



SCUML

SPECIAL CONTROL UNIT AGAINST MONEY LAUNDERING

ANNUAL REPORT 2018

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ABBREVIATIONS

SCUML	SPECIAL CONTROL UNIT AGAINST MONEY LAUNDERING
CBTR	CASH BASED TRANSACTION REPORT
CTR	CURRENCY TRANSACTION REPORT
DNFI	DESIGNATED NON FINANCIAL INSTITUTION
FATF	FINANCIAL ACTION TASK FORCE
AML/CFT	ANTI MONEY LAUNDERING AND COUNTERING THE FINANCING OF TERRORISM
WMD	WEAPONS OF MASS DESTRUCTION
MLPA	MONEY LAUNDERING PROHIBITION ACT
EFCC	ECONOMIC AND FINANCIAL CRIMES COMMISSION
UNODC	UNITED NATIONS OFFICE ON DRUGS
EU	EUROPEAN UNION
GIABA	INTERGOVERNMENTAL ACTION GROUP AGAINST MONEY LAUNDERING
ROLAC	RULE OF LAW FOR ANTI-CORRUPTION

1.1 ABOUT SCUML

- SCUML was established by the Federal Government in September 2005 in compliance with the provisions of the Money Laundering (Prohibition) Act, 2004 which was subsequently amended to Money Laundering (Prohibition) Act 2011 (as amended).
- SCUML was created as part of measures for the implementation of the Financial Action Task Force (FATF) Recommendations on Anti- Money Laundering /Combating the Financing of Terrorism (AML/CFT) in Nigeria.
- The FATF requires Countries to implement 40 Recommendations which are considered as international standard for combating money laundering and terrorist financing as well as the financing of the proliferation of weapons of mass destruction (WMD).
- The recommendations include amongst others the establishment of Legal and Institutional framework for the effective implementation of the AML/CFT measures in all Countries. This led to the enactment of the Money Laundering (Prohibition) Act, 2011 (as amended) and the Terrorism (Prevention) Act, 2011, (as amended) in Nigeria.
- SCUML was created under the Money Laundering (Prohibition), Act, 2011 (as amended) to implement specific sections of the Act in line with the FATF recommendations for the implementation of AML/CFT measures within the Designated Non- Financial Institutions (DNFIs) Sector in Nigeria.
- SCUML is statutorily under the Federal Ministry of Industry, Trade and Investment but operationally domiciled within the Economic and Financial Crimes Commission (EFCC) as the Commission drives the operational activities of the Unit in line with Sections 6(C) and 7(2) of the EFCC Establishment Act, 2004.

1.2 VISION

To be an effective and efficient Unit for the supervision and regulation of DNFBPs in Nigeria for AML/CFT compliance in line with international best practices.

1.3 MISSION STATEMENT

To protect the DNFBPs Sector in Nigeria from the threats of money laundering and the financing of terrorism and proliferation: thereby strengthening the integrity of the Nigerian financial system and contributing to the global fight against money laundering, terrorism financing and the financing of proliferation of weapons of Mass Destruction.

1.4 MANDATE OF SCUML

SCUML has the mandate to monitor, supervise and regulate the activities of DNFBPs in Nigeria in consonance with the Nigeria's AML/CFT regime. The DNFBPs as defined under section 25 of the Money Laundering (Prohibition) Act, 2011 (as amended) are:

- Dealers in Jewellery
- Car dealers
- Dealers in luxury goods
- Audit firms
- Tax consultants
- Clearing and settlement companies
- Supermarkets
- Casinos, Pool Betting and lottery businesses
- Law firms, notaries, and other independent legal practitioners
- Accountants and Accounting Firms
- Trust and Company Service Providers
- Estate Surveyors and Valuers
- Dealers in precious stones and metals
- Non-governmental organizations (NGOs, NPOs, FBOs, CSOs)
- Importers and dealers in cars or any other automobiles
- Construction companies
- Consultants and consulting companies
- Hospitality Industry
- Real estate agents, Estate developers, Estate Agents and Brokers
- Mortgage Brokers
- Dealers in mechanized farming equipments and machineries

- Practitioners of mechanized farming.

