

# A Multi-Stakeholder Approach to Nigeria's FATF Delisting

## Workshop Report

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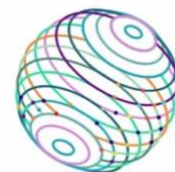
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*Global South Dialogue on Economic Crime*

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## Project Website

Find out more about the 'FATF Greylisting: Implications and Learnings from a Global South Perspective: Nigeria as a Case Study' Project at <https://gsdec.network/a-multi-stakeholder-approach-to-nigerias-fatf-delisting-workshop-report/>.

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# **TABLE OF CONTENTS**

<b>LIST OF ABBREVIATIONS</b>	<b>4</b>
<b>BACKGROUND</b>	<b>5</b>
<b>THE WORKSHOP</b>	<b>7</b>
<b>RECOMMENDATIONS</b>	<b>10</b>
<b>CONCLUSION</b>	<b>17</b>
<b>APPENDIX A: WORKSHOP POSTER</b>	<b>18</b>

# LIST OF ABBREVIATIONS

<b>AML</b>	Anti-money laundering
<b>CFT</b>	Counter-terrorism financing
<b>DNFBPs</b>	Designated non-financial businesses and professions
<b>FATF</b>	Financial Action Task Force
<b>FSRB</b>	FATF style regional body
<b>FIRS</b>	Federal Inland Revenue Service
<b>GIABA</b>	Inter-Governmental Action Group against Money Laundering in West Africa
<b>GSDEC</b>	Global South Dialogue on Economic Crime
<b>ICRG</b>	International Cooperation Review Group
<b>KYC</b>	Know Your Customer
<b>MDAs</b>	Ministries, Departments, and Agencies
<b>ML</b>	Money laundering
<b>NBA</b>	Nigerian Bar Association
<b>NFIU</b>	Nigeria Financial Intelligence Unit
<b>NGO</b>	Non-governmental organization
<b>NC</b>	Non-compliant
<b>PC</b>	Partially compliance
<b>SCUML</b>	Special Control Unit Against Money Laundering
<b>SRBs</b>	Supervisory and Regulatory Bodies
<b>TF</b>	Terrorist financing

# BACKGROUND

On 24 February 2023, the Financial Action Task Force (FATF) greylisted Nigeria owing to significant deficiencies in the country's anti-money laundering and counter-terrorism financing (AML/CFT) efforts. When a country is placed on the FATF's greylist, it implies that it is under increased monitoring due to strategic deficiencies identified in its regime's ability to combat money laundering and terrorist financing (ML/TF), and the country has committed to addressing its challenges.

The FATF is an inter-governmental standard-setting body that develops and promotes AML/CFT recommendations which countries must implement and comply with. Arguably, the FATF's standards are developed on two fronts: prevention and enforcement. While the former is focused on regulation, supervision, reporting and customer due diligence, the latter is designed to be punitive and centers on investigation, confiscation, prosecution, and sanctions. To determine how countries comply with the FATF's standards and effectiveness outcomes, the FATF conducts periodic mutual evaluations. Under the oversight of the FATF's International Cooperation Review Group (ICRG), countries are reviewed based on the risk they present to the international financial system. Prompts for review are where:

1. A country fails to participate in an FATF style regional body (FSRB)/FATF or hinders the timely publication of its mutual evaluation report;
2. Is nominated by an FATF member or FSRB based on specific risks or threats; or
3. Has achieved poor results on its mutual evaluation, especially where it has 20 or more non-compliant (NC) or partially compliance (PC) ratings for technical compliance or it is rated NC/PC on three or more of the big six (6) recommendations (3,5,6,10,11 and 20).<sup>1</sup> Where a country has low effectiveness on its immediate outcomes, its likelihood of being reviewed is high.

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<sup>1</sup> Therefore, four possible level of technical compliance: Compliant (C), Largely Compliant (LC), Partially Compliant (PC) and Non-Compliant (NC).

Countries are not automatically greylisted due to the ICRG's review process. Instead, they are placed on a one-year observation period during which they are to address their strategic deficiencies with the aid of an action plan and high-level political commitment towards reform. Greylisted jurisdictions are those working with the FATF to address their strategic deficiencies. Countries that fail to improve their deficiencies can be blacklisted, a list that calls on other countries to apply countermeasures to protect the international financial system.

