



OLANIWUN  
AJAYI



# FINTECH

2024

HIGHLIGHTS

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2025

OUTLOOK

# F O R E W O R D

The year 2024 was filled with a variety of notable happenings in technology and innovation, ranging from the significant growth of electronic payments as the use of electronic channels to make payments grew by 86.44% in H1 2024, to the transformative strides made in artificial intelligence across the world.

Despite an overall decline in investment activity across the African continent, fintech continued to play a dominant role in the Nigerian and broader African tech space, accounting for 63% of total funding deals in 2024. One of the highlights in this regard was the achievement of unicorn status by two fintech companies, Moniepoint (Nigeria) and Tyme (South Africa), after securing \$110 million and \$250 million, respectively. There was also a notable rise in investments in climate tech, with climate-tech companies raising \$325 million in 2024. In addition, we examine the increasing shift toward debt financing, mergers and acquisitions, and innovative business models that emerged as players adapted to evolving economic conditions.

As we look to 2025, the trends of 2024 provide a glimpse into an industry poised for further evolution. Emerging themes such as the integration of artificial intelligence into everyday business models, the shift toward flexible rent payment models, and the growing prominence of e-mobility solutions signal a future driven by technological ingenuity and economic

adaptation. Meanwhile, the issuance of new regulations or revision of specific regulations, including on cross-border remittances, data protection, cybersecurity and virtual assets, reemphasise the importance of compliance in promoting a secure and resilient ecosystem.

In this year's fintech forward look, we highlight the key deal trends and funding activities that arose in 2024, provide sectoral analysis and key insights across fintech, digital marketplaces, and emerging technologies, and offer a regional spotlight on notable regulatory developments across Africa.

We welcome your thoughts, feedback and inquiries about the report. Please reach out to us at [TIF@olaniwunajayi.net](mailto:TIF@olaniwunajayi.net) with any questions or observations. We hope you find this edition engaging and insightful.



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PART  
**01**

# DEAL TRENDS



# HIGHLIGHTS OF DEBT AND EQUITY FUNDING IN 2024



In 2024, African tech startups raised a total of

**\$2.2 billion** in equity, debt and grants which in comparison to 2023, is a decline by **25%**.<sup>1</sup>



In 2024, tech companies in Nigeria raised **\$400 million** as the third highest country in Africa, behind Kenya and Egypt, still lower than **\$410 million** raised in 2023.<sup>2</sup>



In 2024, the Fintech sector in Africa ranked #1 in funding deals contributing **47%** (**over \$1 billion**) in funding volume, ahead of Energy in second and Logistics and Transport, in third.<sup>3</sup>



Reports show that a significant portion of investments was directed toward climate tech which accounted for **32%** of all startup funding in 2024<sup>4</sup> thereby accounting for **\$423 million** in funding.<sup>5</sup>



In 2024, the use of debt to fund African tech continued to gain momentum. This is evidenced by the increasing amount of funds raised through debt-equity.<sup>6</sup> This trend can be attributed to the rise of innovative debt financing mediums or hybrid forms of financing (equity and debt).<sup>8</sup>

1. [Africa: The Big Deal's, '2024, just 2.2 billion in the bank.](#)
2. [Africa: The Big Deal's, Kenya and East Africa in the lead again in 2024.](#)
3. [Africa: The Big Deal's, Fintech and Climate tech in short.](#)
4. Ibid.
5. [Africa: The Big Deal's, Climate tech represented 32% of funding raised in 2024.](#)
6. [Ngozi Chukwu, 'Founders continue to Raise Debt as funding decline persists, according to the State of Tech in Africa Report' \(Tech Cabal, 13 June 2024\).](#)
7. [Briter Bridges, 'Debt Financing in Africa's Innovation Ecosystem' \(Briter Bridges, 2023\).](#)
8. Ibid.



## Some notable funding involving the Nigerian market in 2024 include:

Company	Sector/Service	Funding Raised & Funding Round
<b>January</b>		
<b>Cleva</b>	Fintech	<b>\$1.5 million</b> (pre-seed round) <sup>9</sup>
<b>February</b>		
<b>Arnegy</b>	Clean tech	<b>\$3 million</b> <sup>10</sup>
<b>Klas</b>	Education Technology (Edtech)	<b>\$1 million</b> (pre-seed round) <sup>11</sup>
<b>Bfree</b>	Tech-enabled debt collection	<b>\$2.95 million</b> <sup>12</sup>
<b>March</b>		
<b>Moove</b>	Mobility fintech	<b>\$100 million</b> (series B round) <sup>13</sup>
<b>Zone</b>	Blockchain	<b>\$8.5 million</b> <sup>14</sup>
<b>Youverify</b>	Identity verification and AML solutions	<b>\$2.5 million</b> (Pre-series A round) <sup>15</sup>
<b>April</b>		
<b>Chowdeck</b>	Foodtech	<b>\$2.5 million</b> (seed funding) <sup>16</sup>
<b>May</b>		
<b>Renda</b>	Logistics	<b>\$1.9 million</b> <sup>17</sup>
<b>July</b>		
<b>Intron Health</b>	Clinical speech recognition	<b>\$1.6 million</b> (pre-seed round) <sup>18</sup>
<b>August</b>		
<b>Waza</b>	Fintech	<b>\$8 million</b> <sup>19</sup>
<b>September</b>		
<b>Regfyl</b>	Identity verification and AML solutions	<b>\$1.1 million</b> <sup>20</sup>
<b>UmrahCash</b>	Fintech	<b>\$500,000</b> <sup>21</sup>

9. [Samson Akintaro, 'Nigerian Fintech Startup, Cleva raises \\$1.5 million in Pre-seed' \(Nairametrics, 08 January 2024\).](#)

10. [Tage Kene-Okafor, 'Arnegy, which provides solar power systems to homes and Businesses in Nigeria, raises \\$3 million' \(Tech crunch, 15 February 2024\).](#)

11. [Tage Kene-Okafor, 'Techstars-backed Nigeria Edtech Klas raised \\$1 Million for Global Scaling of Online teaching platform' \(Tech crunch, 06 February 2024\).](#)

12. [Samson Akintaro, 'Nigerian Debt Recovery Startup, Bfree secures \\$2.95 million in fresh funding' \(Nairametrics, 29 February 2024\).](#)

13. [Tage Kene-Okafor, 'Uber Leads \\$100 million Investments in African Mobility Fintech Moove as Valuation hits \\$750 Million' \(Tech Crunch, 19 March 2024\).](#)

14. [Ganiu Oloruntade, 'Blockchain payments startups Zone raises \\$8.5 million in first funding as a standalone business' \(Tech cabal, 18 March 2024\).](#)

15. [Tage Kene-Okafor, 'Nigeria's Youverify raises \\$2.5 million to enhance anti-money laundering Compliance' \(Tech crunch, 13 March 2024\).](#)

16. [Samson Akintaro, 'Nigerian Food Delivery Startup, Chowdeck secures \\$2.5 million seed funding' \(Nairametrics, 30 April 2024\).](#)

17. [Faith Omoniyi, 'E-commerce Logistics Partner Renda raises \\$1.9 million to expand across Nigeria, Kenya' \(Tech Cabal, 02 May 2024\).](#)

18. [Deborah Dan Awoh, 'Nigerian Startup, Intron Health raises \\$1.6 million in Pre-seed Funding' \(Nairametrics, 26 July 2024\).](#)

19. [Samson Akintaro, 'Nigeria accounts for 14% as African Startups raise \\$56 million in August 2024' \(Nairametrics, 19 August 2024\).](#)

20. [Faith Omoniyi, 'Regfyl, a Nigerian Fraud Detection Company raises \\$1.1 million to expand team and build new compliance product' \(Tech cabal, 17 September 2024\).](#)

21. [Cryptoguru, 'Nigerian Web3 Startup, UmrahCash, Reportedly Secures \\$500,000 from Adaverse to Transofrm Fintech for Religious Pilgrims' \(Bitcoinke, 20 September 2024\).](#)



Company	Sector/Service	Funding Raised & Funding Round
<b>October</b>		
<b>Klasha</b>	Fintech	<b>\$2 million</b> <sup>22</sup>
<b>Yellow Card</b>	Cryptocurrency	<b>\$33 million</b> (series C round) <sup>23</sup>
<b>Moniepoint</b>	Fintech	<b>\$110 million</b> (series C round) <sup>24</sup>
<b>November</b>		
<b>Lingawa</b>	Edtech	<b>\$1.1 million</b> (pre-seed round) <sup>25</sup>
<b>December</b>		
<b>Billboxx</b>	Fintech	<b>\$1.6 million</b> (pre-seed round) <sup>26</sup>
<b>Juicyway</b>	Fintech	<b>\$3 million</b> (pre-seed round) <sup>27</sup>
<b>WATT Renewable Corporation</b>	Cleantech	<b>\$15 million</b> debt facility <sup>28</sup>
<b>PBR Life Sciences</b>	Healthtech	<b>\$1 million</b> (pre-seed). <sup>29</sup>

22. NM partners, '[Klasha raises an additional \\$2 million to expand B2B cross border payment rails into China](#)' (Nairametrics, 16 October 2024).

23. Taje Kene- Okafor, '[African Crypto Startup Yellow Card raises \\$33 Million led by Blockchain Capital to scale its B2B pivot](#)' (Tech Crunch, 16 October 2024).

24. Olumuyiwa Olowogboye, '[Moniepoint gets \\$1 Billion Valuation in new funding round led by DPI](#)' (Tech Cabal, 29 October 2024).

25. Samantha Dorisca, '[Techstars-Backed Lingawa, An AI-Driven Edtech Platform, Has Secured \\$1.1M in Funding](#)', (Yahoo!Finance, 27 November 2024).

26. Faith Omoniyi, '[Nigerian Fintech raises \\$1.6 million in Pre-seed from Norrsken, 54 Collective](#)' (Tech Cabal, 11 December 2024).

27. NM partners, '[Nigeria's Juicyway raises \\$ 3million to help businesses solve FX shortage problem](#)' (Nairametrics, 16 December 2024).

28. Samson Akintaro, '[WATT secures \\$15 million debt facility to finance Solar projects in Nigeria](#)' (Nairametrics, 11 December 2024).

29. Faith Omoniyi, '[Techstars-backed PBR Life sciences raises \\$1 million pre-seed funding](#)' (Tech Cabal, 20 December 2024) accessed 06 January 2025.



## FUND ESTABLISHMENTS

### \$300 million

fund

Partech, a global VC firm closed its "Partech Africa II Fund", a \$300 million fund that targets early-stage startups in Africa.<sup>30</sup>



### \$8.6 million

fund

Satgana, a VC firm focused on investments in climate tech, closed on its \$8.6 million fund, to invest in up to 30 (thirty) climate tech startups across Africa and Europe.<sup>31</sup>



### \$154 million

fund

TLcom Capital closed a \$154 million fund which will be used to invest in startups at seed and series A funding stage.<sup>32</sup>



### \$750,000

grant

Accelerate Africa was launched as an African-focus accelerator, backed by a \$750,000 grant from the United States Agency for International Development (USAID).<sup>33</sup>



### \$78 million

fund

Jango Capital closed a \$78 million fund, to be used in bridging the gender gap in Africa.<sup>34</sup>



30. Chinwe Michael, 'Partech raises \$300m fund to boost African Investments' (BusinessDay, 20 February 2024).  
 31. Osamu Ekhat, 'VC firm Satgana Closes First Fund to Support Early Stage Climate Tech Startups in Africa' (TechPoint, 28 March 2024).  
 32. Frank Eleanya, 'TLcom Capital closes \$154 million fund for early stage African startups' (Techcabal, 21 April 2024).  
 33. Chimgozirim Nwokoma and Abullah Ajibade, 'Iyanuoluwa Aboyeji is Building Africa's Y Combinator but without the money' (Techpoint, 17 January 2024).  
 34. Abdullah Ajibade, 'African VC, Jango Capital closes \$78 million to support African African SMEs and enhance inclusivity' (Techpoint.Africa, 30 October 2024).



