



**NATIONAL ANTI-MONEY  
LAUNDERING/COUNTERING THE  
FINANCING OF  
TERRORISM/COUNTERING  
PROLIFERATION (OF WEAPONS  
OF MASS DESTRUCTION)  
FINANCING STRATEGY  
2023 - 2027**



# NATIONAL ANTI-MONEY LAUNDERING/COUNTERING THE FINANCING OF TERRORISM/COUNTERING PROLIFERATION (OF WEAPONS OF MASS DESTRUCTION) FINANCING STRATEGY 2023 - 2027

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## Chapter 1: Introduction

1. Nigeria's first National Anti-Money Laundering and Countering the Financing of Terrorism (AML/CFT) Strategy was developed in 2018 covering a period of two years. The Strategy which was based on the 2016 National AML/CFT Risk Assessment (NRA) had three strategic objectives:
  - a. To enhance existing AML/CFT preventive measures aimed at protecting the financial and designated non-financial sectors from abuse by money launderers and terrorist financiers.
  - b. To enhance the effectiveness of national AML/CFT stakeholders thereby reinforcing the regulatory and institutional framework of Nigeria's AML/CFT regime, and
  - c. To strengthen AML/CFT cooperation and coordination through a multi-faceted synergy to combat money laundering and the financing of terrorism.
2. A subsequent Action Plan was developed to provide the mechanism for the execution of these strategic objectives with eleven (11) outcomes, twenty-eight (28) outputs and ninety-five (95) separate activities. While several key results were achieved after the lifetime of the Strategy and Action Plan, the overall completion rate of the activities was **37%**. An assessment of the performance of the 2018 National Strategy is included in **Annex II**.
3. In 2018, the Inter-Governmental Action Group Against Money Laundering in West Africa (GIABA) commenced Nigeria's 2<sup>nd</sup> Round AML/CFT Mutual Evaluation Exercise. This exercise was concluded with the on-site visit in September 2019, however, due to various reasons, including the COVID-19 pandemic the Mutual Evaluation Report (MER) was not published until the 4<sup>th</sup> quarter of 2021<sup>1</sup>. The MER identified a range of deficiencies across Nigeria's AML/CFT framework and recommended 84 separate remedial actions. Some of these actions were in line with outstanding activities from the Strategy and Action Plan. As a consequence of receiving ratings of Low or Moderate Effectiveness for all the Immediate Outcomes, Nigeria was placed under the GIABA Enhanced Follow-Up Report and subjected to the Financial Action Task Force's International Cooperation Review Group Process. During the one-year Post-Observation Period following the publishing of the report, the country took additional steps to ensure the completion of many of the remaining activities on the Action Plan, furthermore, a Strategic Implementation Roadmap (SIR)<sup>2</sup> on AML/CFT was developed and endorsed by the Heads of Agencies of AML/CFT Stakeholder Agencies and ratified by the Inter-Ministerial Committee on AML/CFT (IMC). The 1<sup>st</sup> SIR was designed to be implemented over one year from December 2021 to November 2022.
4. Under the aegis of the IMC and as part of the SIR, a National Working Group on Risk Assessment was convened in January 2022. The working group using a proprietary methodology and as part of the SIR and in line with one of the priority recommendations in Nigeria's MER completed an assessment of the inherent money laundering and terrorist financing risks prevalent in Nigeria. In addition, following updates to the FATF Standard and in particular Recommendation 1, the country also completed an assessment of the risk related to the financing of the proliferation of weapons of mass destruction, the country also completed an assessment of Non-Profit Organisations (NPOs) at Risk of Terrorist Financing In line with Recommendation 8, an assessment of risks related to Virtual Assets and Virtual Asset Service providers in line with Recommendation 15 and Legal

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<sup>1</sup> The publication of the report was also affected by capacity challenges within the GIABA Secretariat which delayed publication of the final drafts

<sup>2</sup> The SIR contained 322 separate activities based on the 84 recommended actions in the MER

Persons and Legal Arrangements in line with Recommendation 24. In October 2022, the following National Inherent Risk Assessment Reports were published by the IMC

- i. Money Laundering Risk Inherent Risk Assessment
- ii. Terrorist Financing Risk Assessment
- iii. Proliferation Financing Risk Assessment
- iv. Legal Persons and Legal Arrangements Risk Assessment
- v. Money Laundering Risks Related to the Extractive Sector<sup>3</sup>
- vi. NPOs at Risk of Terrorism Financing<sup>4</sup>

The findings of these risk assessments are summarized in **Chapter 3**.

5. Following the completion of the inherent risk assessments, the SIR was updated with recommended actions and mitigations to address the threats and vulnerabilities identified. The SIR, therefore, served as the mechanism for ensuring overall coordination of national Anti-Money Laundering/Countering the Financing of Terrorism/Countering Proliferation (of weapons of mass destruction) Financing (AML/CFT/CPF) efforts in line with Recommendation 2.
6. Following the conclusion of the one-year observation period, Nigeria submitted its Post-Observation Period Report (POPR) in November 2022 to the ICRG Africa and Middle-East Joint Group with a subsequent face-to-face discussion between an inter-agency Nigeria Contact Group and the Joint Group in Rabat, Morocco in January 2023. Based on the Joint Group's assessment of the POPR and the clarifications provided during the face-to-face the Joint Group recommended to the ICRG that Nigeria should be placed on the list of jurisdictions under monitoring ("the grey list") and an action plan<sup>5</sup> should be approved. The FATF endorsed this recommendation during its Plenary in February 2024.
7. Under Immediate Outcome 1 two items were included in the Action Plan:
  - i. Nigeria was required to complete an assessment of its residual ML/TF/PF risks by May 2024, and,
  - ii. Produce an updated National AML/CFT/CPF Strategy and Action Plan by June 2024.
8. In line with these action items, the IMC convened a Residual Risk Working Group in March 2023, and the Working Group completed its assessment of the remaining risks in June 2023, a summary is provided in **Chapter 3**. A parallel Working Group was also convened to prepare the National AML/CFT/CPF Strategy drawing on the findings and recommendations from the National Inherent Risk Assessment and the National Residual Risk Assessment.

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<sup>3</sup> This was published in recognition of the specific vulnerabilities of the extractive industries to public corruption and in line with deficiencies identified in the MER

<sup>4</sup> This was published under a separate but aligned process in November 2022

<sup>5</sup> The Action Plan was jointly developed between the Africa/Middle East Joint Group and the Nigeria Contact Group and contained 15 items with a timeline of June 2025 for completion



## Chapter 2: Nigeria's National AML/CFT/CPF Framework

9. Nigeria has a robust framework for the implementation of AML/CFT/CPF measures. These measures are based on a comprehensive legislative and regulatory framework<sup>6</sup> and implementation via a broad range of institutional mechanisms.

