





AFRICAN CENTER FOR  
GOVERNANCE, ASSET RECOVERY  
AND SUSTAINABLE DEVELOPMENT

2025

# ANNUAL REPORT

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# LIST OF ABBREVIATIONS



AFRICAN CENTER	African Center for Governance, Asset Recovery and Sustainable Development
AfDB	African Development Bank
ANEEJ	Africa Network for Environment and Economic Justice
ARMU	Asset Recovery Management Unit
AUCPCC	African Union Convention on Preventing and Combating Corruption,
CAU	Central Authority Unit
CCB	Code of Conduct Bureau
CFT	Countering the financing of terrorism
CFRN	Constitution of the Federal Republic of Nigeria
CIFAR	Civil Forum for Asset Recovery Compliance Institute of Nigeria
CLA	Commonwealth Lawyers Association
CLE	Council of Legal Education
CSO	Civil Society Organization
DECFI DNFBPs	Digital Evidence and Cyber Forensics Institute Designated Non-Financial Businesses and Professions
EFCC	Economic and Financial Crime Commission
FATF	Financial Action Task Force
FCDO UK	Foreign, Commonwealth and Development Office
FGD	Focus Group Discussion
FIRS	Federal Inland Revenue Service
FMOJ	Federal Ministry of Justice
FOI	Freedom of Information
FRN	Federal Republic of Nigeria
GFAR	Global Forum on Asset Recovery
GSDEC	Global South Dialogue on Economic Crime
GIABA	Intergovernmental Action Group against Money Laundering and Financing of Terrorism in West Africa
HAGF	Honourable Attorney-General of the Federation
IACC	International Anti-Corruption Conference
ICPC	Independent Corrupt Practices and Other Related Offences Commission
IFF	Illicit Financial Flows
IJJ	International Institute for Justice and Rule of Law
IMF	International Monetary Fund
KYC	Know Your Customer
LEA	Law Enforcement Agencies
MANTRA	Monitoring of Recovered Assets through Transparency and Accountability
MCO	Mining Cadastre Office
MDA	Ministries, Departments, and Agencies



MER	Mutual Evaluation Report
MLA	Mutual Legal Assistance
MLPP	Money Laundering Prohibition and Prevention MOU Memorandum of Understanding
NBA	NBA Nigeria Bar Association
NBA-AMLC	NBA Anti-Money Laundering Committee
NDLEA	National Drug Law Enforcement Agency
NFIU	Nigerian Financial Intelligence Unit
NIALS	Nigerian Institute of Advanced Legal Studies
NGOs	Non-Governmental Organizations
NSA	Non-State Actors
NPF	Nigeria Police Force
POCA	Proceeds of Crime Act
RAR	Risk Assessment Report
RPC	Rules of Professional Conduct
RUSI	Royal United Services Institute
SDGs	Sustainable Development Goals
STAR	Stolen Asset Recovery Initiative
TI	Transparency International
UK	United Kingdom
UNCAC	United Nations Convention against Corruption
UNODC	United Nations Office on Drugs and Crime
UNTOC	United Nations Transnational Organized Crime
USA	United States of America
USDOJ	United States Department of Justice



# STATEMENT FROM THE CHAIRMAN OF THE BOARD OF DIRECTORS



Dear Stakeholders,

As we reflect on the year 2025, I am pleased to report that the African Center for Governance, Asset Recovery, and Sustainable Development has continued to strengthen its position as a credible voice and active actor in promoting good governance, asset recovery, and combating illicit financial flows across Nigeria and beyond. In a year marked by complex governance challenges and evolving financial crimes, our resolve remained firm, and our impact tangible.

Throughout 2025, the African Center deepened its engagement within the legal and justice sectors through strategic partnerships, targeted advocacy, and capacity-building initiatives. Notably, we expanded our work on anti-money laundering, counter-terrorism financing, and proliferation financing compliance, particularly through collaboration with professional bodies and regulatory stakeholders. These efforts contributed to increased awareness, improved compliance culture, and strengthened institutional responses to financial and organized crimes.

Our commitment to evidence-based advocacy was further reinforced this year. We invested in research, data analysis, and policy engagement to ensure that our interventions were informed, practical, and aligned with international best practices. Through workshops, sensitization programs, and technical support activities, we supported practitioners and institutions working at the frontline of asset recovery and governance reform.

Despite these achievements, the challenges confronting democratic governance, transparency, and accountability remain significant. The persistence of corruption, money laundering, and illicit financial flows demands sustained vigilance and innovation. In response, the African Center intensified its advocacy and legal support initiatives, reaffirming its role as a trusted partner to institutions and individuals committed to integrity and the rule of law.

Looking ahead, we are well-positioned to scale our impact. We will continue to strengthen our research and data-driven advocacy, expand capacity-building programs, and invest in institutional development to ensure the sustainability and effectiveness of our efforts. Our focus remains clear: equipping stakeholders with the knowledge, tools, and partnerships required to confront corruption and financial crime decisively.

I extend my sincere appreciation to our partners, donors, dedicated staff, Board members, advisors, volunteers, and supporters whose commitment and professionalism made our 2025 achievements possible.

As we move forward, let us remain united in purpose. The fight against impunity, money laundering, and organized financial crimes is not merely an obligation, it is an opportunity to build a more transparent, just, and equitable society. Thank you for your continued trust in and support for the African Center.

Sincerely,

**Agabaidu Chukwuemeka Jideani**

Chairman, Board of Directors

African Center for Governance, Asset Recovery and Sustainable Development



# STATEMENT BY THE EXECUTIVE DIRECTOR



The year 2025 marked a defining phase in the institutional growth of the African Center for Governance, Asset Recovery, and Sustainable Development. Throughout the year, we strengthened our role as a credible authority in asset recovery, AML/CFT implementation, and governance reform across Africa. This period reflects the consolidation of our technical work, expansion of strategic partnerships, and measurable progress in advancing transparency, accountability, and strong institutions.

Our work remains guided by global and continental frameworks, including the United Nations Sustainable Development Goals, particularly Goal 16 on Peace, Justice, and Strong Institutions, the African Union Agenda 2063, the African Union Convention on Preventing and Combating Corruption (AUCPCC), the Common African Position on Asset Recovery, (CAPAR), and the United Nations Convention against Corruption (UNCAC). These frameworks continue to anchor our mission to address illicit financial flows (IFFs), corruption, money laundering, and related financial crimes that undermine governance and sustainable development.

In 2025, the African Center deepened its contribution to national and sector-specific efforts to combat IFFs by expanding technical assistance, research, and capacity-building initiatives, particularly within the legal and justice sectors. Recognizing the gatekeeping role of legal professionals in protecting financial integrity systems, we delivered targeted trainings, sensitization workshops, and supervision-focused engagements to strengthen understanding and implementation of anti-money laundering, counter-terrorism financing, and counter-proliferation financing obligations.

A major highlight of the year was the Center's participation at the Conference of the States Parties (CoSP11) to the United Nations Convention against Corruption. We co-hosted two official side events addressing asset recovery, illicit financial flows, and the role of non-state actors, while contributing to technical discussions on beneficial ownership transparency and the rights of victims of corruption. These engagements reinforced the Center's role as a credible African voice within global anti-corruption processes and strengthened key strategic partnerships.

With the support of our funders and collaborators, we further intensified capacity-building and compliance-support interventions. We organized training for law enforcement officers on the implementation of the Proceeds of Crime (Recovery and Management) Act (POCA) 2022 and sustained monthly awareness initiatives on AML/CFT compliance. Targeted training for legal practitioners focused on suspicious transaction identification and reporting, reinforcing the profession's responsibility within Nigeria's financial integrity architecture. We also advanced ethics and integrity sensitization for aspiring lawyers through structured engagements at the Nigerian Law School. Collectively, these efforts contributed to broader national actions supporting Nigeria's progress on Financial Action Task Force (FATF) requirements and strengthened professional self-regulation and accountability.

Institutionally, 2025 was equally a year of internal consolidation. We invested in organizational systems, partnerships, and human capacity to ensure that the African Center remains credible, responsive, and impact-driven. These efforts position the Center to scale its interventions, expand geographic reach, and deepen engagement with governments, civil society, and international partners.

Notwithstanding these gains, significant challenges persist. Illicit financial flows remain adaptive and transnational, often enabled by weak cross-border cooperation, limited political will, and resource constraints. Addressing these challenges requires sustained collaboration, innovation, and collective resolve. The African Center remains committed to contributing practical, evidence-based solutions and serving as a trusted partner in the fight against financial crime and impunity.

I extend my sincere appreciation to our partners and supporters, particularly the Foreign, Commonwealth and Development Office (FCDO-UK), the MacArthur Foundation, the Deutsche Gesellschaft für



Internationale Zusammenarbeit (GIZ), the African Network for Environment and Economic Justice (ANEEJ), the Nigerian Bar Association Anti-Money Laundering Committee, and the Center for Democratic Development (CDD). Your continued support has been instrumental to our impact. I am equally grateful to our Board, staff, consultants, and collaborators whose professionalism and dedication drive our mission forward.

Looking ahead, we remain committed to leveraging technology, strengthening research and open-data initiatives, expanding capacity-building programmes, and supporting reforms that ensure recovered assets are transparently managed and returned for the benefit of citizens. Together, we will continue advancing justice, upholding the rule of law, and promoting governance systems that enable sustainable development across Africa.

I invite you to engage with this annual report and join us in deepening our collective efforts in the years ahead.