## MERGERS AND ACQUISITIONS (M&A)

As of H1 2024, at least 17 M&A deals had been reported.<sup>35</sup> Most M&A deals remain largely unreported in the Nigerian tech market, however some reported notable acquisitions in the past year include:

BuuPass, a Kenyan-based travel booking platform acquired QuickBus, a bus ticketing company with operations in Nigeria and South Africa.<sup>38</sup>

Mastercard acquired a **3.8%** stake in MTN's Momo.<sup>36</sup>



Nigerian-based fintech, **Carbon** acquired **Vella Finance** and its AI-powered business banking platform.<sup>37</sup>

Paystack, Piggyvest, Venture Platform, and P1 Ventures acquired Brass, a Nigerian business banking start-up.<sup>39</sup>

Nigerian wealthtech, Risevest acquired Hisa, a Kenyan mobile investment platform.<sup>40</sup>



35. [Tech Cabal, 'State of Tech in Africa \(H1 2024 Report\)' \(Tech Cabal Insights, 12 July 2024\).](#)  
 36. [Olusegun Odunewu, 'Mastercard to Acquire 3.8% minority stake in MTN's Fintech Division' \(National Daily, 08 February 2024\).](#)  
 37. [Olumide Ologunagbe, 'Carbon acquires Fintech Firm to Empower SMEs' \(Business Day, 16 February 2024\).](#)  
 38. [Kenn Abuya, 'BuuPass acquires QuickBus, a bus ticketing platform, in a cash and stock deal' \(Tech Cabal, 30 April 2024\).](#)  
 39. [Boluwatife Omotayo, 'Paystack acquires Brass, appoints new CEO' \(Business Day, 28 May 2024\).](#)  
 40. [Kenn Abuya, 'Nigerian Investment Fintech Rise Completes Acquisition of Kenya's Hisa' \(Tech Cabal, 11 September 2024\).](#)



PART

02

# SECTORAL WRAP-UP AND OUTLOOK

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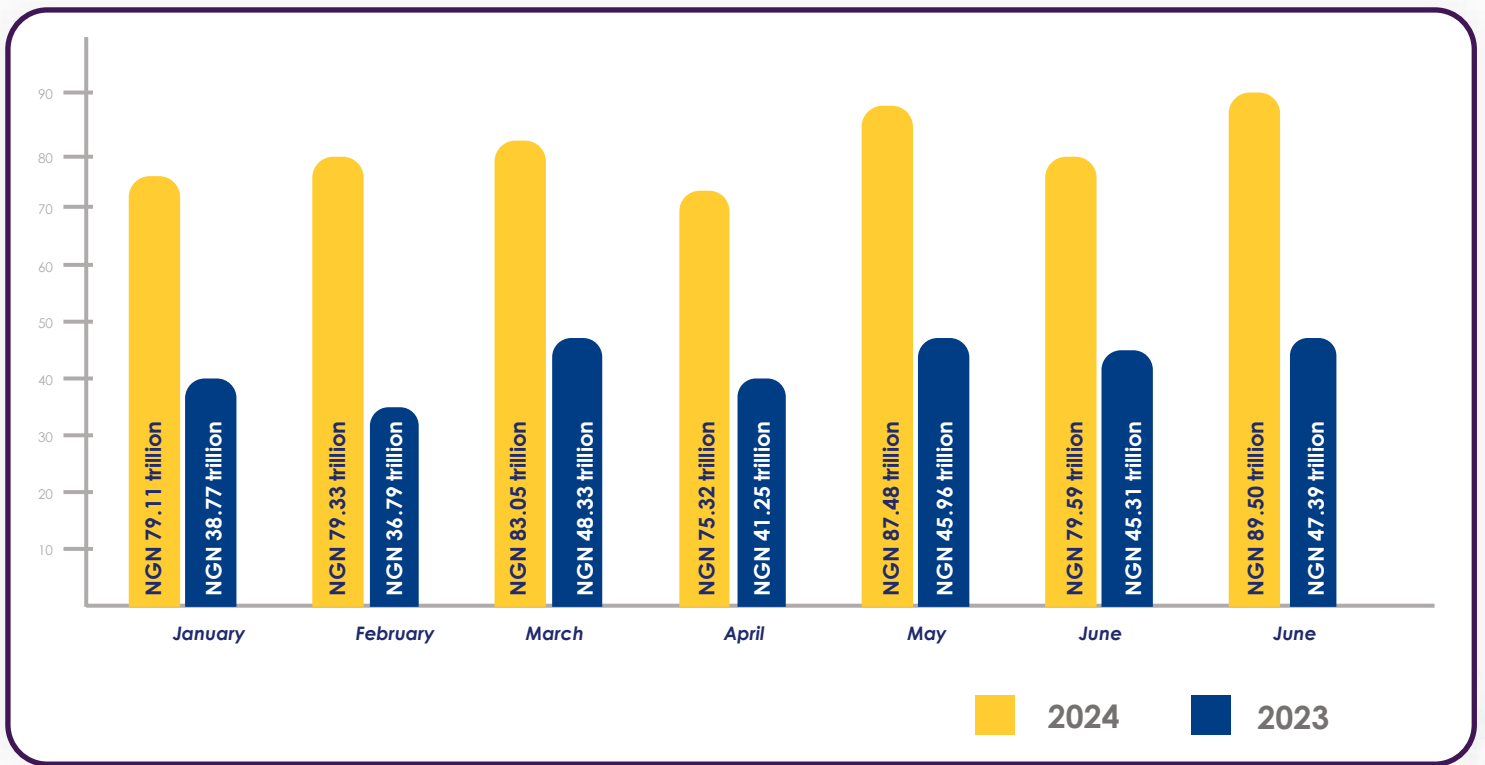
# FINTECH

## GENERAL OVERVIEW OF PAYMENTS FOR 2024

### Value and Volume of Electronic Payments Transactions Recorded by NIBSS

Transactions done through electronic channels in Nigeria utilising the Nigeria Inter-Bank Settlement System (NIBSS) rose by 86.44% to NGN566.39 in H1 2024 from NGN306.60 trillion recorded in the same period in 2023.<sup>41</sup>

To further contextualise the data, the H1 monthly breakdown of electronic payments in 2024 vis-à-vis 2023 is as follows:



The highest monthly record was in July at N89.5 trillion representing an 89% year-on-year increase compared with the N47.4 trillion recorded in July 2023.

On the strength of the volume of electronic payments transactions done the H1 2024, the Federal Government of Nigeria generated NGN103.7 billion from electronic money transfer levies, which was a 7.55% increase from the NGN96.44 billion generated in H1 2023.<sup>42</sup>

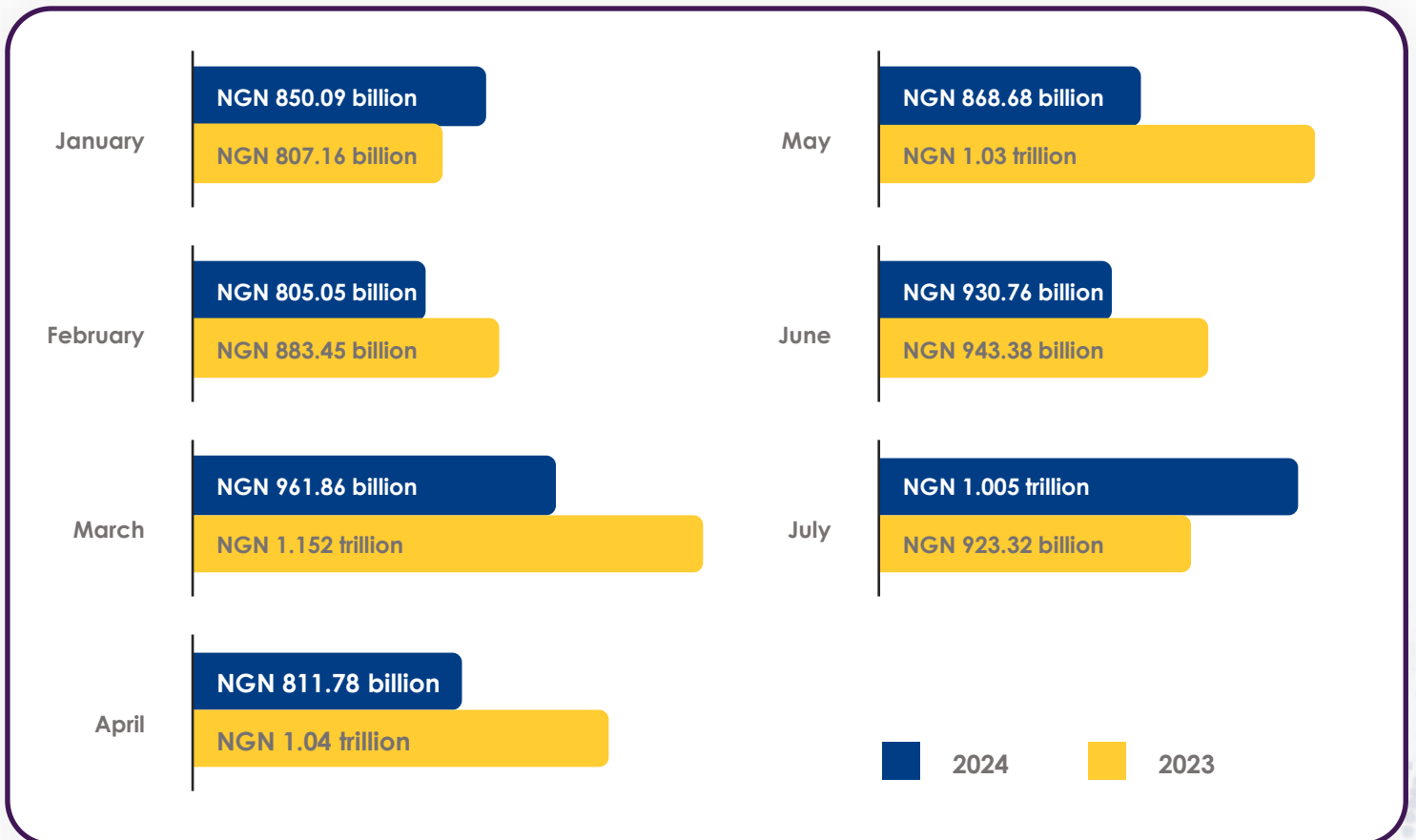
41. Temitope Aina, 'E-Payment Transactions Grow By 86%- NIBSS' (Punch, 26 September 2024) accessed 04 November 2024.

42. Sami Tunji, 'FG earns N103.7bn from Cash Transfer Taxation' (Nairametrics, 12 October 2024) accessed 04 November 2024.



## Value and Volume of Point of Sale (PoS) Transactions

The breakdown of the value of POS transactions in H1 2024 v H1 2023.<sup>43</sup>

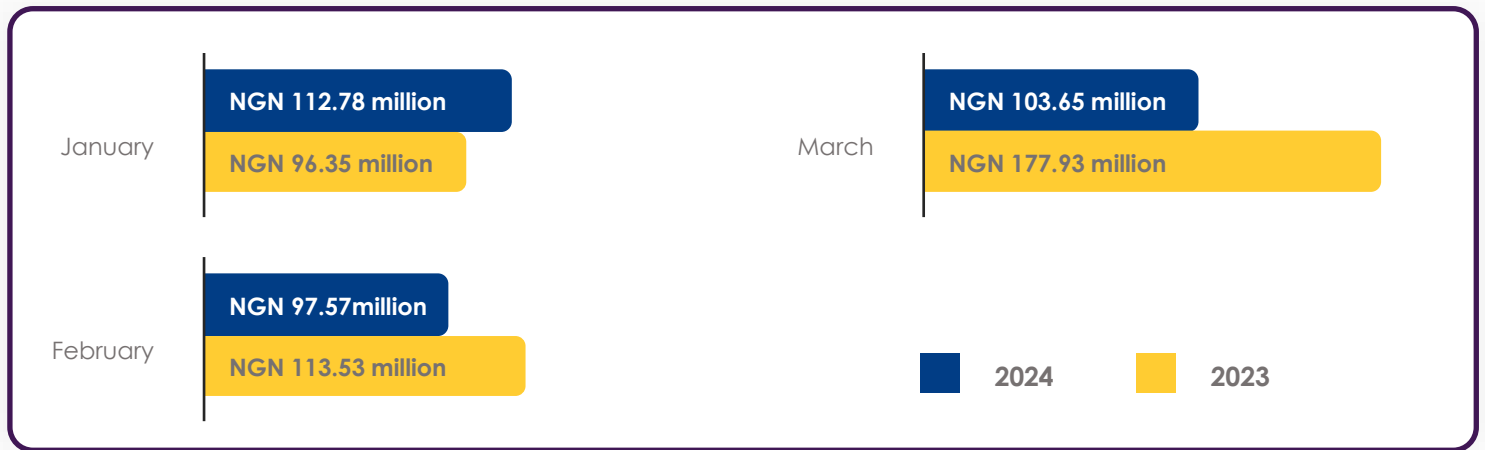


Generally, there was a decrease in POS transactions in H1 2024.<sup>44</sup> This is despite reports that there was a 50% increase in the number of PoS machines deployed across Nigeria as of July 2024 from about 2.3 million in July 2023 to 3.04million in July 2024.<sup>45</sup>

43. Sami Tunji, 'POS transactions crash by N226 Billion in Q1 2024 as Cash outside Banks Climbs' (Nairametrics, 05 April 2024).  
 44. Chinwe Michael, 'POS Transactions hit N6.23 Trillion in seven months' (Business Day, 10 October 2024).  
 45. Samson Akintaro, 'Deployed POS terminals across Nigeria hit 3.04 Million in July 2024' (Nairametrics).



