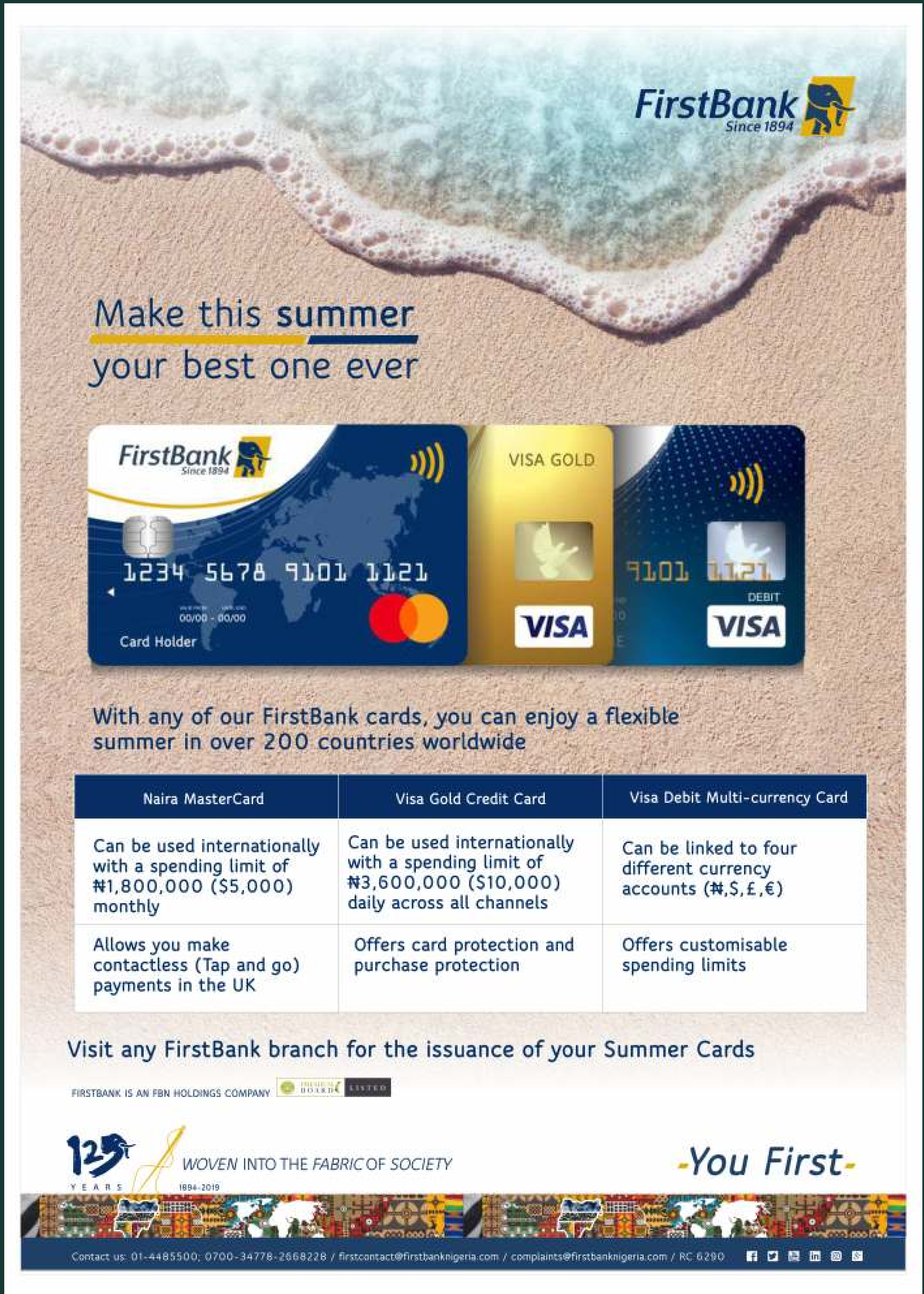


Design + Print production: janoworks @+234 8033220972

CAFEi

CONSUMER AWARENESS & FINANCIAL ENLIGHTENMENT INITIATIVE

VOLUME 1 2019

THE RIGHTS AND PROTECTION OF THE NIGERIAN CONSUMER

WHO IS RESPONSIBLE FOR WHAT?

INSIDE THIS ISSUE

EDITOR'S NOTE

At the national level, the discourse around deficiencies in financial literacy and consumer protection hasn't culminated in major policy actions. This is not exclusive to Nigeria as even citizens in first world countries complain that basic financial knowledge has been mostly restricted to business and finance majors. STEM and humanities majors around the world have begun to advocate for basic education on financial literacy topics like taxes, debt management and financial planning.

In 2017, a financial literacy report on G20 countries by OECD on financial inclusion revealed that only 48% of adults could answer correctly questions on financial knowledge concepts like compounding, budgeting and diversification. These are citizens of the wealthiest countries in the world who are known for their heft income wise and where basic literacy rates are on average around 95%.

In Sub-Saharan Africa, our issues are confounded by a fast growing population with comparatively low basic literacy skills reducing potential earning power and social mobility. Even those being educated are not developing high value skills for today's knowledge economy and this is dovetailing into rising macro problems like unemployment and insecurity plaguing two of its largest economies in Nigeria and South Africa.

The dearth of financial literacy globally has been confounded by decades of mainstream intellectualism dictating that understanding money and finance requires a certain set of skills that are not be easily learnt. The good news is financial literacy is not an art but a principles based model of decision making around money. It can be mastered without any formal education as all it requires is discipline and consistency.

Based on some common sense principles, financial literacy training provides individuals a framework for money management and investment decisions that allow them protect themselves. The democratization of knowledge and the proliferation of new technologies today have created massive opportunities for individuals, corporates and governments like CAFEi looking to promote this as a front burner issue.

Today, CAFEi is launching its maiden magazine to showcase its efforts and thoughts around consumer protection and the financial literacy discourse and asks you to join it as a partner in promoting a cause that fights inequality, systemic poverty, promotes inclusion and drives social mobility in underserved communities.

'Nifemi Adedipe

FOREWORD

We have all been witnesses to the increasing role of technology in product offerings and the digital disruption in various industries. All of these developments are rapidly changing the complexities of interactions between service providers and consumers, leading to increasing tensions at different touchpoints. As we continue to move along in this continuum, as the role of humans reduce in service offering through the use of alternative platforms and as we move farther into the realms of robotics, the risk of frustration at service failure points increases and the need for enhanced mechanism for consumer protection escalates.

Overall, the markets for, and the marketing of, goods and services have undergone profound transformations over the last two decades. Consumers have enjoyed enormous benefits from these changes including advent of new technologies, open global markets and increasing share of services as a component of the global economic equation. Despite these gains, these changes have resulted in many challenges for consumers and increasing concerns for regulatory agencies resulting in flurry of laws and regulations including anti-trust laws and data protection regulations.

Consumers as a class have also gone through phenomenal changes. The changing needs of children, millennial and young adults have been some of the most potent forces shaping the markets in this century, and to a lesser extent, the older adults. While better educated overall, many consumers today still lack the quantitative and literacy skills necessary to cope with more complex, information-intense marketplaces. Similarly, new technologies introduce new technical and legal issues that represent new level of challenges for consumers especially in technology-enabled spaces such as ecommerce, financial services industry and telecommunication. These and other changes in socio-economic conditions have had implications for consumer, resulting in emergence of diverse issues for regulators and other stakeholders with the mandate of protecting consumers.