Sincerely,

**Juliet Ibekaku-Nwagwu**

Founder & Executive Director

African Center for Governance, Asset Recovery and Sustainable Development



## ABOUT US



The African Center for Governance, Asset Recovery, and Sustainable Development (“the African Center”) is an independent governance and research organization registered as a limited liability company under Nigerian laws and headquartered in Abuja, Nigeria. The Center works with national governments, international and regional organizations, and non-governmental organizations to promote good governance, sustainable development, and the rule of law. We work to foster national and international cooperation in recovering and returning proceeds of corruption and illicit financial flow to fill funding gaps for implementing the United Nations Sustainable Development Goals (SDGs) and the African Union (Agenda 2063). The African Center shares the view that returning stolen assets will enable countries in the global South, particularly Africa, to build a foundation for prosperity and good governance.

The African Center fosters national and international cooperation in the recovery and return of proceeds of corruption to enable countries to address inequality, reduce poverty, innovate, and build sustainable partnerships. We aim to promote good governance, sustainable development, and the rule of law. This is achieved through training, research, program management, strategy development, international cooperation, and promoting anti-corruption and anti-money laundering regulatory compliance.



Since 2022, the African Center for Governance, Asset Recovery and Sustainable Development has strengthened governance reform, asset recovery transparency, and justice sector accountability across Nigeria and Africa. Working with national institutions and global partners, we have trained legal professionals, law enforcement officials, compliance officers, and investigative journalists in asset tracing, AML/CFT/CPF compliance, and financial crime prevention.

Our work focuses on anti-corruption, anti-money laundering, counter-financing of terrorism, and countering proliferation financing (AML/CFT/CPF). In collaboration with the Nigerian Bar Association (NBA), NBA Anti-Money Laundering Committee (NBA-AMLC), and the Nigerian Financial Intelligence Unit (NFIU), we led the development of Nigeria's AML/CFT/CPF Risk Assessment Report for the legal sector and supported nationwide compliance training and policy reform initiatives. Our work has been implemented in partnership with institutions such as the Foreign, Commonwealth and Development Office (FCDO UK), the Global South Dialogue on Economic Crime (GSDEC), Royal United Services Institute (RUSI), CLEEN Foundation, the Centre for Democracy and Development (CDD), the MacArthur Foundation, and GIZ.

We support Nigeria's efforts to address FATF grey list deficiencies through stakeholder engagement, risk assessment workshops, international cooperation policy support, and capacity building for justice sector institutions. We maintain formal collaboration agreements with the Nigerian Institute of Advanced Legal Studies (NIALS), Digital Evidence and Cyber Forensics Institute (DEFICI), Africa Network for Environment and Economic Justice (ANEEJ), and IBLF Global.

Our research and advocacy work spans illicit financial flows (IFFs), asset recovery governance, proceeds-of-crime management, and justice reforms aligned with SDG 16 and the African Union Agenda 2063. We have published a Compendium on Anti-Corruption Lessons (2015–2023), Guidelines for Civil Society on Managing Recovered Assets, and policy briefs strengthening AML/CFT compliance. Through our Open Asset Database and international engagements with UNODC, the StAR Initiative, AfDB, and the UNCAC Coalition, we continue to promote an African-centered approach to asset recovery that links transparency with sustainable development.

## 1.1 Mission

Our mission is to reinforce the links between governance, asset recovery, and sustainable development goals in line with Agenda 2030 and the promotion of the rule of law, strengthening justice institutions, preventing illicit financial flows, recovering stolen assets, and social reuse of stolen assets.

## 1.2 Vision

We envision a world free from illicit financial flows, where proceeds of crime are recovered and returned to the victims of corruption to improve their livelihoods and reduce poverty and inequality.

## 1.3 Our Values

The African Center operates through shared core values, which include:

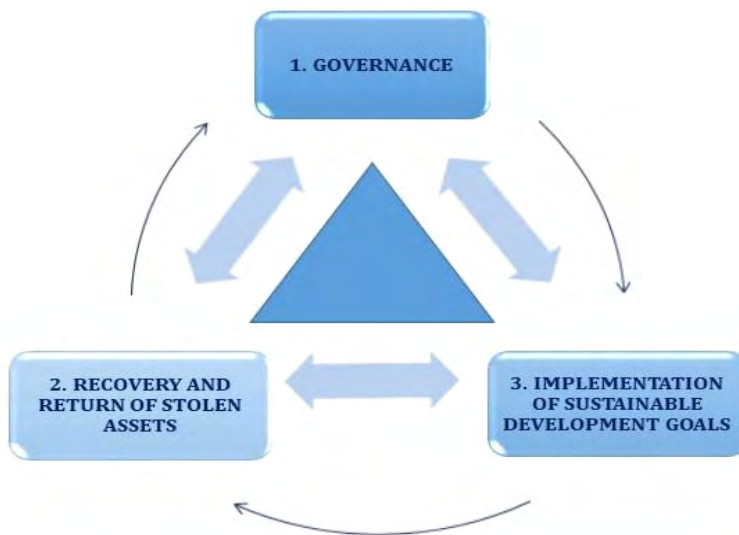
- Respect for and active promotion of human rights, democracy, the rule of law, and gender equality.
- Open exchange of information, knowledge, experiences, and ideas based on mutual respect.
- Transparency and accountability.
- Integrity, professionalism, inclusiveness, and non-partisanship in our work.
- Dialogue and constructive engagement with partners and stakeholders.



The African Center has three thematic objectives.

## 2.1 Improving Governance and Accountability Systems of Government

We work to ensure better governance for all Africans by promoting and implementing the United Nations Sustainable Development Goals. Our Governance approach recognizes that citizens', particularly women's, access to quality education, access to justice, and economic empowerment tools are cross-cutting development issues. We aim to change harmful social norms, create economic opportunities, and design technologies that address women's needs.



## 2.2 The Recovery and Return of Stolen Assets

Under the Asset Recovery theme, the African Center works with national, regional, and international organizations and professional bodies in the private and public sectors to develop clear and comprehensive legal frameworks for recovering the proceeds of all forms of crime and transparently managing the returned assets for the benefit of the victims of these crimes. Our efforts align with Chapter V of the United Nations Convention against Corruption (UNCAC), the African Union Convention on Preventing and Combatting Corruption (AUCPCC), and the Common African Position on Asset Recovery (CAPAR). The Center's core objectives are to identify the links between the return of proceeds of crime and sustainable development and to work with countries of the global South to advocate for expedited mechanisms to return stolen assets for the benefit of their citizens.

## 2.3 The Implementation of the United Nations Sustainable Development Goals and the African Union (Africa We Want Agenda 2063)

The Center works with development partners and other civil society organizations to ensure the effective implementation of the United Nations Sustainable Development Goals (UN/SDGs) and the African Union (AU) Agenda 2063. We focus specifically on UN SDG Goal 16 and AU Agenda Goals 11 and 12. We aim to "promote peaceful and inclusive societies for sustainable development, provide access to justice for all, and build effective, accountable, and inclusive institutions at all levels". The African Center's work in this thematic area is closely linked to the governance and asset recovery thematic areas. The UN Sustainable Development Goals can be found here - <https://sdgs.un.org/goals>



Our core work focuses on strengthening the understanding and implementation of anti-corruption, anti-money laundering, counter-financing of terrorism, and proliferation financing (AML/CFT/PF) frameworks. In collaboration with the GIZ, UK FCDO, MacArthur Foundation, and the United Nations Office on Drugs and Crime, we are advancing legal sector compliance through risk assessments, evidence-based research, and policy guidance.

Our research work covers anti-corruption, anti-money laundering, counter-financing of terrorism, international cooperation, justice sector reform, legal and regulatory reform, illicit financial flows, proceeds of crime, and the return of stolen assets for sustainable development. We have developed various knowledge products, including a CSO Advocacy Toolkit for Transparency International Berlin (with IBLF Global), an AML/CFT case analysis, a Compendium of Anti-Corruption best practices, and a Guideline for Civil Society Organizations on the Management and Monitoring of Proceeds of Crime. We have assisted the Asset Recovery and Management Unit, Federal Ministry of Justice, in implementing the UNCAC, including developing an Asset Recovery and Management Manual and Special Operation Procedure for Efficient Recovery of Stolen Assets.

We support African countries' efforts to address deficiencies identified in their FATF mutual evaluation and work toward removal from the grey list, partnering with the Global South Dialogue on Economic Crime (GSDEC), the Foreign Commonwealth and Development Office (FCDO UK), the German Society for International Cooperation (GIZ) GmbH and the German Federal Ministry for Economic Cooperation and Development (BMZ). We have been involved in the review of laws and conduct of AML/CFT/PF mutual evaluation reports and risk assessments across Africa. We work in Anglophone and Francophone countries and have the network to deliver projects as shown in the profile of our team.

Our partnership networks and contacts cover West, Central, and Southern Africa. We have signed MoUs with institutions such as Global South Dialogue, University of Warwick, the Global Coalition Against Corruption for the UNCAC, the Nigerian Institute of Advanced Legal Studies (NIALS), Digital Evidence Forensic and Compliance Institute (DEFICI), and IBLF Global. We serve on the Boards of the International Institute for Justice and Rule of Law (IJ), and the NEAT Initiative. The Executive Director of the African



Center is the current Convenor of the Anti-Corruption Sub-Committee of the Commonwealth Lawyers Association, a member of the Nigerian Bar Association Anti-Money Laundering Committee, and a member of the African Union Anti-Corruption Body's African Asset Recovery Practitioners

We have an ongoing strategic collaboration with the United Nations Office on Drugs and Crime (UNODC) Stolen Asset Recovery Initiative (StAR). We are members of the UNCAC Coalition, where our Executive Director currently chairs the UNCAC Coalition's Victims of Corruption Working Group. She also serves as an advisory board member of the International Institute for Justice and Rule of Law (IIJ).