### National Coordination

10. In line with Recommendation 2, the Inter-Ministerial Committee on AML/CFT/CPF (IMC) chaired by the Honourable Attorney-General of the Federation and Minister of Justice (HAGF) and co-chaired by the Honourable Ministers of Interior (HMol) and Finance, Budget and National Planning (HMFBNP) has been established as the national AML/CFT/CPF coordination mechanism. While the IMC has policy oversight, the National Sanctions Committee (NSC), chaired by the HAGF, has also been established to have specific responsibility for the implementation of the TFS regime pursuant to United Nations Security Council Regulations 1267 and 1373 in line with Recommendations 6 and 7.

### Legislative Framework

11. Nigeria has enacted a range of laws to provide a strong basis for its AML/CFT/CPF framework. These laws ensure that the country meets the technical compliance requirements of the FATF Standards. The following principal legislation provide are in place.

#### Money Laundering (Prevention and Prohibition) Act, 2022 (MLPPA)

12. The MLPPA was enacted in May 2022 in repeal of the Money Laundering Prohibition Act 2011 (as amended in 2012). The new law provided for the establishment of the Special Control Unit against Money Laundering (SCUML) within the Economic and Financial Crimes Commission (EFCC) as a dedicated regulator for Designated Non-Financial Businesses and Professionals. The law extended AML/CFT/CPF obligations to previously excluded sectors, including lawyers and online casinos and designated virtual asset service providers as a regulated business. The law also addressed deficiencies in the definition of predicate offences, suspicious transaction reporting and rerecord-keeping obligations identified in the MER.

#### Terrorism (Prevention and Prohibition) Act, 2022 (TPPA)

13. The TPPA was enacted in May 2022 in repeal of the Terrorism Prevention Act 2011 (as amended in 20213). The new law provided the basis for the implementation of a Targeted Financial Sanction (TFS) related to the Proliferation Financing Regime in line with Recommendation 7, addressed deficiencies identified by the MER in the implementation of TFS related to Terrorist Financing regime in line with Recommendation 6 and established the National Counter-Terrorism Coordination Centre as the body responsible for oversight of counter-terrorism and counter-terrorism financing activities in the country.

#### Proceed of Crime (Recovery and Management) Act, 2022 (POCA)

14. The POCA was enacted in May 2022 and provided the basis for the effective and efficient management of proceeds of criminal offences including mechanisms for the management and

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<sup>6</sup> All the legislation and regulations cited are available via the IMC website ([imc.gov.ng](http://imc.gov.ng))

disposal of these assets. The act also provided for an effective record-keeping system for proceeds of crime in line with Recommendation 4.

#### Companies and Allied Matters Act 2020 (CAMA)

15. The CAMA was enacted in August 2020 and strengthened the country's system for the registration of legal persons. In particular, in line with Recommendation 24, the act provided for the establishment of a national register of beneficial ownership information of legal persons.

#### Mutual Legal Assistance in Criminal Matters Act 2019 (MLACMA)

16. The MLACMA was signed into law in June 2019 and provides the basis for international bilateral cooperation in the identification, tracing, and seizure of the proceeds and instrumentalities of crime. The act further designated the Attorney-General of the Federation and Minister of Justice as the Central Authority for Nigeria in line with the provisions of the UN Convention Against Corruption and other standards.

#### Nigerian Financial Intelligence Unit (Establishment) Act 2018 (NFIUA)

17. The NFIUA was enacted in June 2018 and established the NFIU as an independent, autonomous Unit within the organizational structure of the Central Bank of Nigeria in line with Recommendation 29. The act empowered the NFIU to act as the Secretariat of the IMC and to coordinate the implementation of AML/CFT activities in Nigeria.

#### Regulatory Framework

18. Nigeria's AML/CFT/CPF regulatory framework is implemented in line with Immediate Outcomes 3 and 4 and their associated Recommendations.
19. The **Central Bank of Nigeria (CBN)** is responsible for the supervision of the following sectors; deposit money banks, microfinance banks, international money transfer operators, development finance institutions, payment service providers, primary mortgage banks, finance companies and bureau de change
20. The **National Insurance Commission (NAICOM)** is responsible for the supervision of the insurance sector, comprising insurance companies, insurance brokers, and loss adjusters.
21. The **Securities and Exchange Commission (SEC)** is responsible for the supervision of the following sector: asset management companies, registrar, custodians, trustees, underwriters, issuing houses, funds and portfolio managers, brokers, dealers and broker-dealers, virtual assets service providers, other capital participants and self-regulatory bodies of the listed institutions.
22. The **Special Control Unit against Money Laundering (SCUML)** is responsible for the supervision of designated non-financial businesses and professions as well as the non-profit organisations at risk of terrorism financing.
23. All supervisory agencies now operate Risk Based Supervision in line with the findings of the National Risk Assessment.
24. The national AML/CFT/CPF regulatory framework is implemented via regulations issued subsidiary to the MLPPA. These include the:
  - i. Central Bank of Nigeria AML/CFT/CPF Regulations 2022
  - ii. Economic and Financial Crimes Commission (SCUML) AML/CFT/CPF Regulations 2022
  - iii. National Insurance Commission AML/CFT/CPF Regulations 2022
  - iv. Securities and Exchange Commission AML/CFT/CPF Regulations 2022



- v. SCUML NPOs Regulation 2023
- 25. In addition, the following regulations issued pursuant to the TPPA provide for the implementation of the Targeted Financial Sanctions regime:
  - i. Targeted Financial Sanctions related to Terrorism Financing Regulations 2023
  - ii. Targeted Financial Sanctions related to Proliferation Financing Regulations 2023
- 26. Aligned to the regulatory functions of the agencies, the **Corporate Affairs Commission (CAC)** is responsible for the registration of legal persons in Nigeria. Pursuant to the provisions of CAMA, the CAC has also issued the following regulations to provide the framework for the registration of legal persons and the implementation of a Beneficial Ownership Information framework:
  - i. Companies Regulation 2021
  - ii. Persons with Significant Control Regulations 2022
- 27. The **Nigeria Export Processing Zones Authority (NEPZA)** and the **Oil and Gas Free Zones Authority (OGFZA)** implement measures for the registration of legal persons in offshore free zones.

### Policy Framework

- 28. The Inter-Ministerial Committee on AML/CFT/CPF (IMC) is the coordinating body for AML/CFT/CPF policy in Nigeria. The IMC operates under a Charter and brings together all public sector Ministries, Departments and Agencies concerned with the implementation of the country's framework to combat money laundering, terrorist financing and proliferation financing. Several strategies and policies have been developed and implemented which are aligned with the objectives and supported by the implementation of this strategy.

### National Counter-Terrorism Strategy 2016 (NACTEST)

- 29. The NACTEST is a subsidiary strategy under Nigeria's National Security Strategy. NACTEST outlines the country's response to the emergence and continued activities of terrorist groups within its borders. The strategy outlines five clear counter-terrorism approaches and of particular relevance to this Strategy is the Identify strand which includes a focus on denying terrorists the ability to raise funds. To further implement this objective, the Office of the National Security Adviser issued the National Strategy for Countering the Financing of Terrorism in 2021 which is described below.

### National Strategy for Countering the Financing of Terrorism 2021 (NSCFT)

- 30. Aligned to the NACTEST is the National Counter-Financing of Terrorism Strategy issued in 2022. The strategy provides the framework for the implementation of CFT countermeasures in Nigeria based on the NIRA findings. The strategy covers supervisory, law enforcement, domestic coordination and international cooperation measures.