In the global scene, there have been multiple cases of hefty fines handed to operators in technology, communication and financial services sectors for breaches ranging from: misuse of consumer data as seen in the case of Facebook, sale of unsafe products as in the case of Monsanto for selling harmful weed killer, charging of excessive fees as in the case of Wells Fargo and outright fraudulent maneuvering of consumers. Across countries and economic blocs, there is a growing call for enhanced consumer protection and stiffer penalties for breaches in contracts, both written and implied obligations between service providers and consumers. On the part of providers, there is a growing investment in compliance including trainings and manning level for compliance departments to stem incidents of penalties and reputational damages as a result of these breaches.

At the national level, after the failed attempt at producing a regulation that protects consumers in Nigeria by the Bureau of Public Enterprise in 2003, there have been several attempts and collaborative efforts among public institutions, government agencies, trade unions and other pressure groups to bring Nigeria into the folds of countries with quality laws that ensure the interest of the public is protected from abuses. Finally, in February 2019, President Muhammad Buhari signed into law the Federal Competition and Consumer Protection Act ("FCCP Act"). This Law ensures competition in all sectors of the economy thereby allowing consumers access to option and strengthens the competitive landscape that ultimately ensures prices reflect economic value delivered to consumers through interaction of the market forces.

Since passing this Law, there have been significant concerns across the board as regards the implementation of the regulation despite establishment of the Competition and Consumer Protection Council. One of the key grey areas has been the challenging task of effectively managing competition and consumer protection by a single commission. In other jurisdictions, these two areas are distinct and have separate set of operating frameworks to deal with issues impacting competition, largely anti-trust, and consumer protection matters that may have little or no bearing on competition. In furtherance of this, there have been increased clamor for a special court dedicated to addressing consumer complaints in Nigeria.

Irrespective of the outcomes of these efforts, this new regulation signals a change in direction and emboldens regulators such as the Central Bank of Nigeria and The Securities and Exchange Commission who have been in the forefront of protecting depositors and the investing public from abuses from financial institutions and listed entities. The CBN for example has introduced regulations that mandates financial institutions to resolve consumer complaints within specified period or face severe penalties. Similarly, the SEC has mandated listed companies to put in place robust complaint management framework. In addition, efforts have been made by these regulators to educate consumers on their rights and avenues to seek redress when these rights are infringed. These efforts are based on the increasing recognition by government and regulators that confident, informed consumers who make well-reasoned decisions represent powerful drivers of innovation, productivity and competition.

In light of the rapid changes in markets and the profound impact they have on consumers, it is particularly important for policy makers to be able to both identify and measure sources and instances of consumer detriment. While policymakers have a wide array of tools available to correct market failures when they occur, it is critical that any policy decision taken be based on sound and objective evidence and careful assessment of the corrective options available. Understanding how markets operate and how consumers make decisions is critical in this regard.

It is important to understand that in the absence of consumer protection, consumers are exploited in many ways including sale of unsafe products, adulteration and hoarding of goods, using wrong weights and measures, charging excessive prices and sale of inferior quality goods. To support efforts of regulators, a number of non-governmental agencies have taken up the challenge of educating the investing public given that this option is proactive and a cheaper option to enforcement of regulation after occurrence of breaches. Informed consumers are more equipped to secure better bargain in value exchange that happens between service providers and consumers. Therefore, greater attention, resources and focus must be given to consumer education by stakeholders including services providers who ultimately benefit from serving informed class of consumers.

At the Consumer Awareness and Financial Enlightenment Initiative, we are dedicated to driving financial literacy and consumer awareness in Nigeria. Since commencement, we have had extensive consultation across a number of institutions, both public and private, religious organizations as well as regulators. We have continued to engage the Central Bank of Nigeria through the Department of Consumer Protection to continue our advocacy for the apex bank to elevate consumer literacy in its agenda. We have also been in touch with the Nigerian Education Research Development Council to advocate for the inclusion of financial literacy in the curriculum for secondary schools in Nigeria.

Our mandate is to drive consumer education in furtherance of a society where accountability is embedded in our DNA and a country where contracts, written or implied, are enforced for the benefit of ensuring shared responsibility as well as prosperity. Our position is fully aligned with that of the late Dr. Martin Luther King when he said "Injustice anywhere is a threat to justice everywhere".

Otunba (Mrs) 'Debola Osibogun JP

ABOUT CAFEi

The Consumer Awareness and Financial Enlightenment Initiative ("CAFEi") is a nongovernmental organization focused on consumer awareness and financial enlightenment. CAFEi's focus on consumer awareness is to improve the comprehensive understanding by the consumer of their rights concerning available products and services being marketed and sold. CAFEi"s focus on financial enlightenment is the process of improving consumers understanding of financial products and concepts, through information dissemination, instruction and/ or objective advice.

MISSION STATEMENT

CAFEi's mission statement is to engage in consumer advocacy and enlightenment by creating content that promotes greater awareness, empowers, educates, inspires and informs consumers about their rights and obligations.

VISION STATEMENT

To Enlighten and be a formidable voice for consumers.

OUR OBJECTIVES

CAFEi's primary objective is to aid consumers in making safe, accurate and informed decisions on goods and services in all facets, including the Banking and Finance industry. The organizations other objectives include:

- Organizing, sponsoring, supporting and promoting seminars, events and debates for consumer awareness;
- Establishing and promoting effective campaigns aimed at promoting awareness, participation and enlightenment of consumers;
- Promoting and advocating for social responsibility and compliance by producers with their duties and responsibility towards consumers;
- Promoting, gathering, collecting, analyzing, evaluating and disseminating consumer related information to both consumers and producers;
- Conducting research to enable the organization provide accurate information on products, consumption analysis and brands;
- Supplying any person with information and assistance required to enhance knowledge and understanding of financial management, finance sector and banking operations.

Governing **Board**

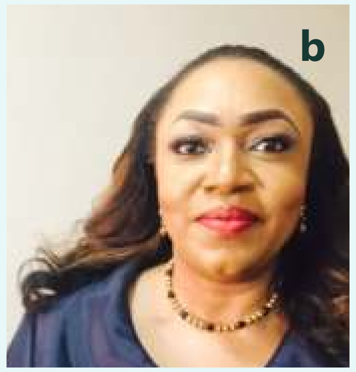
A **OTUNBA (MRS) DEBOLA OSIBOGUN** JP – B.Ed (Econs), MSc (B&F), FCTI, FNIM, MIoD, FCIB, FERP

B **MRS. ABIDOUN ADEWODU** – MBA, MA Agricultural Economics

C **MR. ADEKUNLE OSIBOGUN** – ACTI, MCIArb, FCA, Notary Public

D **MRS. REMI WILLIAMS** – BA, MSc, Banking and Finance

Advisory **Board**



A **Dr. Segun Aina,** OFR

B **Mrs. Mojisola Bakare,** (ASIERU-SWEET)- ACIB NIG, HCIB, ACIB UK (CHARTERED BANKER UK), FICA, HFILRM.