### 3.1 TEAM MEMBERS

#### 3.1.1 BOARD OF DIRECTORS

##### CHAIRMAN

**Mr. JIDEANI AGABAIDU** is a human rights lawyer and a Governance, Risk & Compliance Professional, who analyses what works to enhance and improve democratic governance, public accountability, stakeholder capacity development, and anti-corruption reforms. He conducts research, provides policy advice, develops integrity plans, delivers training, and provides services as a consultant (Long/Short Term Expert (LTE/STE)). He is trained as a lawyer, ethics, anti-corruption, and regulatory compliance practitioner as well as a consultant legislative counsel. His experience spans Capacity Development and Training; Public Sector Reforms; Citizens Engagement & Stakeholder Relationship Management; Human Rights Law & Transitional Justice; Ethics, Regulatory Compliance & Anti-Corruption Services; Company Secretarial & Legal Advisory Services and Legislative Drafting Advisory an Consultancy.



He was trained at the Faculty of Laws Nnamdi Azikiwe University Awka (1997), Ethics Institute of South Africa (2007) and also attended the Zurich International Compliance Academy Switzerland (2008); He holds an LLM (Legislative Drafting) from the [University of Benin/NILDS](#), Nigeria and presently pursuing a joint PhD in Legislative Drafting at the Obafemi Awolowo University Ife and the [Nigerian Institute of Advanced Legal Studies \(NIALS\)](#) with research interest in Delegated Legislation and the Making of Regulations in Nigeria. He also holds a Post-graduate Certificate in Terrorism Studies from the [University of St. Andrews Scotland – UK](#); a Certificate in Fundamentals of Corporate Governance from the [United Nations Institute for Training and Research](#); Ethical Risk Management Certificate from the Ethics Institute of South Africa – Pretoria South Africa. He is currently serving as Director General of the [Abuja Chamber of Commerce and Industry \(ACCI\)](#) and the Chairman of the African Center Board of Directors.

**JULIET IBEKAKU-NWAGWU, LL.B., LL.M., M.A – Founder and Executive Director of the African Center for Governance, Asset Recovery, and Sustainable Development.** She is currently a Postgraduate Researcher,

the Department of Law, School of Law, Politics, and Sociology, University of Sussex, UK. She became a Barrister and Solicitor thirty-two years ago, specializing in law and development with more than twenty-three years of experience in international cooperation in the recovery and return of proceeds of crime for sustainable development, and governance. Her international criminal law experience is focused on financial intelligence, financial crimes, transnational anti-corruption, regulatory compliance on counter-financing of terrorism/anti-money laundering and anti-bribery measures, illicit financial flows (IFF), sanctions regime, and justice sector reform. She has worked with governments, anti-corruption commissions, international, multilateral, bilateral, and regional organizations, as well as civil society





organizations, to foster social development and good governance across Africa. Previous roles held include: Adviser to the President of Nigeria; Director of Nigeria Financial Intelligence Unit; Legal Expert, Commonwealth Secretariat (ECOWAS/GIABA), Assistant Director, EFCC; National Program Coordinator, UNODC; Program Officer, USAID (Nigeria). She is the Convener, Anti-Corruption Sub-Committee of the Commonwealth Lawyers Association and an Advisory Board member of the International Institute for Justice, and Rule of Law, Europe

**HADASSAH ESTHER IGOCHE-AGBAJE** is an accomplished lawyer based in Abuja, Nigeria. She is currently the Managing Partner at BJ Attorneys, a team of Regulatory Compliance Experts and Professionals with expertise in Asset Recovery. She holds memberships in the Nigerian Bar Association (NBA), the Compliance Institute of Nigeria, and the Commonwealth Lawyers Association (CLA). Hadassah also serves as the Co-Chair of the Young Lawyers of the Commonwealth Lawyers Association (YCLA). She is the Chief Compliance/Legal Adviser at the African Center for Governance and Sustainable Development (GTE/LTD). Her expertise spans corporate law, civil and criminal litigation, consumer protection, labour law, asset recovery, legislative drafting, research, policy review, and regulatory compliance. Her legal career includes roles in public service, private practice, and civil society engagement. Notably, she contributed to the research and review of key legislation, including the Proceeds of Crime Act 2022 and the Electoral Act 2022. Hadassah is also a member of various committees within the CLA, including the Public Administration Committee, the Human Rights and Rule of Law Committee, and the Anti-Corruption Sub-Committee.



### 3.1.2 ADVISORY BOARD MEMBERS

**BROOK HOROWITZ** with nearly 20 years in sustainability, Brook is skilled in human rights, anti-corruption, business integrity, health and safety, governance, risk management, and AI ethics. He has acted as an expert to governments and multilateral organizations on creating an enabling environment for responsible business; advised companies on anti-corruption and human rights compliance in their operations; he has led many international project teams in some of the world's most challenging markets. He is the author of government research papers, training manuals, toolkits, and opinion pieces and is a speaker and facilitator at international conferences. Brook is a graduate of Cambridge and Harvard Universities.



**AMATH SOUMARE** a Senior expert in the fight against financial crime with more than 20 years of experience in resolute international & sub-regional organizations (World Bank, European Union, (ECOWAS/GIABA), in technical assistance to member states (OFNAC, CENTIF Senegal) and in the financial sector. Specialized in the implementation of national AML/CFT strategies, Anti-corruption, Compliance, Financial risk management, and Development of training programs.



Mr Soumare is a specialist in the analysis of complex transactions, the identification of suspicious activities, and compliance with national and international regulations -International illicit Financing Flow. He is the founding President of SOPEL International / CANE EXECUTIVE and KEYWORDS Technologies. He is also a senior international expert in



Financial Governance (Anti-Money Laundering & Terrorism Financing, Anti-corruption) with States and international and sub-regional organizations. He holds two postgraduate doctorates in Economic Intelligence & Development, 1998 University Marne La Vallée, France), and a DBA in Monitoring Evaluation Projects Program, Illinois State University, IL, Chicago, USA).

**DR MUHAMMED TAWFIQ LADAN** LL.B (1986), LL.M (1990), and Ph.D (1997) is a Professor of Law with 37 years (1987-2024) experience in teaching, research, publications, mentorship, and Supervision, with specialization in comparative regional economic integration law and practice, public international law relating to the environment, energy, natural resources, humanitarian, human rights, gender and development. Professor Ladani is a member of the World Jurist Association, USA; ECOWAS Regional and Country Rapporteur on Climate Change Litigation of the Global Rapporteurs on Climate Change of the Columbia Law School Sabin Centre, USA; Member Panel of Reviewers of the Draft 2023 Global Report on UNSDG; IUCN Academy of and Commission on Environmental Law; Association of African Environmental Law Scholars; a Hubert Humphrey Fellow, USA, and member, Nigerian Society of International Law.



### 3.1.3 MEMBERS OF STAFF

**OBIALUNANMA NNAOBI-AYODELE** is the Deputy Project Director of the African Center. She is an experienced programme manager, development strategist, and researcher with over a decade of experience in strategic development and policy analysis. She specializes in governance, monitoring and evaluation, strategic framework development, research, project design and management, and public policy analysis. She holds a B.Sc. in Accountancy from the University of Nigeria and a Master's in International Business Management from the Universitat Autònoma de Barcelona, Spain. She is a 2017 Fellow of President Obama's Young African Leaders Initiative (YALI) and currently serves as the Co-Chair (Non-State Actors) of the National Steering Committee of the Open Government Partnership in Nigeria.



**EMMANUEL YUSUFU** is the Program and Legal Officer of the African Center and a seasoned legal practitioner with over half a decade of experience in active legal practice, specializing in litigation, particularly in the areas of property law, land law, commercial law, and labour law. Known for his analytical precision and courtroom advocacy, Emmanuel has successfully represented a diverse portfolio of clients across various courts and tribunals. Beyond his legal practice, Emmanuel is a passionate writer and legal commentator. His thought-provoking articles have been published across multiple reputable online platforms, offering insights on legal trends, judicial decisions, and policy issues. Notably, he was published in the 2020 edition of the Credle Bar Law Journal, where his contribution was commended for its depth and clarity. In 2024, Emmanuel also contributed as an assessor to a significant NBA Anti-Money Laundering and Countering Terrorism Financing Risk Assessment for the Legal Sector, helping to evaluate legal and regulatory risks in complex environments. His expertise in both litigation and legal analysis continues to make him a respected voice in the legal community. Emmanuel holds an LL. B from the University of Jos, a Call to Bar Certificate from the Supreme Court of Nigeria, and is an active





member of several professional organizations, including the Nigeria Bar Association and Commonwealth Lawyers Association.

**CHIDERA AGBO - Program Officer - Legal And Compliance:** She is a legal practitioner, qualified to practice law in Nigeria, with over a decade of experience. She worked with the Nigerian Bar Association Institute of Continuing Legal Education (NBA-ICLE), where she contributed to the strategic development and quality assurance of CLE initiatives nationwide.

She has also played key roles in high-impact legal reform projects, including the domestication and implementation of the Administration of Criminal Justice Act (ACJA 2015) across Nigerian states—a project supported by the MacArthur Foundation. Additionally, in 2019-2020 she served as a research assistant on the project “Practical Intervention for Uncovering and Identifying Beneficial Ownership (BO) as a Mechanism to Recover the Proceeds of Corruption – A Case Study of Nigeria,” a project of Northumbria University UK, funded by the UK Department for International Development qualified (UK DFID), Now Foreign Commonwealth, and Development office (FCDO). She possesses legal expertise, written and verbal communication skills, digital skills, policy implementation experience, and research competence, particularly in justice sector reform and anti-corruption. She is the Program Officer, Legal and Compliance at the African Center.