1.5 FUNCTIONS OF SCUML

SCUML performs the following key functions to actualise its mandate:

- Registration of DNFI in Nigeria.
- Sensitization of DNFI in Nigeria on their compliance obligations, under the Money Laundering (Prohibition) Act 2011 (as amended) and the implementation guidelines.
- Monitoring and supervision of the activities of DNFI as it relates to AML/CFT.
- Conducting off-site, on-site, and spot checks inspection of DNFI.
- Taking necessary enforcement actions to ensure compliance with the AML/CFT Laws and Regulations.
- Collection of statutory reports: Cash based transaction reports (CBTRs) and Currency Transaction Reports (CTRs) for onward forwarding to the Nigeria Financial Intelligence Unit (NFIU).
- Establishment and maintenance of comprehensive database of DNFI and their financial transactions to support tactical, operational and strategic analysis as well as policy options in combating ML/FT.
- Strategic analysis using available data to identify emerging trends and patterns in money laundering and terrorist financing.
- Provision of vital information relating to DNFI money trails to assist criminal investigations by Law Enforcement Agencies in order to boost the fight against economic and financial crimes within the DNFI sector in Nigeria.
- Collaboration with stakeholders to ensure compliance with AML/CFT measures within the DNFI sector in Nigeria.

1.6. OPERATIONAL STRUCTURE AND ORGANOGRAM

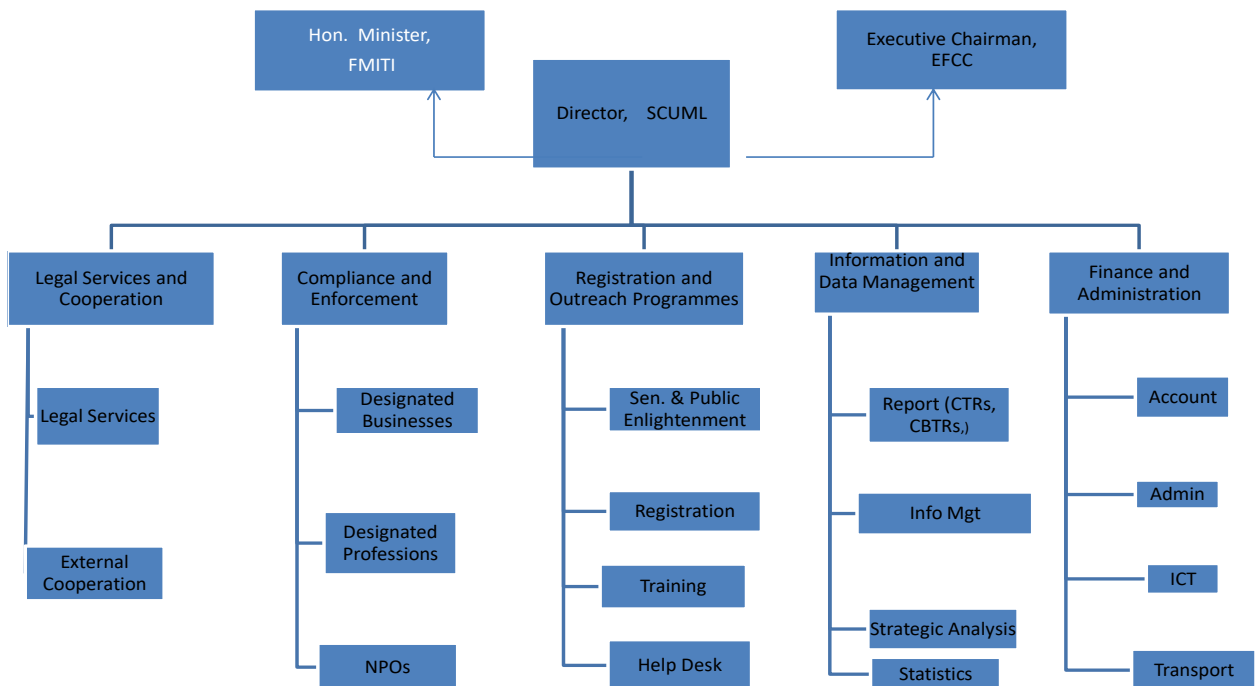
SCUML has its Head Office in Abuja and Eight (8) Offices located in Lagos, Port Harcourt, Enugu, Kano, Kaduna, Gombe, Ibadan and

Maiduguri. Operationally, SCUML is divided into five Sections as follows:

- i. Compliance & Enforcement;
- ii. Registration and Outreach Programme;
- iii. Information & Data Management; and
- iv. Finance and Administration.
- v. Legal Services and Cooperation