C **Dr. Biodun Adedipe,** Ph.D., FCIB, MIoD

D **Mr. Oluseye David Awojobi**

E **Mrs. Folakemi Ani-Mumuney,** MCIM, HCIB, MNIMN)

F **Mrs. Ayomide Olajide**

G **Mrs. Olukemi F. Onabanjo** (Ms.) FCA, MBA, MIoD, HCIB, MCIPM

H **Dr. Wuraola Abiola**

CAFEi CONSUMER AWARENESS & FINANCIAL ENLIGHTENMENT INITIATIVE

Mrs Umma Dutse, former Director of Consumer Protection Department CBN and the President and Chairman, Board of Directors, Otunba Mrs. 'Debola Osibogun

Visit to CBN Consumer Protection Department in October 2017

Visit to Nigeria Educational Research and Development Council (NERDC) in October 2017.

Visit to MD/CEO, Polaris Bank, Mr. Tokunbo Abiru in July 2019

Visit to MD/CEO, FCMB, Mr. Adam Nuru in July 2019

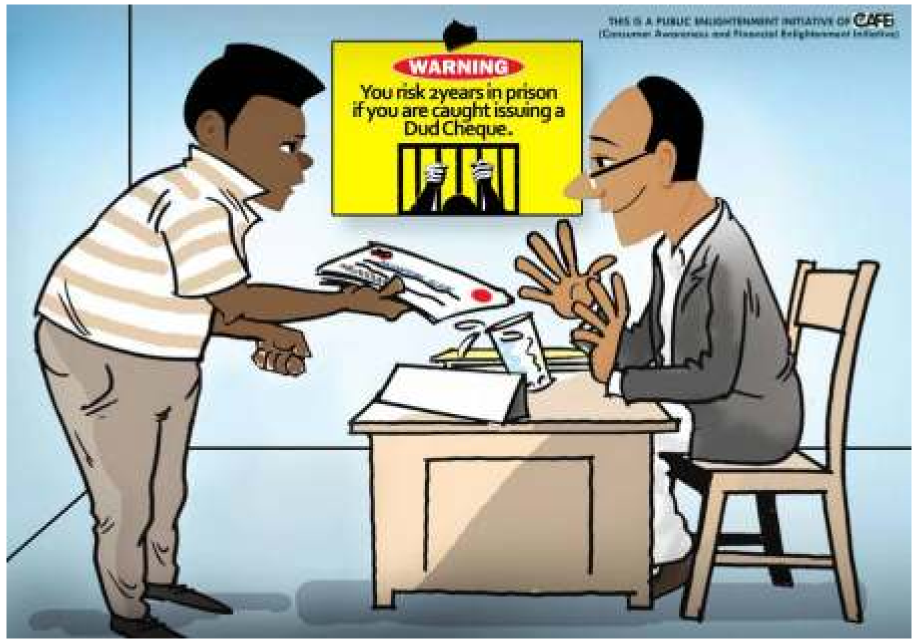
Stakeholders Engagement with CBN Deputy Governor, Mr. Bayo Adelabu in October 2017.

Inauguration meeting of CAFEi on December 19, 2016.

CONSUMER AWARENESS & FINANCIAL ENLIGHTENMENT INITIATIVE

ACTIVITIES
FROM 2016 - 2019

- Women Empowerment program at Word Communication Ministries (Wocom) Ibadan with over 2,000 women in attendance.
- Visit to Nigerian Educational Reseach and Development Council (NERDC) for the inclusion of financial literacy in secondary schools curriculum
- Visit to Consumer Protection Department (CPD) of Central Bank Nigeria to advocate for the inclusion of financial literacy in secondary schools curriculum.
- Visit to Deputy Governor CBN advocating to serve as secretariat for Subcommittee on Financial Literacy and Public Enlightenment of the Bankers Committee
- Strategy meeting with the London Institute of Banking and Finance in the UK on partnership for their "Lessons in Financial Education (LiFE) Programme" on August 3, 2017.
- Publication of "The future begins with savings" to celebrate 2017 World Savings Day in the Independent newspapers on October 31, 2017
- Publication of "Promoting a savings culture and futurein Nigeria'' to celebrate 2017 World Savings Day in The Guardian newspapers on October 31, 2017
- Publication of "Promoting savings' culture in Nigeria to celebrate 2017 World Savings Day in the Punch online (punch.com) on October 31, 2017.
- Radio interview on City FM Lagos and Space FM Ibadan to mark Global Money Week
- Social media circulation of Infographics on how to withdraw from your pension fund



- Social media circulation of infographics on currency handling
- Social media circulation of Infographics on issuance of Dud cheques
- Media Tour to Petal FM and Splash FM to enlighten people on Financial Literacy and consumer protection.
- Advocacy for the mopping up of Tattered notes. Letter written to CBN with a response received.
- Television Scrolling on Channels Television on the need to mop up all tattered notes
- Proposal to CBN to serve as secretariat for Bankers Committee subcommittee on Financial Literacy and Public Enlightenment submitted in February 2018
- Publication in the Punch newspaper in celebration of International Women's Day titled "FCCP 'll promote female entrepreneurs" on March 8, 2019
- Publication in the Business Day newspaper on March 8, 2019 in celebration of International Women Day titled "FCCP law seen as catalyst for conducive business environment for female entrepreneurs"
- Publication in The Nation newspaper to celebrate International Women's Day titled "22% women bankers in banks' boards, says CAFEi report" on March 8, 2019
- Publication in The Nation newspapers to mark the Global Money Week "CAFEi marks Global Money Week" on April 2, 2019

THE SIGNIFICANT ROLE OF FinTech IN THE PROTECTION OF THE NIGERIAN CONSUMER

(**Dr. Segun Aina OFR** – President, FinTech Association of Nigeria & Africa FinTech Network)

INTRODUCTION

Nigeria is clearly the most populated African country with about 200 million people. Despite the various economic and social welfare challenges, it also prides itself as the largest economy in Africa. Nigeria which is the 7th most populous country in the world has the largest number of poor people in the world. The report by Brookings Institution, USA placed Nigeria atop the world poverty statistics — ahead of India. Close to 70% of Nigerians are young people, the majority of whom are either unemployed or dependent and is of great economic concern.

Clearly, the government needs to harness the inherent potential of the large population of young people in order to boost economic development, reduce widespread poverty, and channel large numbers of unemployed youth into productive activities.

However, despite the current challenges, as the economy continues to flourish and the majority young population gets older, their buying power will continue to increase. Increasing the literacy level generally and financial education specifically will help to propel general awareness, increase financial inclusion and boost economic activities.

Various stakeholders have a role to play in creating consumer awareness and effectively protect
consumers. Given the prominence of the internet and mobile phone in the last two decades, it is becoming easier to reach more consumers who also now have online access to information necessary to make an informed decision Fintech has in the last few years provided avenues and services to achieve this.

Fintech is the combination of two words, "financial services" and "technology". Fintech in its broad sense is innovative technology used to compete with traditional financial institutions and methods in financial services delivery. It simply means leveraging technology in rendering financial services that create value to the consumer. The emergence of Fintech has led to the development of several economic activities which has helped to create increased value to an average consumer.