The breakdown of the volume of POS transactions.<sup>46</sup>

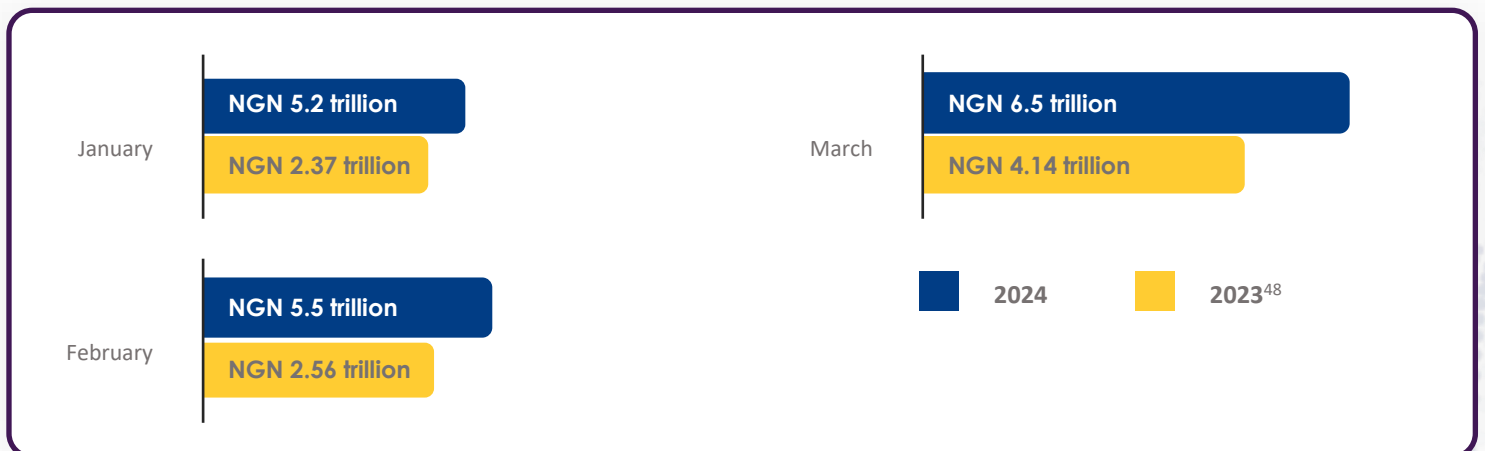


**The volume of POS transactions recorded in Q1 2024 declined from NGN387.81 million in Q1 2023 to NGN314 million in Q1 2024**



### Analysis of MMO Transactions

It is worth noting that Mobile Money Operators (MMOs) in Nigeria witnessed a surge in transactions amounting to N17.2 trillion in Q1 2024, compared to the N9.1 trillion recorded in Q1 2023.<sup>47</sup>



*This analysis projects a significant increase in MMO transactions this year compared to last year.*

46. Ibid.

47. Samson Akintaro, 'Nigeria Records N234 Trillion E-Payment transactions in Q1 2024' (Nairametrics, 17 April 2024) accessed 04 November 2024.

48. Nume Ekeghe, 'Mobile Money Operators Processed N46.9 trillion Transactions in 2023, 141% YoY Growth' (This Day, 12 February 2024) accessed 04 November 2024.



## Factors Influencing Payment Transactions Figures in 2024

The data above highlights shifting consumer behaviour in Nigeria, particularly in relation to POS and electronic payment transactions. While the decline in POS usage raises concerns for businesses reliant on these systems, the substantial growth in electronic payments indicates a growing acceptance and adoption of digital financial solutions.

Some factors that contributed to the rise in electronic payment transactions and the decline in POS transactions are:



## OUTLOOK FOR 2025

Our projection for 2025 is that there will be a continued increase in electronic transactions, with more Nigerians embracing mobile apps, fintech solutions, and digital banking. Despite the decline in POS transaction value in 2024, the 32% increase in POS terminal deployment indicates a potential rebound in 2025. The issuance of a second Payment Terminal Service Aggregator licence to Unified Payment Service Limited (UPSL) is expected to improve service delivery, reduce downtime, and enhance transaction reliability.<sup>51</sup>

Micro, small, and medium-sized enterprises (MSMEs), which rely heavily on cash transactions may face challenges adapting to the rapid digitisation of payments. While digital solutions offer efficiency, MSMEs will need to invest in digital infrastructure and training to remain competitive and determine how to factor in costs associated with digital payments into the cost of their goods or services.

Overall, with the increasing use of digital platforms across all socio-economic classes, 2025 could present more opportunities to expand financial inclusion.

49. CBN, 'Policy on Cashless Nigeria' accessed 24 October 2024.

50. CAC, 'Public Notice: CAC and Fintech Operators' accessed 24 October 2024.

51. CBN Circular to All Payment Service Providers on Connectivity to Payment Terminal Service Aggregators issued on 11 September 2024.



## SECURITY THROUGH REGULATION OF FINTECH

*The CBN issued the Revised Guidelines for Blacklisting for Banks and Other Financial Institutions in Nigeria (Blacklisting Guidelines), replacing the Review of Operational Guidelines for Blacklisting 2016.*

Compared to 2023, regulators in the fintech space issued fewer circulars and regulations and shifted their focus to ensuring stability and compliance by players in the ecosystem. In particular, emphasis moved to enforcement of extant legal framework to ensure the security of fintech companies' operations. In limited cases, the issued circulars and regulations were targeted at tightening protections for the public and preventing the use of fintech platforms for fraudulent activities.

### CBN

The year kickstarted with the issuance of the Revised Guidelines on International Money Transfer Services in Nigeria (**Revised IMTO Guidelines**), which significantly altered the landscape in relation to cross-border remittances.<sup>52</sup> The CBN also issued a circular permitting International Money Transfer Operators (**IMTOs**) to determine naira pay-outs based on prevailing rates in the Nigerian Foreign Exchange Market on a willing seller, willing buyer basis.<sup>53</sup>

In March, the CBN issued a letter to all microfinance banks admonishing against non and late rendition of monthly returns to the CBN.<sup>54</sup> In the same month, the CBN issued the Revised Guidelines for Blacklisting for Banks and Other Financial Institutions in Nigeria (**Blacklisting Guidelines**), replacing the Review of Operational Guidelines for Blacklisting 2016. The Blacklisting Guidelines prescribe the processes and procedures to be adopted by banks and other Financial Institutions (**FIs**) in relation to blacklisting of fraudulent or disreputable individuals from holding positions as employees (core and contract), directors, managers, or officers of FIs.<sup>55</sup>

In April, it was reported that the CBN imposed a ban on five (5) prominent fintech entities: Opay, Moniepoint, Palmpay and Paga, against onboarding new customers<sup>56</sup> due to concerns around, *inter alia*, compliance with the CBN's Know-Your-Customer (**KYC**) requirements. The ban was subsequently lifted following the implementation of remediation steps by the affected entities.

52. Please refer to pages 19-20 of this report for a detailed highlight on the novelties introduced by the Revised IMTO Guidelines.

53. CBN Circular on Removal of Allowable Limit of Exchange Rate Quoted by International Money Transfer Operators dated 31 January 2024.

54. CBN letter dated 5 March 2024 on Late and Non-Rendition of Statutory Monthly Returns to the Central Bank of Nigeria Through FinA Application.

55. Blacklisting Guidelines, para 2.0.

56. Samuel Akintaro, ['CBN clears OPay, Kuda, others to resume new customer onboarding this week'](#) (Nairametrics, 03 June 2024) accessed 9 September 2024.

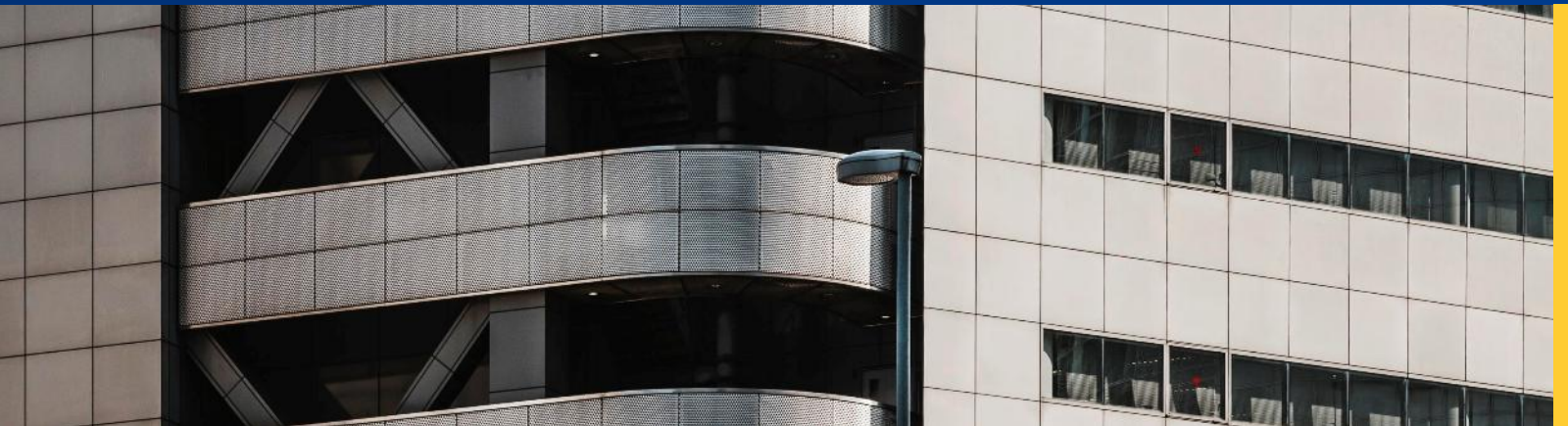


In May, the CBN issued an “Enrolment of Non-individuals as Agents Under the Agent Banking Authorisation” directive requiring all “non-individual” POS operators to register with the CAC.<sup>57</sup> In complying with this directive, some fintech entities did a survey, mapping out agents who did not register their business with the fintech entities in their true names and that were not registered at the CAC. These affected agents were either mandated to register with the CAC or carry on their business in their true names going forward.

Furthermore, in May, the CBN released the Risk-Based Cybersecurity Framework and Guidelines applicable to Deposit Money Banks (DMBs) and Payment Service Banks (PSBs) (**Bank Cybersecurity Framework**), which identifies the cybersecurity measures and controls required to be implemented by DMBs and PSBs. Additionally, the Bank

Cybersecurity Framework sets out certain risks that arise from DMBs and PSBs adopting emerging technologies including risks arising from connections with fintech entities.

The CBN also issued a Circular on Connectivity to Payment Terminal Service Aggregators (**Connectivity Circular**) in September 2024, requiring acquirers to route all transactions from POS terminals at merchant and agent locations through NIBSS or UPSL<sup>58</sup>. Further, NIBSS and UPSL are obliged to send POS transactions to payment processors that have been certified by a payment scheme, nominated by an acquirer, and licensed by CBN. Non-compliance with these security measures will result in sanctions.<sup>59</sup>



## NAICOM

The National Insurance Commission (NAICOM) issued a Revised Market Conduct and Business Practice Guidelines for Insurance and Reinsurance Companies (**Insurance Practice Guidelines**) which sets out the minimum standards for insurance institutions including insurance web aggregators<sup>60</sup> in relation to their dealings with stakeholders.

57. Samuel Akintaro, ‘CAC threatens to shut down unregistered POS businesses as September 5 deadline lapses’ (Nairametrics, 06 September 2024)

58. Paragraph 1 of the Connectivity Circular.

59. Further details on the Connectivity Circular may be found in this [Olaniwun Ajayi post](#).

60. A web aggregator is a company that maintains a website and avails information pertaining to insurance products and price/features comparisons of products of different insurers and offers leads to an insurer.