Nigeria is at cross-roads where it could be delisted or potentially blacklisted. In May 2022, prior to being greylisted, Nigeria had 26 recommendations rated Compliant or Largely Compliant, but lagged on the others. Among the identified challenges were a lack of understanding regarding the national risk assessment, ineffective local and international inter-agency cooperation, poor AML/CFT investigations and prosecutions, and inadequate oversight of designated non-financial businesses and professions (DNFBPs). Indeed, while Nigeria has made commendable strides in addressing a significant aspect of its action plan, the persistence of its greylisted status could severely impede its economic development trajectory. Addressing the challenges requires a multifaceted approach that unearths the views from within to solve our local challenges.

Over the last three years, the Global South Dialogue on Economic Crime (GSDEC) has examined the compliance trajectory of countries with the FATF's standards, the variables that influence compliance alongside the potential unintended consequences of erroneous transplantation. In 2021, Dr Azinge-Egbiri book '[Regulating and Combating Money Laundering and Terrorist Financing: The Law in Emerging Economies](#)' highlighted the compliance complexities that developing countries battle with. Subsequently, Dr Malala, Dr Azinge-Egbiri and Dr Kolawole Ebire, in a report titled '[FATF AML/CFT Standards: An Analysis of Compliance and Effectiveness Status of Assessed Countries under the 4<sup>th</sup> Round and its FSRB equivalent](#)' examined the variances in compliance/effectiveness outcomes across countries. Against this backdrop, we partnered with the Epiphany Azinge Foundation to host this workshop to convene stakeholders to examine Nigeria's greylisting 'three strikes' history while also interrogating proposals for accelerating the country's delisting. As a result, this stakeholder-focused workshop provided critical insights into the implications of the country's greylisting while working to strengthen the capacity of key stakeholders to successfully implement the FATF's AML/CFT regime.

# THE WORKSHOP

The Global South Dialogue on Economic Crime (GSDEC) in collaboration with the Epiphany Azinge Foundation, organized a workshop on Tuesday 27th February 2024 at 11:00 am at the Yar'Adua Center in Abuja, Nigeria (see Appendix A). The workshop aimed to address the challenges faced by Nigeria in its efforts to be delisted from the Financial Action Task Force (FATF) greylist. The workshop provided a platform to sensitize and engage stakeholders on effective measures to achieve delisting and promote compliance with anti-money laundering and counter-terrorism financing (AML/CFT) standards.

**Attendance:** The workshop saw participation from various Ministries, Departments, and Agencies (MDAs), law firms, non-governmental organizations (NGOs), and media representatives. Notable attendees included representatives from the Inter-Governmental Action Group against Money Laundering in West Africa (GIABA), Nigeria Financial Intelligence Unit (NFIU), Special Control Unit Against Money Laundering (SCUML), Federal Inland Revenue Service (FIRS), legal practitioners, academia, and private individuals.

**Speakers:** The workshop featured speakers who provided valuable insights into the challenges and recommendations for Nigeria's delisting. The Keynote speaker was Ibekaku-Nwagwu from the University of Sussex. Other speakers included Muazu Umar from GIABA, Matthew Enu from SCUML, Chiazokam Okadigbo from Deloitte, and Abdullahi Usman Bello from Northumbria University.

**Opening Remarks of GSDEC's Executives:** Dr Joy Malala, Assistant Professor at Warwick University, in her opening remarks, stressed the negative effects of greylisting on countries like Nigeria and emphasized the importance of compliance effectiveness in AML/CFT standards. She underscored the workshop's timeliness in strategizing Nigeria's removal from the FATF greylist. Dr Azinge-Egbiri, Lecturer at Lancaster University underscored Dr Malala's remarks and urged participants to consider the implications of financial crime and greylisting on the jurisdiction as their core purpose for participating in the workshop aimed at strengthening Nigeria's AML/CFT framework.

**Founder/Convener's Opening Remarks:** Professor Epiphany Azinge SAN, founder of the Epiphany Azinge Foundation, emphasized the importance of the workshop in addressing Nigeria's delisting from the FATF greylist. He highlighted the expertise assembled for thoughtful engagement and pragmatic solutions, underscoring the workshop's significance for Nigeria's economic and financial landscape.