The diagram below shows the ecosystem of Fintech:

Source: www.cbinsights.com

THE CONVERGENCE OF FinTech & CONSUMER PROTECTION

Consumer protection can be viewed as the entirety of efforts directed towards preventing consumer exploitation at all levels. Through consumer protection, regulatory agencies ensure that consumers derive maximum satisfaction from the promised value of services by the provider in the market. And with the deregulation of the Nigerian telecommunications sector that started in 2001, the entire economy has witnessed phenomenal growth and significant business developments that have generated an increasing customer base with concern for their protection.

Prior to 2001, there were not more than 400,000 (four hundred thousand) telephone lines. As at 2018, the Nigerian Communications Commission (NCC) records reveal that about 140 million Nigerians use mobile phone while between 25-40 million Nigerians use smartphones. Smartphone usage in Nigeria is projected to grow to 140 million in 2025. Similarly, in 2018, internet users amount to about 92.3 million (internet penetration of about 47%) and expected to grow to 188 million and penetration rate of 84%.

The use of technology in financial products and services (Fintech) is also leading to a wide array of new approaches to rendering financial products and services. Technologies are impacting the way we borrow, make payments, and manage our money. These technologies are also changing the way that entities such as digital lenders, payment services companies, digital banks, credit reporting agencies, debt collectors etc. affect and interact with us.

Fintech is increasing the consumer numbers and reducing financial exclusion rate which in return leads to economic growth and development through the various economic activities engineered by leveraging technology. However, it is important to state that the real issue of concern of protecting the right and privileges of consumers by all stakeholders is the convergence between Fintech and consumer protection.

The Fintech Association of Nigeria (FintechNGR) established in 2017 (are one of the first set of inclusive National Fintech Associations in the world) is the voice of Fintech in Nigeria. Its three core focus are to accelerate, advocate and connect. It is set to be a self-regulatory institution for the Nigeria Fintech Ecosystem and to also ensure principles of consumer protection and rights are enshrined.

GLOBAL FinTech TRENDING ISSUES ON CONSUMER PROTECTION

There have been several discussions in the past but currently, there are few trending global Fintech issues of great interests and relevance to the Nigeria consumer in ensuring the complete protection for consumers. These issues are on the front burners of all stakeholders and they include the following:

General Data Protection Regulation (GDPR): It is the most important change in data privacy regulation in over two decades. It is a regulation in EU law on data protection and privacy for all individuals' citizens of the European Union (EU) and the European Economic Area (EEA) but it is a global issue since products and services are accessible across the world. GDPR reshapes the way in which sectors manage data, as well as redefines the roles for key leaders in businesses to ensure having in place watertight consent management processes and effective data rights management systems in order not to lose their most valuable asset – data. It, in essence, brings control and ownership of the data to the customer or consumer.

Payment Services Directive (PSD2): The purpose of this directive is to increase competition and participation in the payments industry also from non-banks, and to provide for a level playing field by harmonizing consumer protection and the rights and obligations for payment providers and users. The PSD2 is seen as a game changer such that it enables bank customers, both consumers and businesses, to use third-party providers to manage their finances.

Open Banking: It is the use of open-source technology to achieve greater financial transparency options for account holders ranging from open data to private data through the use of open application programming interface (API) that enable third-party developers to build applications and services around the financial institution for consumers. This provides opportunities for consumers to have information on services provided by various institutions, comparing them and having options to choose from. A number of countries have developed Open Banking guidelines and it is hoped that this will also be done and introduced into the Nigeria financial system soon.

Know Your Customer (KYC): It is a process adopted by service providers towards verifying the identity of their clients and assessing their suitability, along with the potential risks of illegal intentions towards the business relationship. Fintech companies have developed technology-enabled digital identity products that make it easy, convenient and less expensive to meet identity requirements of financial service providers. Consumers have the right to dictate what personal records they want to enter online and be aware of the safety and security of such records.

Digital Banking: It involves high levels of process automation and web-based services enabling cross-institutional service composition to deliver banking products and provide transactions. Leveraging on technology, it provides users with the ability to access financial data through desktop, mobile and ATM services! In essence, it has put control of customers or consumers accounts into their hands cutting down the time to do transactions unlike the process used for traditional financial services offerings most of which require visiting brick and mortar locations, long waiting times and inefficient handling.

Digital Financial Education: It is now possible with the enabling power of smartphone and internet connectivity to provide financial education digitally and these are accessed at the convenience of consumers. Some learning institutions such as The Fintech Institute has emerged in Nigeria to focus on digital financial learning and education, some of which are done in collaboration with other leading global institutions in the field of digital education. Convenient and low-cost access to information and education will boost consumer protection initiatives and it is hoped that CAFEi will partner with institutions offering these services as it pursues its mandate.

Conclusion

As the number of consumers increase, leveraging technology, it is clear that Fintech has a major role to play in creating awareness and protecting the consumer as it offers new ways of accessing information and transacting financial services with more transparency, simplicity and greater convenience.

Congratulations to the Board and Management of Consumer Awareness & Financial Education Initiative (CAFEi) on the historical launch that comes up 11th of July, 2019. This initiative will no doubt elevate discussions on the various area of its mandate and be supportive of overall economic development in Nigeria.

Dr. Segun Aina OFR, a former President of the Chartered Institute of Bankers of Nigeria (CIBN), and the pioneer Chairman of Global Banking Education Standards Board. He is also the initiator and President of the Fintech Association of Nigeria and Africa Fintech Network.

PAYMENT SERVICE BANKS - CATALYST FOR ENHANCED FINANCIAL INCLUSION IN NIGERIA

The Central Bank of Nigeria (CBN) stepped-up its drive for expanded access to financial services by one notch on October 26, 2018 when it issued the Guidelines for Licensing and Regulation of Payment Service Banks (PSB) in Nigeria. Prior to the release of these guidelines, there have been growing debates on how best to drive financial inclusion in Nigeria and this move by the apex bank has been hailed by practitioners as a masterstroke.

The first real effort at expanding the financial services dragnet to bring in the unbaked population in Nigeria was recorded in 2012 when the CBN launched the National Financial Inclusion Strategy which had the overarching objective of expanding access to 80% of bankable adults in Nigeria by 2020. When this strategic intent is placed side-by-side the unique demography of Nigeria, it becomes clear and self-evident why the success of the CBN in its quest to drive financial services expansion is tied to the outcomes of this important financial inclusion strategic initiative.

The overwhelming business case for this initiative is embedded in the demographic data of Nigeria: a country with 99.6 million adults above the age of 18, with 63.1 million representing 63.3% of adult population living in the rural area and 20.2 million without formal education. These numbers make clear the challenges the CBN has encountered in driving financial inclusion through the traditional Deposit Money Banks that have clustered their touchpoints in majorly urban areas with skeletal operations in rural areas. For more than half a decade since this initiative was launched, the results have been underwhelming: the Nigerian banking sector has recorded 38 million Unique Banking Customers of the 99.6 million adults above the age of 18, leaving 64% of potential customers with no access to financial services.

