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ANTI-MONEY LAUNDERING REGULATIONS IN THE FOOTBALL SECTOR: OPPORTUNITIES AND CHALLENGES

Abstract

The article analyzes the key factors contributing to the vulnerability of the football sector to money laundering and evaluates the regulations introduced under the 2024 European Union Anti-Money Laundering (AML) Package. The author highlights that the unique characteristics of the football sector, including complex organizational structures, lack of financial transparency, and the cross-border nature of financial flows, significantly increase its susceptibility to exploitation for illegal financial activities. Incorporating the football sector into AML regulations represents a significant step in combating money laundering, promoting financial transparency, and reducing opportunities for illicit activities. However, the implementation of these regulations presents numerous challenges, such as high compliance costs and the need for employee training. The article emphasizes the importance of harmonizing regulations through the adoption of a regulation, which minimizes the risk of legal loopholes and discrepancies in national implementations. It also underscores the role of international cooperation and a dynamic approach to monitoring the enforcement of these regulations. The analyses conducted confirm that extending AML regulations to the football sector is a necessary and promising measure, but further actions

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are essential to effectively reduce financial crime and enhance the global stability of the football industry.

Key words: anti-money laundering, football sector, AML Package, professional football clubs

JEL Classification: F52, G38, L83

1. Introduction

Money laundering is currently one of the most significant challenges facing global economies. It not only undermines the financial stability of states but also enables the funding of other criminal activities, such as drug trafficking, corruption, and terrorism. According to estimates provided by the United Nations Office on Drugs and Crime (hereinafter: UNODC), annual losses resulting from money laundering could amount from 2% to 5% of the world's gross domestic product (hereinafter: GDP) [UNODC, Money Laundering. Overview]. With the International Monetary Fund (hereinafter: IMF) estimating the 2024 global GDP at approximately \$110.06 trillion [IMF 2024], this translates to staggering amounts between \$2.20 trillion and \$5.50 trillion each year. To legitimize funds obtained through illegal activities, criminals employ various methods and exploit numerous sectors, with the football sector playing an increasingly significant role in this process.

In recent years, football has undergone a profound transformation, evolving from the world's most popular sport, drawing millions of fans, into one of the most significant sectors of the entertainment economy. Today, it is not just a sport, but a global industry characterized by massive financial flows. The increasing scale of financial transactions has turned football into a domain not only of athletic competition but also of substantial economic and legal risk.

Nearly two decades ago, the European Union (hereinafter: EU) began recognizing that the popularity of football, combined with its global reach and lack of full financial transparency, could make this industry vulnerable to exploitation by financial criminals. This was highlighted in the 2007 White Paper on Sport, where money laundering was identified as one of the emerging threats and challenges facing European society [European Commission 2007: 2]. The football sector has become particularly attractive to groups engaged in money laundering, as complex player transfers, inflated

sponsorship agreements, and fictitious investments serve as efficient mechanisms to obscure the illicit origins of capital [Cindori, Manola 2020: 892]. According to UNODC estimates, approximately \$140 billion is laundered annually through sports betting alone [UNODC 2021: 259]. This phenomenon underscores the scale of the problem and emphasizes the need for enhanced financial oversight and regulation in this industry. For this perspective, football emerges as a critical battleground for ensuring financial security. Combating money laundering in this sector not only protects its reputation but also prevents the destabilization of economies that derive substantial benefits from this global discipline.

The risk of money laundering in the football sector has been the subject of numerous analyses, both by intergovernmental organizations [FATF 2009] and by academic scholars, who have highlighted the ways in which this sector is exploited for financial crimes [Cindori, Manola 2020: 889–893], as well as possible measures to combat such phenomena [Abrahamyan 2023: 24]. Despite the increasing number of warnings regarding the high risk of money laundering in this industry and the emergence of financial scandals, the decision to subject this sector to anti-money laundering (hereinafter: AML) regulations was made relatively late. In 2024, the EU adopted new AML regulations, collectively referred to as the AML Package, which finally extended to the football sector, specifically professional football clubs and football agents. One possible reason for this delay could be the concern over damaging the social image of football, which for millions of people worldwide symbolizes passion, unity and the purity of sport. As a global social phenomenon, football has long been perceived as a domain free from negative association, which may have contributed to the postponement of legislative action in this area.