**Keynote Address:** Juliet Ibekaku-Nwagwu highlighted that Nigeria has been listed three times and then explored the political, legal and economic challenges that impede Nigeria's progress on AML/CFT issues. She then outlined seven (7) pillars that are critical for Nigeria's compliance with the FATF standards, strongly emphasizing the need for inter-agency cooperation, coordination (horizontally/vertically), enhanced monitoring and stronger commitment to strengthen AML/CFT laws.

**Presentations:** The workshop featured presentations on various topics, including:

- ***Navigating the Shadows: An In-Depth Analysis of the Multi-Faceted Factors behind Nigeria's Grey Listing*** by **Muazu Umar**: Muazu discussed the lack of national coordination in Nigeria and emphasized the importance of exiting the grey- and blacklists. He highlighted the need for effective financial action against terrorism financing and explained the role of FATF in setting global AML standards. Umar also addressed various challenges in Nigeria's AML/CFT regime, including risk understanding, supervision, and regulation.
- ***DNFBPs: Regulatory and Operational Challenges*** by **Matthew Enu**: Matthew highlighted the challenges faced by Designated Non-Financial Businesses and Professionals (DNFBPs) in complying with AML/CFT regulations. He discussed the legal framework, operational issues, and the need for sector-specific risk assessments. He also emphasized the importance of building capacity to enhance compliance among DNFBPs.
- ***Leveraging Global Partnerships for Nigeria's Successful Removal from FATF Greylist*** by **Pattison Bolieigha**: Pattison emphasized the significance of global partnerships in Nigeria's delisting efforts. He also stressed the importance of collaboration with international organizations and financial institutions to adopt best practices and enhance capacity. Bolieigha outlined strategies for effective communication, engagement, and diplomatic efforts to garner support for Nigeria's removal from the FATF greylist.



- ***Examining the Conflict of Interest in FATF's Requirements for Lawyers by Chiazokam Okadigbo:*** Chiazokam discussed the ethical considerations and challenges faced by lawyers in complying with FATF requirements. She highlighted the need for due diligence, suspicious transaction reporting, and adherence to professional conduct rules. Okadigbo emphasized the importance of constructive dialogue and synergy between law enforcement agencies and lawyers to uphold ethical standards.
- ***Inter-Agency Collaboration: A Panacea for Nigeria's Delisting by Abdullahi Usman Bello:*** He emphasized the need for trust and cooperation among relevant organizations to enhance Nigeria's AML/CFT compliance. He underscored the importance of synergy and collaboration in combating financial crimes and stressed the role of inter-agency cooperation in achieving effective enforcement and implementation of AML/CFT measures.
- ***Towards an Effective Sanctions Regime in Nigeria by Chinedum Odenyi:*** He discussed the importance of sanction regimes in ensuring AML/CFT compliance. He highlighted the need for comprehensive sanctions, including trade and immigration sanctions, to deter money laundering and terrorism financing. He also emphasized the role of strong institutions and effective enforcement mechanisms in imposing sanctions and ensuring compliance with AML/CFT regulations.
- ***Nigeria's Action Plan: A Comprehensive Roadmap for Nigeria's Exit from the FATF Greylist by Mohammed S. Ahmed.*** He outlined Nigeria's action plan for achieving FATF delisting, and discussed the progress made in implementing the action plan and emphasized the importance of inter-agency collaboration and strategic communications. He also highlighted the need for sustained efforts to address AML/CFT deficiencies and demonstrate Nigeria's commitment to FATF standards.

# RECOMMENDATIONS

Recommendations were made during the workshop, highlighting the need for improved coordination, capacity building, trust-building among stakeholders, and effective communication with global partners. Recommendations also included strengthening legal frameworks, enhancing international cooperation, and promoting sustainable solutions.