***The CBN also issued a Circular on Connectivity to Payment Terminal Service Aggregators in September 2024***

## OUTLOOK FOR 2025

Moving on, we look forward to seeing more regulations being issued and stricter implementation by regulators in 2025. We expect to see regulations or circulars from the Federal Competition and Consumer Protection Commission in relation to the activities of digital money lenders. We also expect the CBN to issue new regulations replacing outdated provisions in extant payments regulations, and this exercise may involve consolidation of regulations and guidelines that relate to the same subject matter. Additionally, the CBN is likely to release wholistic guidelines setting out key corporate governance requirements for fintech entities within its regulatory purview to address the governance failures that often lead to mismanagement and even, winding up of certain fintech companies.

Furthermore, we predict that the NAICOM may issue more guidelines, regulations or push for an amendment of the extant Insurance Act to adequately regulate some of the disruptive technology being deployed within the Nigerian insurance market.



## EVOLUTION OF PAYMENT SOLUTION SERVICE PROVIDERS

The Nigerian payments landscape is dynamic, routinely undergoing remarkable transformation to meet customers' ever-changing needs. In recent times, Payment Solution Service Providers (PSSPs), a subset of Payment Service Providers (PSPs), have evolved beyond their role as mere facilitators of electronic transactions. These service providers are transforming into neo-banks, offering a broader range of services, thus appealing to a broader consumer base seeking more than just payment solutions.<sup>61</sup>



This evolution caught the attention of the CBN in December 2023 when the CBN instructed the NIBSS to delist all PSSPs and other non-deposit-taking Finance Institutions from its NIBSS Instant Payment (NIP) Outwards System.<sup>62</sup> This, however, did not dull the innovation and dynamism of PSSPs as in 2024, some PSSPs sought collaboration with or acquired deposit-taking institutions in order to continue to provide banking services.<sup>63</sup>

Beyond service expansion, PSSPs are at the forefront of improving payments as they are adopting faster and more reliable payment models that cater to the growing demand for speedy and seamless transactions. PSSPs have capitalised on the limitations faced by traditional banks, particularly during periods of cash scarcity, transaction processing downtimes, and system upgrades.<sup>64</sup> PSSPs also play a critical role in financial inclusion through the adoption of non-traditional banking models such as self-assisted account opening and the use of phone numbers as account numbers.

## OUTLOOK FOR 2025

As technology continues to advance, we can expect PSSPs to further innovate to cater to the evolving needs of Nigerian customers, and offer more robust financial services, thus blurring the lines between traditional banks and fintech entities. Innovative solutions that PSSPs may explore, in 2025 and beyond, include leveraging the experience gained from deploying payment gateways for fiat transactions in developing gateways for cryptocurrency or other digital/virtual asset transactions, and using blockchain or other distributed ledger technologies to enable more effective fiat payments. Successful implementation of these (or any other) innovative solutions by PSSPs will nonetheless remain subject to any limitations under the applicable legal framework. Further, we anticipate that the evolution of PSSPs will attract heightened regulatory scrutiny as regulators will seek to ensure that PSSPs operate within the confines of applicable law.

61. Flutterwave, for example, launched its Send App in 2023 to facilitate international money transfers, alongside its Swap solution designed to provide individuals and entities with access to foreign currency. In addition, Moniepoint has been reported to be pursuing a commercial banking licence from the CBN. Muktar Oladunmade, 'Moniepoint to acquire a commercial bank license' (TechCabal, 14 November 2024) <<https://techcabal.com/2024/11/14/moniepoint-commercial-bank-license/>> accessed 13 December 2024.
62. NIBBS Directive to Disconnect Switches, Payment Solution Service Providers (PSSPs) and Super Agents from NIBBS Instant Payment (NIP) Outwards System issued 05 December 2023.
63. By way of an example, Paystack and PiggyTech jointly acquired Brass, an entity that offers current account services and commerce tools to MSMEs.
64. Kelvin Okojie, 'OPay, PalmPay Top Most Popular Fintech Apps among Nigerians' (Businessday NG, 09 August 2023)



## CROSS-BORDER RESTRICTIONS AND THE WAY FORWARD

Nigeria has long been a significant player in the global remittance market, operating through banks and IMTOs. In 2023, remittances to Nigeria were estimated at over \$19.5 billion,<sup>65</sup> which was 35% of fund transfers to Africa. The CBN also reported a significant increase in remittance inflow, reaching \$553 million in July, a 130% increase compared to the corresponding period in 2023.<sup>66</sup>

With the issuance of the Revised IMTO Guidelines in January 2024, the Nigerian landscape for cross-border remittances has been significantly altered.<sup>67</sup> These changes have and will continue to reshape the remittance space in the coming years.

Some of the key changes that the Revised IMTO Guidelines introduced are highlighted below:

01

**Restriction to Inbound Transfers:** The Revised IMTO Guidelines limits the activities of IMTOs to only inbound money remittance.<sup>68</sup> This restriction implies that IMTOs can no longer transfer funds from Nigeria to recipients outside Nigeria. This restriction is likely aimed at improving the CBN's oversight of foreign currency outflows and potentially reducing the country's capital flight.

02

**B2B Transfer:** Unlike the former IMTO guidelines, the Revised IMTO Guidelines recognises business to business cross border money transfers as one of the permissible activities of IMTO.

03

**Naira-only Payouts:** Another significant change is the restriction on payout currencies. While the superseded IMTO guidelines permitted payouts in foreign currencies, e-Naira and Naira,<sup>69</sup> the Revised IMTO Guidelines mandate payouts in Naira only.<sup>70</sup> This shift is part of reforms to strengthen the local currency and reduce dollarisation of the economy.<sup>71</sup>

04

**Restrictions on Fintech Companies:** The Revised IMTO Guidelines prohibit fintech companies from directly providing international money transfer services.<sup>72</sup> This change appears to be an attempt to create a clear separation between traditional banking services, local payments processing, and international remittances.

65. World Bank Group and Knomad, 'Remittances Slowed in 2023, Expected to Grow Faster in 2024' (2024) 4 Migration and Development Brief, 42.

66. CBN reports all-time high remittance inflows at US\$553 Million for July 2024.

67. Read our analysis on the Revised IMTO Guidelines [here](#)

68. Revised IMTO Guidelines, para 3.1. Under paragraph 3.1 of the previous IMTO Guidelines, IMTOs were permitted to undertake allowable inbound and outbound international money transfers.

69. The previous IMTO Guidelines, para 3.1.

70. Revised IMTO Guidelines, para 4.2.1.

71. This includes the CBN circular on the removal of the allowable limit of exchange rate quoted by IMTOs issued on 31 January 2024 directing IMTOs to issue naira payouts to beneficiaries of diaspora remittances at the prevailing foreign exchange market rates. Other reforms include the prohibition of foreign currency collateral for Naira loans, removal of interbank FX transaction limits, market-based pricing in the I&E FX window, ensuring that the Net Open Position (NOP) limit of deposit money banks overall foreign currency assets and liabilities on-and-off balance sheet does not exceed 20% short or 0% long of shareholder's funds unimpaired by losses using the gross aggregate method.

72. Revised IMTO Guidelines, para 2.6(i).



The regulatory changes to cross-border remittances have forced IMTOs to restructure their operations and business model in line with the Revised IMTO Guidelines. IMTOs have discontinued their outbound services or settlement in forex.<sup>73</sup> Others have adopted partnerships with local banks which will ensure ease in managing currency conversions efficiently or offer outbound services.

Furthermore, companies likely to be categorised as “fintech entities” already holding IMTO licences or considering obtaining the licence will need to restructure their business to ensure that the IMTO licence is not co-mingled with their other licence(s).

## OUTLOOK FOR 2025

Considering that the CBN considered and granted IMTO Approvals-in-Principle (AIP) to about fourteen (14) companies<sup>74</sup> in 2024, we expect that there will be more IMTO licence applications in 2025. We envisage that interested entities are likely to be international remittance companies looking to expand their service offerings to the Nigerian market. This will in turn lead to an increase in the inflow of remittance.

The Revised IMTO Guidelines represent a significant shift in Nigeria's approach to cross-border remittances, as the guidelines aim to strengthen the local currency and financial system. These changes present substantial challenges for businesses in the sector. As the market adapts to these changes over the next year, we expect to see new business models emerge, potentially reshaping Nigeria's remittance sectors. There is a potential for increased use of other channels for remittance of monies out of Nigeria as companies innovate around the constraints imposed in the Revised IMTO Guidelines, in a bid to facilitate cross-border payments.

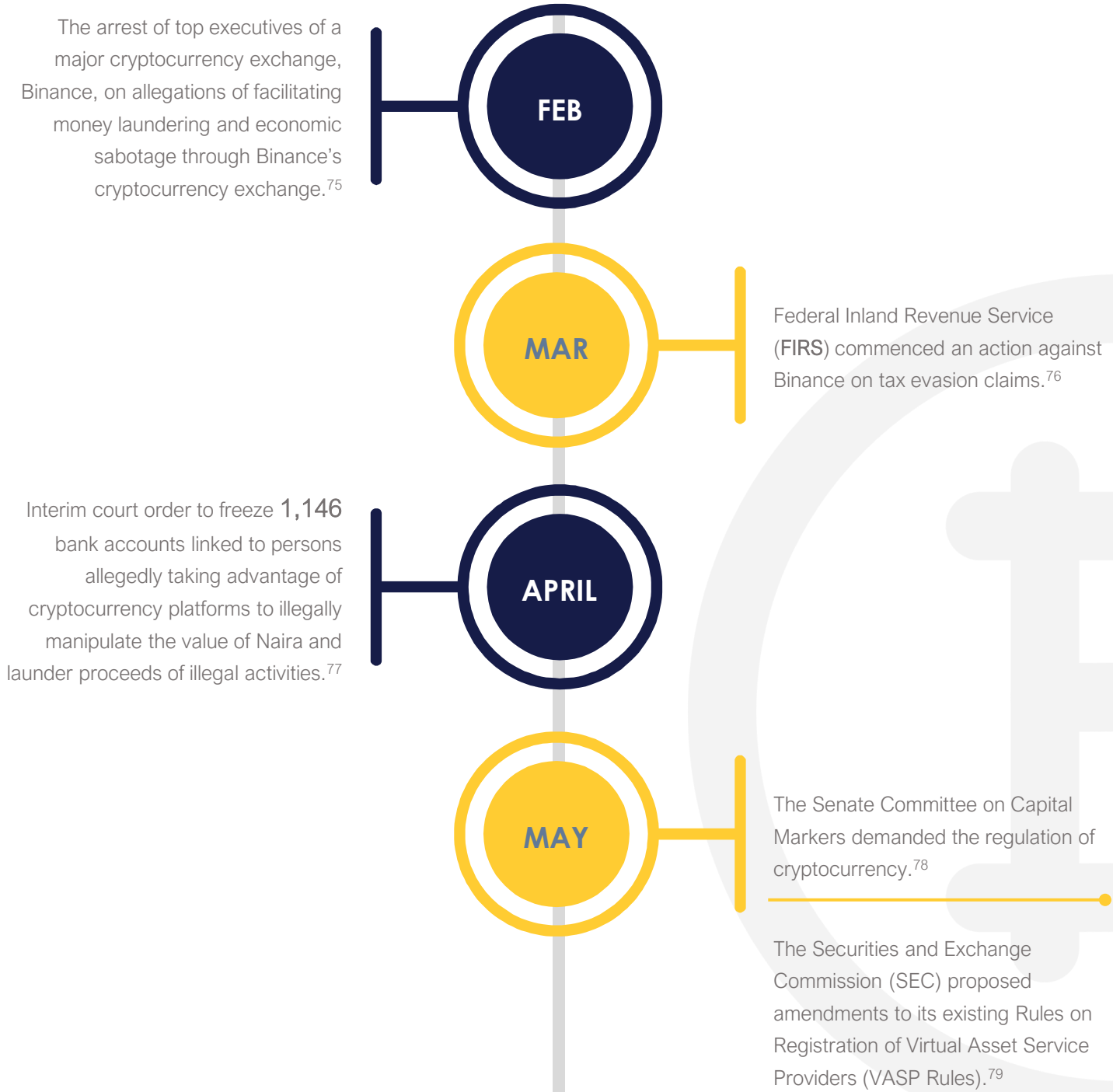
73. See Revised IMTO Guidelines, paras 3.1 and 4.2.1.