The Director of SCUML has dual reporting obligations to the Minister and to Executive Chairman respectively as shown in the diagram 1 below:

Diagram 1: Organogram of SCUML



1.7. STAFF STRENGTH

The staff strength of SCUML as at 31/12/2018 was 63 distributed across the offices as follows:

- Abuja - 31
- Lagos - 10
- Port Harcourt - 7
- Kano - 6
- Enugu - 4
- Gombe - 2

- Kaduna - 1

- Maiduguri - 1

- Ibadan - 1

The staff of the Unit are drawn from the Federal Ministry of Industry, Trade and Investment (FMITI) and the Economic and Financial Crimes Commission (EFCC). Out of 63, a total of 55 staff are from the Commission ,while the Ministry has 8.

1.8. FUNDING

During the year under review, the Unit was funded singlehandedly by the Commission (EFCC). There had been no financial support from the Ministry since 2012.

2.0 TASKS ACCOMPLISHED

During the year under review the Unit carried out the following operational activities in line with its operational mandate:

2.1 INSPECTION OF DNFIS

SCUML conducted compliance inspection on **952** DNFIs across the Country in 2018 to ensure compliance with the Nigeria's AML/CFT regime. Table 1 indicates the inspection exercises conducted on DNFIs by SCUML across various states of the Federation and the FCT.

Table 1: No. of DNFIs Inspected in 2018 in various States of the Federation.

S/N	STATE	NO. OF DNFIS INSPECTED
1	ABIA	21
2	ADAMAWA	8

3	AKWA IBOM	14
4	ANAMBRA	36
5	BAUCHI	20
6	BAYELSA	16
7	BENUE	Nil
8	BORNO	03
9	CROSS RIVER	Nil
10	DELTA	11
11	EBONYI	18
12	EDO	Nil
13	EKITI	Nil
14	ENUGU	40
15	FCT	50
16	GOMBE	22
17	IMO	30
18	JIGAWA	14
19	KADUNA	19
20	KANO	23
21	KATSINA	21
22	KEBBI	Nil
23	KOGI	23
24	KWARA	Nil
25	LAGOS	80
26	NASSARAWA	18
27	NIGER	14
28	OGUN	08
29	ONDO	09
30	OSUN	Nil
31	OYO	Nil
32	PLATEAU	Nil
33	RIVERS	410
34	SOKOTO	05
35	TARABA	07
36	YOBE	05
37	ZAMFARA	07
	TOTAL	952

Table 2 below provides a Sectorial breakdown of the number of DNFI's inspected during the year under review across the zonal offices of SCUML and the Head Office, Abuja.

Table 2: Sectorial breakdown of DNFI's inspected in each of the SCUML Offices in 2018

SECTOR	ZONES							
	ABUJA	LAGOS	PORT HARCOURT	GOMBE	BORNO	ENUGU	KANO	TOTAL
LUXURY GOODS: (i.e. Jewelries, Precious stone & metals, super markets & car dealers)	20	29	61	03	01	08	43	165
REAL ESTATE: (i.e. Real estate agents, Developers & brokers, Construction companies, Estate surveyors and valuers, Mortgage Brokers etc)	28	23	198	01	01	21	13	285
PROFESSIONALS: (i.e., Legal Practitioners, Chartered Accountants, Tax Consultants, etc)	03	13	34	18	Nil	05	03	76
NON-PROFIT ORGANISATIONS	13	09	46	30	05	15	08	126
HOTELS & HOSPITALITY	41	23	112	05	01	96	22	300
TOTAL	105	97	451	57	08	145	89	952

It is worthy to note that SCUML recorded 2 convictions for non-compliance with relevant sections of the Money Laundering Prohibition Act (2011) as amended. See table 3 for details

Table 3: Summary of SCUML Operational Activities from 1/1/2018-31/12/2018

Location	No. of Non-Compliance Cases Under investigation	No. of Non-Compliance Cases In Legal Dept	No. of Non-Compliance Cases in Court	No.of Conviction	Recoveries Made
Enugu	8	Nil	Nil	Nil	Nil
PH	25	4	1	Nil	Nil
Lagos	7	8	Nil	Nil	₦1M
Kano	22	Nil	Nil	1	Nil
Gombe	5	2	2	Nil	Nil
Kaduna	Nil	Nil	Nil	Nil	Nil
Ibadan	Nil	Nil	Nil	Nil	Nil
Maiduguri	3	Nil	Nil	Nil	Nil
Kebbi	Nil	Nil	Nil	1	Nil
Total	70	14	3	2	₦1M