### National Anti-Corruption Strategy 2022-2025 (NACS)

- 31. The National Anti-Corruption Strategy provides a coordinated national response involving all stakeholders to the pervasive threat of corruption in Nigeria in line with the UN Convention against Corruption. NACS has five pillars, with Pillar 1 (Prevention), Pillar 4 (Enforcement and Sanctions) and Pillar 5 (Recovery and Management of the Proceeds of Crime) aligning with the three Strategic Objectives of the AML/CFT/CPF Strategy.

### National Drug-Control Master Plan 2021-2025 (NDCMP)

- 32. Nigeria's National Drug Control Master Plan was issued in September 2021 and provides the framework for the country's response to both the use and the traffic of narcotics and other illicit

substances. The NIRA identified traffic in illicit substances as one of the country's highest-risk predicate offences. This strategy will align with the NDCMP Supply Reduction Pillar's Outcome 1 (increased disruption of drug trafficking) and Outcome 2 (Making drug trade unprofitable). In particular, Outcome 2 focuses on targeting the proceeds of drug trafficking and ensuring effective management of those proceeds.

#### National Strategy to Counter Wildlife and Forestry Crime

33. The National Strategy to Combat Wildlife and Forest Crime in Nigeria aims to address the interconnected issues of wildlife and forest crime, money laundering, and terrorism financing. It recognizes the significant impact these activities have on biodiversity conservation, national security, and sustainable development. The strategy recognizes that wildlife and forestry crimes are often associated with money laundering and terrorism financing. The illicit proceeds from wildlife and forest crimes are frequently used to fund terrorist activities, exacerbating security concerns within the country. The strategy specifically contains a strategic component on financial crimes and money laundering: which will strengthen financial systems to detect and prevent money laundering associated with wildlife and forest crime. This involves enhancing the capacity of financial institutions to identify suspicious transactions, conduct risk assessments, and promote the use of modern technologies for financial monitoring.

#### National Policy on Confiscation

34. Following the passage of the Proceeds of Crime (Recovery and Management) Act 2022, Nigeria issued a National Policy Statement on the Confiscation of the Proceeds of Crime. The Policy requires relevant law enforcement agencies to prioritise parallel financial investigation and the pursuit and recovery of illicit criminal gains as a deterrent.

#### International Cooperation Plan and Strategy

35. Nigeria has developed an International Cooperation Plan and Strategy which serves as a guide to competent authorities on international cooperation related to money laundering, terrorist financing and other crimes. The Plan and Strategy which is coordinated by the Central Authority Unit of the FMOJ supports the implementation of MLACMA and other international cooperation legislation. The Plan also provides a mechanism for the identification of high-priority jurisdictions for international cooperation.

#### Other Institutional Frameworks

36. In addition to the supervisory bodies outlined in the regulatory framework section above, Nigeria has a range of other agencies responsible for implementing the law enforcement, international cooperation and other regulatory functions necessary for an effective AML/CFT/CPF system.
37. While the **Nigeria Police Force** is established as Nigeria's principal law enforcement agency and has the powers to investigate all crimes, the following agencies have specific powers and responsibilities to investigate the highest risk predicate offences.
  - i. The **Department of State Services** is responsible for the investigation of terrorism and terrorism financing crimes.
  - ii. The **Economic and Financial Crimes Commission** is responsible for the investigation of financial crimes in particular fraud and is the principal money laundering investigative agency in Nigeria.

- iii. The **Independent Corrupt Practices and Other Related Offences Commission** is responsible for implementing preventive measures and investigating criminal offences related to corruption.
  - iv. The **National Drug Law Enforcement Agency** is responsible for the investigation and prosecution of crimes related to the trafficking, distribution and sale of illicit drugs and psychotropic substances.
38. The **Honourable Attorney-General of the Federation (AGF) and Minister of Justice** is responsible for the administration of justice in Nigeria and the prosecution of all crimes; however, this power is delegated to other agencies and institutions including those outlined above. Within the Ministry of Justice, a **Complex Casework Group (CCG)** has been established with specific responsibility for the prosecution of serious crimes, including terrorism financing. The powers of the AGF for international cooperation and mutual legal assistance have also been delegated to a specially established **Central Authority Unit (CAU)**.
39. The **National Counter-Terrorism Coordination Centre (NCTC)** in the Office of the National Security Adviser (NSA) to the President is responsible for operational coordination of counter-terrorism and counter-terrorism financing efforts.
40. To improve coordination and collaboration between relevant law enforcement institutions, in January 2022 the AGF issued “Standard Guidelines and Procedures for the Exchange of Cases and Intelligence Between Law Enforcement Agencies”, these guidelines ensure that there is a clear mechanism for agencies to transfer cases which fall outside their mandate to the institution which has the power to investigate and prosecute the criminal activity involved, aligned with these guidelines in 2022 the ICPC and EFCC signed a protocol for the exchange of cases. The AGF also issued in November 2022 the “National Policy on Confiscation of Proceeds of Criminal Activity” which requires agencies to prior the pursuit of illicit gains linked to criminal activity in line with POCA. These measures are in addition to existing bilateral agreements and MoUs signed between agencies to facilitate cooperation, coordination and the exchange of intelligence.
41. Other agencies and institutions involved in the implementation of the AML/CFT/CPF framework are described in **Annex I** to this strategy.

## Chapter 3: ML/TF/PF Threats and Vulnerabilities

42. Nigeria completed its National Inherent Risk Assessment (NIRA) in October 2022<sup>7</sup>. The findings of the NIRA were published in five reports as listed below:

- i. National ML Inherent Risk Assessment
- ii. National TF Inherent Risk Assessment
- iii. National PF Inherent Risk Assessment
- iv. National Risk Assessment of Legal Persons and Legal Arrangements
- v. National Risk Assessment of ML/TF in the Extractive Sector

The NIRA identified the relative threat from all 21 predicate offences as summarized in the chart below:

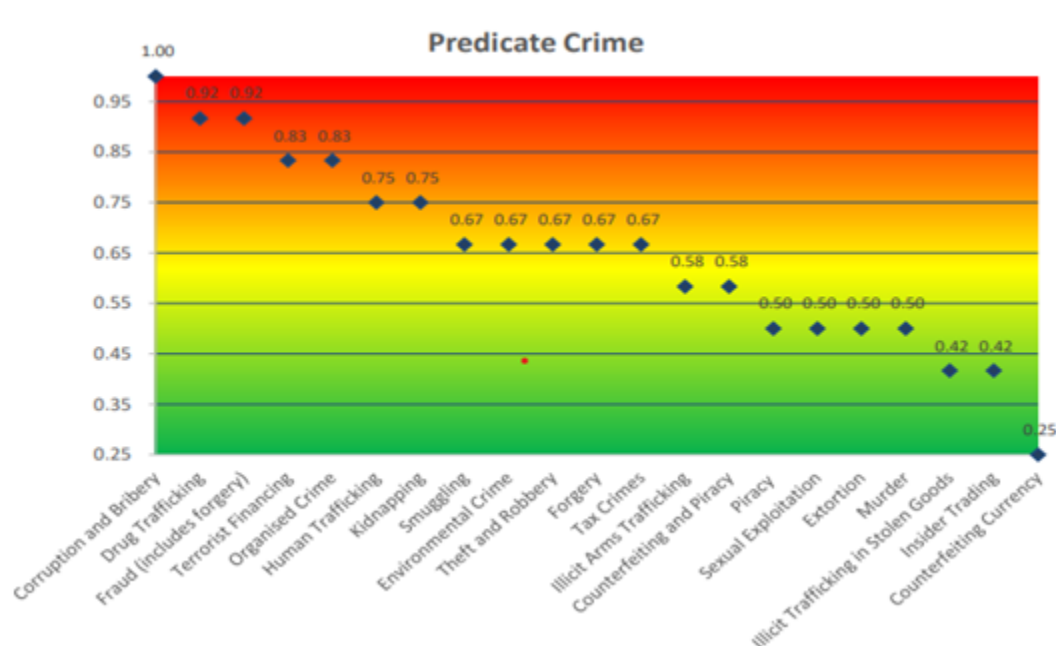


Figure 1: ML Threats

43. The NIRA also assessed the relative vulnerabilities of all regulated sectors and classified their relative vulnerabilities as outlined below:

<sup>7</sup> The detailed findings and the methodology for the NIRA are available in the reports published on the NFIU website ([www.nfiu.gov.ng/NIRA](http://www.nfiu.gov.ng/NIRA)) or via the IMC website ([imc.gov.ng](http://imc.gov.ng))

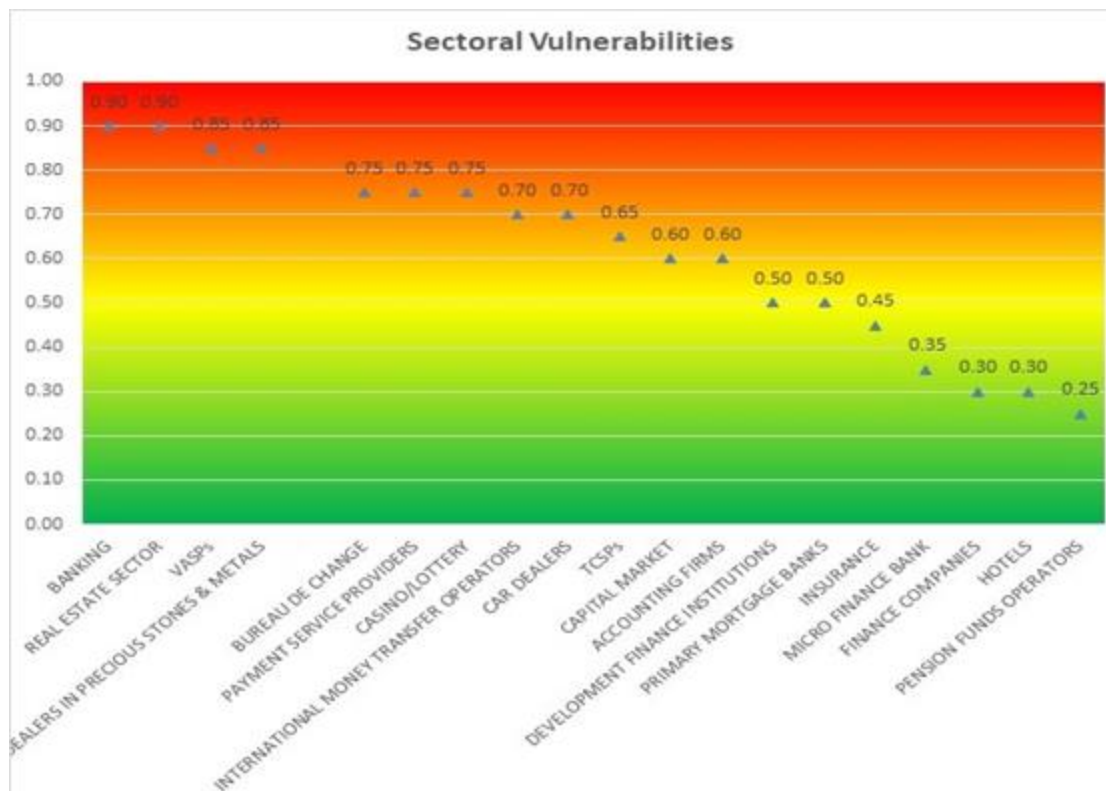


Figure 2: Sector vulnerabilities

44. The TF threat from groups operating in Nigeria was also assessed and the following risk ratings were determined:

Table 1: TF Risk Ratings

Terrorist Groups	Overall Rating	Rating After Mitigating Measures
	(VH)(H)(M)(L)	(VH)(H)(M)(L)
Islamic State West Africa Province (ISWAP)	VH	H
Boko Haram	H	M
Yan Bindiga and Yan Taadda	H	M
Indigenous People of Biafra (IPOB)	H	M

45. The NIRA assessed the PF threat from state and non-state actors and the following ratings were determined:

Table 2: PF Risk Ratings

PF Actors	Overall Rating	Rating After Mitigating Measures
	(VH)(H)(M)(L)	(VH)(H)(M)(L)
DPRK	H	H
IRAN	H	H
Non-State Actors	M	M

46. In June 2023, Nigeria completed an assessment of the effectiveness of the AML/CFT/CPF mitigation control in place and determined the outstanding residual risk. Through the assessment process, several recommended actions and further mitigations and controls were also identified. These were prioritized on a risk basis and included in the SIR. These recommended actions and the SIR form the primary basis for this Strategy. Based on an assessment of the controls in place the following residual ratings were also identified:

Table 3: ML Risk Ratings

Predicate Crime	Inherent Rating	Rating After Mitigating Measures
	(VH)(H)(M)(L)	(VH)(H)(M)(L)
Corruption and Bribery	VH	H
Illicit trafficking in narcotic drugs and psychotropic substances	VH	H
Fraud	VH	H
Terrorist Financing	H	H
Participation in an Organised Criminal Group	H	M
Trafficking in Persons and Smuggling of Migrants	H	M
Kidnapping	H	M
Smuggling	H	M
Environmental Crime	H	M
Tax Crimes	H	M
Forgery	H	M
Theft and Robbery	H	M



Sector	Inherent Vulnerability Rating	Rating After Mitigating Measures
	(VH)(H)(M)(L)	(VH)(H)(M)(L)
Banking	VH	H
Real Estate Sector	VH	H
VASPs	H	H
Dealers In Precious Stones & Metals	H	H
Bureau De Change	H	H
Payment Service Providers	H	H
Casino (Including Online)/Lottery	H	M
International Money Transfer Operators	H	H
Trusts and Company Service Providers	H	M
Car Dealers	H	M

## Chapter 4: National AML/CFT/CPF Strategy

47. The National AML/CFT/CPF Strategy 2023-2028 is designed to achieve three (3) strategic objectives. These strategic objectives will be informed by a thorough understanding of the ML/TF/PF risk landscape and will be enabled by two key pillars, strong domestic cooperation and effective utilization of international cooperation mechanisms. The outcomes of this strategy are intended to work in concert with the other national strategies outlined in Chapter 2, in particular, the objectives, outcomes and outputs outlined below should be read together with the National Strategy for Countering the Financing of Terrorism as a coherent set of actions that will be implemented by Nigeria to respond to the ML/TF/PF threats it faces.