74. Samson Akintaro, [“CBN says New IMTO licences push Nigeria's remittance inflows to \\$585 million in August 2024”](#), (Nairametrix, September 2024),



## REGULATORY SHIFT FOR VIRTUAL AND DIGITAL ASSETS

In 2024, there was a plethora of regulatory activity and legal action within the virtual and digital asset space in Nigeria, especially in relation to cryptocurrency. We have set out below a timeline of these activities and actions:



75. Temitayo Jaiyeola, '[Is Binance to Blame for Naira's Woes](#)' (Business Day, 04 March 2024) accessed 30 October 2024. The charges against the last executive in custody were dropped in October; see Deborah Musa, '[FG Drops Money Laundering Charges Against Binance Executive Gambaryan](#)<https://punchng.com/breaking-fg-drops-money-laundering-charges-against-binance-executive-gambaryan/>' (Punch, 23 October 2024) accessed 03 November 2024.

76. Osamu Ekhatior, '[Nigeria's Rax Agency Sues Binance for Tax Evasion](#)' (Techpoint, 26 March 2024) accessed 03 November 2024.

77. EFCC, '[Court grants EFCC Order to Freeze 1146 Suspicious Account](#)' (EFCC, 29 April 2024) accessed on 03 November 2024.

78. Punch, '[Senate Seeks Cryptocurrency Regulation](#)' (Punch, 27 May 2024) accessed 04 November 2024.

79. CNBC Africa, '[Nigeria's SEC meets Crypto Exchanges Stakeholders](#)' (CNBC Africa, 06 May 2024) accessed 30 October 2024. The proposed amendments to the Rules include: (a) Prohibition of persons or entities from providing any virtual assets service unless registered with the SEC; (b) an extension of the meaning and definition of digital assets to include cryptocurrency such that the term will be referred to as 'Virtual (Crypto) assets'; (c) a requirement that only companies duly incorporated in Nigeria with their Chief Executive Officer (CEO) / Managing Director (MD), or its equivalent resident in Nigeria, may apply for registration as a VASP. (d) A requirement for existing Capital Market Operators (CMOs) registered to provide trading, offering platforms, and custodial services but seeking to be registered as VASPs to establish a subsidiary/ separate entity to take up the VASP function; and (e) Securities structured to be exclusively offered through a SEC-registered crowdfunding portal or intermediary are exempted from registration of digital assets. Read our analysis of the Proposed Amendments to the SEC's Rules on Issuance, Offering Platforms and Custody of Digital Assets [here](#); and on the SEC Framework on Accelerated Regulatory Incubation Program for the Onboarding of VASPs and DISPs [here](#)



The SEC released the Framework on Accelerated Regulatory Program for the onboarding of Virtual Assets Service Providers and other Digital Investments Service Providers (ARIP Framework).<sup>80</sup>

JUNE

AUGUST

National Security Adviser initiated action to freeze \$38 million held as crypto in digital wallets.<sup>81</sup>

The SEC granted two digital asset exchanges the first AIP and admitted 5 (five) virtual asset service providers to its Accelerated Regulatory Incubation Program.<sup>82</sup>

The Executive Chairman of the FIRS announced the intention to regulate cryptocurrency from a tax perspective.<sup>83</sup>

USA and Nigeria formed a bilateral liaison group to disrupt cryptocurrency-related crimes and illicit finance.<sup>84</sup>

OCTOBER

DECEMBER

The SEC released an amendment to the Rules on Digital Assets Issuance, Offering Platform Exchange, and Custody which will be effective on 30 June 2025.<sup>85</sup>

80. SEC Framework on Accelerated Regulatory Incubation Program (ARIP) for the Onboarding of Virtual Assets Service Providers (VASPs).

81. Alexander Onukwue, 'Nigeria Targets Crypto Accounts Worth \$38 Million in Intensified Crackdown' (Semafor, 15 August 2024) accessed 3 November 2024.

82. SEC, Press Release: Update on the SEC's Accelerated Regulatory Incubation Program and Regulatory Incubation Program available at: <https://sec.gov.ng/press-release-update-on-the-secs-accelerated-regulatory-incubation-program-and-regulatory-incubation-program/> accessed 30 October 2024.

83. Oluwakemi Abimbola, 'FIRS plans Law to Regulate Crypto' (Punch, 17 August 2024) accessed 4 November 2024.

84. Oluwapelumi Adejumo, 'US and Nigeria Unite to Tackle Crypto Crime with New Liaison Group' (Cryptoslate.com, 25 October 2024) accessed 03 November 2024.

85. [This amendment made major changes to the Rules on Digital Assets including the recognition of stable coins, Airdrops.](#)



Although the above summary above suggests that digital and virtual assets, particularly cryptocurrencies, are being treated inconsistently by the Nigerian government and agencies, a closer look reveals a similar underlying theme- the need to make sure that the space is regulated, and digital/virtual assets are not used to weaken Nigeria's financial and economic stability.

It is expected that the implementation of the ARIP Framework will establish order in what has been a largely unregulated market, thereby safeguarding users and spurring innovation within the sector. This ARIP will also help the SEC better understand the risks and opportunities posed by virtual assets and will shape future regulatory efforts.<sup>86</sup>

## OUTLOOK FOR 2025

Based on the precedent set in 2024, we expect that next year will also be awash with regulatory activity, such as the formal issuance of the amended VASP Rules in time for the exit of the first cohort of the ARIP. We anticipate that the amended VASP Rules will increase transparency and accountability in the sector and will be tailored to address any concerns SEC has observed from the operations of the current ARIP cohorts.

Ahead of the effective date of the exposure draft on the Amendment to the Rules on Digital Assets Issuance, Offering Platform Exchange and Custody which proposes to make extensive changes to the digital and virtual assets space in Nigeria, we expect a finance act (or similar legislation) in 2025 to introduce major changes to the taxation of digital and virtual asset companies targeting Nigerians. We also expect increased applications into the SEC's ARIP and an influx of investments in cryptocurrency products.<sup>87</sup> However, players in the space must ensure their products and services comply with minimum anti-money laundering and terrorism financing requirements to avoid encounters with law enforcement.

86. Obas Esiedesa, 'SEC grants provisional approval to two digital exchanges' (Vanguard, 29 August 2024)

87. Oluwatomisin Amokeoja, 'Nigeria Resumes Cryptocurrency Transactions with New Guidelines for VASPs' (Forbes, 30 January 2024)



# DIGITAL MARKETPLACE

## SOCIAL COMMERCE IS HERE TO STAY: TRACING THE DEVELOPMENT OF SOCIAL COMMERCE IN NIGERIA

Driven by a pivot in customers' desire for an immersive, end-to-end infusion of their e-commerce and social experience during and post the COVID-19 pandemic,<sup>88</sup> there has been an increased focus globally on social commerce.

However, social commerce, as a concept, dates to the early 2000s when Yahoo! launched 'Pick Lists' which allowed users list goods, add ratings and leave comments on Yahoo!, and social media companies such as Meta (nee Facebook) launched commerce features embedded within social platforms such as Whatsapp, Instagram etc.<sup>89</sup>

E-commerce businesses such as Amazon are collaborating with social media platforms including Snapchat and TikTok to enable users of these platforms to buy products from Amazon directly through social media.<sup>90</sup>

The seamless integration of entertainment, social interaction, and shopping has reshaped e-commerce business marketing strategies allowing such businesses to increase visibility, reach broader audiences and enhance user experiences, thus increasing revenue for these businesses.

Nigeria is not exempt from the growing interest in social commerce. This is especially as business owners leverage popular social media platforms to target and interact with their consumers and drive consumer engagement using influencer and content marketing. All of these are propelling the growth of social commerce in Nigeria. In 2024, a few startups raised funding to plug or expand into the Nigerian social commerce industry<sup>91</sup> and/or emerged to address certain needs of key players within the Nigerian social commerce industry.

## OUTLOOK FOR 2025

To put the interest in social commerce in perspective, McKinsey forecasts that the global social-commerce market is expected to exceed \$2 trillion by 2025.<sup>92</sup> The social commerce industry in-country is estimated to achieve a Compound Annual Growth Rate of 31.2% from 2024 to 2029 and the gross merchandise value derivable from social commerce is forecasted to reach \$6.03 billion in 2029. Accordingly, we expect that more small and medium enterprises and large retail chains in Nigeria will harness the benefits of social commerce to reshape their traditional and e-commerce business marketing strategies to increase visibility, reach a broader audience, and enhance user experience.

We also expect to see global social media platforms create or modify their current social commerce products to meet the needs of their Nigerian users resulting from the unique socio-economic terrain in Nigeria such as issues relating to ease of payments for goods or services via these platforms.

88. Ashish Sinha, Prakash Bagri, Kiran Pedada, Rajendra Srivastava, 'Ecommerce Disrupted: Is Social E-Commerce the Future of Online Shopping?' (Management & Business Review, 2022)

89. Kadi Arula, 'The Evolution of Social Commerce: What, When, How and Why?' (IFP, 1 December 2021) <[The Evolution of Social Commerce: What, When, How and Why?](#) (insightsforprofessionals.com)

90. Amanda Drendel, 'TikTok and Amazon Join Forces: Implications for Social Commerce' (True Interactive, 14 August 2024)

91. For example, Chpter raised \$1.2 million pre-seed funding to expand its social commerce platform into Nigeria, Ghana, Egypt and Morocco.

92. McKinsey and Company, 'Social Commerce: The Future of How Consumers Interact with Brands' (McKinsey and Company, 19 October 2022) <



# EDTECH

## IS EDTECH MAKING A COMEBACK?

The COVID-19 pandemic accelerated the adoption of EdTech, driving a surge in the demand for digital learning solutions.<sup>93</sup> However, this sector suffered setbacks shortly afterward due to several factors, including the reopening of physical schools, ineffective marketing strategies, and increased competition from a large number of market players.<sup>94</sup> Many emerging African EdTech providers also struggled with inadequate funding.

As of 2021, the sector had attracted only \$20 million in investment across Africa—a small fraction compared to the global EdTech funding and that of other tech sectors.<sup>95</sup> In 2023, EdTech ranked 6th in growth among tech-enabled startups in Africa, contributing 5% to the annual increase in deal volume in the tech sector; this indicates a modest yet noteworthy presence in the ecosystem.<sup>96</sup>

In 2024, a rapidly growing EdTech startup, Klas, raised \$1 million in pre-seed funding<sup>91</sup> and Lingawa, an Edtech platform seeking to promote learning native African language raised \$1.1million in pre-seed funding<sup>98</sup>.



**EdTech ranked 6th in growth among tech-enabled startups in Africa, contributing 5% to the annual increase in deal volume in the tech sector.**

93. CivicTech Contributor, '[Unlocking Potential: The Rule of EdTech in Africa](#)' (Medium, 05 September 2024)

94. Vincent Mutwiri, '[The Decline of EdTech Investments: Understanding the Factors Behind the Slow Down](#)' (LinkedIn, 19 September 2024)

95. The Exchange, '[EdTech's Role in African Development](#)' (Further Africa, 18 May 2022)

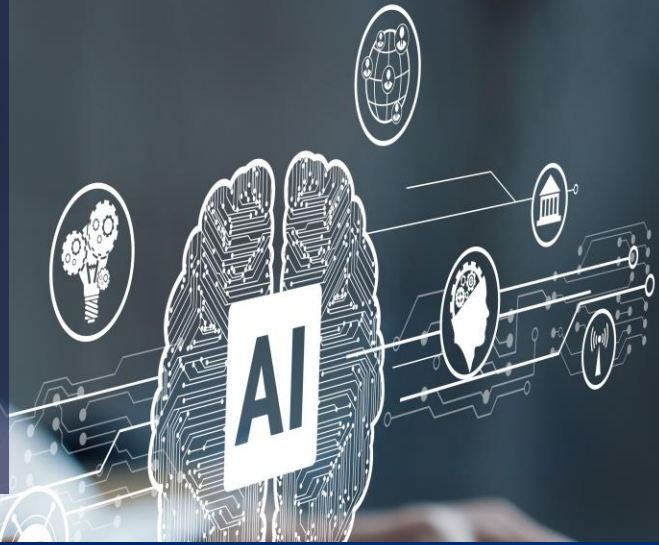
96. Venture Capital in Africa Report, March 2024, available at: [https://www.avca.africa/media/o5makqy5/avca234-19-vc-report\\_4.pdf](https://www.avca.africa/media/o5makqy5/avca234-19-vc-report_4.pdf)

97. Tage Kene-Okafor, '[Techstars-backed Nigerian edtech Klas raises \\$1 Million for global scaling of online teaching platform](#)' (Tech Crunch, 06 February 2024)

98. <https://empowerafrica.com/lingawa-secures-1-1m-to-revolutionize-african-language-learning-with-tech-driven-approach/>



“  
These will include (x) the growing demand to upskill to stay competitive in an ever-evolving job market, (y) the adoption of artificial intelligence (AI)



## OUTLOOK FOR 2025

Despite the obstacles faced in recent years, the EdTech industry is projected to reach \$460 billion by 2026.<sup>99</sup> Several factors will drive the resurgence of EdTech in the coming years. These will include (x) the growing demand to upskill to stay competitive in an ever-evolving job market, (y) the adoption of artificial intelligence (AI) and other emerging technologies including virtual reality (VR) to deliver personalised and effective learning experiences, (z) the expansion of libraries by leveraging online platforms and curating digital resources, and (xx) the integration of gaming technology to enhance student engagement and motivation.<sup>100</sup>

It is also expected that the proposed National Digital Economy and e-Governance Bill, when enacted will spur investment in EdTech in Nigeria as the bill, when passed, promises to introduce certainty and structure around delivery of service (including the provision of education) via electronic communications.<sup>101</sup>

Lastly, in view of the extensive skills gap that needs to be bridged to meet the demand for specialised talent for AI development and the global demand for this talent,<sup>102</sup> we expect that more EdTech companies will pivot or be established next year with a focus on upskilling African undergraduate and graduate engineers, software developers and data analysts.