The recently released report on global financial inclusion by the World Bank put the numbers from the Nigerian banking industry in context: as at 2018, 3.8 billion adults, representing 69% of global bankable adults now have an account at a bank or with a mobile money agent, up from 51% in 2011 In East Asia and the Pacific, 71% of adults have an account, 65% for Europe and Central Asia, and 70% for South Asia. Buoyed by the mobile money revolution in East Africa, Sub-Saharan Africa has been able to increase bank accounts for adults to 48%, leaving 95 million adults unbanked.

The Case for Payment Service Banks

The case for Payment Service Banks in Nigeria is succinctly captured in one key data point: 63.3% adult population in Nigeria live in the rural area and of this population, 70% own a mobile phone. Put differently, Nigeria currently has 84% mobile penetration overall, with 70% in the rural area. This penetration rate has been forecasted to grow to 90% by 2025, making Nigeria one of the fastest growing networks in the world. This data shows the strategic importance of telecommunication and internet-enabled services in driving banking penetration beyond the reach of traditional banks.
The combined forces of high mobile penetration and high-density of rural dwellers are excellent recipes for telco-enabled financial services. This case is further enhanced by the increased insecurity challenges in a number of areas in Nigeria and acute infrastructure deficit including poor road networks. Some of these challenges have resulted in stunted growth in branch expansion by commercial banks and the increasing request for branch closure and rationalization by banks in Nigeria.

In addition, the evolving financial services landscape and increasing shift from brick-and-mortar financial services channels has ensured telecommunication companies and e-commerce businesses are adequately empowered to compete for their share of the financial services market both globally and in the local context. Recently, Facebook began to delve deeper into the financial services space by attempting to persuade large banks and credit card companies to open-up its platforms for Facebook to offer services such as chat banking and account management to its 1.3 billion customers. Similarly, we have seen the phenomenal growth of Safaricom in Kenya, on the back of its mobile-banking payment system, that now accounts for 6.5% of the GDP of Kenya, paying $5.8 billion in taxes to the Government of Kenya in the last 5 years. Since launching of M-PESA in 2007, Safaricom has grown its customer base from zero to 27 million customers with $2.1 billion deposit from the retail base of $5 average deposit per day and a total loan disbursement of $914 million of $31 average loan size payable in 26 days.

Away from justification of PSB at the micro level, the entire economy stands to enjoy the enormous windfall of enhanced access to financial services by the larger chunk of the population that are predominantly Nigerians living in the rural areas. Therefore any scheme targeted at the retail end of the chain has the capacity to accelerate the growth of the economy for numerous reason including the mere fact that Micro, Small and Medium Scale Enterprises (MSME) account for 90% of the economy. Creating credible path for these individuals and small enterprises including rural farmers and traders to access financial services products including micro loans increases the velocity of money supply astronomically.

Reading through the transcript of the recent press conference of the CBN Governor, it is not surprising to note that the projected double-digit growth for the Nigerian economy in 5 years has been largely anchored around targeted intervention to close the financial exclusion gap. The CBN has a target to increase the number of Unique Banking Customers to 100 million in 5 years from 38 million, representing a CAGR of 21.4%. Similarly, the apex bank intends to triple the assets of the MSME over the next 3 years from N400 billion on the back of improved financial inclusion.
These justifications are core to the plans of the CBN for releasing the PSB Guidelines - to enable high-volume, low-value transactions in remittance, micro-saving and withdrawal services in a secured technology-driven environment. The PSB framework is designed to provide financial services through a mix of physical touchpoints and other mobile or digital channels. Based on the Guidelines, PSBs are mandated to ensure 25% of their touchpoints are located in rural areas in pursuit of the aspiration of shrinking the pie of the unbanked population in Nigeria.

Future of Financial Services and Impacts of Payment Service Banks in Nigeria

The release of the Guidelines for PSB by the CBN represents one more step towards the goal of keeping the Nigerian financial services industry at pace with the evolving global financial services landscape. Over the last decade, we have been witnesses to rapid transformation in the financial services space driven largely by groundbreaking technologies and accelerated by growing demand from young, short-attention-span consumers who have by their actions questioned the future of the traditional banking model. In response, regulators have begun to put in place frameworks to keep pace with these changes and ensuring the integrity of the system. The PSB model whilst helping to address the challenges of reducing the unbanked and under-banked population, the model also advances the case for driving delivery of financial services through digital channels.

Although the Guidelines have been very explicit on the services that a PSB can offer including; basic deposits, selling FX, operating electronic wallets, financial advisory services and remittance services, PSBs are likely to enhance these offerings over time to deepen their foothold in the financial services industry. This outcome has been considered potential risks for traditional banks who have seen significant chunk of their revenue chipped-away by fintech and now being attacked by new players with distinct threats. Even though a broad spectrum of players consider PSBs complementary to their existing business models including the agency banking model, other more skeptical and risk averse institutions still consider these new entrants as potential threats to their market share.

Similar to the experience from India, PSBs as it is regulated today will in some areas such as deposit mobilization compete with banks and may be complementary in other areas. This structure is largely driven by the fact that PSBs are not permitted to provide the full gamut of financial services including creation of risks assets and fixed deposits thus, providing opportunities for traditional banks to partner in an effort to providing outlets for deposits mobilized. This opportunity for partnership has resulted in traditional banks holding equity interest in PSBs in India. Three of the seven payment banks that have commenced operations received significant investments from some of the biggest banks. State Bank of India, ICICI Bank and Kotak Bank have investments in PSBs. Similar exploratory conversations have started in Nigeria among banks and Telcos who are in different stages of securing approval to roll-out.

This capability is crucial in providing differentiating services to the growing base of new breed of young, cosmopolitan, vocal and internet-savvy consumers who are leading one of the biggest changes in the history of financial services globally – transformation from card-based transactions to mobile and wallet-based transactions to enjoy the benefit of multichannel and on-the-go banking services.

Whilst the jury is still out on the viability of PSB model in Nigeria, there is sufficient basis to believe the PSB model will be of enormous benefit to all stakeholders; shareholders of PSBs, the regulator, customers and the general public for a number of reasons. First, this development will result in increased competition. A competitive market drives efficiency and efficiency in turn enhances quality of value to shareholders and ensures prices reflect value. The released Guidelines have already began to dominate agendas at board meetings of traditional banks and eliciting responses from banks, exacerbating the immense competitive pressure from fintechs. Secondly, a number of qualified applicants for PSB license, predominantly Telcos, are solidly positioned to accrue critical mileage deploying their existing infrastructure. This important consideration will not only lower the cost to serve, it will facilitate quick access to market and provide excellent platform for expansion. MTN for example already has 67 million number of active customers and a huge base of agents in its ecosystem, significantly more customers than the combined Tier 1 banks in Nigeria. Whilst the conversion rate may not be in linear proportion, this huge customer base provides an excellent platform and an overwhelming proposition to the stakeholders of the company.

Finally, some of these potential PSBs are one step ahead in the journey to customer acquisition. A good number of telecommunication companies already sit on a huge database of customer information, an invaluable asset that will be pivotal in the race to model customer behavior through predictive data analytics. This capability is crucial in providing differentiating services to the growing base of new breed of young, cosmopolitan, vocal and internet-savvy consumers who are leading one of the biggest changes in the history of financial services globally – transformation from card-based transactions to mobile and wallet-based transactions to enjoy the benefit of multichannel and on-the-go banking services.