## **Key Recommendations:**

1. Nigeria is on the right trajectory, and it is imperative to sustain the progress the country has made, particularly under the leadership of the NFIU. This entails a continued commitment to implementing effective AML/CFT measures and enhancing enforcement mechanisms to ensure compliance with FATF standards.
2. A crucial step in strengthening Nigeria's AML/CFT regime is the development of tailored training programs for the legal profession. Providing comprehensive training on AML/CFT regulations and best practices will enhance the capacity of legal practitioners to navigate compliance requirements and effectively advise their clients.
3. To bolster Nigeria's AML/CFT efforts, there is a pressing need to strengthen capacity and supervision across relevant institutions. This involves investing in training programs, enhancing regulatory oversight, and implementing robust compliance mechanisms to detect and prevent financial crimes effectively.
4. Achieving an effective AML/CFT regime in Nigeria and securing delisting from the FATF greylist necessitates comprehensive reforms. This includes reforming the legal framework, conducting sustained outreach efforts to promote risk understanding, and building the capacity of Supervisory and Regulatory Bodies (SRBs) and licensing authorities to effectively oversee compliance efforts.
5. Nigeria must prioritize building trust and fostering collaboration with international partners to combat money laundering effectively. Strengthening diplomatic and

strategic partnerships will facilitate information sharing, technical assistance, and coordinated efforts to address transnational financial crimes.

6. Effective communication and engagement with global partners are essential components of Nigeria's AML/CFT strategy. By leveraging technical expertise and financial crime support from international stakeholders, Nigeria can enhance its capabilities in combating money laundering and terrorism financing.
7. The Nigerian government should actively seek support through diplomatic channels to facilitate delisting from the FATF greylist. This entails amplifying Nigeria's voice on the global stage and garnering international support for its efforts to strengthen its AML/CFT regime.
8. Recognizing the importance of global partnerships, Nigeria should collaborate with international organizations, financial institutions, and other stakeholders to enhance expertise in recovering illicit funds from money laundering activities.
9. Nigeria must demonstrate its commitment to effective communication with global stakeholders, engage in capacity-building initiatives, and leverage technical expertise and financial crime support to bolster its AML/CFT efforts.
10. Nigeria should highlight the significant progress made in implementing AML/CFT recommendations to instill confidence in international partners. By showcasing tangible achievements, Nigeria can demonstrate its dedication to combating financial crimes effectively.
11. Nigeria must remain steadfast in its commitment to sustainable solutions in combating money laundering and terrorism financing. This entails implementing reforms in both the public and private sectors and ensuring continuous improvement in AML/CFT measures.
12. To garner support from both the public and private sectors, Nigeria should showcase the progress made in AML/CFT reforms and highlight its unwavering commitment to combating financial crimes. Engaging stakeholders and carrying the private sector along are essential for achieving meaningful progress.

13. Nigeria should advocate for fair and objective evaluations of its AML/CFT regime by the FATF. Addressing any misconceptions and clarifying misunderstandings will contribute to Nigeria's efforts to secure delisting from the FATF greylist.
14. Addressing misconceptions surrounding Nigeria's AML/CFT regime is crucial for enhancing confidence in the country's financial system. By providing clarity and transparency, Nigeria can dispel any doubts about its commitment to combating financial crimes effectively.
15. Embracing a comprehensive approach that involves all stakeholders is essential for combating financial crimes effectively. Nigeria should foster partnerships between the public and private sectors to enhance collaboration and coordination in AML/CFT efforts.
16. Leveraging technology to showcase Nigeria's achievements in AML/CFT will enhance transparency and demonstrate the country's commitment to combating financial crimes. By leveraging innovative solutions, Nigeria can showcase its progress to international partners effectively.
17. Nigeria must demonstrate its commitment to sustainable solutions and go beyond FATF standards to maintain credibility in combating financial crimes. By prioritizing sustainability and continuous improvement, Nigeria can enhance its reputation as a responsible member of the global financial community.
18. Nigeria should leverage global partnerships to facilitate its removal from the FATF greylist successfully. By collaborating with international stakeholders, Nigeria can access technical expertise, financial resources, and support to strengthen its AML/CFT regime effectively.
19. Ensuring customer due diligence by lawyers and compliance with Know Your Customer (KYC) requirements are essential components of Nigeria's AML/CFT efforts. By promoting adherence to reporting requirements and preventing tip-offs, Nigeria can enhance the effectiveness of its AML/CFT regime.