99. Juan Ramirez, 'The Future of EdTech: Key Trends Shaping the Landscape in 2023 and Beyond' (EdTech Digest, 26 September 2023)

100. Malvika Bhagwat, 'These 5 Key Trends will shape the EdTech Market up to 2030' (World Economic Forum, 26 February 2024).

101. Joseph Oluoluwa, 'Digital Economy Bill will Unlock Edtech Investment, Nigeria's Tech Minister Says' (Tech Cabal, 10 July 2024)

102. Flavia Cristian, 'The AI talent shortage: Outsourcing or In-house Development' (Craftworks.ai)



# REGULATORY COMPLIANCE

## SECURING THE FUTURE: NEW RULES RELATING TO CYBERSECURITY AND DATA PROTECTION IN NIGERIA



With the increase in digitisation, the need for robust legal frameworks to safeguard personal data of Nigerians remains critical. In 2024, significant statutory and regulatory interventions were made to strengthen cybersecurity and data protection across various sectors. These adjustments were encompassed in the laws, regulations, and guidelines set out below:

### Cybercrimes (Prohibition, Prevention, etc.) (Amendment Act) 2024

The Amendment Act revisited ambiguous provisions in the Cybercrimes (Prohibition, Prevention, etc.) Act 2015 (Principal Act) by amending certain sections to bring clarity,<sup>103</sup> and replacing outdated sections with those more in tune with current realities.<sup>104</sup> Some of the notable amendments in the Amendment Act in relation to cybersecurity are:



The provision for the establishment, by the National Security Adviser of sector-specific Computer Emergency Response Teams (**CERT**)<sup>105</sup> and sectoral Security Operation Centres (**SOCs**). These sectoral CERTs and SOCs will collect and share cybersecurity intelligence with the National CERT,<sup>106</sup> enabling more specialised and coordinated responses to threats in different sectors.



The imposition of an obligation on all public and private organisations to integrate and route their internet and data traffic through the sectoral SOC.

103. Cybersecurity (Prohibition, Prevention, etc.) (Amendment) Act), ss 21, 22, 30 & 37.

104. Ibid, ss 24, 27, 38, 41, 44.

105. Ibid, ss 24, 27, 38, 41, 44.

106. Ibid, s 41 (d).



## Guidance Notice for the Registration of Data Controllers and Processors of Major Importance 2024 (Guidance Notice)

Further to the powers conferred on the Nigeria Data Protection Commission (NDPC) in the Nigeria Data Protection Act 2023 (NDPA), the NDPC issued the Guidance Notice on 14 February 2024. The Guidance Notice provides for the categorisation of data controllers and processors of major importance<sup>107</sup> into three tiers<sup>108</sup> based on the volume and sensitivity of personal data they handle, namely:



This Guidance Notice sets out NDPC’s compliance expectations based on the scale of data processing activities by companies in each category, thereby allowing the facilitation of a clearer regulatory framework.

## Nigerian Communications (Consumer Code of Practice) Regulations 2024 (the CCP Regulations)

On 29 July 2024, the Nigeria Communications Commission issued the CCP Regulations which prescribes the general consumer code of practice that applies to licensees<sup>109</sup> in Nigeria.<sup>110</sup> In relation to data protection and cybersecurity, the general consumer code of practice provides, *inter alia*, the following:



Licensees shall only conduct telemarketing in accordance with the “call” or “do-not-call” preferences of consumers;<sup>111</sup>

Licensees shall adopt and implement a “Protection of Consumer Information Policy”;<sup>112</sup>

A customer’s consent must be obtained before personal data can be used to generate market analytics or before same can be transferred, for free or otherwise, to a related or unrelated third party.<sup>113</sup>

107. Nigeria Data Protection Act 2023, s 65 – a data controller or data processor of major importance” means a data controller or data processor that is domiciled, resident in, or operating in Nigeria and processes or intends to process personal data of more than such number of data subjects who are within Nigeria, as the Commission may prescribe, or such other class of data controller or data processor that is processing personal data of particular value or significance to the economy, society or security of Nigeria as the Commission may designate.  
 108. Guidance Notice for the Registration of Data Controllers and Processors of Major Importance (DCPMI), para 2.  
 109. CCP Regulations, reg 12 defines “Licensee” as a person who either holds an individual licence or undertakes activities which are subject to a class licence or authorization granted under the Nigerian Communications Act, No. 19, 2003.  
 110. CCP Regulations, reg 3(1).  
 111. CCP Regulations, para 28(2) of the Schedule.  
 112. CCP Regulations, para 44(1) of the Schedule.  
 113. CCP Regulations, para 44(8)-(9) of the Schedule.



These regulatory advancements reflect the Nigerian government's commitment to fortifying its digital infrastructure, enhancing compliance, and safeguarding personal data amid the growing complexities of the digital age.

Separately, some legislative bills and draft regulations were issued in 2024, which, when enacted or officially issued in the coming years, will have implications on data protection and cybersecurity practices of companies in Nigeria. These bills and regulations include the National Digital Economy and E-Governance Bill 2024 and Draft General Application and Implementation Directive 2024 for the Nigeria Data Protection Act 2023.<sup>114</sup>

## IS NIGERIA MOVING FROM GREY TO BLACK?



On 24 February 2023, the Financial Action Task Force (FATF) placed Nigeria on its grey list, a designation for countries with strategic deficiencies in their Anti-Money Laundering, Combating the Financing of Terrorism, and Countering Proliferation Financing (AML/CFT/CPF) frameworks.<sup>115</sup> The grey-listing was done in response to the FATF's examination of Nigeria's AML/CFT/CPF compliance system which exposed gaps, including insufficient legal frameworks and regulatory measures.<sup>116</sup>

The implications of being grey-listed are far-reaching. Nigeria now faces heightened monitoring by the FATF, exemplified regulatory scrutiny for businesses with ties to the country, reduced access to international financial services, reputational damage, challenges in conducting international transactions, and a potential reduction in foreign investments.<sup>117</sup>

To exit the grey list, Nigeria must address the deficiencies in its AML/CFT/CPF frameworks and implement the recommendations of the FATF by the deadline of May 2025. The country formally committed to this<sup>112</sup> and has already taken steps towards extricating itself from the grey list. Among these steps are the updating of the national AML/CFT/CPF strategy and the establishment of a mechanism to maintain comprehensive data on asset confiscation.<sup>119</sup>

114. Read our analysis of the NDPA-GAID [here](#)

115. KPMG, ['What Actions Should Be Considered Following the Latest Grey-Listing of South Africa and Nigeria?'](#) (07 March 2023) accessed 27 September 2024.

116. Richard M, ['Nigeria Remains on FATF Gray List Due to Compliance Failures'](#) (Shufti, 6 November 2023)

117. Debevoise and Plimpton, ['Nigeria and South Africa Added to the FATF Grey List – Implications for International Investors'](#) (08 March 2023) accessed 26 September 2024.

118. KPMG, ['What Actions Should Be Considered Following the Latest Grey-Listing of South Africa and Nigeria?'](#) (07 March 2023) accessed 27 September 2024.

119. FATF, ['Jurisdictions under increased Monitoring – 23 February 2024'](#) accessed 24 October 2024.



In addition, a Beneficial Ownership Register was established by the CAC on 25 May 2024 for the purpose of preventing money laundering and the facilitation of illicit financial flows by corporate entities, and to make information about beneficial owners readily available to aid investigations and prosecutions.<sup>120</sup>

Despite these efforts, during plenary sessions in October 2023 and February 2024, the FATF reviewed Nigeria's AML/CFT/CPF compliance status and revealed that Nigeria still has some outstanding recommendations to implement.<sup>121</sup>

With the May 2025 deadline fast approaching, concerns are growing about the possibility of Nigeria being moved from the grey list to the more severe blacklist.<sup>122</sup> Blacklisting could have grave consequences for the country's financial reputation and economic stability.<sup>123</sup> It could severely damage Nigeria's international reputation, lead to a withdrawal of foreign investments and diminish prospects for economic growth.

The Nigerian Financial Intelligence Unit has however maintained that it is confident in Nigeria's ability to exit the grey list by the deadline stating that 30% of the FATF's action plan has been complied with already.<sup>124</sup> It is hoped that the country's ongoing efforts to strengthen its AML/CFT/CPF frameworks will be sufficient to meet FATF's requirements within the stipulated timeframe, allowing Nigeria to exit the grey list and avoid the more damaging blacklist.



**Blacklisting could have grave consequences for the country's financial reputation and economic stability.**

120. Richard M, '[Nigeria Employs New BOR Initiative to be Removed from FATF's Gray List](#)' (Shufti, 27 July 2023) accessed 30 September 2024.

121. Adelani Adepegba and Damilola Aina, '[Nigeria fails global money laundering review at FATF plenary](#)' (Punch, 06 November 2023) accessed 24 October 2024.

122. The blacklist refers to countries with serious strategic AML/CFT/CPF deficiencies, including Iran, Myanmar, and the Democratic People's Republic of Korea.

123. Financial Crime Academy, '[The Implications of FATF Greylist and Blacklist](#)' (23 August 2024) accessed 24 October 2024.

124. Ejike Ejike, '[Nigeria Moves to Exit Financial Action Task Force Grey List](#)' (allAfrica, 4 September 2024) accessed 24 October 2024.



# ARTIFICIAL INTELLIGENCE

## NIGERIA – THE FUTURE LEADER IN AI?

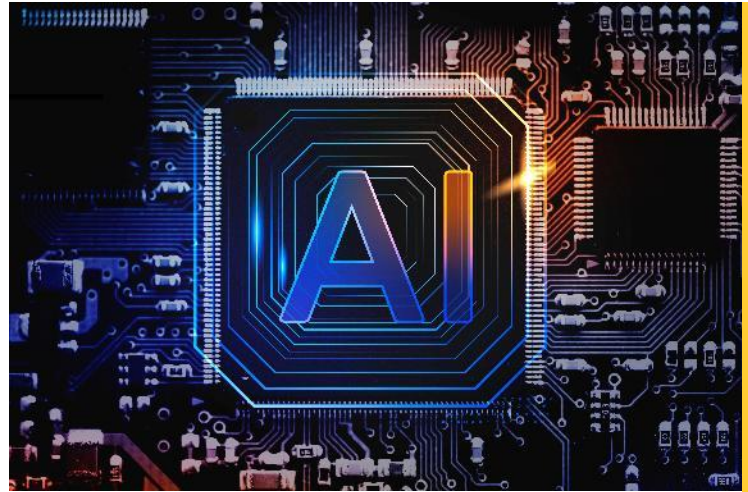
AI is a welcome development around the world. In healthcare, AI is topical and significant because of its potential to increase precision in diagnostics and treatment; in agriculture, AI has the potential to improve food security through crop yield, and in the educational sector, we are already witnessing its power to improve learning and further democratise knowledge.

These are some of the many benefits of AI that underpin its importance to the advancement of today's world. In light of the foregoing, 2024 witnessed critical global conversations on AI strategy and governance. Governments across the world engaged the private sector with a view to positioning themselves as AI leaders to take advantage of its immense benefits, while seeking solutions to its inherent risks.

In Africa, the African Union's Continental Artificial Intelligence Strategy (**AU CAIS**) was adopted in July 2024.<sup>125</sup> The AU CAIS provides a roadmap for AI governance, ethics, and the development of an Africa-centred AI. It also seeks to strategically position Africa to benefit from growth, inclusion, and socio-economic development attainable through AI.

