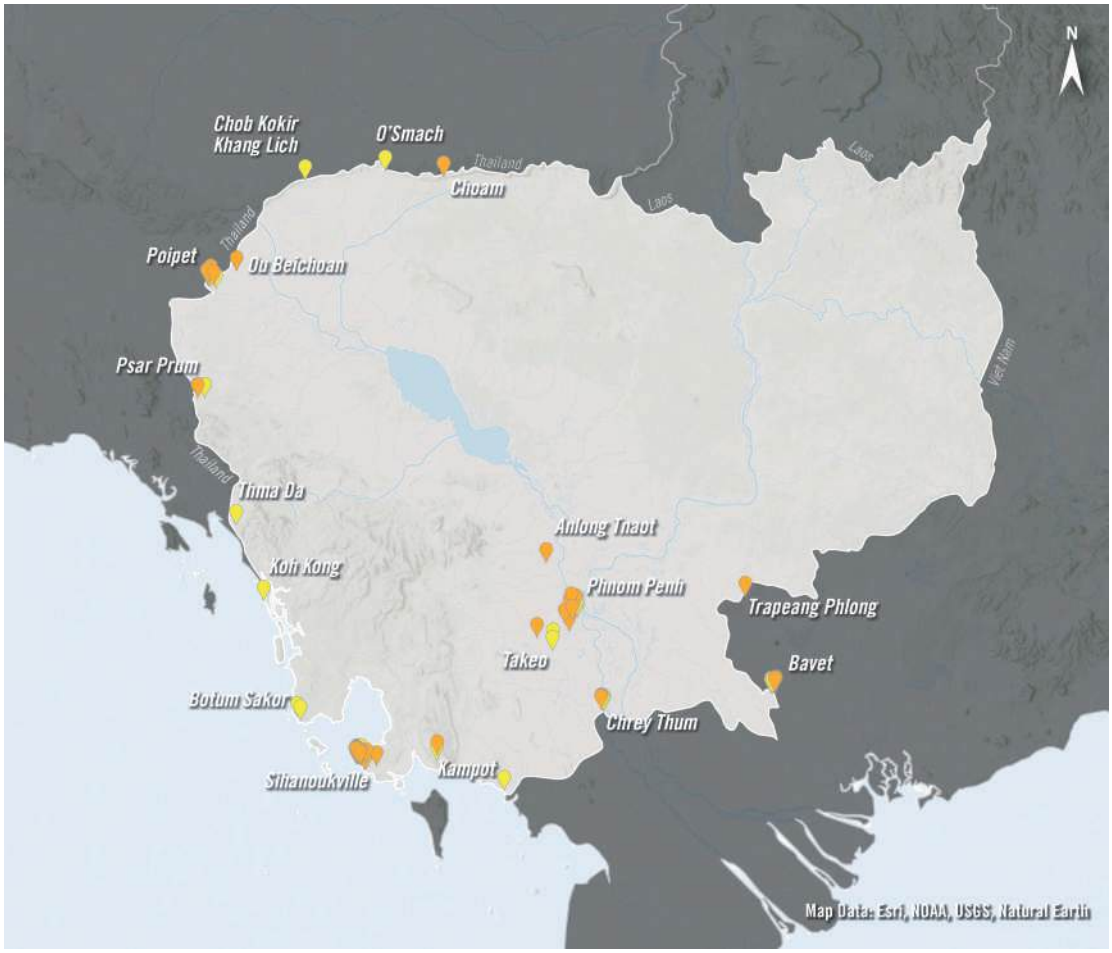
	ID Number	Coordinates	Security features
1.	**BA01**	11.0780, 106.1698	Perimeter wall, security guards, possible placement of strategic security guard locations
2.	**BA04**	11.0761, 106.1662	Perimeter wall, security guards
3.	**BA07**	11.0680, 106.1698	Perimeter wall, security guards
4.	**BA08**	11.0741, 106.1702	Perimeter wall, security guards
5.	**BA09**	11.0675, 106.1614	Perimeter wall, security guards
6.	**BA10**	11.0732, 106.1687	Perimeter wall, security guards
5.	**BA09**	11.0675, 106.1614	Perimeter wall, security guards
6.	**BA10**	11.0732, 106.1687	Perimeter wall, security guards
7.	**BA12**	11.0656, 106.1628	Perimeter wall, security guards, internal-facing security cameras placed on perimeter wall, possible placement of strategic security guard locations
8.	**CH02**	14.3406, 104.0585	Perimeter wall with barbed or razor wire, security guards
9.	**CT06**	10.9596, 105.0606	Perimeter wall, security guards
10.	**CT07**	10.9555, 105.0594	Perimeter wall, highly likely placement of strategic security guard locations