The article aims to analyze the factors determining the vulnerability of the football sector to money laundering, evaluate the regulations introduced under the EU AML Package and identify the opportunities and challenges associated with their implementation. The central thesis posits that while extending AML regulations to the football sector represents a necessary and positive development, it is likely to be accompanied by significant challenges arising from the unique characteristics of this industry. The study employs a dogmatic-legal method and includes an analysis of the relevant

literature, European Commission documents, and secondary data, such as reports from Financial Action Task Force (hereinafter: FATF).

2. Money Laundering Risks in the Football Sector

Money laundering, recognized as one of the key threats to financial systems, has been the subject of numerous definitions in both academic literature and legal acts, each highlighting various aspects of the phenomenon (Van den Broek 2015: 1; Regulation 2024/1624: Article 2, paragraph 1, point (1)). Based on these definitions, it can be concluded that money laundering is the process of transforming assets derived from illegal sources into funds with an ostensibly legal character. This process often unfolds in three stages, commonly referred to as placement, layering, and integration [Georgieva 2020: 24; Alldridge 2008: 441]. The first stage, placement, involves introducing illegally obtained funds into the financial system. The second stage, layering, includes conducting transactions aimed at obscuring the origin of these funds. Finally, the integration stage refers to the phase where “laundered” funds re-enter the financial system, supported by evidence of their apparent legitimacy [Bartlett 2002: 2]. Financial criminals, by exploiting these stages, engage various sectors of the economy [Alldridge 2008: 459], including the sports sector, with football being a primary focus, as repeatedly highlighted in European Commission documents [European Commission 2007: 16–17; European Commission 2019: 7–16].

The vulnerability of the sports sector to money laundering stems primarily from its significant social and economic role. Its importance is discussed not only in terms of its impact on physical and mental health but also its substantial economic contribution. The White Paper on Sport highlights that, as early as 2004, the sports industry in its broadest sense generated approximately 3,7% of the EU's GDP and provided employment to 15 million people [European Commission 2007: 11]. Over the past several years, the significance of sport has continued to grow steadily. This growth is evident in increased investments, the globalization of sporting events, and the rising economic value of sports-related industries. Consequently, sport has become an essential component of the economy, underscoring the need for enhanced financial oversight and regulation within the sector.

Football is considered the most popular sport in the world. According to data presented in 2024 by the international football governing body,

the Fédération Internationale de Football Association (hereinafter: FIFA)¹, the number of registered male players in 2023 reached 128,694, while the number of professional football clubs worldwide stood at nearly 3,986 [FIFA 2023: 4]. In women's football, the number of professional players in 2023 amounted to just over 19,064 [INSIDEFIFA, Member Associations Survey Report. Grow the participation]. The immense popularity of football is further evidenced by figures presented in another FIFA report on the 2022 FIFA World Cup held in Qatar. According to estimates, the total audience for the final match of this global sporting event, both live and televised, reached 1.5 billion people, while approximately 5 billion individuals engaged with the tournament in some capacity [FIFA World Cup Qatar 2022™ in numbers]. The financial impact of football is equally impressive, because it is a sector generating highest revenues among sports disciplines, with a consistent year-on-year increase. In the 2022/2023 season, the European football market reached a value of €35.3 billion, marking a 16% growth compared to the previous season [Deloitte, Football Division Annual Review of Football Finance 2024: 2–3].

The title of the most popular and the most profitable sport in the world also brings with it numerous risks [European Commission 2018: 13–15]. Among these, its vulnerability to various abuses by financial criminals, including the use of the football sector for money laundering. The vulnerability of this sector to money laundering was extensively described in the 2009 FATF report, which categorized risk factors into three groups: structural factors, financing-related factors, and cultural factors [FATF 2009: 14–16].