Furthermore, in Nigeria, the Federal Ministry of Communication, Innovation and the Digital Economy (**FMCIDE**) intensified its efforts to position Nigeria as an AI leader and spur AI innovation. Notably in April, the FMCIDE, in collaboration with the National Centre for Artificial Intelligence and Robotics (**NCAIR**), organized an AI Strategy Workshop,<sup>126</sup> bringing together key stakeholders to discuss the future of AI in Nigeria. This workshop culminated in the draft National Artificial Intelligence Strategy (**NAIS**) which was released in August 2024.<sup>127</sup>

The NAIS contains strategic pillars that seek to propel Nigeria towards the attainment of its vision. These pillars include building foundational AI infrastructure, developing and sustaining a world-class ecosystem, accelerating AI adoption and sector transformation, responsible AI development, and developing a robust governance framework.



125. [African Union, Continental Artificial Intelligence Strategy \(AU 2024\)](#)

126. The Federal Ministry of Communications and the Digital Economy, ['Ministry's Artificial Intelligence Strategy Workshop to Attract 120 Experts from Across the World'](#)

127. National Centre for Artificial Intelligence and Robotics (NCAIR), National AI Strategy (NCAIR 2024) available at: [https://ncair.nitda.gov.ng/wp-content/uploads/2024/08/National-AI-Strategy\\_01082024-copy.pdf](https://ncair.nitda.gov.ng/wp-content/uploads/2024/08/National-AI-Strategy_01082024-copy.pdf) You can read our analysis of the National AI Strategy [here](#)



Some of the strategies for the attainment of these pillars are the deployment of high-performance computing resources, investing in AI-specific hardware and software development, setting up clean energy AI clusters, pursuing pioneer status for AI, tax breaks and other incentives to encourage the establishment of critical AI infrastructure, amongst others. These strategies are targeted at highlighting the opportunities within the Nigerian AI sector for investors and innovators alike, as well as incentivising participation in the sector.

Additionally, in furtherance of the FMCIDE's vision to foster collaboration for the growth of AI innovation in Nigeria, the NCAIR in collaboration with Google announced a N100 Million AI Fund to nurture and inspire Nigeria's nascent AI industry.<sup>128</sup>

In line with the vision to lead the continent in the deployment of AI solutions, the FMCIDE has begun exploring the development of AI solutions by collaborating with Awarri, an indigenous startup to build its own large language model.<sup>129</sup>

Within the private sector, Nigeria's budding AI ecosystem has also seen some product development initiatives. A notable product is GreyDot's NiGPT, a Nigerian-centric generative AI chatbot which seems to display the same level of competence as ChaptGPT<sup>130</sup> especially for Nigeria-specific questions. Funding has also begun to trickle into the ecosystem with Intron Health's<sup>131</sup> recent \$1.6 million in a pre-seed funding round.<sup>132</sup>

## OUTLOOK FOR 2025

In 2025, we anticipate that there will be a continued trickle of early investments within the Nigerian AI industry for exceptional products developed using AI technology. Further, we expect to see an improvement in the skill gap within the Nigerian technology sector as the FMCIDE kicked off the second phase of its Three Million Technical Talent program.<sup>133</sup>

In terms of regulatory efforts, we envisage that there will be an early AI regulation, as the National Information Technology Development Agency has stated that it is developing policies to combat pitfalls and risks in AI technology in order to ensure equitable benefits for all Nigerians.<sup>134</sup>

128. Emma Okonji, 'NCAIR, Google Launch N100m AI Fund to empower Nigerian startups' (THISDAYLIVE, 11 September 2024) accessed 30 October 2024.

129. Temitayo Jaiyeola, 'Nigeria to champion AI inclusion with Local Language Model' accessed 30 October 2024.

130. Uma Edwin, 'Greydots AI launches Nigeria's first generative AI to rival other LLMs' accessed 30 October 2024.

131. Intron Health is a pioneering AI startup in the health sector providing speech-to-text transcription tools for healthcare workers.

132. Joel Omulo, 'Nigerian AI startup, Intron Health, raises \$1.6 million in Pre-Seed Funding' accessed 30 October 2024.

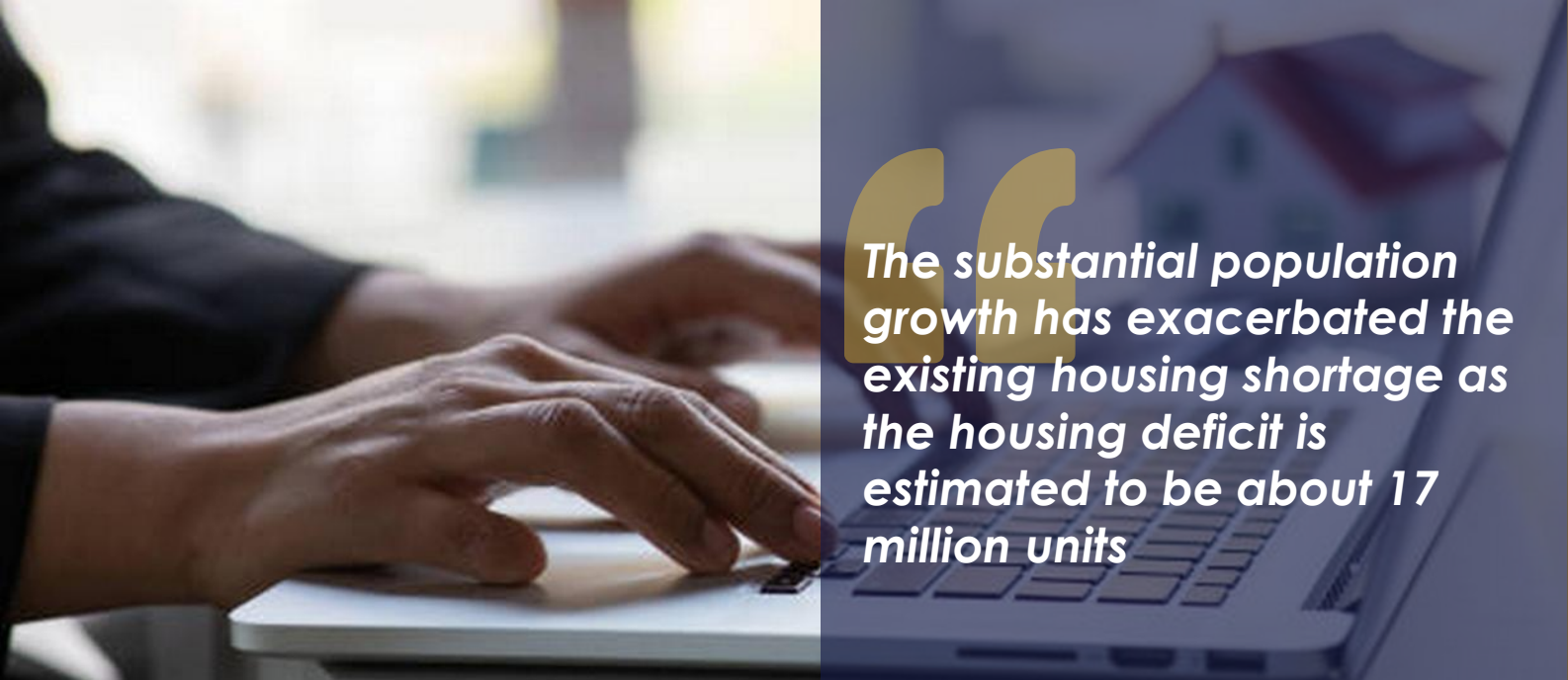
133. See <https://3mtt.nitda.gov.ng/>

134. Boluwatife Omotayo, 'NITDA outlines Nigeria's two-fold approach to AI adoption' (Businessday NG, 21 October 2024) accessed 30 October 2024.



# EMERGING AREAS

## PROPTech: LIVING WITH RENT NOW PAY LATER (RNPL)



**The substantial population growth has exacerbated the existing housing shortage as the housing deficit is estimated to be about 17 million units**

The rental market landscape in Nigerian urban cities is undergoing changes, adapting to the changing needs of tenants and landlords. This transformation has been driven by socio-economic factors such as the rising cost of living, and increasing urbanisation, making housing a challenge for many prospective tenants.

To further contextualise the rental market dynamic using Lagos State as an example, the State has witnessed rapid population growth, and it is estimated that the city's population could reach over 17 million by 2025.<sup>135</sup> The substantial population growth has exacerbated the existing housing shortage as the housing deficit is estimated to be about 17 million units.<sup>136</sup> The housing deficit is further compounded by rising rents, increasing by over 100% in the past four years and outpacing income growth.<sup>137</sup>

The aforementioned has led to the emergence of innovative solutions, such as the Rent Now Pay Later (RNPL) model which offer flexible payment options for persons struggling with rent payment. RNPL is slowly becoming a viable option for Nigerians in view of the annual upfront payment system which remains the predominant model for rent payment in most Nigerian urban cities. The evolution of the market towards more flexible payment options has driven the growth of RNPL as the service aligns rental payments with the income cycles of most tenants.

135. ['Population of Lagos, Nigeria from 2015 to 2022'](#) (Statista, 2024)

136. [Lagos State Government, 'Lagos Has Delivered 3,000 Homes for Residents in Less Than Five Years – Sanwo-Olu'](#)

137. Caleb Obiowo, ['House Rents in Lagos Skyrocket by Over 100% as Household Incomes Stall'](#) (Nairametrics, 05 May 2024) accessed 07 November 2024.



The RNPL service represents a significant shift in the rental market, offering a middle ground between upfront annual payments which is pro-landlord and monthly rent options which is pro-tenant. Already, the Lagos State government, in August 2024,<sup>138</sup> announced its plan to launch a digital platform in 2025 that will enable tenants to pay their rent monthly, as part of the larger EKO Revenue Plus program.<sup>139</sup>

This platform aims to simplify the rental process and align with global best practices by providing a more manageable payment schedule for tenants.<sup>140</sup> There are also startup companies already offering different commercial variations of RNPL, whether through a subscription based model or outright credit advances.<sup>141</sup>



## OUTLOOK FOR 2025

The growth of this sector in 2025 is likely to be driven by changing consumer preferences and economic factors that necessitate more flexible payment options for rent. As Nigerian urban cities continue to grapple with housing challenges, RNPL schemes offer a promising solution to bridge the gap between housing demand and affordability. Furthermore, once open banking is completely operationalised in Nigeria, it is expected there will be a stream of new players offering cutting-edge RNPL-based platforms since RNPL providers can leverage open banking solutions to facilitate collections of monthly payments from renters.

However, there are primary challenges associated with the RNPL model such as ensuring the profitability of the model without adopting predatory debt collection methods,<sup>142</sup> and managing cashflow due to frequency of missed or late payments by tenants. Moreover, RNPL providers must implement 'responsible/ethical lending policies' by avoiding fraudulent or abusive practices and educating users about the importance of timely repayment to avoid debt accumulation.

138. Josephine Ogundeji, '[Lagos Vows to Enforce Monthly Rental Policy](#)' (Punch, 04 March 2024) accessed 07 November 2024.

139. Olasunkanmi Akoni, '[Tenancy: Lagos Govt to Launch Digital Platform for Monthly Rent](#)' (Vanguard, 06 August 2024) accessed 07 November 2024.

140. '[Lagos State to Launch Digital Platform for Monthly Rent Payment](#)' (Buyletlive Blog, 16 August 2024) accessed 07 November 2024.

141. For example, Spleet Africa lists residential houses on its marketplace with options for monthly, quarterly and biannual subscription.

142. '[Making an Investment Decision on the Rent-Now-Pay-Later Model](#)'



## E-MOBILITY COMES TO NIGERIA (MOBILITY TECH)



***The current reliance on diesel-powered generators in many regions creates a paradox for EV adoption.***

Rising climate change awareness, coupled with fuel scarcity and fluctuating oil prices, present a significant opportunity to reduce carbon emissions, improve air quality, lessen reliance on fossil fuels, and save costs on petrol through electromobility (e-mobility) - the use of electric vehicles (EVs) for transportation.

Although the rise of electric vehicles (EVs) in Nigeria has gained some momentum since 2023, early initiatives laid the groundwork for the adoption of EVs. These efforts included advancements in research and development, government-led initiatives, and active involvement from the private sector.