### Deep Understanding

Nigeria will ensure that there is a thorough understanding of the ML/TF/PF risk prevalent in the country and use this understanding to inform the design and implementation of law enforcement, supervisory and regulation measures

#### Strong Barriers

Nigeria will implement measures to ensure that money launderers and the financiers of terrorism and proliferation of weapons of mass destruction cannot misuse its financial system

#### Effective Detection

Nigeria will ensure that it has sufficient resources and capacity to detect, investigate and prosecute money laundering, terrorist financing and proliferation financing, particularly related to the highest risk offences, groups and actors.

#### Dissuasive Consequences

Nigeria will ensure that individuals and entities violating AML/CFT/CPF laws, regulations and policies are subject to measures including asset confiscation, freezing, seizure as well as appropriate criminal penalties and other sanctions.

### Strong Domestic Coordination

Nigeria will ensure that domestic institutions in the public and private sector cooperate effectively to ensure the achievement of the objectives outlined above.

### Effective International Cooperation

Nigeria will ensure that it seeks and provides the widest range of cooperation with other jurisdiction

48. Each of the strategic objectives and the enabling pillars will consist of several outcomes. The outcomes will be further broken down into specific outputs and activities which are articulated in the updated SIR. The SIR will thus form Nigeria's AML/CFT/CPF action plan over the 2023-2027 period.

### Strategic Objective 1: Strong Barriers

49. The protection of Nigeria's financial sector relies on an effective system of entry controls and barriers to ensure that money launderers, financiers of terrorism and proliferation of weapons of mass destruction are unable to introduce illicit proceeds into the financial system. This objective will be achieved through the following outcomes:

SO1.1: Establishing and/or strengthening mechanisms for effective implementation of market entry controls for DNFBPs by SRBs and other licensing authorities.

SO1.2: Strengthening the capacity of self-regulatory organizations, particularly for sectors rated as highly vulnerable

SO1.3: Strengthening systems for the verification of beneficial ownership information for both onshore and offshore legal persons

SO1.4: Implementing appropriate legislation obligating the collection of beneficial ownership information for legal arrangements and ensuring the availability of this information on a timely basis to competent authorities

SO1.5: Conducting an assessment of the feasibility of developing systems for registers of beneficial ownership information related to other assets, particularly real estate.

SO1.6: Implementing effective risk-based supervision for all regulated sectors with a clear and consistent approach to off-site and on-site examination and improved timelines for the conclusion of supervisory cycles.

SO1.7: Identifying and implementing measures to ensure the effective supervision of OFIs, DNFBPs and VASPs commensurate with their risks.

SO1.8: Implementing a risk-based approach to supervision of NPOs at Risk of TF and providing guidance and capacity building to identified NPOs to mitigate the risk of abuse by terrorist financiers.

### Strategic Objective 2: Effective Detection

50. Nigeria will also implement an effective national response to money laundering prioritizing the highest-risk predicate offences. This will involve a coordinated approach involving action by regulatory, supervisory, law enforcement and prosecutorial authorities. This objective will be achieved through the following outcomes:

SO2.1: Strengthening systems for the exchange of intelligence between competent authorities and ensuring the prioritization of the pursuit of proceeds of crimes

SO2.2: Developing a National Counter-Fraud Strategy to ensure an effective, coordinated response to this crime

SO2.3: Developing and implementing a standardized curriculum for money laundering investigative officers across all law enforcement agencies

SO2.4: Identifying, training and providing adequate resources for dedicated teams of ML/TF prosecutors targeting the highest risk predicate offences within LEAs and the FMOJ.

SO2.5: Identifying, training and providing adequate resources for dedicated international cooperation lawyers within the FMOJ to support asset recovery and mutual legal assistance.

SO2.6: Broadening and deepening the range of entities filing suspicious transaction reports through the development of guidance documents and capacity building.

SO2.7 Ensuring that all FIs, DNFPBs and VASPs have effective systems to detect and report suspicious transactions.

SO2.8: Improving national systems for feedback on money laundering and terrorist financing.

SO2.9: Conducting an assessment of the resources available to supervisory authorities and ensuring their alignment with the identified ML/TF/PF risks.

SO2.10: Conducting an assessment of the capacity of supervisory resources and developing a skills upgrade programme where necessary.

### Strategic Objective 3: Dissuasive Consequences

51. Finally, Nigeria will also ensure that it effectively deters the commission of acts of money laundering and terrorist financing by applying a broad range of dissuasive sanctions and denying criminals access to their illicit proceeds. This objective will be achieved through the following outcomes:

SO3.1: Developing and implementing sentencing guidelines for money laundering cases

SO3.2: Developing and implementing regulations, guidelines and uniform SOPs for the management of proceeds of crimes.

SO3.3: Ensuring the enforcement of dissuasive administrative and monetary sanctions for violations of AML/CFT/CPF by regulated entities

SO3.4: Ensuring the enforcement of appropriate dissuasive sanctions where beneficial ownership information is not provided or false information is provided