The first group of risk factors identified by FATF primarily includes the football sector's accessibility due to the lack of significant entry barriers, which facilitates the establishment of informal connections among representatives of public authorities, the business sector, and criminal networks. Another critical element increasing risk in this sector is its complexity, characterized by opaque networks of stakeholders and the frequent occurrence of high-value, cross-border financial transactions, which further complicate oversight and control mechanisms. Additionally, football clubs often exhibit diverse legal and ownership structures, and their management frequently lacks adequate

¹ It is an organization established in 1904, created in response to the need for a global governing body for football. One of its key objectives is to combat practices that could undermine the integrity of the sport [FAFT 2009: 11].

managerial competencies, thereby exacerbating the sector's vulnerability to financial and legal risks [FATF 2009: 14].

The financial factors identified by FATF as increasing the risk of money laundering in the football sector include the involvement of substantial financial resources, both in the form of cash flows and international transfers related to player transactions [FATF 2009: 15]. Although cashless payments are becoming increasingly popular, cash continues to be used, particularly in ticket sales for sporting events. Unfortunately, this creates opportunities for abuse, such as declaring the sale of a full allocation of tickets, a significant portion of which may be purchased by individuals involved in financial crimes to "launder" funds. These tickets are then often resold at higher prices [De Sanctis 2014: 36]. FATF also highlighted the practice of player overvaluation by clubs, which artificially inflates balance sheet values. The sector's complexity, coupled with the pressure to secure funding in the face of unpredictable sports results, often forces clubs to rely on funds from uncertain sources [Cindori, Manola 2020: 888]. In such circumstances, due diligence requirements in establishing business relationships are not always strictly observed, and the COVID-19 pandemic further intensified risks in this sector. Football clubs experienced significant financial losses, which frequently led to a lowering standard for verifying business partners. As a result, some business relationships were established with entities linked to financial crimes, including money laundering.

The cultural vulnerabilities of the football sector represent another group of factors that heighten the risk of money laundering. According to the FATF, young players, often inexperienced and susceptible to external influences, are particularly vulnerable to exploitation for illicit activities. Financial criminals frequently take advantage of their lack of knowledge and support system, involving them in money laundering schemes, often in ways that are difficult for the players to detect [FATF 2009: 16]. Another significant cultural factor is the pursuit of social prestige by individuals involved in criminal activities. The football sector, as a space for interaction with influential figures, is often utilized more for building social standing and image than for direct financial gain [Appermont, Bull 2024: 3]. Perhaps the most critical cultural element is the societal role that football plays. It is widely regarded as a symbol of passion and social unity, making it difficult for the public to accept its potential connections to criminal activities, resulting in the underreporting

of illegal practices by both fans and club managers. Furthermore, fearing the loss of sponsors and reputational damage, club management often chooses to ignore or downplay the risks associated with ties to the criminal underworld. This reluctance to confront such issues further complicates efforts to effectively counteract these threats.

In both academic literature and reports by international organizations, other factors contributing to the high risk of money laundering in the football sector have been widely discussed. Among these, the dynamic growth of the betting market [De Sanctis 2014: 29], particularly online platforms, is often highlighted. This increased focus on this area is attributed to factors such as the growing penetration of the Internet, the rising use of mobile phone, easier access to online gambling, cultural acceptance, and the widespread prevalence of corporate sponsorships and celebrity endorsements [UNODC 2021: 256]. Available data suggests that the use of the sports sector to legalize illicit funds may involve approximately \$140 billion annually [UNODC 2021:259].

It is worth referring to the European Commission's reports on the assessment of money laundering risks. In 2019, the European Commission, for the first time in such a document, identifies professional football as a sector characterized by high risk of money laundering [European Commission 2019: 5]. In its 2022 report, the high vulnerability of this sector to money laundering activities was reaffirmed, with the added observation that the COVID-19 pandemic further exacerbated this risk by worsening the financial situation of many clubs [European Commission 2022: 12]. In both documents, the only recommendation concerning the football sector stated that "Member States should consider which actors should be covered by the obligation to report suspicious transactions and what requirements should apply to the control and registration of the origin of the account holders and the beneficiaries of funds" [European Commission, 2019: 19; European Commission, 2022: 24]. Thus, despite recognizing the high money laundering risk within the football sector, the European Union at that time chose not to implement more decisive regulations, leaving the responsibility for action in this area to the Member States.