**EMMANUELA OKONKWOABUTU is a Program Officer** with expertise in governance, asset recovery, and sustainable development. Her expertise encompasses program and project management, legal research and writing, proposal preparation and stakeholder engagement. She has managed projects and secured



grants from top-tier donors such as MacArthur Foundation, FCDO UK, GIZ, Economic and Social Research Council (ESRC) Impact Accelerator Fund, UK Research and Innovation (UKRI), Transparency International. She has a proven track record in conducting research and writing, drafting legal documents, and supporting key project implementation, including contributions to publications such as the "Compendium on Lessons Learnt and Best Practices from Nigeria Anti-Corruption Efforts: 2015 to 2023", "Guideline for Civil Society Organizations in the Management and Monitoring of Proceeds of Crime." "NBA Anti-money Laundering, Countering Terrorism Financing Risk Assessment for Legal Sector" "Asset

Recovery and Management Manual", "Special Operation Procedure for Efficient Recovery of Stolen Assets". She served as a rapporteur for the NBA AMLC risk-based supervision visits and was part of the National Action Plan (NAP) IV drafting team for Nigeria, Africa. Emmanuela holds an LL.B from Nnamdi Azikiwe University, a Call to Bar Certificate from the Supreme Court of Nigeria, and is an active member of several professional organizations, including the Nigeria Bar Association, Commonwealth Lawyers Association, the Institute of Chartered Mediators and Conciliators, and the Compliance Institute of Nigeria.

**JENNIFER NGOZI ADEWUNI ACA, ACTI, is the Project Accountant/ Finance Manager.** She is a dynamic and accomplished finance and accounting professional with over 8 years of progressive experience across project accounting, donor fund management, tax administration, and financial compliance. She holds an MSc in Finance from Lincoln University College, Malaysia, and a Bachelor's degree in Accounting and Babcock University, Nigeria.

Jennifer has managed multi-million-dollar projects and secured grants from top-tier donors. She has a strong track record in budgeting, financial





reporting, compliance, and internal control systems, and she brings a deep understanding of donor requirements, having worked with organisations such as the Public and Private Development Centre (PPDC), Oxford Policy Management Limited, and the Federal Capital Territory-Internal Revenue Service. Her professional affiliations include the Institute of Chartered Accountants of Nigeria (ACA), and the Chartered Institute of Taxation of Nigeria (ACTI), with ACCA certification in view.

She is highly skilled in audit preparation, financial systems improvement, and capacity-building for finance teams. Jennifer steps into her role as Project Accountant / Finance Manager at the African Center with a commitment to upholding transparency, donor confidence, and financial integrity in all organizational operations.

**OLUWABUNMI FOLORUNSO (Assistant Accountant)** A meticulous and results-driven accounting professional with a strong foundation in financial management, data analysis, and compliance.

Demonstrates proficiency in maintaining accurate financial records, processing payments, and generating reports that support operational decision-making. Skilled in the use of Microsoft Office Suite, especially Excel, and other financial tools essential for efficient treasury and accounting functions. With hands-on experience as a Treasury Officer and Data Collection Officer, Oluwabunmi has a proven ability to manage financial disbursements, reconcile accounts, and uphold compliance with both organizational and regulatory standards. Highly organized and committed to accuracy, Oluwabunmi brings a dependable and analytical approach to every financial task. She is currently pursuing her Master's in



Financial Economics at the University of Abuja. She has a B.Sc. in Accounting from Joseph Ayo Babalola University. She is a student Member of, Institute of Chartered Accountants of Nigeria (ICAN).

**PRINCE TIJANI DAUDA serves as the Program Officer - Communications.** He is an Information Technologist and Communications Specialist with a strong background in public relations, digital media, and strategic communications. At the African Center, he leads media and advocacy efforts for projects focused on anti-corruption, governance reform, and asset recovery. His work includes developing and implementing communication strategies that support policy dialogue, stakeholder engagement, and public awareness on illicit financial flows (IFFs), accountability, and financial transparency.



With previous experience as Special Adviser and Chief Press Secretary at the Kogi State House of Assembly and as Media Lead at the Socio-Economic Research and Development Center (SERDEC), Prince Tijani brings deep expertise in media relations, content development, and policy communication across government, civil society, and international development spaces.

**PRINCE IGHODALO ESEZOBOR is a Monitoring, Evaluation & Learning specialist** with over five years of experience designing and implementing risk-based systems in anti-corruption, AML/CFT, and asset



recovery initiatives across Sub-Saharan Africa. He brings deep technical expertise in illicit financial flow monitoring, beneficial ownership transparency, compliance tracking, and evidence-based adaptive programming. Prince has led large-scale baseline to endline assessments, developed and operationalized indicator frameworks aligned with donor and national strategies, and built real-time dashboards for compliance oversight. His capacity building, data quality assurance, and strategic learning products have informed program pivots, strengthened accountability, and contributed to sustained donor confidence.



**NIMFEL MWARMIKAT JERUSA: Program Officer - Legal and Compliance.** She is a dedicated and detail-oriented legal practitioner with a growing track record in legal administration, regulatory compliance, and executive support. She possesses exceptional organizational skills, an analytical mindset, meticulousness, and the ability to manage information across multiple levels of management. With a drive for continuous professional growth, she is currently pursuing a master's degree in law (LL.M) at the University of Jos, Plateau State, Nigeria. Her career journey reflects a unique blend of legal intelligence, operational insight, and executive coordination. She is a member of the Nigerian Bar Association, and the International Law Association- Nigerian Branch.





# **PART I**

# **NATIONAL**

# **ENGAGEMENTS**



## 4.1 African Center Strengthens Nigeria's Asset Recovery System Through POCA 2022 Training-of-Trainers

The African Center conducted a comprehensive Training-of-Trainers (ToT) Workshop on the effective implementation of the Proceeds of Crime (Recovery and Management) Act, 2022 (POCA). The programme, supported by the UK Foreign, Commonwealth & Development Office (FCDO), equips key Nigerian law



enforcement and regulatory agencies with the technical capacity required to operationalize POCA and advance national asset recovery objectives.

Held as a hybrid format 19–26, November 2025 (virtual) and 1–3 December 2025 (at the EFCC academy), the training brought together 24 officers from 11 critical agencies, including the Federal Ministry of Justice, Economic and Financial Crimes Commission (EFCC), Independent Corrupt Practices and other related offences Commission (ICPC), Nigerian Financial Intelligence Unit (NFIU), National Drug Law Enforcement Agency (NDLEA), National Agency for the

Prohibition of Traffic In Persons (NAPTIP), Director of State Services (DSS), the Nigeria Police Force (NPF), Code of Conduct Bureau (CCB), Nigerian Security and Civil Defense Corps (NSCDC), and Nigerian Maritime Administration and Safety Agency (NIMASA). The initiative directly addressed gaps identified during the September 2025 Technical Needs Assessment and supported recommendations from the May 2025 National Asset Recovery Summit to strengthen system-wide capacity.



Through a mix of expert-led sessions, practical case studies, mock trials, and peer learning, participants were exposed to core areas of POCA implementation, including evidence-led financial investigations, non-conviction-based asset forfeiture, mutual legal assistance and cross-border cooperation, crypto and virtual asset tracing, chain-of-custody management, ethical investigative interviewing, and effective instructional delivery techniques to support cascade trainings.

The engagement also emphasized institutional readiness, professional ethics, and inter-agency collaboration, situating the implementation of POCA within Nigeria's broader anti-corruption and illicit financial flows agenda. It further reinforced the importance of sustained capacity development in consolidating Nigeria's recent compliance gains and improving the effectiveness and transparency of asset recovery processes.

## 4.2 National AML/CFT Compliance Webinar Series For Legal Practitioners

Under the FCDO-supported project on Tackling Illicit Financial Flows through Asset Recovery and Management and Countering ML/CFT/PF in Nigeria, the African Center and the Nigerian Bar Association Anti-Money Laundering Committee (NBA-AMLC) delivered a structured national webinar series to strengthen AML/CFT compliance within Nigeria's legal sector.



### 4.3 AML/CFT Compliance: A Non-Negotiable for Modern Law Firms

Under the FCDO-supported project on Tackling Illicit Financial Flows through Asset Recovery and Management and Countering ML/CFT/PF in Nigeria, the African Center and the Nigerian Bar Association Anti-Money Laundering Committee (NBA-AMLC) delivered a structured national webinar series to strengthen AML/CFT compliance within Nigeria's legal sector.

The first session of the series, delivered by Professor Ernest Ojukwu, SAN, examined the regulatory obligations of legal practitioners under the Money Laundering (Prevention and Prohibition) Act 2022.

The webinar attracted 1,268 live participants from all six geopolitical zones and 11 additional countries. Discussions focused on DNFBP obligations, client due diligence (CDD), enhanced due diligence (EDD), sanctions screening, reporting requirements, and internal compliance systems aligned with international standards



### 4.4 Practical AML/CFT Compliance under the RPC 2023 and NBA-AMLC Protocol

The second national webinar provided step-by-step compliance guidance under the 2023 Rules of Professional Conduct (RPC) and the NBA-AMLC Protocol.

The session recorded 2,576 registrations and 1,842 active participants across Nigeria and the diaspora. It addressed high-risk practice areas, reporting pathways, documentation standards, and supervisory expectations.

Post-session assessments reflected measurable knowledge gains, strong relevance ratings, and balanced gender participation, demonstrating impact in strengthening sector-wide compliance awareness.

### 4.5 Beyond "KYC": The Art of Strategic Client Due Diligence

Delivered by Professor Adedeji Adekunle, SAN, the third session repositioned CDD and EDD as strategic risk-management tools rather than procedural formalities. The webinar attracted 252 participants and provided practical instruction on beneficial ownership verification, risk-based client assessment, red-flag identification, confidentiality considerations, and technology-enabled compliance systems under the RPC 2023 framework.