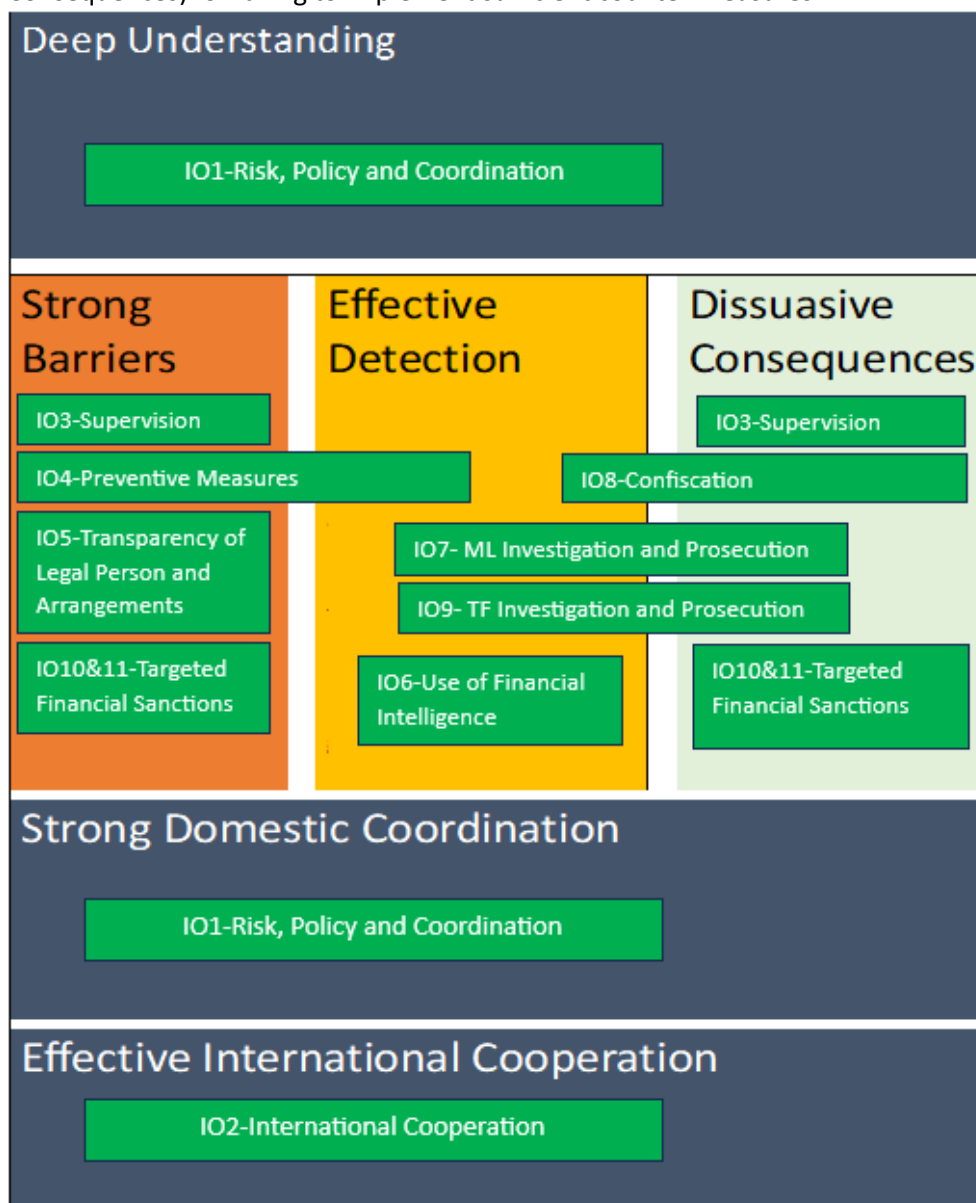
### Cross-Cutting Objectives:

52. To achieve the 3 strategic objectives outlined above, Nigeria will also ensure that an appropriate enabling framework is in place. This will include the following:

- i. Nigeria recognizes that an effective AML/CFT regime is based on a thorough understanding of risk and the application of counter-measures in response to that risk understanding. Nigeria will consequently seek to continuously update its understanding of the ML/TF risks it faces, ensure that this understanding is widely shared with all stakeholders and apply a system of controls and mitigations to respond to the risk. Particularly attention will be paid to risks emerging from new technologies, trans-national risks from the immediate region as well as key international jurisdictions, and
- ii. Nigeria recognizes the importance of domestic cooperation and collaboration as a key pillar of an effective AML/CFT regime. To this end, Nigeria will continue to strengthen and improve the mechanisms and platforms established to promote intelligence exchange, inter-agency collaboration and operational coordination. In particular, Nigeria will pursue the development of innovative public-private partnerships and utilize joint task forces to pursue priority offences. Nigeria will also strengthen data collection systems at an institutional level, in particular, the disaggregation of statistics on money laundering
- iii. Nigeria also recognizes the importance of international cooperation to address the transnational nature of the highest-risk predicate offences identified in its NRA. Nigeria will strengthen its systems for both formal and informal international cooperation and will also pursue bilateral and multilateral opportunities to promote international cooperation in asset recovery, transparency initiatives and asset sharing. In particular, Nigeria will prioritise international cooperation with the highest-risk jurisdictions and will ensure that for the highest-risk predicate offences, it pursues proactive identification and recovery of assets and extradition of perpetrators of crime who are in foreign jurisdictions, this will be enabled through developing, implementing and assessing MoUs, asset sharing agreements and other international agreements.

## Chapter 5: Monitoring, Evaluation and Learning Framework

53. The Inter-Ministerial Committee on AML/CFT/CPF (IMC) will oversee the implementation of this Strategy. The SIR will form the implementation mechanism and will be updated to include key performance indicators for each of the outcome areas with a traffic-light style assessment of the performance on the strategic objectives.
54. The SIR is organized around the FATF 11 Immediate Outcomes (IOs) and the objectives of this strategy are mapped to these Outcomes as demonstrated in the figure below. This strategy also recognizes that each IO may cut across different objectives, for instance, IO3 which deals with supervision and ensuring that criminals do not have access to the financial sector (Strong Barriers) also has components which deal with the imposition of sanctions on regulated entities (Dissuasive Consequences) for failing to implement sufficient counter-measures.





55. The IMC will establish a monitoring, evaluation and learning mechanism either as a stand-alone group or under the mandate of an existing sub-committee. The National AML/CFT/CPF Data Framework will provide the means for the collection of performance data regarding the implementation of the Strategy and the SIR and the IMC Secretariat will produce a quality performance report to the IMC.
56. An annual performance review will be prepared by the Secretariat which will be presented, in line with the IMC Charter, at the Annual Review Meeting of the Heads of AML/CFT/CPF agencies. A summarized version of the annual report will also be published at the end of every year. The annual performance review will also form the basis for the biannual Money Laundering Strategy Report presented to the President and Commander-in-Chief as contained in Section 26 of the MLPPA.
57. To ensure alignment of the Strategy with emerging trends and keep implementation in line with the most relevant risks, a mid-term review of the Strategy will be conducted in the second half of 2025 with a proposed revision to be published at the end of the year. The mid-term review and any proposed revisions will be based on an update to the National Risk Assessment which will be conducted in the first half of 2025.

## Annexe I: National AML/CFT/CPF Organisational Framework

### Inter-Ministerial Committee on AML/CFT/CPF (IMC)

Nigeria's AML/CFT/CPF framework is coordinated by the Inter-Ministerial Committee on AML/CFT/CPF (IMC). The IMC is Chaired by the Honourable Attorney-General of the Federation and Minister of Justice with the Honourable Ministers of Finance and Interior as co-Chairs. The NFIU is the Secretariat and as provided for in Section 2(4) of the NFIU coordinates the activities of the IMC.

Following its restructuring in 2021, the IMC has six standing sub-committees which oversee the implementation of Nigeria's AML/CFT/CPF framework. 37 Ministries, Departments and Agencies (MDAs) make up the membership of the IMC.