2.2 SENSITIZATION OF DNFIS

SCUML carries out sensitization activities to sensitize DNFIs of their compliance obligations under the AML/CFT Laws and Regulations in Nigeria. During the year under review a total of **8,501 DNFIs** were sensitized. The breakdown of the number of DNFIs sensitized in each across the Zonal Offices of SCUML and the Head Office, Abuja is provided in the table 4 below:

Table 4: NO. OF DNFIS SENSITIZED PER ZONE (JAN-DEC 2018)

ZONE	NO.OF DNFIS SENSITIZED
ABUJA	4,847

ENUGU	239
GOMBE	175
KANO	235
LAGOS	1,516
PORT HARCOURT	785
KADUNA	305
IBADAN	335
MAIDUGURI	64
TOTAL	8,501

2.3 REGISTRATION OF DNFIS

SCUML has the mandate to register all DNFIs in Nigeria in line with Section 5 of the Money Laundering (Prohibition) Act, 2011 (as amended). The registration is done online through the SCUML website www.scuml.org.

The total numbers of DNFIs registered by SCUML from inception 2005 to December, 2018 stood at 62,888 however, during the year under review, a total of 11,401 DNFIs were registered. Table 5 below provides the breakdown of the number of DNFIs registered by SCUML from January to December, 2018 in each state of the federation and the FCT.

Table 5: No. of DNFIs Registered per State from January – December, 2018

S/N	States	No. of registered DNFI
1	ABIA	72
2	ADAMAWA	65
3	AKWA IBOM	105
4	ANAMBRA	104

5	BAUCHI	43
6	BAYELSA	40
7	BENUE	94
8	BORNO	81
9	CROSS RIVER	43
10	DELTA	197
11	EBONYI	26
12	EDO	157
13	EKITI	20
14	ENUGU	188
15	FCT	4660
16	GOMBE	31
17	IMO	89
18	JIGAWA	15
19	KADUNA	418
20	KANO	282
21	KATSINA	48
22	KEBBI	14
23	KOGI	173
24	KWARA	92
25	LAGOS	2237
26	NASSARAWA	352
27	NIGER	204
28	OGUN	180
29	ONDO	60
30	OSUN	56
31	OYO	283
32	PLATEAU	175
33	RIVERS	719
34	SOKOTO	24
35	TARABA	18
36	YOBE	22
37	ZAMFARA	14
	TOTAL	11401

2.4 PROVISION OF VITAL INFORMATION RELATING TO DNFIS TO ASSIST CRIMINAL INVESTIGATIONS BY LAW ENFORCEMENT AGENCIES

SCUML received Information Requests from Law enforcement agencies and provided the required information accordingly. Table 6 below indicates the number of information request received from Law enforcement agencies and the number of responses provided.

Table 6: Number of requests for information received and the number of

responses provided.

ORGANIZATION	NO. OF INFO. REQUEST RECIEVED	NO. OF RESPONES PROVIDED
EFCC	31	31
NFIU	3	3
NIGERIAN POLICE FORCE DEVELOPMENT & EMPOWERMENT UNIT	1	1
TOTAL	35	35

2.5 COLLECTION OF STATUTORY REPORTS

In compliance with Sections 5 and 10 of the Money Laundering (Prohibition) Act 2011 (as amended), SCUML receives Cash Based Transaction Reports (CBTRs) and Currency Transaction Reports (CTRs) from DNFI's for onward forwarding to the Nigeria Financial Intelligence Unit (NFIU).

Table 7 below indicates the number of CBTRs and CTRs received from DNFI's and forwarded to NFIU in 2018.

Table 7: Breakdown of CBTRs/CTRs received and forwarded to NFIU from January – December, 2018.

DNFI's	No. of CTRs/CBTRs Received & forwarded to NFIU
Accounting/Audit firms	158,550
Legal Practitioners	7

Trust & Company Service Providers	2,547
Automobile (Car Dealer)	5,218
Casinos and Pool Betting	7,476
Real Estate, Estate Surveyors, etc	5,472
Hospitality Industry	8,502
NGOs/Religious Organizations	3,283
Super Markets	3,215
Nil	6,350
TOTAL	200,620

2.6 TRAININGS

During the year under review, SCUML staff benefitted from various training programs sponsored by the Commission, UNODC as well as British Council under the Rule of Law for anti-corruption programme as indicated in tables 8A & B and C respectively below:

Table 8A: Training/workshops/conferences and programs attended by SCUML staff in 2018.