The session advanced a more proactive and intelligence-informed approach to due diligence within legal practice.

### 4.6 Red Flags and Professional Duty: When Silence Is Not an Option

The fourth session, led by Dr. Emmanuel Oluwasina Sotande, COO, DNFBP Sector (NFIU), focused on identifying high-risk indicators in legal transactions and navigating statutory reporting obligations.

A total of 683 participants joined live from major legal hubs across Nigeria. The session clarified distinctions between Suspicious Transaction Reports (STRs) and Suspicious Activity Reports (SARs), demonstrated use of the NBA-AMLC reporting platform, and addressed the interface between reporting duties and professional confidentiality.

Post-webinar evaluations indicated increased confidence in detecting and escalating suspicious activity, reinforcing proactive compliance as a professional standard.



### 4.7 Fifth National AML/CFT Compliance Webinar: Navigating Sanctions Lists and Beneficial Ownership Obfuscation Tactics

Held on 17 December 2025, the fifth session examined the growing complexity of sanctions compliance and corporate transparency obligations.

Delivered by Salisu Abubakar, Assistant Director (Compliance), Corporate Affairs Commission (CAC), the webinar convened over 500 lawyers, regulators, and compliance professionals. It explored cross-jurisdictional sanctions regimes, sanctions breach implications, layered corporate structures, proxy arrangements, and system-level controls for beneficial ownership verification.

The session strengthened participants’ capacity to manage regulatory, legal, and reputational risks within Nigeria’s evolving AML/CFT and corporate governance landscape.



### 4.8 Youth-Focused Dialogue on Asset Recovery – International Anti-Corruption Day 2025

To commemorate International Anti-Corruption Day 2025, the African Center convened a virtual dialogue titled “Asset Recovery for the Next Generation: Why Reclaiming Stolen Billions Matters for Youth.”



Held on 9 December 2025, the event attracted over 100 participants from youth groups, academia, and civil society. The discussion examined the developmental consequences of illicit financial flows and the importance of reinvesting recovered assets into education, entrepreneurship, innovation, and employment.

The dialogue featured Hon. Ayodele Olawande, Minister for Youth Development, who emphasized youth leadership in promoting integrity and accountable governance.

The session strengthened youth engagement in anti-corruption advocacy and asset recovery monitoring processes.

### 4.9 Webinar: Virtual Dialogue on Strengthening Africa’s Voice at CoSP11

As part of its strategic preparations for the 11th Session of the Conference of the States Parties (CoSP11) to the United Nations Convention against Corruption, the African Center convened a virtual dialogue titled “Strengthening Africa’s Voice at CoSP11.”

Held on 9 December 2025, the session attracted over 50 participants, bringing together stakeholders, partners, and civil society representatives from across the continent to examine priority issues shaping Africa’s engagement at CoSP11. Discussions focused on aligning advocacy positions, strengthening technical contributions, and advancing Africa-centred perspectives on asset recovery, transparency, and international cooperation within the UNCAC framework.

Participants deliberated on negotiation priorities, modalities for effective civil society participation,



beneficial ownership transparency, and accountability mechanisms relevant to African jurisdictions. Emphasis was placed on coordinated messaging, evidence-based policy engagement, and the need for unified African positions to enhance influence within global anti-corruption deliberations.

The dialogue resulted in strengthened cross-country coordination and clearer alignment of reform priorities ahead of CoSP11, reinforcing the African Center’s role as a convener of structured and strategic African engagement in international anti-corruption processes.



**4.10 AML/CFT SENSITIZATION FOR NIGERIAN LAW SCHOOL ASPIRANTS.**

A nationwide one-day AML/CFT sensitization workshop for aspirants to the Nigerian Bar was held at the Nigerian Law School, Abuja, on 21 November 2025, with six additional campuses joining virtually and a total of 1,340 participants. Implemented in partnership with the Nigerian Bar Association Anti-Money Laundering Committee, the programme focused on foundational AML/CFT/CPF concepts, ethical obligations under the Rules of Professional Conduct, and the role of lawyers as financial-system gatekeepers in line with Financial Action Task Force standards. The session recorded strong participation and significant learning gains, reinforcing early professional ethics and compliance awareness among future lawyers.



**4.11 AML/CFT/CPF Sensitization Workshop for Heads of Courts**

The African Center hosted a one-day sensitization workshop at the National Judicial Institute for over 120 Justices and Chief Judges to strengthen judicial capacity in adjudicating financial crime cases amid Nigeria’s efforts to exit the FATF Grey List. With participation from the Chief Justice of Nigeria, the NJI, the British High Commission, NBA leadership, EFCC, ICPC, and NFIU, the session emphasized judicial leadership in combating illicit financial flows and reinforced collaboration and continuous education as key to enhancing Nigeria’s financial crime response.



**4.12 Engagement with the Code of Conduct Bureau**

The African Center engaged the Code of Conduct Bureau in Abuja to assess technical and institutional gaps through a Technical Needs Assessment aimed at informing capacity-building for effective implementation of the Proceeds of Crime Act (2022). Welcomed by CCB Chairman Dr. Abdullahi Usman Bello, the engagement strengthened inter-agency collaboration, enhanced the operational capacity of POCA-designated institutions, and reinforced efforts to promote transparency and accountability in asset recovery and management.



As part of its legal sector reform strategy under the FCDO-funded Illicit Financial Flows project, the African Center implemented a series of structured Training of Trainers (ToT) workshops to institutionalize AML/CFT compliance within Nigerian Bar Association (NBA) branches. These interventions were designed to strengthen branch-level capacity, promote effective use of the NBA-AML Portal, and establish sustainable in-house compliance leadership across regions.

## 5.1 Training of Trainers Workshop for NBA Branches – Edo & Delta States

The African Center convened a One-Day Training of Trainers Workshop in Benin City for representatives of eleven NBA branches across Edo and Delta States. The workshop delivered targeted sessions on the global AML/CFT regulatory framework, Suspicious Activity and Suspicious Transaction Reporting (SAR/STR) obligations, Ethical responsibilities of legal practitioners as DNFBPs, Risk-based supervision principles, and Operational use of the NBA-AML Portal.



Facilitated by the African Center in collaboration with NBA-AMLC officials and technical experts, the workshop equipped selected branch representatives to function as in-house compliance trainers.

The intervention strengthened professional integrity within participating branches and enhanced decentralized AML/CFT compliance capacity, contributing to Nigeria's broader efforts to improve legal sector oversight and mitigate exposure to illicit financial flows.

## 5.2 Training of Trainers Workshop for NBA Branches – Imo & Abia States

Building on its regional replication model, the African Center conducted a One-Day Training of Trainers Workshop in Owerri for representatives from NBA branches across Imo and Abia States.





The workshop focused on National and international AML/CFT frameworks, Know Your Customer (KYC) and Customer Due Diligence (CDD) requirements, DNFBP reporting obligations under the Money Laundering Act 2022, Practical deployment and reporting functions within the NBA-AML Portal.

Delivered by the African Center and NBA-AMLC technical resource persons, the workshop strengthened branch-level compliance architecture and prepared participants to cascade AML/CFT knowledge within their respective jurisdictions.

By embedding standards and persons within each branch, the intervention advanced compliance awareness, improved adherence to reporting standards, and reduced the vulnerability of legal practitioners to misuse in illicit financial transactions.

### 5.3 Training of Trainers Workshop on AML Compliance – Kano State

In Kano State, the African Center delivered a One-Day Training of Trainers Workshop emphasizing AML compliance obligations and practical application of the NBA-AML Portal as a self-regulatory compliance platform.



The Training sessions extensively focused on the lawyers' role as financial system gatekeepers, Effective SAR/STR reporting practices, strengthening transparency and internal accountability within law firms, and Risk-based compliance management.

Participants were equipped to replicate AML/CFT knowledge across NBA branches within the region, ensuring continuity beyond the initial intervention.

The workshop reinforced legal sector oversight mechanisms and supported the operationalization of the NBA-AML Portal as a central compliance tool for enhancing transparency and preventing illicit financial flows.



## 6.1 Mid-Term Review Meeting (FCDO Project)

The African Center participated in the Mid-Term Review Meeting of the FCDO-funded Illicit Financial Resilience project hosted by ANEEJ in Lagos. As a key implementing partner, the Center presented updates on its major interventions, including the Technical Needs Assessment across eight POCA-designated agencies, which identified institutional and policy gaps to inform targeted capacity-building. The Center



also highlighted progress on the Train-the-Trainers workshop for 18 POCA agencies, nationwide AML/CFT sensitization with the NBA-AMLC across 33 NBA branches, the monthly AML/CFT webinar series, and engagements with Nigerian Law School students.

## 6.2 Courtesy Visit to the National Judicial Institute

The African Center paid a courtesy visit to the National Judicial Institute (NJI) to strengthen collaboration ahead of the AML/CFT Risk Assessment of the Nigerian Judiciary, building on the joint sensitization workshop earlier convened with the NJI and chaired by the Chief Justice of Nigeria. Received by NJI Administrator Hon. Justice Babatunde Adejumo, the engagement reinforced commitments to develop tailored programmes that enhance judicial capacity, improve consistency in AML/CFT adjudication, and align the judiciary with global best practices, with the African Center pledging continued technical support.



## 6.3 Advocacy Engagement with CDD-West Africa on Strengthening POCA Implementation

The African Center met with the Centre for Democracy and Development (CDD-West Africa) to initiate a strategic partnership focused on supporting effective implementation of the Proceeds of Crime Act (2022) and enhancing national efforts to combat illicit financial flows. The engagement established a foundation for joint advocacy, shared technical expertise, and coordinated policy dialogue, reinforcing Nigeria's reform momentum toward FATF compliance and greater financial transparency.