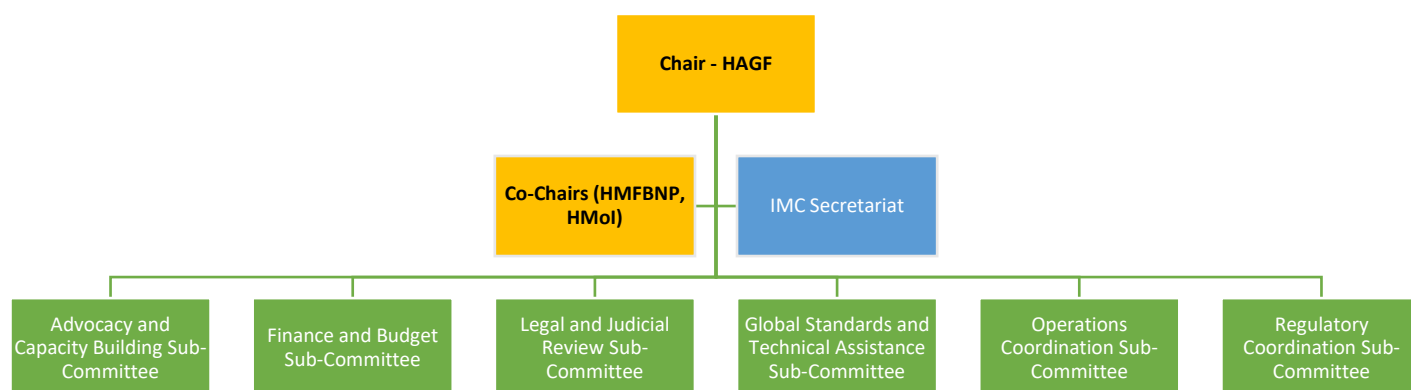


Figure 3: IMC Organisational Structure

Table 4: Members of the IMC

AGENCY		AGENCY	
1	Federal Ministry of Justice (FMOJ)	20	Nigeria Immigration Service (NIS)
2	Federal Ministry of Finance, Budget & National Planning (FMBNP)	21	Nigeria Customs Service (NCS)
3	Ministry of Interior (MOI)	22	Securities and Exchange Commission (SEC)
4	Ministry of Foreign Affairs (MFA)	23	National Insurance Commission (NAICOM)
5	Federal Ministry of Industry, Trade and Investment (FMITI)	24	Central Bank of Nigeria (CBN)

6	Office of the National Security Adviser (ONSA)	25	National Agency for the Prohibition of Trafficking in Persons (NAPTIP)
7	National Drug Law Enforcement Agency (NDLEA)	26	Nigerian Nuclear Regulatory Authority (NNRA)
8	Nigeria Police Force (NPF)	27	National Environmental Standards and Regulations Enforcement Agency (NESREA)
9	Independent Corrupt Practices and Other Related Offences Commission (ICPC)	28	National Intelligence Agency (NIA)
10	Economic and Financial Crimes Commission (EFCC)	29	National Lottery Regulatory Commission NLRC)
11	Department of State Service (DSS)	30	Nigeria Data Protection Bureau (NDPB)
12	Federal Inland Revenue Service (FIRS)	31	National Judicial Institute (NJI)
13	Nigeria Security and Civil Defence Corps (NSCDC)	32	Financial Reporting Council of Nigeria (FRC)
14	Nigerian Communications Commission (NCC)	33	Code of Conduct Bureau (CCB)
15	Nigeria Copyright Commission (NCC)	34	National Orientation Agency (NOA)
16	Corporate Affairs Commission (CAC)	35	National Identity Management Commission (NIMC)
17	Nigerian Maritime Administration and Safety Agency (NIMASA)	36	Federal Competition and Consumer Protection Commission (FCCPC)
18	Nigeria Extractive Industries Transparency Initiative (NEITI)	37	Nigerian Financial Intelligence Unit (NFIU)
19	Federal Road Safety Corps (FRSC)		

### Authorised Officers Forum

To support operational coordination pertaining to financial intelligence to combat ML/TF, Nigeria has also formed an Authorised Officers Form (AOF) bringing together all agencies that receive and utilize intelligence from the NFIU. The forum meets every quarter and focuses on effective information and intelligence exchange, managing the feedback process and supporting the development of strategic intelligence to improve the overall effectiveness of the AML/CFT framework. The AOF is led by the NFIU (which provides the Secretariat and chairs the meetings) and includes

*Table 5: Members of Authorised Officers Forum*

NAME OF AGENCY	
1	Corporate Affairs Commission
2	Code Of Conduct Bureau
3	Defence Intelligence Agency
4	Department Of State Services
5	Economic And Financial Crimes Commission
6	Federal Competition & Consumer Protection Commission
7	FCT Internal Revenue Service
8	Federal Inland Revenue Service
9	Federal Ministry of Justice
10	Federal Road Safety Commission
11	Independent Corrupt Practices and Other Related Offences Commission
12	International Criminal Police Organisation

13	Kaduna Internal Revenue Service
14	Lagos Internal Revenue Service
15	Nigerian Army Intelligence Corps
16	National Insurance Commission
17	National Agency for Food & Drug Administration & Control
18	Nigerian Army Corps of Military Police
19	National Agency for The Prohibition of Trafficking in Persons
20	Nigerian Navy
21	Nigerian Copyright Commission
22	Nigeria Communications Commission
23	Nigeria Custom Service
24	Nigeria Correctional Service
25	Nigeria Deposit Insurance Corporation
26	National Drug Law Enforcement Agency
27	Nigeria Extractive Industries Transparency Initiative
28	National Environmental Safety and Regulatory Enforcement Agency
29	Nigerian Financial Intelligence Unit
30	Nigeria Intelligence Agency
31	Nigerian Maritime Administration and Safety Agency
32	National Identity Management Commission
33	Nigeria Immigration Service
34	National Lottery Regulatory Commission
35	Nigerian Police Force
36	Nigeria Security and Civil Defense Corps
37	Office Of National Security Adviser
38	Special Control Unit Against Money Laundering
39	Securities And Exchange Commission
40	Standard Organisation of Nigeria

### National Sanctions Committee

The National Sanctions Committee is established under Section 9 of TPPA as the central body responsible for the coordination of CPF as well as targeted financial sanction related to terrorism financing and proliferation financing. The NSC is Chaired by the Honourable Attorney-General of the Federation and Minister of Justice and includes 15 members:

*Table 6: Members of the NSC*

Members	
1	Honourable Attorney-General of the Federation and Minister of Justice
2	Minister of Finance
3	Minister of Foreign Affairs
4	Minister of Interior
5	National Security Adviser
6	Director-General Department of State Services
7	Governor Central of Bank Nigeria
8	Inspector-General of Police
9	Executive Chairman Economic and Financial Crimes Commission

10	Executive Chairman Independent Corrupt Practices and Other Related Offences Commission
11	Executive Chairman National Drug Law Enforcement Agency
12	Executive Chairman Federal Inland Revenue Service
13	Director-General National Intelligence Agency
14	Chief of Defence Staff
15	Director-General National Agency for the Prohibition of Trafficking in Persons and Other Related Offences
16	Director/Chief Executive Officer Nigerian Financial Intelligence Unit

The role of the HAGF as Chair of the NSC and IMC and the NFIU as Secretariat to both the IMC, NSC, as well as the AOF, provides a mechanism for ensuring effective coordination of the various AML/CFT/CPF collaboration platforms. The AOF in particular, while having a distinct role, reports its activities to the IMC through the Operations Coordination Sub-Committee.