	ID Number	Coordinates	Security features
11.	**KA03**	10.6666, 104.0173	Perimeter wall, security guards
12.	**KCC01**	11.8855, 104.7094	Perimeter wall with internal-facing barbed wire, security guards
13.	**OB01**	13.7409, 102.7415	Perimeter wall, security guards, likely placement of strategic security guard locations
14.	**PO02**	13.6525, 102.5582	Perimeter wall with use or razor or barbed wire, caged windows
15.	**PO04**	13.6464, 102.5655	Perimeter wall, cages on windows
16.	**PO05**	13.6461, 102.5661	Perimeter wall, security guards, bars on windows,
17.	**PO09**	13.6891, 102.5770	Perimeter wall, caged windows
18.	**PO11**	13.6635, 102.5555	Perimeter wall, security guards
19.	**PO17**	13.6489, 102.5978	Perimeter wall, security guards, likely placement of strategic security guard locations
20.	**PP02**	11.4530, 104.8561	Perimeter wall which previously contained electric fencing, internal-facing security cameras along perimeter walls security guards, caged windows
21.	**PP03**	11.5019, 104.8272	Perimeter wall with electric wire, appears abandoned as of 2024

	ID Number	Coordinates	Security features
22.	**PP11**	11.4107, 104.6514	Perimeter wall with barbed or razor wire, security guards, caged windows and other areas
23.	**PP14**	11.5985, 104.8683	Perimeter wall with internal-facing barbed or razor wire, security guards, bars on windows, internal-facing barbed wire placed on roof fencing
24.	**PP15**	11.5868, 104.8755	Perimeter wall with (previously) internal-facing barbed or razor wire
25.	**PP18**	11.5929, 104.8983	Perimeter wall, security guards
26.	**PP19**	11.5702, 104.8602	Perimeter wall with barbed or razor wire, security guards, caged windows on lower and higher levels
27.	**PP21**	11.6048, 104.8691	Perimeter wall with barbed or razor wire, caged windows on lower and higher levels, appears to be abandoned
28.	**PP22**	11.5264, 104.8755	Perimeter wall with barbed or razor wire, security guards, caged windows
29.	**PSP02**	12.9353, 102.4927	Perimeter wall with barbed or razor wire, security guards
30.	**PSP03**	12.9314, 102.4943	Perimeter wall, security guards, double-gate system

	ID Number	Coordinates	Security features
31.	**SI03**	10.5732, 103.5579	Perimeter wall with previously installed internal facing barbed or razor wire, security guards, internal facing security cameras
32.	**SI05**	10.5968, 103.6310	Perimeter wall, security guards, internal-facing security cameras on perimeter walls
33.	**SI07**	10.6101, 103.5350	Perimeter wall with barbed or razor wire, security guards, caged windows
34.	**SI10**	10.6162, 103.5652	Perimeter wall with internal-facing barbed or razor wire, security guards
35.	**SI13**	10.6338, 103.5056	Perimeter wall, security guards, caged windows
36.	**SI14**	10.6322, 103.5063	Perimeter wall, security guards, caged windows
37.	**SI17**	10.6251, 103.4982	Perimeter wall, security guards
38.	**SI18**	10.6249, 103.4977	Perimeter wall with barbed or razor wire, security guards placed in location to look back towards the site
39.	**SI19**	10.6255, 103.4957	Perimeter wall
40.	**SI23**	10.6151, 103.5271	Perimeter wall with barbed or razor wire, security guards
41.	**SI31**	10.6057, 103.5286	Perimeter wall, security guards, cages on windows
42.	**SI38**	10.6214, 103.5127	Perimeter wall, security guards