#### 6.4 NBA-AMLC Knowledge Sharing and Capacity Building Session

On 4 September 2024, the Nigerian Bar Association Anti-Money Laundering Committee (NBA-AMLC) convened a knowledge-sharing and capacity-building session at the AMLC Secretariat, NBA House, Abuja, bringing together committee members, regulatory stakeholders, and legal practitioners to review progress in strengthening AML/CFT compliance within Nigeria's legal sector.



The session was attended by the NBA General Secretary, Dr. Mobolaji Ojibara, alongside NBA-AMLC leadership and members, including Professor Ernest Ojukwu, SAN (Co-Chair), Mr. Babajide Oladipo Ogunipe (Co-Chair), Professor Adedeji Adekunle, SAN, Professor Musa Usman Abubakar, Dr. Esa Okibe Onoja, and Dr. Maryam Idris Abdulkadir, Assistant Secretary of the Committee. The Executive Director of the African Center, Juliet Ibekaku-Nwagwu, participated virtually.

Representatives of key regulatory institutions, including the EFCC-Special Control Unit Against Money Laundering (SCUML) and the Corporate Affairs Commission, also contributed to the discussions.

The meeting provided an opportunity to review the Committee's activities over the past year, assess implementation progress, and identify strategies to strengthen coordination, institutional capacity, and the sustainability of AML/CFT compliance initiatives within the legal profession.

#### 6.5 Federal Ministry of Finance Stakeholder Engagement

The African Center, represented by its Monitoring & Evaluation Officer, participated in the Federal Ministry of Finance's second-quarter stakeholder engagement on presidential priorities and ministerial deliverables, gaining insights into government fiscal and policy directions. The meeting strengthened the Center's institutional relationships and supported alignment of its programmes with national development frameworks, reinforcing its commitment to evidence-based advocacy for governance reforms.

#### 6.6 Engagement with the UK ISF Team on IFF Reforms



The African Center engaged with the UK Integrated Security Fund (ISF) Team during their oversight visit to the Federal Ministry of Justice and NBA Headquarters, presenting updates from the ongoing Technical



Needs Assessment involving NAPTIP, NDLEA, ICPC, CCB, NPF, and FMOj, with NFIU and EFCC scheduled next. Discussions focused on strengthening asset recovery reforms, inter-agency coordination, and Nigeria's national asset recovery database, while the ISF Team commended progress on the NBA-AML Portal and monthly AML/CFT knowledge sessions—reaffirming the UK Government's support for Nigeria's anti-illicit finance efforts under the FCDO-supported Illicit Finance Resilience Project.

### 6.7 Advocacy Visit to the MacArthur Foundation (Abuja)

A delegation from the African Center, led by Deputy Project Director Nma Nnaobi-Ayodele and Program Officer Emmanuela Okonkwo-Abutu, paid an advocacy visit to the MacArthur Foundation in Abuja. The engagement explored areas of collaboration in the fight against corruption, with discussions focusing on strategies to enhance the recovery and transparent management of proceeds of crime, particularly under the Proceeds of Crime Act (POCA) 2022. The visit also emphasized the need for Nigeria to accelerate reform actions toward exiting the FATF Grey List, while establishing grounds for future partnership in policy advocacy and institutional strengthening.

### 6.8 National Asset Recovery Summit & Launch of the Forfeited Assets Database

The National Asset Recovery Summit marked the official launch of Nigeria's National Database for Recovered Assets, a project in which the African Center played a major technical role. The event also introduced new regulatory frameworks under POCA 2022 to strengthen transparency, accountability, and digital tracking in asset management.



The African Center's active participation reinforced its position as a key partner in national asset recovery efforts, creating new opportunities for policy engagement, joint advocacy, and collaboration with both national and international anti-corruption stakeholders.

### 6.9 Project Launch: Illicit Finance Resilience Project with ANEEJ and FCDO

The African Center, in partnership with ANEEJ and with funding from the UK FCDO, launched the Illicit Finance Resilience Project to strengthen Nigeria's asset recovery systems, enhance AML/CFT compliance,





and promote transparent management of confiscated assets. The inception meeting convened key national institutions—including NFIU, ICPC, FIRS, NDLEA, NAP TIP, and NEITI, alongside the UNODC StAR Initiative to advance collaboration on asset tracing, recovery, and management. The initiative reinforces the framework of the Proceeds of Crime Act (2022) and builds on the African Center’s ongoing efforts to support investigators, improve accountability, and ensure recovered assets contribute to national development.

### 6.10 Capacity Building: Launch of ICT Equipment and AML Web Portal for NBA-AMLC

The African Center presented ICT equipment and launched a new AML web portal for the NBA-AMLC at the NBA National Secretariat in Abuja, enhancing the Committee’s digital infrastructure for secure STR submission and strengthening Nigeria’s AML/CFT compliance framework. Represented by Mrs. Obialunanma Nnaobi-Ayodele, the initiative deepened collaboration with the NBA, ANEEJ, and the FCDO, reinforcing the Center’s role in driving legal-sector transparency, accountability, and governance reform.



### 6.11 Advocacy Visit to the African Development Bank (AfDB), Abuja

Led by the Executive Director, the Deputy Project Director, and members of the program team, the African Center engaged with officials of the African Development Bank to discuss its Budget Support Program and alignment with Nigeria’s Open Government Partnership (OGP) commitments. The dialogue centered on the development of Nigeria’s fourth National Action Plan (NAP IV), with the African Center, through its Deputy Project Director, as Co-Chair of OGP Nigeria, providing technical insights on transparency reforms and citizen engagement. The engagement expanded the Center’s opportunities to contribute to policy guidance and governance reforms, further solidifying its role in advancing open government and fiscal accountability.

### 6.12 NBA Annual Conference - General Conference Panel on “Dirty Money”.

The African Center participated in the “Dirty Money” breakout session at the 2025 NBA Annual General Conference, where Executive Director Juliet Ibekaku-Nwagwu joined key stakeholders from the NBA-AMLC, NFIU, and the NBA to discuss lawyers’ responsibilities in combating illicit financial flows and



complying with the 2023 Rules of Professional Conduct. The panel highlighted the NBA-AML Portal developed with FCDO support as a key tool enabling STR filing and access to compliance resources, reinforcing that AML compliance strengthens professional integrity and is achievable for law firms of all sizes.



### 6.13 Courtesy Visit to the Nigerian Bar Association on Strengthening AML Collaboration

The African Center, alongside the UK Foreign, Commonwealth & Development Office, paid a courtesy visit to the President of the Nigerian Bar Association to discuss new project activities supporting the implementation of the NBA-AMLC Action Plan. The engagement focused on strengthening legal practitioners' AML compliance capacity and enhancing cooperation with national and international institutions, with the NBA President affirming the Association's commitment to advancing reforms that reinforce integrity and improve Nigeria's legal and regulatory frameworks.



### 6.14 Engagement: Meeting with FCDO UK and ARMU on Strengthening POCA Implementation



The African Center joined FCDO UK, the Federal Ministry of Justice's Asset Recovery and Management Unit (ARMU), and ANEEJ in a high-level meeting focused on enhancing the implementation of the Proceeds of Crime Act (POCA), emphasizing institutional capacity-building for asset tracing, recovery, management, and the national forfeited assets database. Partners discussed targeted technical assistance, stakeholder training, and reforms to prevent re-looting and improve transparency, agreeing on next steps, including a comprehensive Technical Needs Assessment and further engagements on illicit financial flows and asset management reforms.

### 6.15 African Center at OGP NAP IV Retreat

The African Center participated in the Open Government Partnership (OGP) Nigeria National Action Plan IV Development Committee Retreat held in Abuja, contributing to the integration of key commitments on Asset Recovery and Management, Legislative Engagement, and Judiciary Engagement.

Represented by Mrs. Nma Nnaobi-Ayodele and Emmanuela Okonkwo-Abutu, the Center provided technical input to strengthen transparency, institutional accountability, and citizen participation within Nigeria's open governance reform framework. The engagement reinforced the African Center's role as a policy contributor and reform partner in advancing accountable governance at the national level.





# **PART II**

# **INTERNATIONAL**

# **ENGAGEMENTS**



### 7.1 African Center Engagement at UNCAC CoSP11, Doha

In December 2025, the African Center actively participated in the 11th Session of the Conference of the States Parties to the United Nations Convention against Corruption (UNCAC CoSP11) in Doha, Qatar. The Conference provided a critical global platform for advancing international cooperation, strengthening asset recovery systems, and reinforcing people-centered approaches to accountability.

The Center's engagement was strategic and sequenced, beginning with civil society agenda-setting, advancing targeted advocacy, and culminating in the co-hosting and participation in high-level policy dialogues. Collectively, these engagements amplified African perspectives within global anti-corruption processes and advanced reform-oriented outcomes across asset recovery, beneficial ownership transparency, victims' rights, and sub-national governance.