3. The AML Package and Its Significance for the Football Sector

The issue of money laundering and its detrimental impact on various economic sectors was recognized by the European Union over three decades ago. In 1991, the EU adopted the Council Directive 91/308/EEC of 10 June 1991 on the prevention of the use of the financial system for the purpose of money laundering [Official Journal of the EU L 166 of 28 June 1991, p. 77–83; hereinafter: I AML Directive], marking the first step in establishing a unified EU framework for combating money laundering. However, the dynamic evolution of criminal practices and the exploitation of emerging economic sectors for concealing illicit funds necessitated consistent adaptation of the regulations to the changing circumstances. As a result, since the adoption of the I AML Directive, the provisions have been amended multiple times, with subsequent directives introducing increasingly detailed requirements. A pivotal moment came in 2024 with the adoption of the so-called AML Package, which, for the first time, addressed anti-money laundering measures through a regulation. This legislative shift aimed primarily at achieving greater harmonization of rules across all Member States while simultaneously enhancing mechanisms for detecting and preventing illicit financial operations.

The first significant initiative toward the previously mentioned harmonization of EU regulations was the introduction of a legislative package by the European Commission on 20 July 2021. Until then, each Member State had the autonomy to adopt to existing regulations, often overlooking critical elements during implementation. This led to financial criminals operating transnationally seeking legal loopholes that enabled them to achieve their goals, such as money laundering. By addressing these issues through a regulation, the European Commission seeks to close these gaps, effectively reducing the vulnerabilities that criminals have historically exploited. In the Proposal for a Regulation of the European Parliament and of the Council on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing [Official Journal of the EU L 1624 of 19 June, 2024, p. 1; hereinafter: Resolution 2024/1624], it was indicated that, to mitigate new and emerging threats, the list of obliged entities was expanded to include providers of crypto-asset services, as well as other sectors such as crowdfunding platforms and migration operators [European Commission 2021: 2]. In the first version of proposal, there was no explicit reference to the necessity of including the football sector in the scope of the regulation, despite

the repeated emphasis on the high risk of money laundering present in this sector, which appeared incomprehensible [Appermont, Bull 2024: 9]. It was only through interinstitutional negotiations that both the European Parliament and the Council of the European Union deemed it necessary to expand the scope of the regulations to additional sectors, including football clubs and football agents [European Parliament 2021]. Thus, the football sector was explicitly included for the first time in money laundering regulations.

On 31 May 2024, the AML Package was finally adopted. This package comprises four legal acts: the previously mentioned Resolution 2024/1624 [Official Journal of the EU L 1624 of 19 June, 2024, p. 1], as well as Regulation (EU) 2024/1620 of the European Parliament and of the Council of 31 May 2024 establishing the Authority for Anti-Money Laundering and Countering the Financing of Terrorism and amending Regulations (EU) No 1093/2010, (EU) No 1094/2010, and (EU) No 1095/2010 [Official Journal of the EU L 1620 of 19 June, 2024, p. 1], Regulation (EU) 2023/1113 of the European Parliament and of the Council of 31 May 2023 on information accompanying transfers of funds and certain crypto-assets and amending Directive (EU) 2015/849 [Official Journal of the EU L 150 of 19 June, 2024, p. 1], Directive (EU) 2024/1640 of the European Parliament and of the Council of 31 May 2024 on the mechanisms to be put in place by Member States for the prevention of the use of the financial system for the purposes of money laundering or terrorist financing, amending Directive (EU) 2019/1937, and amending and repealing Directive (EU) 2015/849 [Official Journal of the EU L 1640 of 19 June, 2024, p. 1].