20. Building awareness among staff of law firms about the importance of due diligence is critical for enhancing compliance with AML/CFT regulations. By educating legal professionals about their obligations, Nigeria can strengthen its AML/CFT framework and prevent financial crimes effectively.
21. The Nigerian Bar Association (NBA) should actively engage with regulators to foster a mutually beneficial relationship. By advocating for regulatory reforms and promoting compliance with AML/CFT regulations, the NBA can contribute to a more effective AML/CFT regime in Nigeria.
22. Conducting robust risk assessments for specific transactions and implementing mitigating measures are essential for lawyers to protect themselves and their clients from financial crimes. By adopting a proactive approach to risk management, Nigeria can enhance the integrity of its legal sector.
23. Maintaining open dialogue among stakeholders is crucial for navigating the complexities of AML/CFT regulations. By fostering continuous communication and collaboration, Nigeria can address challenges effectively and strengthen its AML/CFT regime.
24. Inter-agency collaboration is vital for Nigeria's efforts to be removed from the FATF greylist. By coordinating efforts and sharing information, government agencies can enhance the effectiveness of AML/CFT measures and demonstrate Nigeria's commitment to combating financial crimes.
25. Nigeria must adhere to FATF recommendations to ensure its removal from the FATF greylist and prevent further sanctions. By implementing necessary reforms and demonstrating compliance with international standards, Nigeria can avoid blacklisting and safeguard its financial system.
26. Improving strategic communications is essential for Nigeria to effectively convey its AML/CFT efforts to international stakeholders. By enhancing transparency and clarity in communications, Nigeria can build confidence in its commitment to combating financial crimes.
27. Strengthening customer relations and promoting suspicious transactions reporting are critical for enhancing the effectiveness of Nigeria's AML/CFT regime. By fostering

a culture of compliance and encouraging stakeholder engagement, Nigeria can improve its ability to detect and prevent financial crimes.

28. Upholding ethical standards is paramount for lawyers in their role in combating financial crimes. By adhering to professional ethics and promoting integrity, lawyers can contribute to a robust AML/CFT framework in Nigeria.

29. Nigeria must strengthen its legal and policy framework, enhance international cooperation, improve risk assessment procedures, and strengthen law enforcement agencies to combat financial crimes effectively. By prioritizing these measures, Nigeria can enhance its resilience against ML and TF and safeguard its financial system.

#### **Other Recommendations:**

- **Understanding the Importance of Global Partnerships:** Nigeria's aspiration to be delisted from the FATF greylist necessitates a recognition of the pivotal role played by global partnerships. Collaborating with international organizations, financial institutions, and other nations is indispensable for Nigeria to access expertise, resources, and best practices in combating ML and TF. By forging alliances and engaging in cooperative efforts, Nigeria can leverage the collective knowledge and capabilities of the global community to enhance its AML/CFT regime.
- **Building Trust and Cooperation:** Establishing trust and fostering cooperation with international partners are paramount for Nigeria's success in addressing the deficiencies highlighted by the FATF. Nigeria should demonstrate its commitment to transparent communication and active engagement with global stakeholders. By cultivating an environment of openness and collaboration, Nigeria can enhance mutual trust and facilitate more effective cooperation in combating financial crimes on a global scale.
- **Utilizing Technical Assistance and Capacity Building:** Leveraging technical assistance and capacity-building initiatives offered by international organizations and partner countries represents a significant opportunity for Nigeria to bolster its AML/CFT efforts. These programs can provide invaluable training, technical expertise, and financial support to strengthen Nigeria's regulatory frameworks, enforcement mechanisms, and institutional capacity. By actively engaging with

these initiatives, Nigeria can enhance its capabilities and improve its effectiveness in combating financial crimes.

