

Observations on the operating environment of the grey economy and economic crime

Results of a survey sent to prevention authorities in February 2026

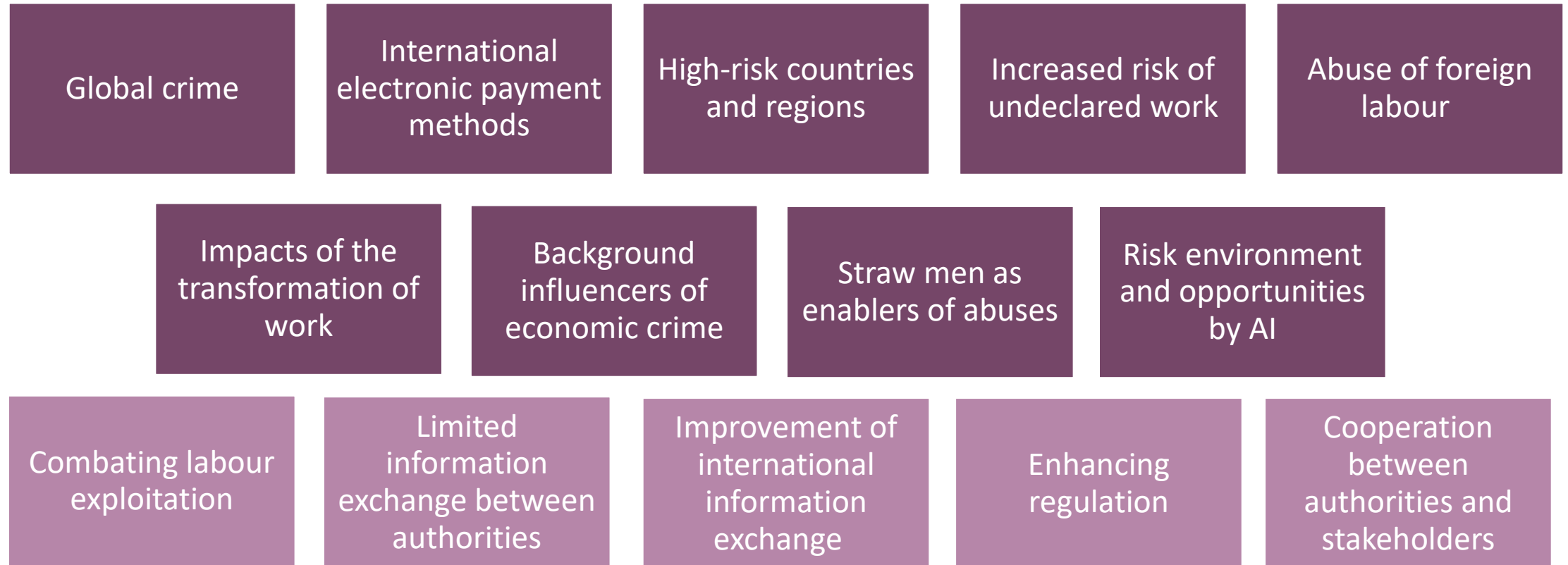
Teemme harmaan talouden torjunnasta näkyvää.

Torjunta kuuluu kaikille.

Survey on the operating environment of the grey economy and economic crime 2026

- Conducted by the editors of Situational picture of the grey economy and economic crime.
- The survey was addressed to the authorities combating the grey economy, ministries and organisations.
- The goal was to collect information about
 - changes, weak signals and phenomena,
 - the technological and international operating environment,
 - prevention work.
- The results of the survey form one part of the situational picture of the grey economy and economic crime.

Survey results



Global crime as a growing threat

- Use of electronic payment methods and international trade in criminal activity, organised crime, online scams, circumvention of sanctions.
- Escalation of crime: international criminal networks, migrant labour exploitation, gang crime, more professional straw man arrangements.
- Rapid transfer of criminal proceeds abroad: as account transfers, in virtual currencies and in cash.
- Companies and identities as instruments of crime.
- Increased threat of environmental crime and link to other crime.
- Longer and more fragmented food supply chains increase the risk of food fraud.

International electronic payment methods

- Crypto assets, mobile banks established abroad and electronic payment platforms play a significant role in grey economy phenomena.
- Access to information, confiscation of criminal proceeds, enforcement injunctions and identifying perpetrators are more difficult and slower.
- Virtual IBANs have become significantly more common, especially in economic offences.
- Rejections of bank account applications and account closures are increasing due to the risks associated with customer relationships.
- Use of other companies' or individuals' accounts or operation outside the banking system.

High-risk countries and regions in prevention

- Third countries are some of the most challenging in terms of prevention.
- Legislation does not enable international cooperation, operating methods differ from those in Finland.
- Authorities do not have sufficient resources or skills for cooperation.
- Business registers and structures make concealing operators possible.
- Impacts of organised crime operating in such as the Baltic countries and Sweden are felt in Finland.
- In circumvention of sanctions, countries around Russia and those that have not imposed sanctions represent a high risk, as well as regions with large numbers of companies with a Russian background.