The act that directly imposed obligations on professional football clubs and agents was Regulation 2024/1624. Recital 24 of this regulation identifies factors that expose the football sector to the risk of money laundering, including the global popularity of football, the considerable sums, cash flows and financial interests involved, the prevalence of cross-border transactions. Additionally, it underscores the necessity of implementing appropriate anti-money laundering measures through customer due diligence procedures for investors, sponsors (advertisers), other partners, and counterparties [Recital 24 of Regulation 2024/1624]. Recital 25 also highlights an important issue, noting that while the risk of money laundering is higher in the top divisions of national football leagues—primarily due to high-value cross-border player transfers—such risks are not exclusively determined by league divisions.

Lower-division clubs are also vulnerable to exploitation by financial criminals. This necessitates a careful assessment by Member States to determine whether such clubs, despite their lower division status, still pose a significant risk before exempting them from the application of AML regulations [Recital 25 of Regulation 2024/1624].

Article 2 paragraphs 1 point (52) of the discussed regulation provides a definition of a professional football club, described as any legal person that is, owns or manages a football club that has been granted a license and participates in the national football leagues in a Member State and whose players and staff are contractually engaged and are remunerated in exchange for their services [Regulation 2024/1624: Article 2 paragraphs 1 point (52)]. Similarly, point (53) of this article defines a football agent as a natural or legal person who, for a fee, provides intermediary services and represents football players or professional football clubs in negotiations with a view to concluding a contract for a football player or represents professional football clubs in negotiations with a view to concluding an agreement for the transfer of a football player [Regulation 2024/1624: Article 2 paragraphs 1 point (53)].

According to Article 3 of this regulation, both football agents and professional football clubs are classified as obliged entities. For professional football clubs, however, the regulation enumerates specific instances in which they are subject to legal obligations. These instances include: transactions with an investor, transactions with a sponsor, transactions with football agents or other intermediaries, transactions for the purpose of a football player's transfer [Regulation 2024/1624: Article 3 point(3n) and point(3o)]. The inclusion of these entities in the group of obliged entities imposes a numerous obligation, as outlined in subsequent articles of the discussed Regulation. The scope of these obligations is extensive. Among them, the following can be highlighted: the implementation of internal strategies, procedures, and control measures aimed at ensuring compliance with AML regulations [Regulation 2024/1624: Article 9], undertaking measures to identify and assess the risks of money laundering across all areas of the entity's activities [Regulation 2024/1624: Article 10], appointing one member of the management body in its management function who shall be responsible for ensuring compliance with AML regulations [Regulation 2024/1624: Article 11], applying and conducting customer due diligence

measures [Regulation 2024/1624: Articles 19 and 20], and, notably, reporting of suspicions [Regulation 2024/1624: Article 69]. This imposition of numerous responsibilities positions them as “gatekeepers in the system”, tasked with engaging in preventive actions aimed at deterring and ultimately reducing the volume of money subjected to laundering process [Simser 2013: 41–42].

The diversity among professional football clubs in terms of size, financial resources, and league divisions prompted the EU legislator to allow Member States to exempt certain clubs from the obligation to comply with the requirements set forth in Regulation 2024/1624. According to Article 5, paragraph 1 of the Regulation, Member States may decide to exempt, in full or in part, professional football clubs that participate in the highest division of the national football league and that have a total annual turnover of less than EUR 5,000,000, or the equivalent in national currency, for each of the previous two calendar years, as well as professional football clubs that participate in a division lower than the highest division of the national football league [Regulation 2024/1624: Article 5, Paragraph 1]. However, both scenarios require a prior risk assessment to demonstrate a low level of risk associated with the nature and scale of the activities of such professional football clubs. This provision should be positively assessed as it allows entities that are not significantly exposed to money laundering risks to be relieved of the costly obligations associated with aligning their procedures with the requirements outlined in AML regulations.

The discussed regulations constitute a significant step toward building a financial system resilient to abuse. These provisions not only introduce preventive measures but also increase the accountability of entities in the football sector, which, in the long term, may positively impact both economic stability by reducing the occurrence of money laundering activities and public trust in the football sector, which has faced numerous financial scandals in recent years². In the coming years, it will be crucial to monitor the implementation of these new measures, their effectiveness, and their impact on reducing money laundering in the football industry. Additionally, developing mechanisms and tools to support the entities in fulfilling their obligations, including artificial intelligence and big data analysis, may prove essential.

