



10th November 2025

Development of AML/CFT Compliance Manual and Practical Guidance for Law Firms Providing Trust and Company Service Provider (TCSP) Services

1. Background

The African Centre for Governance, Asset Recovery and Sustainable Development, in collaboration with national regulatory authorities and stakeholders, is implementing initiatives to strengthen compliance with Anti-Money Laundering and Countering the Financing of Terrorism (AML/CFT) obligations in Nigeria. This initiative is with funding support from ANEEJ and UK FCDO.

Law firms that provide Trust and Company Service Provider (TCSP) services are classified as Designated Non-Financial Businesses and Professions (DNFBPs) under Nigeria's AML/CFT framework. While TCSPs play a legitimate and important role in corporate and trust services, they are also vulnerable to misuse for money laundering, terrorism financing, and proliferation financing if appropriate controls are not in place.

Findings from Nigeria's [Legal Sector Risk Assessment \(LRA\) Report](#) underscore risks and identify the need for sector-specific guidance to support Trust and Company Service Providers particular law firms. The LRA outlines twenty-six recommendations aimed at strengthening preventive measures, supervision, transparency, and risk mitigation within the legal profession, with particular attention to Trust and Company Service Providers.

In line with the Financial Action Task Force (FATF) Recommendations 33 and 34, as well as Nigeria's Money Laundering (Prevention and Prohibition) Act 2022, Terrorism (Prevention and Prohibition) Act 2022, NFIU Act 2018, and applicable SCUML Regulations, law firms providing TCSP services are required to maintain accurate and up-to-date beneficial ownership information, apply robust customer due diligence measures, and ensure timely reporting to competent authorities. However, many of these service providers (law firms) lack standardized, practical, and sector-specific AML/CFT compliance manuals tailored to TCSP operations. This gap creates compliance risks and inconsistencies in practice. To address this challenge, the African Center seeks to engage a qualified consultant to develop a practical, user-friendly AML/CFT Compliance Manual and Guidance tailored specifically to law firms providing TCSP services in Nigeria.



Call for Submission of Proposals

This RFP invites qualified Consultants to develop a practical, user-friendly AML/CFT Compliance Manual and Guidance for law firms providing Trust Company Services.

2. Objectives

The objectives of this assignment are to:

- a) Develop a sector-specific AML/CFT Compliance Manual and Guidance for law firms providing Trust Company services, aligned with Nigerian law and international standards;
- b) Provide practical guidance to support law firms in meeting their customer due diligence, record-keeping, reporting, and beneficial ownership obligations; and
- c) Generate recommendations that may inform supervisory engagement, policy refinement, and future training initiatives for TCSPs within the legal sector.

3. Scope of Work

The consultant/firm will:

- 1. Develop AML/CFT Compliance Manual and Practical Guidance for Law Firms Providing Trust and Company Service Provider (TCSP) Services**
 - a. Design a standardized Compliance Manual/Guidance
 - b. Include sections on Know Your Customer (KYC), due diligence, recordkeeping, suspicious transaction reporting, and beneficial ownership transparency
 - c. Align with FATF Recommendations, POCA, MLPA, and other national laws
 - d. Include templates, checklists, and reporting workflows
- 2. Submit Final Deliverables:**
 - a. Final Assessment Report (with risk ratings and recommendations)
 - b. AML/CFT Compliance Manual tailored for law firms providing TCSPs
 - c. Summary presentation slides



4 Deliverables and Timeline

Deliverable	Description	Timeline
Inception Report	Workplan and methodology	Within 1 week of contract signing
Draft AML/CFT Compliance Manual & Guidance	Draft manual for Law Firms Providing Trust and Company Service Provider (TCSP) Services	Week 2
Final Manual and Report	Revised and finalized documents	Week 4
Summary Presentation	Key findings and guidance overview	Week 4

5. Required Qualifications

The ideal consultant(s) must have:

- a. Proven expertise in AML/CFT, financial crime compliance, or regulatory risk assessments
- b. Experience in developing compliance frameworks or manuals for DNFBPs or financial institutions.
- c. Strong familiarity with FATF standards and Nigeria's AML/CFT legal architecture
- d. Demonstrated capacity for stakeholder engagement and technical writing
- e. At least 5 years of relevant consulting experience in governance, law, or finance

6. Proposal Requirements

Interested applicants should submit:

- a. Technical proposal (max 10 pages) outlining understanding, methodology, timeline, and relevant experience
- b. CVs of lead consultant(s) and team members (where applicable)
- c. 2 samples of similar past work or client references

7. Submission Instructions

- a. **Deadline:** November 18, 2025.



- b. **Email submissions to:** info@africancenterdev.org.
- c. **Subject Line:** *RFP – TCSP AML Compliance Manual for TCSP*

Only shortlisted applicants will be contacted.

For further inquiries, please contact:

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We look forward to receiving your proposals.