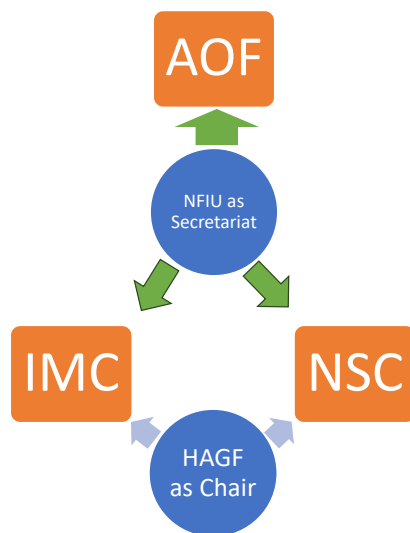


Figure 4: Multiplatform Coordination Mechanism

## Annexe II: 2018 National AML/CFT Strategy Review

The 2018 National AML/CFT Strategy outlined three strategic objectives based on the 2016 National AML/CFT Risk Assessment (NRA):

- a. To enhance existing AML/CFT preventive measures aimed at protecting the financial and designated non-financial sectors from abuse by money launderers and terrorist financiers.
- b. To enhance the effectiveness of national AML/CFT stakeholders thereby reinforcing the regulatory and institutional framework of Nigeria's AML/CFT regime, and
- c. To strengthen AML/CFT cooperation and coordination through a multi-faceted synergy to combat money laundering and the financing of terrorism.

A subsequent Action Plan was developed to provide the mechanism for the execution of these strategic objectives with eleven (11) outcomes, twenty-one (21) outputs and ninety-five (95) separate activities. Before the completion of the revised strategy, a review of the 2018 National AML/CFT Action Plan was conducted. The assessment of progress indicated that 37% of all activities were completed, 48% of all activities are still in progress and 15% of activities were reviewed (these were considered to be outside the scope of the AML/CFT strategy).

Table 7: 2018 National Action Plan Performance Summary

				Status of Activities					
	Outcomes	Outputs	Activities	Completed	% Completed	In progress	% In progress	Reviewed	% Reviewed
Objective 1	4	7	26	6	23%	9	35%	11	42%
Objective 2	3	13	50	19	38%	28	56%	3	6%
Objective 3	4	8	19	10	53%	9	47%	0	0%
Total	11	28	95	35	37%	46	48%	14	15%



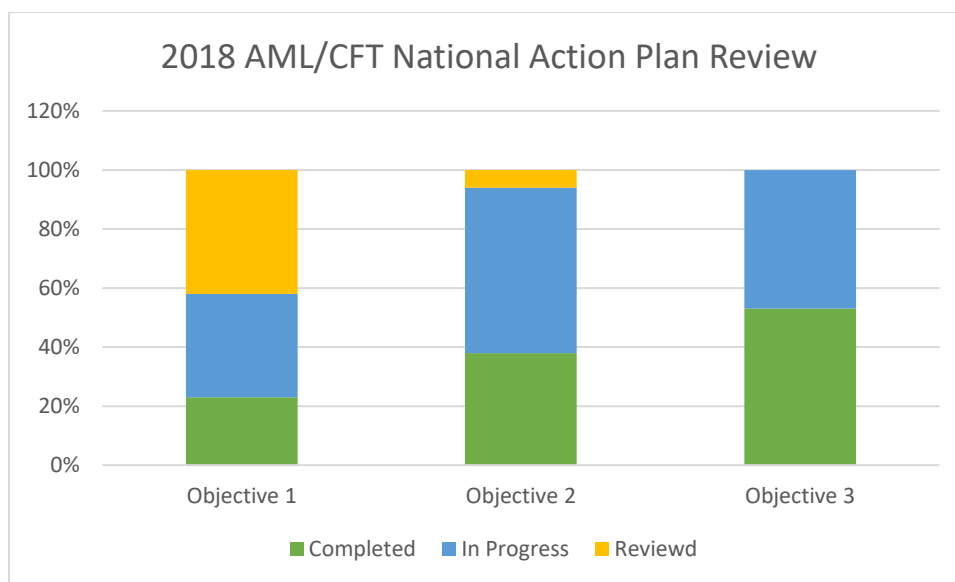


Figure 5: 2018 National Action Plan Performance Summary

Table 8: 2018 National Action Plan Detailed Performance

Objectives	Outcomes	Outputs	No of Activities
<b>Comprehensive AML/CFT Preventive Measures</b>	Robust AML/CFT Regulatory Framework	Review and Enactment of Relevant AML/CFT Legislation	6 activities (3 completed, 3 in progress)
		Issuance of guidance and regulations by regulators and supervisors	3 activities (1 complete, 1 in progress, 1 reviewed)
	Formalised economy	Formulation of comprehensive economic policy to capture the informal economy	6 activities (1 complete, 3 in progress, 2 reviewed)
	AML/CFT Enlightened and Engaged Citizenry	Awareness, sensitization and engagement programmes	3 activities (1 complete, 2 in progress)

	Adequately empowered and engaged populace	Skill and vocation acquisition	3 activities (3 reviewed)
		The targeted, restructured education system	4 activities (4 reviewed)
		Environmental cleanup and infrastructural development	1 activity (1 reviewed)
<b>Enhance the effectiveness of National AML/CFT Stakeholders</b>	Enhanced operational efficiency of NFIU, LEAs, ACAs, regulators and judiciary	Adequate manpower and capacity	2 activities (2 in progress)
		Robust technical capacity	2 activities (2 in progress)
		Adequate funding for AML/CFT matters	2 activities (1 completed, 1 in progress)
		Adequate and appropriate infrastructure	1 activity (1 completed)
		Reinvigorated code of conduct and ethics	1 activity (1 completed)
	Effective regulation, supervision and compliance	Improved capacity of regulators	15 activities (5 completed, 9 in progress, 1 reviewed)
		Improved STR reporting regime	5 activities (3 completed, 2 in progress)
		Effectiveness of compliance function	5 activities (5 in progress)
		Reinvigorated code of ethics for regulators and operators	5 activities (1 completed, 3 in progress, 1 reviewed)
		Effective entry controls	1 activity (1 in progress)
	Harmonised and integrated disparate databases	Standardised AML/CFT statistics	4 activities (4 completed)
		Centralised database for AML/CFT activities	1 activity (1 in progress)

		Reliable identification infrastructure	6 activities (3 completed, 2 in progress, 1 reviewed)
<b>Strengthen National AML/CFT Cooperation and Coordination</b>	Enhanced collaboration amongst stakeholders	Improved synergy amongst AML/CFT Stakeholders	1 activity (1 completed)
		Established framework for domestic bilateral and multilateral cooperation	2 activities (2 completed)
		Established framework and monitoring mechanism that ensures implementation of all AML/CFT international obligations	5 activities
	An Effective AML/CFT Sanctions Regime	Effective National Sanctions Committee	2 activities (2 completed)
	Effective information sharing and feedback mechanism	An efficient information-sharing platform amongst relevant stakeholder agencies	1 activity (1 completed)
		An effective Information Security Management System	1 activity (1 in progress)
		An efficient feedback mechanism amongst stakeholders	4 activities (1 completed, 3 in progress)
	Formulation, effective implementation and coordination of National AML/CFT policy and strategy	Established national AML/CFT policy coordination framework	3 activities (2 completed, 1 in progress)