² Further details on these scandals can be found in: Bishop M. L., Cooper A. F. 2018: 21–22.

4. Opportunities and Challenges of Implementing AML Regulations in the Football Sector

The inclusion of professional football clubs and agents under EU AML regulations marks a new chapter in combating money laundering within this globally influential and economically significant industry, long recognized as highly vulnerable to financial crime risks [Cindori, Manola 2020: 886]. The imposition of numerous obligations on football clubs and agents, aims to strengthen financial oversight in the football world. However, the practical implementation of these regulations presents numerous challenges due to the specific characteristics of the football industry. As highlighted in Chapter 1, this sector is distinguished by its complex organizational structure, unconventional relationships between entities, and frequent cross-border financial flows, which significantly differentiate it from other sectors subject to AML regulations. Therefore, the adaptation process for professional football clubs and agents to these new requirements is expected to be highly intricate. On the one hand, the long-overdue inclusion of the football sector under AML regulations has the potential to significantly curb criminal activities by enhancing oversight of transfer markets, addressing the overvaluation of player transfers, and increasing transparency in ownership structures [Simser 2013: 49]. On the other hand, compliance with these regulations will involve substantial costs, including the implementation of new procedures, employee training, and overcoming inconsistencies in approaches among EU Member States. While the benefits of extending AML regulations to this high-risk sector are clear, their effective implementation requires a carefully considered and systematic approach tailored to the unique dynamics of the football industry.

Acknowledging the substantial adjustments required, the EU legislator extended the transition period for professional football clubs and agents until 10 July 2029, whereas other obligated institutions must comply with the new rules by 10 July 2027. This extension offers a vital opportunity for entities in this sector to develop and refine their compliance frameworks. However, the prolonged transition period also introduces risks, as it creates a window for financial criminals to adapt their strategies and exploit potential regulatory gaps. As practical experience demonstrates, stricter controls and the introduction of more rigorous regulations often lead to the adaptation of criminal actors, who swiftly adjust their activities to align with evolving legal frameworks [FATF 2009: 5]. Therefore, it is crucial to support

these new regulations with flexible and effective supervisory mechanisms capable of promptly identifying and neutralizing emerging threats. Dynamic monitoring of financial flows and rapid responses to innovative money laundering techniques should be integral to the anti-money laundering system implemented in the football sector.

The introduction of unified AML regulations in the football sector across the EU should be positively evaluated, as it has the potential to significantly enhance financial transparency in this industry. The obligation to report suspicious transactions and identify clients and beneficial owners could substantially reduce the risk of fraudulent practices, including the conclusion of fictitious sponsorship agreements. In practice, these regulations will require detailed documentation of funding sources, such as specifying which funds originate from sponsors, investors, or player transfers. This approach is highly likely to limit the concealment of illicit funds within the complex financial structures that have historically characterized football clubs. However, implementing these regulations may encounter challenges, particularly those related to the absence of strict criteria for valuing players in the transfer market. The process of determining a player's value largely depends on subjective factors and is influenced by various aspects such as age, nationality, and the number of matches played in a season [Majewski 2016: 91–104]. These conditions may still lead to ambiguities and, potentially, abuses in practice.

Another potential benefit of the new EU AML regulations, particularly in the football sector, is the strengthening of international cooperation. Previously, the implementation of AML regulations through directives led to discrepancies among Member States, creating legal loopholes that financial criminals could exploit. Moreover, as discussed in the previous chapter, the decision to include the football sector under AML regulations was left to individual Member States. This approach proved insufficiently effective, as only two countries – Belgium and Bulgaria – opted to implement such measures [Appermont, Bul 2024: 9–10]. Addressing this critical issue through regulations that are directly applicable across all Member States is a significant step forward, ensuring greater harmonization and effectiveness in combating money laundering. However, fully eradicating financial crime in the football sector remains a challenge. It is noteworthy that the United Kingdom, which is no longer subject to these regulations following its

departure from the EU, is home to the Premier League – the largest and most profitable football league in the world [Deloitte, Football Division Annual Review of Football Finance 2024]. Consequently, the football sector may still face various forms of abuse, as leagues in countries not covered by these regulations could continue benefiting from illicit funds, thereby growing stronger and negatively affecting competition. Considering this, the importance of international cooperation must be emphasized even more strongly. Such cooperation is a critical preventive measure, and its absence could undermine the effectiveness of these solutions [Cindori, Manola 2020: 895].