	ID Number	Coordinates	Security features
43.	**SI41**	10.6212, 103.5019	Perimeter wall with electric fencing and internal-facing barbed wire, security guards, internal-facing cameras
44.	**SI43**	10.6046, 103.5279	Perimeter wall, security guards
45.	**TB01**	11.6730, 105.9749	Perimeter wall with electric fencing, security guards, possible placement of security guard positions at strategic positions inside location



The map above shows the 53 locations Amnesty International determined were or had been scamming compounds, marked in yellow, overlapped by the 45 locations that were deemed as suspicious compounds - shown with orange markers. Many suspicious compounds are close to verified locations, but some are in new areas such as Trapeang Phlong and Ou Beichoan.

ANNEX III

Below is the response from Cambodia's National Committee to Combat Human Trafficking received via email on 26 May 2025.

Response to the Request for Comment and Information from Amnesty International

(Reference: TG ASA 23/2025.6702; dated 12 May 2025 by [redacted] Deputy Regional Director, Research, East and Southeast Asia and the Pacific Regional Office)

Dear Amnesty International Representative,

I would like to thank you for sending me the questionnaire regarding the NCCT reports published during 2022-2024. Before I respond, as the Permanent Vice-Chair of the NCCT, I would like to inform you about the status of some anti-trafficking efforts related to online platforms conducted by Cambodian authorities. Since the end of 2022, Cambodian authorities have been accepting various types of information from both Cambodian citizens and foreigners who wish to seek intervention based on different victimization situations. This can be done without filling any formal information form or any requirement to appear in person in front of the competent authorities. Individuals can provide information through the official Facebook page of the Ministry of Interior, as well as via the HOTLINE of General Commissariat of National Police at 117 (+855 97 9117 117) and a dedicated HOTLINE for foreigners at (+855 31 2012 345).

In general, authorities promptly search for individuals who request intervention, often with the cooperation of the premises' owner. This effort aims to locate the person as quickly as possible for humanitarian reasons. Therefore, the information received is not considered as a formal complaint that necessitates a criminal investigation. Once the individual related to the intervention request is located, authorities conduct a physical examination to assess initial victimization. Following this, the authorities proceed with interviews to determine any potential human trafficking victimization in accordance with the Palermo Protocol, while implementing necessary measures based on the findings.

In 2024 and early 2025, Cambodian authorities received a total of 3,553 intervention requests from foreigners, involving 6,584 individuals from 33 different nationalities. Out of these, 1,762 requests were found, representing 3,008 foreigners from 22 nationalities, while 335 requests, corresponding to 791 foreigners, could not be located. Notably, 1,456 requests were deemed irregular because they lacked identification for the requester, a specific address, or any contact information for further inquiries. Nevertheless, Cambodian authorities continue to investigate these cases.

Regarding your eight questions, some of them fall outside the jurisdiction of the NCCT, so I will respond to some of the questions as follows:

1.a. From January 1, 2025, to April 30, 2025, Cambodian authorities received 1,232 requests for intervention from 2,076 foreigners (23 different nationalities). Out of these, 595 requests were validated, involving 947 foreigners from 15 nationalities. Among these cases, five foreigners were identified as victims of confinement, which led to the arrest of 19 suspects from two nationalities (12 Chinese and 7 Myanmar), and the closure of two (business operation) locations.

1.b. Regarding the figures you mentioned, as they were not mentioned as reported in any specific report, therefore, I will provide information for 2024 and early 2025. During this period, Cambodian authorities received intervention requests through various channels, which were managed by a task force responsible for monitoring and resolving these requests. These requests, suggestions, and comments from the public were collected via the Ministry of Interior's Facebook page and forwarded to capital and provincial police departments through the National Police's operational team against transnational smuggling network. From the 1,762 requests received during this time, authorities identified 13 cases of human trafficking, with 81 involving foreigners.