In conclusion, the licensing of PSBs if well executed and regulated will be net accretive to the Nigerian economy from the mere fact that this development helps to drive the objective of increasing access to financial services for a large swath of rural dwellers who are unbanked or underserved by the existing traditional model. For the Central Bank, the more Nigerians that are captured in the formal sector, the higher chances of driving policy efficiency. Therefore, the development of this framework ticks a number of boxes for the apex bank in its quest to drive accelerated economic growth consistent with its recently released 5-year growth plan.

Otunba (Mrs) 'Debola Osibogun, FCIB.
Former President of the Chartered Institute of Bankers of Nigeria (CIBN)

CREATING AND SUSTAINING MULTIPLE STREAMS OF INCOME

OVERVIEW

Finance is very similar in nature to life in several respects. It takes efforts, whether natural or by a form of medical intervention to create new human life. But once conception happens, the concern shifts to preserving that life and ensuring it matures for delivery, except again abortion is foisted by nature or happens by the choice of any or all the parties involved. When the baby is safely delivered, all the protection necessary at this stage of high vulnerability is provided by the parents and well wishers, until ultimately the child gets connected to his/her purpose in life.

In similar vein, it takes efforts to make money - some item of relevance to society is manufactured, priced and presented in a way that makes it worthwhile for buyers. The exchange of this item for money creates fresh finance for the manufacturer. Part of the efforts in this process is finding the money (capital) with which to purchase raw materials and other inputs, pay running expenses and other financial, maturing obligations. Trade and distribution come between the manufacturers and final consumers, with those involved getting rewarded for completing the trade cycle.

The needs of the modern society however, transcend tangible products, as a large variety of services are provided by corporate entities and private individuals. For example, the provision of clean and efficient transportation services means many people would not need to buy and own private cars. In the circumstance, owning a car will not be part of the regular, long-term family budget. An employee of a transportation services organization of course, renders service to clients (i.e. commuters) under the services provided by his/her employer.

This completes the production cycle and now brings consumption into the picture. Products and services are sold and bought in a variety of ways, such that every probe of the value chains opens a vista for improvement and new business idea. But then, without a proper understanding of the nature of finance, the money rewards for the production efforts will yield little or no enduring value to the beneficiary.

So much about the analogy between life and finance. The central issues in finance are how to make legitimate money, and how to handle the money made in the nexus of spending and investing. The rest of this article deals with the principles of creating multiple streams of income, while subsequent articles in this series will examine the spending and investing principles.

PRINCIPLES OF MULTIPLE INCOME STREAMS

In the rapidly evolving world of finance, inflationary environment and expanding financial responsibilities that stress governments, corporate entities and private individuals, depending on one single source of income is becoming increasingly risky. As such, diversifying income sources makes much sense. But here, the focus will be on individuals.

To multiply is to have multiple plies, in which several strips are combined as one. One layer upon another provides insulation against value erosion of any single ply. The more diversified the sources of income are, the more likely an individual will gain sustainable financial independence. It is important though to be clear about where to start – there must be a primary source of income.

The first principle is to **start from where you are with what you have.** There must be some knowledge, skills, experience, and/or relationships that allow you to help someone or some organization solve a problem that they will be ready to pay you for. Have a financial goal in view – for some, it is to be financial independent, others consider basic comfort, while think mega. For sure though, you cannot have a desire to feast like a king when all you have access to is a plate of food!

The second principle is to **do something with what you have.** This hangs on the seed principle – that effort, assistance, care, voluntary work, contribution could just be the 'seed' that defines your economic engine. You then need to turn it on by getting up and start using it. Why should you ask for assistance and help when you can render assistance to someone at some place, some time to get rewarded for what you have done. Volunteer work also gets you noticed, working with passion for no pay or little stipend makes you visible to prospective employers and vision helpers. Until you have discovered and now key into your passion (something you find easy to do and will do without pay), you may just continue to wait for a jackpot that never comes.

The third principle is to **establish a primary income source.** This can be paid employment that gives you regular salary, or for a self-employed person who draws a fixed amount every month as a business owner. Whether you are paid employee or self-employed doesn't matter here, what matters is that you do everything within your capacity to sustain and protect that source. This requires that your hard work rests on three pillars:

1. Get adequate knowledge (the facts and figures as necessary) about what you do.
2. Get proper understanding of what you do. That is, interprets those facts in ways that make you different. If you repeat only what somebody else has said, your voice cannot be distinct in the market.
3. Apply rightly what now know and understand

The fourth principle is to **never venture into a new business until you have firmly established the existing income streams.** In business, this is called over-trading -- biting more than you can chew! If you look at all the successful diversified businesses around you, you will find that each of them started somewhere, but they did not completely abandon their primary trade or craft! Some either expanded into related businesses or integrated backwards or forward.

The fifth principle is to **explore a second source of income only when you have established the first**. You will never get to multiplication by abandoning what you had earlier started. Every income source you establish should be nurtured to maturity and stability, unless you a convincing business case to abandon it. Otherwise, the space you vacate in the market would be occupied by someone else! Let us assume that you chose to go into animal farming. You started with goats, mastered the animal up to the stage of proper understanding of how to make money from it and you successfully carried out the plan. You may now add another type of animal, say sheep, chicken or pigs, every of which has its peculiarities that you must find out and handle accordingly, if you want to make money from the venture. Making money from rearing goats, pigs and chicken represents multiple streams of income, but from a defined business line – animal farming.

The sixth principle is to **explore first the possibility of a related business activity before you diversify into a non-related business.** These happens in all business types, from professional services like business/financial consulting to trading and manufacturing. For example, established car dealers often offer maintenance service and repairs in addition to selling cars. They offer warranty which becomes voided once you take your car to service in a garage other than theirs. Coming down to a micro business, the woman selling 'akara' could readily add akamu or bread to complement, while the man selling shoes would consider complementing with polish, brush or some kind of wiping foam. As well, a retailer of soft drinks should also complement with bottled or satchet water, depending on location and event. Nothing prevents a plumber offering service of washing water tanks every three months. The idea then is to seek income diversification by simply asking "what else does anyone that buys my product need in order to make good use of what I sell?" If you cannot do any of these directly, is it possible to organize those that do it or find business for them?

The seventh principle is to **constantly check the state of affairs of your income sources.** This is called performance management or scorecard analysis. Never get so satisfied with what any particular income source is yielding and then abandon caring for it or make an assumption that it will always be so. If you do, someone else will take it from behind. And if that happens, your renewed and peculiar knowledge of that income source should enable you to look for it, find it and bring it back!

The eighth principle is **not to dabble into what you don't understand.** This is the flip side to the three pillars mentioned in the third principle, and it is the easiest route to loss and shame. Whatever job or business you have a passion for, study it and interview with those already in it (both the successful and failed); become an *expert* in it. Where applicable, do a pilot test, instead of plunging into it headlong and with all your precious limited resources!