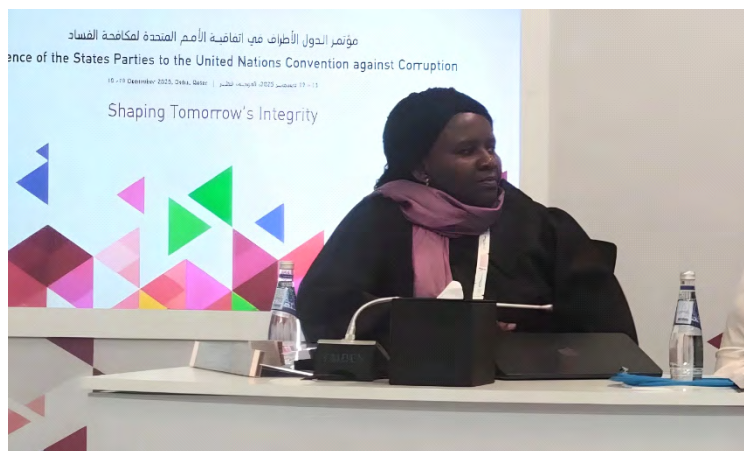
### 7.2 Civil Society Coordination and Reform Agenda-Setting

Upon arrival in Doha, the African Center participated in civil society-led consultations aimed at shaping reform priorities ahead of formal CoSP11 negotiations. These engagements identified key areas of focus, including strengthening the UNCAC Implementation Review Mechanism, protection of civic space, asset recovery, environmental crime, political financing, and cross-cutting issues related to victims' rights and access to information.

The Center further participated in the Civil Society Preparatory Day convened by the Global Civil Society Coalition on UNCAC in collaboration with UNODC. The forum brought together nearly 700 civil society representatives from over 200 organizations worldwide to coordinate advocacy positions and enhance effective participation during the Conference.



During the asset recovery discussions, the Executive Director emphasized the importance of meaningful civil society participation in asset return negotiations and the establishment of practical monitoring mechanisms to track implementation of CoSP commitments.



In parallel, the Victims of Corruption Working Group convened a strategic coordination meeting chaired by the Executive Director in her capacity as Chair of the Working Group. The session aligned advocacy priorities on victims' compensation, protection of victims' interests in asset recovery proceedings, and institutionalization of victim-centered approaches. These discussions directly informed subsequent side events and policy dialogues during the Conference.



### 7.3 Advancing People-Centered Asset Recovery and Victims’ Justice

At the core of its CoSP11 engagement, the African Center co-hosted two high-level side events focused on innovative practices in asset return cooperation and victims’ compensation.

The sessions were convened by senior policymakers, prosecutors, civil society leaders, and international experts to advance people-centered approaches to asset recovery. Among the distinguished contributors was the Chairman of the Economic and Financial Crimes Commission (EFCC), who shared Nigeria’s practical experience in international asset tracing, cross-border cooperation, and enforcement coordination. His intervention highlighted operational challenges in complex recovery cases and emphasized the importance of strong inter-agency collaboration and global partnerships in ensuring successful asset return outcomes.

Discussions further examined Nigeria’s experience in the Abacha asset recovery process, the role of civil society in promoting transparency and social reuse of returned assets, and emerging tools for strengthening restitution frameworks.

The second dialogue focused on victims of corruption and corruption-enabled human rights abuses, emphasizing compensation frameworks, sanctions-based restitution tools, and the establishment of victim funds. The discussions reinforced the Center’s position that asset recovery is incomplete unless it delivers tangible justice and redress to victims.

### 7.4 Strengthening Transparency Systems and Institutional Reform

*The African Center also convened and participated in high-level discussions on beneficial ownership transparency and sub-national anti-corruption reform.*

A key side event on beneficial ownership implementation brought together representatives from Nigeria, the United Kingdom, and South Africa to translate commitments into measurable impact. The Center facilitated technical exchanges on implementing UNCAC Resolution 10/6, including system-to-system integration with national beneficial ownership registers and enhanced use of financial intelligence to identify complex ownership structures and support non-conviction-based asset forfeiture. In addition, the Center contributed to dialogue on strengthening sub-national anti-corruption frameworks. Discussions emphasized federal–subnational coordination, preventive approaches alongside enforcement, and the use of transparency tools such as open budgets, e-procurement systems, and civic monitoring to mitigate corruption risks at the grassroots level.

The Center also engaged in a closed civil society coordination meeting, presenting its work on asset recovery, AML/CFT advocacy, and capacity building, including contributions to reforms that supported Nigeria’s exit from the FATF grey list.

### 7.5 Global Conferences, Multilateral Platforms & Thought Leadership



The African Center participated in the United Nations Office on Drugs and Crime (UNODC) Asset Recovery Webinar Series, where the Executive Director, Juliet Ibekaku-Nwagwu, featured as a speaker in Episode 1 titled “How Nigeria Became a World Champion in Asset Recovery.”

The session, supported by the Government of Norway and joined by leading Nigerian experts, examined Nigeria’s trajectory in asset recovery reform, including the strengthening of legal frameworks for proceeds-of-crime management, Institutional coordination mechanisms, international cooperation in asset return, and sustained political commitment to transparency and accountability

The webinar positioned Nigeria’s reform experience within global best practices and reinforced the African Center’s role in shaping international dialogue on effective asset recovery systems.



## 7.6 Global Policy Leadership and Multilateral Contributions

### 7.6.1 African Center Contributes to G20 Anti-Corruption Policy Reports under South Africa's Presidency

The Executive Director of the African Center, Juliet Ibekaku-Nwagwu, led the drafting of two major anti-corruption policy reports developed under the G20 Anti-Corruption Working Group during South Africa's presidency. The reports contribute to global efforts to strengthen transparency, accountability, and international cooperation in combating corruption and illicit financial flows.

The policy work brought together experts and stakeholders from multiple jurisdictions to examine emerging risks and identify practical measures for strengthening anti-corruption frameworks, asset recovery mechanisms, and institutional accountability. Through this engagement, the African Center contributed technical expertise and policy insights that informed discussions among G20 member states and partner institutions.



The Center's participation in the development of these reports highlights its growing role in shaping international anti-corruption policy dialogue and reinforces its commitment to advancing reforms that strengthen financial integrity and asset recovery globally.

For more information:

<https://africancenterdev.org/african-center-executive-director-leads-the-drafting-of-two-major-g20-anti-corruption-reports-under-the-south-african-presidencies/>

## 7.7 International Anti-Corruption Day 2025: Call for Unity, Youth Leadership, and Justice

On the occasion of International Anti-Corruption Day 2025, the African Center issued a public statement calling for stronger collective action against corruption and illicit financial flows, while emphasizing the importance of youth leadership in advancing transparency and accountability.



The statement highlighted the need for sustained collaboration among governments, civil society, and international partners to strengthen institutional integrity and ensure that anti-corruption efforts translate into tangible benefits for citizens. It also underscored the role of young leaders in driving reform, promoting ethical governance, and sustaining long-term anti-corruption initiatives across Africa.

Reaffirming its commitment to justice, accountability, and inclusive governance, the African Center called on

policy makers and stakeholders to deepen reforms that strengthen asset recovery systems, improve transparency in public institutions, and ensure that recovered assets are used to support sustainable development.

#### Full statement:

<https://africancenterdev.org/press-statement-international-anti-corruption-day-2025-african-center-calls-for-unity-youth-leadership-and-justice/>

## 7.8 2025 Commonwealth Law Conference, Malta

The African Center participated in the 24th Commonwealth Law Conference in Malta, where its Executive Director facilitated four high-level sessions on AML/CFT, sanctions enforcement, cryptocurrency



regulation, and asset recovery under UNCAC. The engagement elevated the Center’s international visibility, strengthened its contributions to global legal reform discourse, and opened new partnerships with consultants, the Central Bank of Kenya, and East African law societies, expanding opportunities to advance anti-corruption and compliance initiatives across Africa and the wider Commonwealth.

**7.9 Statement on the Qali Warma Supreme Court Judgment (Peru)**

In her capacity as Chair of the UNCAC Coalition’s Victims of Corruption Working Group, the Executive Director issued a statement welcoming the Peruvian Supreme Court’s judgment in the Qali Warma school feeding corruption case.

The ruling recognized Proética (Transparency International Peru) as an aggrieved party and affirmed the principle that corruption produces direct and identifiable victims. The statement underscored the decision’s relevance to Articles 13 and 35 of the United Nations Convention against Corruption (UNCAC), particularly regarding civil society participation and victim access to justice.



The African Center called on African and global stakeholders to adopt victim-centered approaches in anti-corruption enforcement, reinforcing the importance of inclusive accountability, standing for civil society actors, and recognition of collective harm in corruption cases.

This intervention strengthens the Center’s role in shaping global discourse on accountability, legal reform, and rights-based anti-corruption frameworks.



# **PART III**

# **REGIONAL**

# **ENGAGEMENTS**



### 8.1 Strengthening Africa's Asset Recovery Framework: AUABC CAPAR Workshop, Harare

The African Center participated in a three-day Capacity-Building Workshop on Curbing Illicit Financial Flows hosted by the African Union Advisory Board against Corruption (AUABC) in Harare, Zimbabwe, under the framework of the Common African Position on Asset Recovery (CAPAR).

The Executive Director, Madam Juliet Ibekaku-Nwagwu, delivered the keynote address and led technical sessions on investigative journalism, asset tracing methodologies, beneficial ownership transparency, and cross-border collaboration. She emphasized the need for stronger investigative systems, enhanced inter-agency coordination, and structured implementation of CAPAR across African Union member states.



The engagement strengthened regional collaboration among prosecutors, journalists, anti-corruption agencies, and civil society actors, while advancing practical frameworks for improving asset recovery effectiveness across the continent.

### 8.2 Press Statement on Operation Serengeti 2.0: Strengthening Africa's Response to Cyber-Enabled Financial Crime

The African Center issued a formal statement, signed by the Executive Director, Juliet Ibekaku-Nwagwu, commending INTERPOL, the United Kingdom, and participating African law enforcement agencies for the successful execution of Operation Serengeti 2.0 under the African Joint Operation against Cybercrime (AFJOC) initiative. The operation disrupted transnational cyber-enabled financial crime networks and resulted in the recovery of USD 97.4 million. The African Center emphasized the importance of ensuring that recovered assets support victim restitution, institutional strengthening, and sustained enforcement capacity across affected jurisdictions.