S/N	ORGANISERS	TITLE	LOCATION	DATE	NO. OF BENEFICIARIES
1	MENAFATF	Workshop on Typologies GIABA	Rabat Morocco	22 nd -25 th January 2018	1
2	EFCC	Essential Features and functions of Microsoft excel for data analysis	Karu, Abuja	19 th -21 st Feb 2018	10
3	GIABA	GIABA Technical/Plenary Meeting	Sally Senegal	7 th - 11 th May 2018	2
4	EFCC	Free ICT Training	Abuja	9 th -11 th May, 2018	3

5	EFCC	Effective Work Ethics & Attitudinal Change & Performance Improvement	Niger	13 th -16 th June,2017	1
6	EFCC	Training on essential Features and functions of Microsoft Excel for Data Analysis	Abuja	6 th -10 th Nov,2017	1
7	EFCC	Servicom unit one day workshop	Abuja	12 th May 2018	1
8	EFCC	Smart Strategies and creative thinkers programme	Kano	July 23 rd - 27 th , 2018.	1
9	EFCC	Effective communication and interpersonal skills	Lagos	30 th July-3 rd Aug 2018	1
10	EFCC	Essential features and functions of Microsoft excel for data analysis	Abuja	16 th July-18 th 2018	10
11	EFCC	Technical Workshop to review 2018 strategic plan	Enugu		1
12	EFCC	Basic terrorism financing course	Abuja	27 th -31 st August	2
13	EFCC	Conference on illicit financial flows	Abuja	14 th -15 th September	3
14	EFCC	GIABA National workshop on combating terrorism financing	Lagos	17 th -19 th	1
15	GIABA	30 th GIABA Technical commission/plenary meeting	Banjul Gambia	11 th - 16 th Nov 2018	1

Table 8B: UNODC/BRITISH COUNCIL sponsored training programs attended by SCUML staff in 2018

S/N	ORGANISERS	TITLE	LOCATION	DATE	NO.OF BENEFICIARIES
1	UNODC	Money Laundering Typologies & Indicators	Abuja	12 th -13 th Mar,2018	3
2	UNODC	Training on Money Laundering Typologies	Abuja	3rd-4 th May,2018	10
3	UNODC	Training on Money Laundering Typologies	Abuja	7 th -8 th May,2018	10
4	UNODC	Training on Money Laundering Typologies	Abuja	9 th -10 th May 2018	10
5	UNODC	Training on Money Laundering Typologies	Abuja	14 th -15 th May 2018	10
6	ROLAC/BRITISH COUNCIL	Sensitization of SRO/Trade Associations	Abuja	28 th -Nov 2018	7

2.6 TRAINING-PROGRAMMS ORGANIZED FOR DNFIs

A total of 52 DNFIs requested for training, which was delivered accordingly.

Table 8C: Number of trainings/Workshop programme Conducted by SCUML

S/N	ORGANISERS	TITLE	LOCATION	NO.OF PARTICIPANTS
1	SCUML in collaboration with NNGOs	Two(2)days regional workshop in collaboration with NNGO to sensitize NGOs on AML/CFT obligation	Abuja	100
2	SCUML	Training at Ajuji Greenwich Hotel	Abuja	13
3	SCUML	Training of NGOs (Dr Olawale Lukman Foundation & Mullard Fuller Foundation	Abuja	08

4	SCUML in collaboration with ROLAC	2 days workshop for sensitization of SROs on Preparation for Mutual Evaluation Exercise	Abuja	40
5	SCUML	Training of Twenty five (25) Chief Compliance Officers	Kaduna	25
6	SCUML	Training for Association of Car Dealer in Ibadan	Ibadan	34
7	SCUML	Training of Fifteen (15) DNFI's by Port Harcourt Zonal office	Port Harcourt	15
8	SCUML	Training for SROs ICAN,CENGOS,COREN, NIESV	Enugu	(4) SROs
9	SCUML	Training of Fifteen (15) DNFI's by Lagos Zonal office	Lagos	15