The ninth principle is **not to go into a partnership until you are fully persuaded.** The persuasion (or desperation) to diversify income sources may lead into avoidable loss and pain. There are four basics to give attention to if you seek successful partnerships in income diversification:

1. Conduct analysis of the venture and be sure you understand its dynamics -- how the business will make money and what it will cost to operate it.

2. Make sure you have a written agreement with your prospective partner(s), covering among several things profit sharing/retention, growth plans, exit plans, dealings with family members, etc.

3. Assure yourself that the person (may be one of the partners) that will run the business is of proven and demonstrable integrity.

4. Ensure monthly performance reports are produced, analyzed, discussed and the business/accounts are audited by independent auditors.

The tenth principle is to **always remember where you started from -- the source.** It is good to always acknowledge the beginning, as a pointer of hope to those who are just starting out. Do not despise the days of small beginnings, as no big corporate entity you see around today started big.

Conclusion

Money and more money is what most governments, corporate entities and private individuals want, but not all of them give serious enough attention to how to grow, strengthen and sustain multiple streams of income. This is very evident in public finance in Nigeria and all around the world, but the principles enunciated in this article are hardly considered, let alone followed.

As such, it is important to state that it is not enough to know and learn these principles; it is more important to practice them. Working and respecting these principles over a long period of time results in starting the journey to wealth creation.

'Biodun Adedipe. Ph.D., FCIB, MIoD
Chief Consultant, BAA Consult

THE FEDERAL COMPETITION AND CONSUMER PROTECTION ACT

–IMPLICATIONS FOR THE NIGERIAN WOMAN

Globally, there has been a growing consensus on the positive correlation between female participation in economic activities and increased growth and efficient management of resources. A recent study by McKinsey Global Institute found that $12 trillion could be added to global GDP by 2025 if female participation in the public, private and social sectors of the economy increased. Despite the increasing participation of women in politics across the world, albeit at a scale still far behind the male counterparts, these achievements of the few who have managed to break the glass ceiling has been likened to a 'cartel'[1], where only the powerful are admitted whilst the rest are shut-out from making inroad into political relevance.

The narrative rings true for Nigeria where an average of only 6.7% of women are represented in politics either through elected or appointed positions[2]; 22% of bank boards are female as opposed to a CBN target of 40%[3], and according to the World Bank, just 17.52% of 15-64 year-old women were engaged in some sort of employment in 2017. A 2013 survey by the Small and Medium Enterprises Development Agency of Nigeria (SMEDAN) showed that 23% of small or medium sized enterprises (SMEs) were owned by women and although this increased to 43% for micro enterprises (MSMEs), they are not captured as part of the economic activity as they relate to the informal sector.

Several steps have been taken globally and in the local environment to drive broad-based inclusive economic growth and close gender gap largely as a mechanism for poverty reduction and in the pursuit of shared prosperity. Development institutions such as the Bank of Agriculture, Bank of Industry have rolled out series of intervention funds targeted at enhancing access to finance for women as part of the growing effort to drive financial inclusion for all. Similarly, several regulations, even though gender-neutral, have been targeted at eliminating barriers to participation in several sectors which have traditionally impaired ability of women to compete.

One of such is the recent regulation passed by the President Muhammadu Buhari government - The Federal Competition and Consumer Protection Act (FCCP), which came into effect on February 6, 2019. The Act repeals the Consumer Protection Act Chapter 25, Laws of the Federation Nigeria 2014 and Sections 118-128 of the Investment and Securities Act which regulated Mergers and Acquisitions (M&As) via the Securities and Exchange Commission (SEC) and "establishes the Federal Competition and Consumer Protection Commission and the Competition and Consumer Protection Tribunal; for promotion of competition in the Nigerian markets at all levels, by eliminating monopolies, prohibiting abuse of a dominant market position and penalizing other restrictive trade and business practices"[4].

COMPETITION AND CONSUMER PROTECTION LAW – HISTORICAL CONTEXT[5]

Even though anti-trust laws have been used sparingly in emerging markets including Nigeria owing to the paucity of M&A transactions and industry maturity, they have been of tremendous weaponry in developed markets including the US and European Union that have had to rein-in powerhouses with oligopolistic tendencies from decimating competition, leaving consumer with fewer choices. The much-publicized case between the European Union and Microsoft and recently, the blockage of AT&T's acquisition of Time Warner by the US Department of Justice are some of examples of how governments and agencies have risen to protect consumers through the promotion of competition.

In the Nigerian context, it has been a long road, littered with near misses and failed attempts at passing the bill that ensures fair competition in the market place, leading to strangleholds on a number of industries by dominant players

[1] Hubbard, How Monopolies Make Gender Inequality Worse, Forbes, 2017

[2] Oloyede, Monitoring Participation of Women in Politics in Nigeria, National Bureau of Statistics (NBS), 2016

[3] Ogwu, Women occupy only 22% of board seats out of 21 banks, Daily Trust, 2018

[4] Federal Competition and Consumer Protection Act, 2018

[5] Prince I. Mbanefo, The Birth of Competition Law in Nigeria, 2016

such as flour production, noodles production, cement and beverages. The first real attempt was made by the Bureau of Public Enterprise (BPE) in 2003 when the agency drafted the first competition bill for consideration by the National Assembly, followed by the competition bill drafted in 2006 by the Federal Ministry of Justice. The former bill was not considered while the latter was passed by the Federal Executive Council but rejected by the Senate owing to concerns that it did yielded too much power to future ministers of the competition agency and would result in too much political control thereby reducing the autonomy required for the law to be effectively implemented.

Following the National Assembly's decision in 2006, a forum of BPE consultants, lawyers and practitioners came together to redraft the bill addressing the identified shortcomings of the previous version but this was again thrown out by the National Assembly. In 2008, another bill was drafted revising the previous bill and recommending the creation of a Nigerian Trade and Competition Commission. The bill passed the first and second reading at the Senate but stalled thereafter.

Despite the uproar and clamor from various stakeholders such as the Nigeria Employers' Consultative Association (NECA), Enhancing Nigeria Advocacy for a Better Business Environment (ENABLE)+, law firms, prominent lawyers there have been no success until February 2019.

Outline of the FCCP Law

Key highlights of the new regulations are highlighted below:

On Implementation: The new law will be enforced by an independent FCCP Commission to secure the rights of all consumers and ensure safe products and efficient markets, through the creation of the FCCP Tribunal to handle any issues or disputes arising from non-compliance with the regulation. This new structure of an independent Tribunal re-directs issues regarding competition from the Federal High Court per the Nigerian Constitution, to the FCCP Tribunal. This will among others, ensure quick resolution of complaints and issues identified.

On Restrictive Agreements: Agreements such as those undertaken by trade associations which fix price, segment markets by allocation of customers, suppliers, territories etc. or limit production are strictly prohibited. Both consumers and competitors stand to gain from the implementation of this regulation which promotes a fairer playing field for businesses and prices for consumers.

On Abuse of a Dominant Position: Charging excessive prices, refusing competitor access and engaging in exclusionary acts are prohibited. A dominant position is defined as the ability to take action without consideration of the reaction of consumers or competitors, enjoying a position of economic strength and/or having dominant market share as defined by the FCCP Commission. This section of the law protects smaller businesses from being bullied by larger corporates, also protecting consumers from higher prices compared to the value they derive.