AFRICAN CENTER FOR GOVERNANCE, ASSET RECOVERY AND SUSTAINANCE DEVELOPMENT



The statement further highlighted the alignment of the operation with ongoing reform efforts supported by the UK Foreign, Commonwealth and Development Office (FCDO), particularly in strengthening asset recovery systems, inter-agency coordination, and compliance frameworks across Africa.

This engagement reflects the Center's continued commitment to regional cooperation, technological innovation in enforcement, and stronger compliance systems to combat illicit financial flows.

### 8.3 Study Tour: Kenyan Delegation Engagement with NBA-AMLC

A delegation from Kenya's Financial Reporting Centre visited the NBA-AMLC in Abuja to study Nigeria's legal sector AML/CFT regulatory model, receiving briefings on the Committee's mandate, Targeted Financial Sanctions implementation, DNFBP supervision, and the NBA-AMLC Portal. The engagement strengthened peer learning, established pathways for continued information exchange, and advanced discussions on regional frameworks for legal sector self-regulation. The African Center commended the





NBA-AMLC's leadership, noting that the visit reflects growing continental recognition of Nigeria's progress in promoting AML/CFT compliance and financial integrity

#### 8.4 African Center Contribution to FATF Policy Brief on Nigeria's Greylisting Experience

In 2025, the African Center contributed to the ESRC-funded research project titled "FATF Greylisting: Implications and Learnings from a Global South Perspective – Nigeria as a Case Study." The policy brief was developed by Nkechi Valerie Azinge-Egbiri, PhD, and Joy Malala, PhD, with support from the Nigerian Financial Intelligence Unit (NFIU).

The African Center participated in and contributed insights during the high-level stakeholder engagement convened in June 2024, which brought together representatives from the judiciary, law enforcement agencies, regulatory bodies, and academia to examine Nigeria's AML/CFT reform trajectory following FATF greylisting.

Drawing from these discussions, the brief outlines strategic recommendations aimed at strengthening legal capacity, improving inter-agency coordination, and embedding sustainable institutional compliance practices.

This engagement reflects the African Center's commitment to evidence-informed reform, policy dialogue, and strengthening Nigeria's response to FATF monitoring processes.

Full policy brief available at: <https://africancenterdev.org/fatfpbnge>

#### 8.5 Participation in the Inaugural Meeting of the African Asset Recovery Practitioners (AARP) Forum

The Executive Director of the African Center for Governance, Asset Recovery and Sustainable Development, Juliet Ibekaku-Nwagwu, participated in the Inaugural Meeting of the African Asset Recovery Practitioners (AARP) Forum, held from 15–17 April 2025 in Nairobi, Kenya.

Convened under the auspices of the African Union, the forum brought together asset recovery practitioners, policymakers, and experts from across African Union Member States to strengthen cooperation in implementing the Common African Position on Asset Recovery (CAPAR).



The meeting provided an important platform for dialogue on improving regional coordination in tracing, recovering, and managing proceeds of crime, while advancing practical strategies for enhancing transparency, accountability, and cross-border collaboration in asset recovery processes across the continent.

Through its participation, the African Center contributed to discussions on strengthening institutional capacity, promoting best practices in asset recovery, and supporting Africa's collective efforts to combat illicit financial flows and corruption.



# **PART IV**

# **INSTITUTIONAL GOVERNANCE AND BOARD OVERSIGHT**



### 9.1 Board and Extraordinary General Meetings

In 2025, the African Center for Governance, Asset Recovery and Sustainable Development convened three governance meetings of the Board and Advisory leadership to provide strategic oversight, review programme implementation, and strengthen institutional governance.

The meetings were held on 28 April 2025, 7 August 2025, and 11 December 2025, bringing together the Chairperson, Advisory Board members, and management team to review organizational progress, financial performance, partnerships, and strategic priorities. These meetings played an important role in guiding the Center's institutional development and ensuring accountability in the implementation of its programmes on asset recovery, anti-corruption, and financial integrity.

### 9.2 Institutional Policies and Governance Reforms

The Board approved several key governance and operational measures aimed at strengthening institutional systems and ensuring transparency and accountability. These included:

- Ratification of updated organizational policies, including AML/CFT, procurement, safeguarding, financial management, monitoring and evaluation, and risk management frameworks.
- Approval of the Data Privacy Policy and Fundraising Policy to enhance compliance and strengthen the Center's resource mobilization strategy.
- Adoption of an updated governance structure and organizational framework to support the Center's growth and expanding programme portfolio.

### 9.3 Financial Statement – 2025 Financial Year

The 2025 financial year reflects the African Center for Governance, Asset Recovery and Sustainable Development's continued commitment to strong financial stewardship, transparency, and responsible resource management in support of its governance and development programmes. During the reporting period, African Center recorded total income of 288,200,287.39, derived primarily from grant funding provided by development partners, administrative fees, consulting and research services. These resources enabled the African Center to implement key programmatic activities focused on governance reform, asset recovery, policy engagement, and capacity building across its areas of operation.

Total expenditure for the year amounted to 284,719,595, reflecting investments in programme implementation, personnel and consultancy support, stakeholder engagements, project implementation activities, and institutional operations. Expenditure remained aligned with approved project budgets and donor compliance requirements, ensuring that financial resources were efficiently deployed to achieve programme objectives and deliver measurable impact.

In accordance with statutory and regulatory requirements, the Centre remained fully compliant with all applicable tax and employee-related obligations during the year. Pay-As-You-Earn (PAYE) and withholding taxes were duly remitted to the relevant tax authorities, while pension contributions were paid to the designated Pension Fund Administrators in line with the Pension Reform Act. African Center also met its statutory obligations to the Nigerian Social Insurance Trust Fund (NSITF) and other required regulatory bodies. These payments project the African Center's continued commitment to accountability, regulatory compliance, and responsible financial governance.

Overall, the Centre remains committed to maintaining robust financial management systems, adhering to donor compliance standards, and ensuring that resources entrusted to the African Center are utilized effectively to advance its mission and strategic objectives.



**PART V**

**LOOKING AHEAD:  
STRATEGIC PRIORITIES  
FOR 2026**



As the African Center for Governance, Asset Recovery and Sustainable Development reflects on the progress achieved in 2025, the organization remains committed to expanding its role as a trusted partner in advancing transparency, accountability, and financial integrity across Africa. The coming year will focus on consolidating gains made in asset recovery and anti-corruption reforms, strengthening regional cooperation, and reinforcing the institutional sustainability of the Center.

### **Advancing Asset Recovery and Financial Integrity**

In 2026, the African Center will deepen its work in supporting effective asset recovery systems and strengthening financial integrity frameworks across Africa. Building on the technical assistance, policy engagement, and capacity-building programmes implemented in 2025, the Center will continue to support government institutions, law enforcement agencies, the judiciary, and legal practitioners in improving the tracing, recovery, and management of proceeds of crime.

Attention will be given to strengthening the implementation of the Proceeds of Crime (Recovery and Management) Act (POCA) and advancing anti-money laundering and counter-terrorism financing (AML/CFT) compliance within the legal sector. Through collaboration with institutions, funding support from donors, and other national stakeholders, the Center will expand training programmes, develop practical tools and guidance, and promote stronger compliance systems across the legal and financial ecosystem.

The African Center will also continue to generate policy research, technical guidance, and analytical insights that support institutional reforms and strengthen asset recovery practices at both national and regional levels.

### **Strengthening Regional and Global Collaboration**

Recognizing that illicit financial flows and corruption are transnational challenges that require collective responses, the African Center will continue to strengthen partnerships and collaborative initiatives with regional and international institutions.

In the coming year, the Center will deepen its engagement with organizations such as the African Union, the African Development Bank, the United Nations Office on Drugs and Crime, and the Global Civil Society for the UNCAC, while continuing to participate in global policy platforms that shape international anti-corruption and asset recovery frameworks.

Through these engagements, the African Center will contribute to knowledge exchange, promote best practices, and support the development of coordinated responses to financial crime and governance challenges across jurisdictions. The Center will also continue to support emerging practitioner networks and regional dialogue platforms aimed at strengthening cooperation among policymakers, practitioners, and civil society organizations across Africa.

### **Strengthening Institutional Sustainability and Impact**

To ensure long-term impact and resilience, the African Center will prioritize the diversification of its funding base and the strengthening of its institutional capacity. In addition to maintaining strong relationships with existing development partners, the Center will expand engagement with philanthropic foundations, regional institutions, and strategic partners that share its commitment to governance reform and financial integrity.

The organization will also further develop its consultancy and technical advisory services in areas such as asset recovery, AML/CFT compliance, governance reform, and institutional capacity-building. By leveraging its expertise and growing regional network, the African Center aims to position itself as a



leading source of technical knowledge and policy support on asset recovery and anti-corruption reforms across Africa.

Through these priorities, the African Center looks ahead to 2026 with a renewed commitment to strengthening institutions, advancing accountability, and contributing to more transparent and resilient governance systems across the continent.

### **A FINAL WORD**

The progress recorded in 2025 reflects the collective efforts of our partners, stakeholders, and dedicated team working toward a shared vision of accountable governance and sustainable development across Africa. As the African Center continues to grow, we remain guided by the belief that strong institutions, transparent systems, and effective asset recovery mechanisms are essential for ensuring that public resources serve the public good.

We are grateful for the continued support of our partners, donors, and collaborators, whose commitment enables the Center to expand its impact and strengthen reform efforts across national, regional, and global platforms. Together, we look forward to deepening this work in the years ahead, advancing practical solutions that promote integrity, justice, and sustainable development for the benefit of present and future generations.