- **Engaging in Diplomatic Efforts:** Diplomatic efforts play a crucial role in garnering support from foreign governments and diplomatic missions in advocating for Nigeria's delisting from the FATF greylist. Engaging in bilateral and multilateral discussions, diplomatic channels, and strategic alliances can amplify Nigeria's voice and influence on the global stage. By effectively leveraging diplomatic channels, Nigeria can build consensus, mobilize international support, and advance its objectives in combating financial crimes.
- **Showcasing Progress and Commitment:** Nigeria must showcase tangible progress and demonstrate unwavering commitment to implementing the FATF's recommendations. Highlighting successful reforms, legislative amendments, enforcement actions, and institutional improvements is essential to instilling confidence in international partners and stakeholders regarding Nigeria's compliance efforts. By transparently showcasing its achievements, Nigeria can bolster its credibility and pave the way for its delisting from the FATF greylist.
- **Advocating for Fair Evaluation:** Advocating for a fair and objective evaluation process by the FATF is crucial for Nigeria. Emphasizing the need for impartiality, transparency, and consistency in assessing Nigeria's compliance is essential. Addressing any misconceptions or misinterpretations of Nigeria's AML/CFT regime is imperative to ensure a fair assessment of its efforts and facilitate its successful delisting from the FATF greylist.
- **Embracing a Comprehensive Approach:** Nigeria should adopt a comprehensive approach that integrates regulatory reforms, law enforcement measures, public-private partnerships, and technological advancements in combating financial crimes. By embracing innovative solutions and leveraging emerging technologies, Nigeria can enhance its effectiveness in preventing and detecting illicit financial activities. This holistic approach will enable Nigeria to address the multifaceted challenges posed by financial crimes more effectively.
- **Staying Committed to Sustainable Solutions:** Nigeria's commitment to sustainable solutions must transcend mere compliance with FATF standards. Emphasizing the importance of long-term sustainability, institutional resilience, and continuous

improvement is crucial for maintaining Nigeria's credibility and resilience in the global fight against financial crime. By prioritizing sustainable solutions, Nigeria can demonstrate its dedication to combating financial crimes effectively and safeguarding its financial system for future generations.

Each of these recommendations underscores the multifaceted approach required for Nigeria to effectively combat financial crimes, strengthen its AML/CFT regime, and secure its removal from the FATF grey list.



# CONCLUSION

The workshop concluded with a commitment to sustaining progress towards Nigeria's delisting from the FATF greylist. Participants expressed optimism about Nigeria's potential to meet FATF standards and become a trusted member of the global financial community.

**Founder/Convener's Closing Remarks:** Professor Epiphany Azinge SAN expressed gratitude to participants and resource persons for their contributions. He expressed confidence in Nigeria's ability to achieve delisting from the greylist and become a member of FATF.

The workshop concluded at 3:05 pm, followed by lunch, marking a significant step forward in Nigeria's efforts to address AML/CFT deficiencies and achieve FATF compliance.

# APPENDIX A: WORKSHOP POSTER



**Workshop: A Multistakeholder Approach to Nigeria's FATF Delisting**

**Tuesday 27<sup>th</sup> February**  
**11:00 WAT (GMT+1)**

**Yar'adua Center, Abuja, Nigeria**  
**or online:**

<https://bit.ly/EpiphanyAzingeFoundation2024Workshop>

*This workshop will bring together **stakeholders** to discuss **sectoral challenges of the greylisting of Nigeria by Financial Action Task Force (FATF)**, alongside **proposals for accelerating the country's delisting.***



**KEYNOTE SPEAKER: Juliet Ibekaku-Nwagwu**  
*Academic Scholar,  
University of Sussex School of Law, Politics and Sociology*

**WORKSHOP MODERATOR: AIG David Igbodo (Rtd)**  
*Principal Partner, DB Legal Consultant*



**Muazu Umar**  
*Director of Policy and Research, GIABA*

**Matthew Enu**  
*Compliance Officer and Sectional Head,  
SCUML*



**Jude Odinkinigbo**  
*Counsel, Templars and Senior Lecturer,  
Faculty of Law, UNN*

**Chiazokam Okadigbo**  
*Associate Director Forensic at Deloitte*



**Abdullahi Usman Bello**  
*Northumbria University*

**Pattison Boleigha**  
*President, Compliance Institute of Nigeria*



**Chinedum Odenyi**  
*HOD Sanctions, NFIU*

**Mohammed S. Ahmed**  
*Chief of Staff to the Director, NFIU*



**HOST: Dr Joy Malala**  
*University of Warwick*

**HOST: Dr Nkechi Azinge-Egbiri**  
*Lancaster University*