The Federal Government, through the National Automotive Design and Development Council, launched an EV Pilot Program in three universities;<sup>143</sup> —while private sector leaders like First Electric, PSC Solar Industries, Rubitec Nigeria Limited, and Stallion Motors have driven the growth of the EV market in Nigeria with initiatives ranging from EV charger installations<sup>138</sup> to the introduction of the first all-electric SUV, the Kona.<sup>145</sup>

Currently, several Nigerian companies are actively pursuing opportunities in the e-mobility sector, eager to join the growing global transition towards sustainable transportation. In March 2024, Nigerian entity Trekk which is also Africa's first electric scooter-sharing platform, partnered with Joseph Sarwuan Tarka University, Makurdi to provide an eco-friendly alternative for on-campus commuting.<sup>146</sup>

143. Joshua Olomu, '[3 Nigerian Universities to Teach Electric Vehicle Pilot Programme](#)' (PM News Nigeria, 05 February 2021) accessed 07 November 2024.

144. '[Private Sector Indigenous Companies Driving the EV Revolution in Nigeria](#)' (Renewable Energy Technology Institute, 16 November 2020)

145. Olamide Ologunagbe, '[Stallion Group introduces Hyundai Kona EV to tame rising energy prices](#)' (Business Day, 20 June 2023) accessed 16 October 2024.

146. '[Trekk Seals Partnership with Jostum](#)' (Trekk, 5 July 2024)



Additionally, Savenhart Investment Limited Technology, a Nigerian EV manufacturing company partnered with Glovo in May 2024 for the provision of its Ginsu EV bikes and charging ecosystem to Glovo riders for deliveries.<sup>147</sup> Meanwhile, in Q3 of 2024, Electric Motor Vehicle Company, a Nigerian e-mobility company, secured a landmark \$275 million deal with China Road and Railway Corporation to enhance the accessibility of EVs in Nigeria and position the country as a leading exporter of EVs in Africa in record time.<sup>148</sup>

Despite the transformative benefits of EVs in Nigeria, a number of challenges impede widespread EV adoption, including inadequate charging infrastructure and unreliable electricity. The current reliance on diesel-powered generators in many regions creates a paradox for EV adoption. Nonetheless, the recent Value Added Tax (VAT) (Modification) Order 2024 (VAT Order), which commenced on 01 September 2024, makes a significant step towards fostering the growth of the EV industry, as it has exempted electric vehicles, their parts, and semi-knocked-down units from VAT.

Additionally, the VAT Order exempts services related to the manufacturing, assembly, and sale of EVs from VAT. This tax incentive provides a strong impetus for investors to enter the EV market, supporting broader adoption of e-mobility solutions and stimulating sustainable economic growth.

## OUTLOOK FOR 2025

While the VAT Order is laudable, much more needs to be done to create a conducive environment for e-mobility to thrive in Nigeria. As a first step, the crucial infrastructure gaps that will ease adoption of e-mobility need to be addressed, otherwise the Nigerian market and business terrain may not be considered attractive and suitable for the manufacturing and use of EVs. Furthermore, to encourage local and foreign private sector investments and patient capital for players in the space, the government must consider other incentives and tax breaks beyond exemption from VAT.

147. Bolu Abiodun, '[Glovo partners with Siltech to use its EV bikes and charging ecosystem in some parts of Lagos](#)' (Techpoint, 30 May 2024) accessed 2 October 2024. Bolu Abiodun, '[Glovo partners with Siltech to use its EV bikes and charging ecosystem in some parts of Lagos](#)' (Techpoint, 30 May 2024) accessed 2 October 2024.

148. Nicholas Kalu, '[EMVC signs \\$275m mega e-mobility deal with Chinese firm](#)' (The Nation, 29 July 2024) accessed 10 September 2024.



## CLIMATE-TECH IN CLIMATE CHANGE



Climate technology has recorded significant growth within Africa. This growth is attributable in part to the increased climate awareness championed by the United Nations through its Conference of the Parties to the United Nations Framework Convention on Climate Change (COP). The COP has not only driven global efforts towards a greener climate but has generated interest and mobilized funds from both private and public sectors to advance the Sustainable Development Goals by 2030.<sup>149</sup> The concept, which was relatively undeveloped in Africa with limited funding prospects<sup>150</sup> has become increasingly visible, rapidly establishing itself as one of the fastest-growing sectors across the continent.<sup>151</sup>

Despite the global economic downturn and its effect on fundraising, climate tech startup companies in Africa raised \$325 million this year, amounting to 45% of all startup investments in Africa this year.<sup>152</sup> It has been suggested that one of the factors spurring investments in climate tech is the diversity of opportunities<sup>153</sup> as climate tech covers a wide range of applications such as renewable energy, mobility and transportation, industrial processing & manufacturing, and sustainable agriculture, built environment, among others.<sup>154</sup> Nevertheless, investors seem more interested in the energy sector and water industries.<sup>155</sup>

This industry is also enjoying the support of Development Finance Institutions and private institutions such as the International Finance Corporation which, in a bid to bridge the climate tech financing gap, announced its first-ever investment in an entirely climate-focused fund in Africa (by investing \$5 billion in Equator Venture Fund).<sup>156</sup> Furthermore, investment in climate tech is further supported by initiatives like the African Development Bank's Sustainable Energy Fund for Africa .

Based on the steady growth of climate tech in Nigeria, coupled with government and investor interest, its future looks promising. The gradual market shift towards solar energy solutions and increasing petrol prices may encourage the adoption of clean technology in Nigeria; however, high costs may be a major barrier to its widespread implementation, particularly in the renewable energy and mobility sectors.

149. Redaction Africa news, 'Nigeria: Uptick recorded in Private Funding for Climate Tech Startups' (Africa news, 13 August 2024) accessed 13 September 2024.

150. 'Climate-Tech Startups in Nigeria Experience Surge in Private Funding' (Africa Vibes, 02 May 2024) accessed 13 September 2024.

151. Ibid.

152. James Wambua, 'Climate tech Startups in Africa defy odds, see record surge in Financing to \$325 million' (The Exchange, 18 October 2024)

153. Ibid.

154. Dasha Shunina, 'Funding The Future: The Investment Potential of Today's Climate Tech' (Forbes, 27 March 2024) accessed 31 October 2024

155. Ibid.

156. Kehinde Akinseinde-Jayeoba, 'IFC Invests \$5 Million in Equator Fund to Drive Climate Tech Financing in Africa' (Nigerian Tribune, 07 October 2024)



PART  
**03**

# REGIONAL SPOTLIGHT

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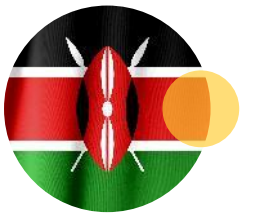


As the continent continues to foster innovation and entrepreneurship, regulatory frameworks that govern these advances are equally crucial to supporting sustainable growth. Africa's tech revolution spans sectors such as digital financial services, e-commerce, AI, agritech, and more — placing the continent at the centre of the global digital conversation. This regional spotlight examines notable changes to the regulatory landscape in select jurisdictions in Africa.



### Tanzania: Tax on Digital Assets

Tanzania introduced a 3% tax on digital asset transactions as part of its new tax measures through its Finance Act 2024.<sup>157</sup> The Finance Act defines digital assets as intangible items of value, such as cryptocurrencies, token codes, and cryptographically generated numbers.<sup>158</sup> This tax targets non-resident individuals or entities operating platforms that facilitate digital asset exchanges or transfers.<sup>159</sup> Cryptocurrency exchanges, brokers, and similar platforms must now register under Tanzania's tax system and withhold a 3% tax on payments made to Tanzanian residents.



### Kenya: National AI Strategy Development

Kenya is developing a comprehensive National AI Strategy by collaborating with the Kenyan Ministry of Information and Communication Technologies and Digital Economy.<sup>160</sup> From 15 to 17 May 2024, Naivasha hosted the third stakeholders' workshop on the development of Kenya's National AI and Emerging Technologies Strategy.<sup>161</sup> This strategic move aims to guide the country's development, application, and governance of AI, maximizing the benefits of this transformative technology while ensuring ethical standards and national priorities are upheld.



### Ghana: 5G Network Rollout

On 1 November 2024, Ghana launched its first 5G network, marking a major milestone in digital transformation and economic growth.<sup>162</sup> Developed by Next-Gen InfraCo, a consortium of telecommunications companies, the network aims to boost connectivity and establish Ghana as a digital economy hub in West Africa. Initial rollout will begin in Accra, Kumasi, and Takoradi, with plans for nationwide coverage by 2026.<sup>163</sup> A phased approach, including subsidies, will ensure rural areas are included in this expansion.

With its high speeds, low latency, and robust capacity, the 5G network will drive advancements in sectors like agriculture, healthcare, transportation, and manufacturing, making technologies like the IoT and AI part of everyday life.

157. Samson Akintaro, 'Tanzanian Finance Act, 2024 makes changes affecting businesses and individuals' (EY Global, 30 July 2024) accessed 18 October 2024.

158. Ibid.

159. Ibid.

160. David Indeje, 'Kenya Unveils National Emerging Technologies and AI Strategy Framework' (KICTANet, 5 June 2024) accessed 04 November 2024.

161. Ibid.

162. Hikmatu Bilali, 'Ghana Launches First 5G Network to Drive Digital Economy and Inclusive Growth' (ecofin agency, 04 November 2024) accessed 04 November 2024.

163. Ibid.



# CONCLUSION

Africa's tech landscape is not only evolving but is also setting a pace that underscores the continent's commitment to innovation, inclusion, and sustainability. Each country's actions—from Tanzania's digital asset tax to Ghana's 5G rollout, and Kenya's AI strategy—highlight Africa's integral role in the global tech conversation. As these nations continue to address unique challenges and capitalize on local strengths, the digital revolution sweeping through Africa promises to unlock immense potential, redefining economies, transforming communities, and shaping a future driven by technology and collaboration.





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- [Overview of Nigeria's Draft National Artificial Intelligence Strategy 2024](#)
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## FAST FACT PUBLICATIONS

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- [SEC framework on Accelerated Regulatory Incubation Program for the Onboarding of VASPs and DISPs](#)
- [Guidelines on Operation of Bank Accounts for Virtual Assets Service Providers](#)
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- [September Tech Digest](#)
- [October Tech Digest](#)
- [November Tech Digest](#)
- [December Tech Digest](#)



# GLOSSARY OF TERMS

ABBREVIATION	MEANING
AI	Artificial Intelligence
AIP	Approval-in-Principle
AML/CFT/CPF	Anti-Money Laundering, Combating the Financing of Terrorism, and Countering Proliferation Financing
ARIP Framework	Framework on Accelerated Regulatory Program for the onboarding of Virtual Assets Service Providers and other Digital Investments Service Providers
ATM	Automated Teller Machine
AU CAIS	African Union's Continental Artificial Intelligence Strategy
BOFIA	Banks and Other Financial Institutions Act 2020
CAC	Corporate Affairs Commission
CBN	Central Bank of Nigeria
CCP Regulations	Nigerian Communications (Consumer Code of Practice) Regulations 2024
CERT	Computer Emergency Response Teams
COP	Conference of the Parties to the United Nations Framework Convention on Climate Change
DPO	Data Protection Officer
EdTECH	Educational Technology
ET	Emerging Technology
EV	Electric Vehicle
FATF	Financial Action Task Force
FI	Financial Institution
FIRS	Federal Inland Revenue Service
FMCIDE	Federal Ministry of Communication, Innovation, and the Digital Economy
IMTO	International Money Transfer Operators
IoT	Internet of Things
KYC	Know-Your-Customer



# GLOSSARY OF TERMS

ABBREVIATION	MEANING
MSMEs	Micro, small, and medium-sized enterprises
MMO	Mobile Money Operator
NAIS	National Artificial Intelligence Strategy
NCAIR	National Centre for Artificial Intelligence and Robotics
NDPA	Nigeria Data Protection Act 2023
NDPA-GAID	Draft General Application and Implementation Directive 2024 for the Nigeria Data Protection Act 2023
NDPC	Nigeria Data Protection Commission
NIBSS	Nigeria Inter-bank Settlement System Plc
NIP	NIBSS Instant Payment
POS Terminal	Point-of-Sale Terminal
PSP	Payment Service Provider
PSS	Payment Solution Services
FATF	Financial Action Task Force
PTSP	Payment Terminal Service Provider
RNPL	Rent Now Pay Later
SEC	Securities and Exchange Commission
SOCs	Security Operation Centres
VASPs	Virtual Asset Service Providers
VASP Rules	Rules on the Issuance, Offering and Custody of Digital Assets
VAT	Value Added Tax



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