On Price Regulation: Power is given to the President to control prices in a specified industry on the recommendation of the FCCP Commission if there is concern that competition might reduce or the consumer interest could be compromised.

On Sanctions: Violation of the law for individuals will result in either a jail term up to three years or a fine of N10 million. For corporates, once convicted, will be made to pay a fine up to 10% of previous year's turnover and each of their directors will additionally face sanctions as described for individuals. The sanctions are divergent from most

Nigerian law which require the convicted to compensate victims as punitive measures. Rather under the new law, individuals and corporates face significant measures which will impact them personally and their bottom lines directly. This bolder move is a step in the right direction to ensuring compliance with the regulation across all levels.

Implications of the FCCP Law for the Nigerian woman

Aside from the obvious benefits of the FCCP for all consumers such as improved and increased choice due to a greater number of industry players offering more innovative products, there are some benefits that could arguably accrue to women more than men.

Nigerian consumers at large are at a disadvantage due to inadequate knowledge of their consumer rights. The diversity of Nigerian consumers also means that they do not face a 'one-price-fits-all' choice of goods and services. In some cases, such as with e-commerce, women are generally perceived as willing to pay higher compared to men which leaves them susceptible to higher pricing. The new consumer protection law could address some of these differences if adequately enforced to ensure that prices are determined by market forces rather than gender. Additionally, price fixing in the form of trade agreements or information asymmetry are also forbidden under the new law and consumers have a right to information in a plain and understandable language with proper labelling. Consumers can therefore make better-informed choices and self-select their price point based on their perceived value of a product.

The consumer protection law is also expected to improve the quality and safety of products available in the markets. In recent times, the Standards Organization of Nigeria (SON) and National Agency for Food and Drug Administration and Control (NAFDAC), have complained of the increase in fake and sub-standard products in Nigeria many of which women have fallen victim. Beauty items such as make-up and hair products and food items such as rice, margarine and cooking oil are some of the products which have been substituted with sub-standard or fake replicas and sold at market prices. While the onus has previously been on consumers to provide evidence that the products they purchase are substandard, the new law shifts this responsibility to the manufacturers to prove their products meet the expected and marketed quality. Those who fail to do so will be made liable and charged up to 10% their annual turnover in fines.

Implementing the FCCP Law

The passing of the FCCP bill into law was a major first step to securing better value for consumers through competitive markets. However, the effectiveness of the FCCP regulation is dependent on its implementation by the FCCP Commission and awareness of the law on the part of consumers. As the Commission develops its strategy for implementation of the law, and to ensure that the intended value of the law is realised, some key factors must be considered in its implementation:

Knowledge and Competence of the Commission and Tribunal: As Nigeria's first competition law, the FCCP is new to both its enforcers and those it intends to govern. The Commission must educate its staff on the new competition law through mandatory trainings and engagements which prepare them for effective implementation of the law.
Awareness drives such as workshops via various channels such as social media, tv networks, radios etc to educate consumers on their rights are essential to making the FCCP law effective. This is particularly important if the Commission is to gain trust of consumers in its interpretation and enforcement. A lack of understanding or inefficient interpretation of the regulation could encourage businesses to develop a perception that the Commission is ill-equipped to adequately enforce the law encouraging them to not comply. For consumers, this could be detrimental particularly for women who are at a greater disadvantage when it comes to anti-competitive behaviour.

Another key concern could be the ability of the Commission to adequately police competition in Nigeria given that the former Consumer Protection Council (CPC), which will now become the Competition and Consumer Protection Commission, previously did not focus on competition. It is very rare that Competition and Consumer Protection are governed by the same body and this raises the question on whether the Commission has the required expertise to effectively manage competition in Nigeria. Furthermore, in the event that there is a conflict between consumer protection and competition, where the Commission focuses its priority could severely affect women.

The competence of the Commission and Tribunal is therefore important as the Act recommends that members among other qualifications should also have some expertise in competition law. Given that this is the first competition law in Nigeria, it is recommended that some members of the Commission and Tribunal have served in markets where competition law has effectively been implemented and functions largely as designed. This will augment the competency of both bodies in enforcing and presiding over cases related to competition.

Prominent Gender Representation: For the FCCP to be able to influence gender equality, it is important that there is adequate representation of females to champion the cause. The government has a target of 35% females in political positions at every level, which the National Council of Women Societies has increasingly put pressure on the president to adhere to. This must also be demanded of the authorities responsible for implementation of the FCCP law. The FCCP Commission for example, currently only has 20% representation of women as directors. Although these women hold strategically important roles to the implementation of the law – Director of Surveillance and Enforcement and Director of Consumer Education – for the real issues facing women in the market place to be addressed, they need higher representation where it matters.

Collaboration with other Agencies: The expansive mandate of the FCCP Commission will require sufficient financing and human capital to effectively implement across the country. The commission can quickly achieve scale and resources by designating authority to existing agencies such as NAFDAC, SON, SEC etc. to assist in carrying out some duties.

For sectors where regulatory commissions already exist, such as telecommunications which has become a large contributor to economic advancement and GDP, these regulatory bodies should be allowed to continue under the authority of the FCCP Commission. This will help foster a collaborative effort towards achieving more competitive markets and fair and efficient options for consumers and also present a united front to businesses when dealing with the regulatory bodies and the Commission, and limit conflict in implementing the FCCP law across all industries.

Independence of the Commission: The Commission's autonomy must be upheld for the FCCP law to be effectively implemented. Interference from the government or favoritism as a result of relationship or expected benefits, as can be common in Nigeria, must not be encouraged. The Commission must remain impartial in discharging its duties to ensure all businesses are fairly assessed by the law, and consumers receive fair hearing of complaints raised.

Clarity of Jurisdiction: Pursuant to Section 251(1)(f) of the 1999 Constitution of the Federal Republic of Nigeria, the Federal High Court has jurisdiction over matters relating to monopolies. However, the new regulation appoints the FCCP Tribunal to preside over all competition-related cases, giving it equal ranking with the Federal High Court. By design, this should facilitate quicker resolution of issues. However as was seen recently the Code of Conduct Tribunal, the Federal High Court was able to interfere in the activities of the Tribunal. It is important that jurisdictional overlap is avoided so that the Tribunal can effectively carry out its duties and consumers can have access to quick and fair judgements on issues raised.

Conclusion

The challenges of implementing competition law in Nigeria are great, but the government's willingness to pass this law, fifteen years after it was initially proposed highlights that perhaps there is a realization of the value lost in not regulating our market structures. The FCCP law could be the catalyst to creating a more conducive business environment for female entrepreneurs. Even though this law will not constitute 'silver bullet' in closing the gap on gender equality as the regulation does not directly address issues such as the gender wage gap and segmentation, it will go a long way in increasing access to female participation in economic activities thereby enhancing the objective of empowerment for women. Nevertheless, it remains to be seen if increased female participation translates to economic growth given the higher costs of running a business in the formal sector.

Otunba 'Debola Osibogun
President,
Consumer Awareness and Financial Enlightenment Initiative (CAFEi)