2.7 WORKSHOP ORGANIZED BY SCUML IN COLLABORATION WITH OTHER STAKEHOLDERS

The Special Control Unit against Money Laundering (SCUML) during the period under review collaborated with the British Council under the Rule of Law and Anti-Corruption (RoLAC) programme in Nigeria with the support of the European Union (EU) and outlined training programmes for Self Regulatory organizations (SROs) /Trade Associations and DNFI's in preparation for the forthcoming FATF/GIABA Mutual Evaluation of the Nigerian AML/CFT Regime scheduled for September 2019. The training was scheduled for 5 geopolitical regions of the country namely North Central, North East, North West, South West and South-South respectively. The first batch of the training was held between 28th and 29th November, 2018 at Abuja for SROs. The subsequent batches were slated to commence in the year 2019.

2.8 COLLABORATION AND PARTNERSHIP

SCUML also hosted the staff of two international agencies namely the Ghana

Revenue Service and the Ghana Financial Intelligence Centre who paid a one week working visit on the 13th -18th August, 2018. The visit was to under study the working operations of the Unit as a model in setting up Ghana supervisory body on the DNFBP sector.

2.9 MANAGEMENT TRAINING

Due to paucity of funds, there was no management training but there was a strategy session where all management staff met and deliberated on operational issues to achieve efficiency

3.0 ONGOING ACTIVITIES/NEW PLANS FOR IMPROVING THE PERFORMANCE OF SCUML

The Unit is currently implementing the under listed programmes to ensure operational efficiency

- Implementation of the second phase of DNFI Registration platform to upgrade the CBTRs/CTRs reporting system and improve the quality of SCUML database.
- Acquisition/deployment of new analysis tools for strategic analysis of CBTRs/CTRs.
- Harmonization of SCUML CBTRs/CTRs reporting template with that of NFIU currently NFIU uses goAML application which runs on XML (Extensible Markup Languages) While SCUML has Excel.
- Expansion of SCUML activities through opening of more offices for effective coverage of the DNFI sector. Currently SCUML has 9 functional offices which is grossly inadequate in view of size of the DNFI sector.
- Updating the SCUML Standard Operating Procedure (SOP) to accommodate new processes and procedure
- Updating the SCUML AML/CFT Compliance Manual to accommodate new Compliance techniques.
- Opening of SCUML offices in Benin, Uyo, Ilorin, Sokoto and Markurdi.

3.1 CHALLENGES/CONSTRAINTS

The Unit is faced with the following challenges which impedes its operational efficiency

- I. **Inadequate human, financial and technical resources** – SCUML do not have adequate human, financial and technical resources for effective supervision of DNFI sector for AML/CFT compliance.
- II. **Size and geographical spread of DNFI in Nigeria**- The huge size and the wide geographical spread of DNFI in Nigeria constitute a big challenge to effective supervision of the sector.
- III. **Legal Constraints**- Existing Court judgment on legal status of SCUML and the AML/CFT supervision of legal practitioners.
- IV. **Low level of AML/CFT Knowledge**. Most DNFI do not have the required knowledge/capacity to comply with AML/CFT laws and regulations.
- V. **Inadequate Office Space**: There is limited office space to adequately cater for the needs of Staff of the Unit.
- VI. **Operational Vehicle**: The existing vehicles are old and depreciated and has significantly increased the maintenance cost.

3.2 RECOMMENDATIONS

In view of the challenges highlighted above, the following recommendations are proffered:

- I. Improving funding of SCUML activities
- II. Enhance the number and quality of SCUML staff
- III. Provision of adequate technical resources (ICT Infrastructure)
- IV. Strengthen the legal and regulatory framework to ensure effective supervision and regulation of the DNFI sector.
- V. Increased public engagement through the use of social media platforms such as Twitter, Facebook and Instagram
- VI. Improve the level of cooperation and collaboration with AML/CFT

stakeholders for effective AML/CFT compliance

VII. Provision of operational vehicles.

3.3 CONCLUSION

In conclusion, I would like to re-iterate the need to improve funding for SCUML activities and also to build the human capacity for SCUML staff to ensure effective supervision of DNFIs for AML/CFT compliance. These measures, I believe, will go a long way in addressing the Money Laundering and Terrorist Financing risks identified in National Risk Assessment (NRA) for the DNFIs sector and also contribute to the achievement of the EFCC Strategic objectives contained in EFCC Strategic plan 2018-2023.