A challenge stemming from subjecting professional football clubs to the obligations under AML regulations may be the lack of a uniform legal definition of the term “client.” The AML directives and the recent Regulation 2024/1624 impose numerous due diligence obligations on obliged entities regarding their clients. However, the absence of a precise definition of who qualifies as a “client” under AML provisions could lead to significant interpretative uncertainties. This issue may become particularly pronounced in a specialized sector like football, where a “client” could refer to a player, investor, sponsor, or even another football club [De Sanctis 2014: 29]. The lack of clear guidance in this regard could result in inconsistent application of regulations across Member States or pose the risk of sanctions being imposed on professional football clubs for improperly implementing the rules. Introducing such a definition is not straightforward due to the diversity of obliged entities, which include both financial and non-financial institutions, each interacting with different categories of clients. Moreover, the absence of a definition might also be justified by the ongoing changes in the sector and the emergence of new client categories as a result. Ultimately, it remains to be seen in practice whether this approach proves effective or whether the development of sector-specific guidelines might become necessary. Such guidelines could account for the specificities of various industries and facilitate the more effective implementation of AML regulations, particularly in the football sector.

5. Conclusions

This article analyzes the factors determining the susceptibility of the football sector to money laundering and evaluates the regulations introduced as part of the EU AML Package. The findings unequivocally demonstrate that

the football sector, due to its unique characteristics, represents a significant risk area in the context of financial crime. The reviewed data and referenced academic literature confirm the complex ownership structures, a lack of financial transparency, and the cross-border nature of financial flows increase the sector's vulnerability to exploitation for money laundering. The inclusion the football sector under AML regulations, although relatively late, constitutes a significant step in combating this practice. The provisions contained in AML Package, especially in Regulation 2024/1624, introduced new obligations for professional football clubs and agents, such as suspicious transaction reporting, and the implementation of due diligence procedures. As demonstrated, these regulations have the potential to significantly enhance financial transparency in the industry and reduce opportunities for illicit activities. However, their implementation entails numerous challenges, including the costs of establishing procedures, the need for staff training, and the lack of a uniform approach among EU Member States. This inconsistency may, in part, stem from the absence of a standardized definition of "client" within the AML framework.

The harmonization of regulations through the introduction of a regulation, rather than a directive, is recognized as a key benefit. This approach significantly minimizes the risk of legal loopholes and discrepancies in national implementations, fostering a more unified and effective framework. Additionally, it enhances international cooperation, which is critical for combating money laundering in a sector characterized by its global operations and cross-border financial flows. This harmonization not only strengthens the regulatory landscape but also lays a robust foundation for long-term stability and transparency within the football industry.

Drawing from the analyses conducted, this article substantiates the thesis that incorporating the football sector into AML regulations is both a necessary and strategically promising step forward, though not without its challenges. The effectiveness of this initiative hinges on further actions, such as rigorous monitoring of regulation implementation, fostering robust international cooperation, and developing sector-specific guidelines that address the unique operational complexities of the football industry. These measures could play a critical role not only in curbing financial crimes but also in enhancing transparency and fostering greater stability within the global sports sector.

Given the persistent challenges and the adaptive strategies of financial criminals, the successful application of these regulations necessitates a dynamic and coordinated approach. This requires active participation from all stakeholders, including EU institutions, Member States, and entities within the football sector. The comprehensive and effective enforcement of these measures has the potential to eliminate the exploitation of professional football clubs and agents for money laundering activities. Furthermore, it could establish the football sector as a benchmark for other industries, particularly those in the broader sports domain, which face analogous challenges in countering financial crimes.

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