Increased risk of undeclared work

- Risk factors for undeclared work: international crises, unemployment, higher living costs, reduced benefits, more stringent provisions in the Aliens Act, lack of a work permit and labour exploitation.
- Labour-intensive and low-paid sectors as well as seasonal work.
- Trainees, substitutions and fixed-term positions as well as partially undeclared work make it difficult to uncover and prove undeclared work.
- Undeclared income from short-term letting of rental housing.

Abuses of foreign labour

- Misleading image of Finland concerning studies, employment and benefits.
- Unpaid traineeships or work demonstrations as a precondition for receiving a promised or made-up job.
- Franchising as an operating model similar to entry fees.
- Loans to finance the activities obtained from relatives or the community.
- Incompetence in fulfilling statutory obligations.

Impacts of the transformation of work

- Light entrepreneurship as a means used by debtors and grey economy operators to continue their business and avoid enforcement proceedings.
- Income is converted into expense allowances, lack of insurances.
- Forced light entrepreneurship has increased.
- The individual is employed as an employee and light entrepreneur by the same employer.
- The fight against the grey economy could be enhanced by imposing an obligation to register and a reliability requirement on invoicing service companies.

Background influencers of economic crime

- The activity of professional enablers, straw men and figurehead nominees of the companies on the verge of bankruptcy are more widespread and professional.
- Certain expert services are concentrated on the same enablers.
- Shell companies and offshore accounts are established for abuses.
- Beneficial owners are concealed by means of complex international ownership and group structures.
- Assisting in the planning and committing financial crimes and the falsification of accounting.
- Enabling of the transport of illicit substances and evasion of restrictions, taxes and duties related to foreign trade.

Straw men as enablers of abuses

- Straw men are used to evade sanctions, taxes, enforcement, trading licences and bans on business operations.
- Continuity of the grey economy: business, employees and property are transferred to new companies operating in the name straw men.
- Straw men arrangements are facilitated by establishing a limited liability company without any financial risk.
- Straw men are used in light entrepreneurship and undeclared rental of platform accounts, in which wages or trade income are reported as the income of the wrong individual.
- Figurehead nominees of the companies on the verge of bankruptcy are more widespread, especially in connection of bankruptcies.
- Foreign figurehead nominees may not be reached during administrative or criminal processes.

Risk environment and opportunities by AI

- Suspected abuses in online scams, document fraud, applications, recruitment scams, websites and identity fraud.
- Spreading of disinformation in influencing and consumer products.
- Use of AI in control, targeting and research.
- AI-based analysis tools and automated data cross-checks.
- Analyses of official registers and databases: identify deviations, generate prompts.
- Identification of counterfeits and abuses.

Combating labour exploitation

- Pre-screening of foreign labour recruitment companies, supervision models, checklists and guides.
- Occupational health and safety violations as possible indications of labour exploitation.
- Possible amendments to the Act on the Contractor's Obligations.
- Possibility of imposing a negligence penalty for wage underpayment.
- A victim's extended residence permit for job-seeking or entrepreneurship.
- Amended directive on human trafficking and national legislative amendments.

Limited information exchange between authorities

- Automation and real-time data of official registers.
- Continuous development of information exchanges between the authorities and a mutual contact system.
- Developing a joint operational risk analysis.
- Fragmentation, reliability and publicity of information are areas in need of development.
- More extensive information on companies' negligence's in the Business Information System.
- Extending the availability of the Bank and Payment Accounts Monitoring System would prevent concealment and falsification of account information in the future.

Improvement of international information exchange

- Improvement, in particular with third countries.
- Common real-time information systems in the European Union.
- All authorities should have the necessary agreements in place to obtain comprehensive international information.
- International development of operational cooperation between authorities.
- Joint groups and projects led by Member States are effective.

Enhancing regulation

- An entry on combating the grey economy and economic crime in the next Government Programme.
- A special act on the prevention of organised crime to enhance information exchanges and administrative response.
- Insufficient competences partly hinder effective prevention.
- The climate of attitudes in society, political decisions and a more critical attitude towards supervision by the authorities as a threat to prevention.
- Administrative negligence penalties and supervision fees.

Effective cooperation between authorities and stakeholders

- Joint supervision and projects by the prevention authorities, rapid response to identified problems and flexibility in the work.
- Field supervision provides direct observations of sectors and criminality.
- Own-initiative information exchanges, low-threshold reporting channels and centralised information services.
- Contact persons designated for cooperation between the authorities and physical cooperation on the same premises.
- Authorities' cooperation forums.
- Specialisation, training, guides and information campaigns.

www.vero.fi/en/grey-economy-crime/

Teemme harmaan talouden torjunnasta näkyvää.

Torjunta kuuluu kaikille.