1.c. His Excellency Chiv Phally, Deputy General Commissioner of the General Commissariat of National Police

1.d. In the report, the term "Rescue" is referred to as "Intervention" in the national language of Cambodia which equivalent to the word "Intervention" in English that means providing assistance based on available information, even if that information is incomplete or inaccurate. A comprehensive investigation can only be conducted after the authorities have identified the individual seeking intervention as a victim of a crime, particularly if they are identified as victims of human trafficking.

1.e. The suspects arrested during the operation, as reported previously, have been all referred to the court for legal proceedings. Specific to the charges within the court's jurisdiction, some cases are currently ongoing, while others have already reached a verdict. Therefore, it is difficult to determine the exact number of cases.

2. NCCT:

In operations, each specialized unit and institution works according to their respective responsibilities and collaborates effectively. The primary objective is to locate the victim and find a way to extract them from the suspected location as quickly as possible. Once the victim is safe, the investigation and suppression procedures can continue based on the information gathered from the individual who requested the intervention.

3. NCCT is the national committee responsible for combating human trafficking, providing leadership on policy and technical support without directing operations. Therefore, the determination of various crimes and human rights violations relies solely on the assessment of the victim's situation, the authorities receiving the intervention request, and the location where the authorities have conducted investigations and initiated crackdowns.

4. From the beginning of 2024 to 2025, Cambodian authorities conducted crackdowns on a total of 28 locations. They located 5,340 foreigners from 21 different nationalities, with 19 cases being forwarded to court. Additionally, 92 ringleaders and accomplices from 6 nationalities were apprehended (49 from China, 5 from Vietnam, 20 from Indonesia, 3 from Thailand, 6 from India, and 9 from Myanmar). Among the above 28 locations included 10 locations in Preah Sihanouk Province, 5 in Banteay Meanchey Province, 4 in Svay Rieng Province, 3 in Phnom Penh, 1 in Kandal, 1 in Tbong Khmum, 1 in Pailin, 1 in Battambang, 1 in Pursat, and 1 in Mondulkiri Province.

5. NCCT: The procedure for investigating a location is based on the law in force and aims to avoid disrupting legitimate businesses. If individual perpetrators are found to be involved and the owner of the location was unaware, the responsibility falls upon the suspect, who must then follow court procedures.

6. NCCT: Private security personnel have not yet been incorporated into the anti-human trafficking task force – a good point that NCCT will consider.

7. NCCT: In Cambodia, the use of shock batons is not needed for everyone. However, competent police authorities are permitted to use them. If used by an offender, they will serve as evidence in determining the crime.

8. NCCT: There is no separately allocated budget allocated but funds are utilized for joint criminal suppression operations.

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“I WAS SOMEONE ELSE’S PROPERTY”

SLAVERY, HUMAN TRAFFICKING AND TORTURE IN CAMBODIA’S SCAMMING COMPOUNDS

Lisa was only 18 when she left her mother’s home in Thailand. She was looking for work during a break from school. She was taken across a river into Cambodia by human traffickers at night. She spent 11 months in Cambodia and was transferred, against her will, to seven different scamming compounds – locations where she and others were forced to conduct online scams – before being released in early 2025. During her time in these compounds, she was not allowed to leave, and was tortured after she tried to escape. Lisa is one of the 58 survivors that Amnesty International interviewed for this report, and one of thousands of victims of Cambodia's scamming compounds.

In this report, Amnesty International documents the alarming human rights crisis taking place within the scamming industry in Cambodia since 2022. It has identified at least 53 scamming compounds where human rights abuses have taken place or continue to occur, including human trafficking, torture and other ill-treatment, forced labour, child labour, deprivation of liberty and slavery. Amnesty International has also shown a pattern of failed state behaviour which has allowed serious abuses to flourish. The government's woefully ineffective response and failure to meet its obligations to adequately prevent and investigate the scamming crisis demonstrates its acquiescence and points towards complicity in the human rights abuses taking place.

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