Overview of Data

With 23 FCPA case groups, Nigeria has the highest rate of FCPA enforcement in the world in relation to the size of its economy. It has low or very low scores for most transparency and governance indicators. FCPA enforcement in Nigeria focuses heavily on the oil and gas sector, accounting for 15 of the country's 23 case groups. Oil and gas services providers as well as more general service providers, from logistics to IT, have been involved in bribery in the sector. A wide range of government officials has been implicated in oil and gas related cases. An additional four cases were related to the telecommunications sector.

Corruption and Governance Indicators	Nigeria	G7 Average
Transparency International Corruption Perceptions Index	27	73
World Bank Control of Corruption Score	13	87
World Justice Project Rule of Law Score	43	76
Major Correlates of Corruption		
Nominal GDP Per Capita Percentile Rank	25	89
World Bank Government Effectiveness Score	15	89

All indicators are scores/100 or are percentile ranks, 100=best. Some scores have been adjusted accordingly. 1-33 34-66 67-100.

World Bank Enterprise Survey Responses	Nigeria	Top 10 Countries
Share of firms reporting at least one bribe request	40%	1.4%
Share of firms expected to give gifts to secure government contract	46%	1.9%
Share of firms expected to give gifts to officials to "get things done"	41%	1.5%
Share of businesses reporting corruption is a major constraint	25%	7.5%

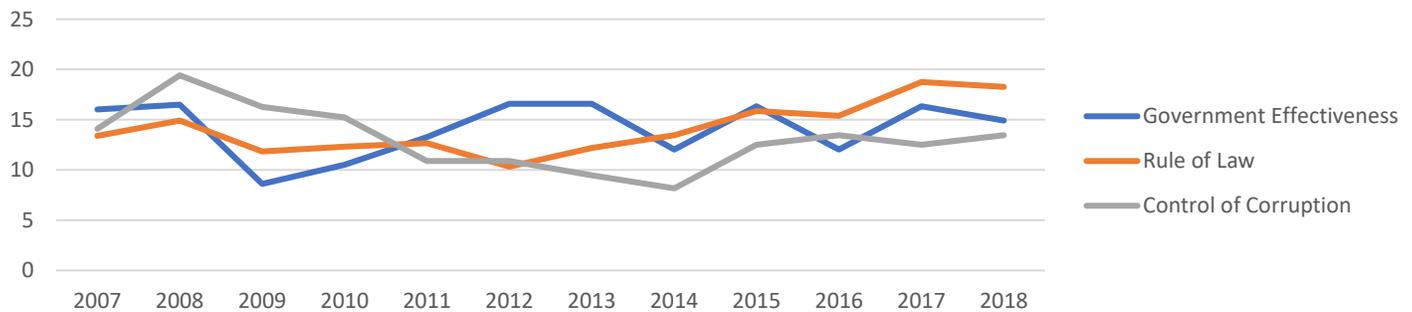## Illustrative FCPA Cases *(as reported)*   *Total FCPA Enforcement: 23 Cases*

● **ABB Vetco Gray**— The oil and gas services company allegedly made payments between 1998 and 2001 to government officials in exchange for inside information on bid tenders and to influence decisionmakers at the National Petroleum Investment Service. Authorities penalized affiliated companies again in 2007 for allegedly bribing Nigerian customs officials between 2002 and 2005.

● **Panalpina World Transport**— The logistics company was charged in 2010 with paying bribes to customs officials in multiple countries, including Nigeria, on behalf of its oil and gas services customers. The bribes were allegedly intended to bend rules or reduce tax burdens regarding the importation of equipment and supplies for Panalpina's customers.

● **Paradigm** — A 2007 pre-IPO due diligence review revealed that employees of the software company had likely bribed officials in multiple countries, including a reported payment of up to USD 200,000 to officials of the Nigerian National Petroleum Company to secure a data processing contract.
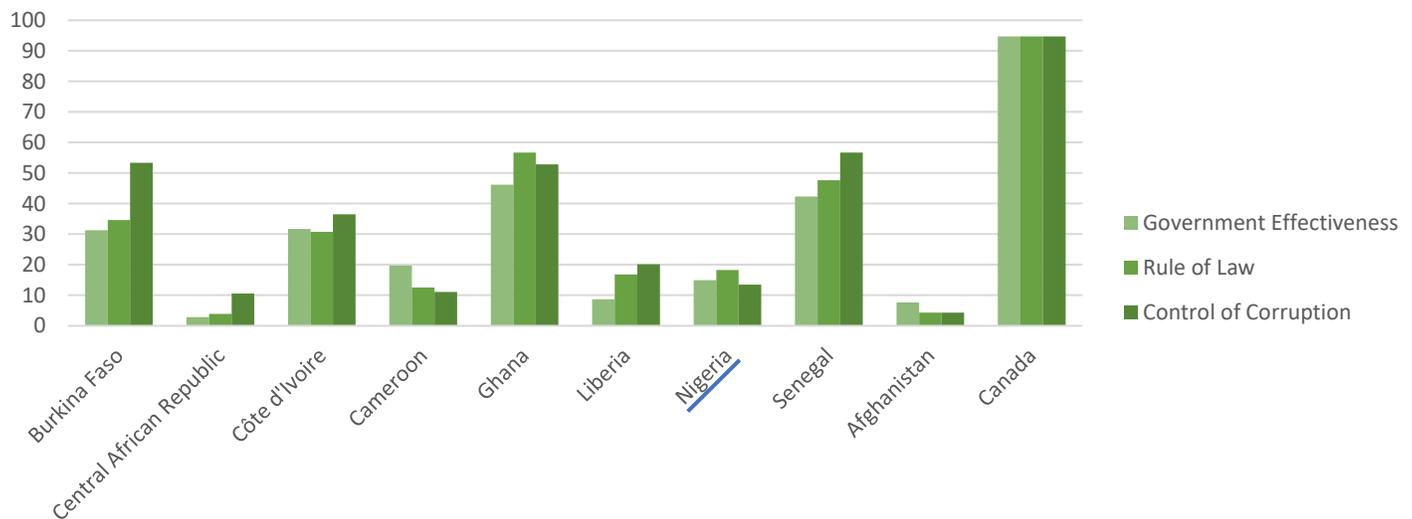
Information Accessibility and Transparency

Availability of Records	🟡	Full registration information requires in-country records retrieval. Shareholding information is generally available.
Freedom of Press	🟡	Reporters without Borders rank 119/180 (180=worst) Freedom House score 51/100, "partly free" (100=least free)
Language Accessibility	🟡	Official records are in English, as is most news media. Multiple indigenous languages may increase difficulty of obtaining first-person information.
Financial Disclosure	⚪	Tax Justice Network Financial Secrecy Score—No data.

🔴 *Poor* 🟡 *Moderate* 🟢 *Accessible*

Trendlines—World Bank Worldwide Governance Indicators (100=best)

Legend: Government Effectiveness, Rule of Law, Control of Corruption

Country Comparison—World Bank Worldwide Governance Indicators (100=best)

Countries: Burkina Faso, Central African Republic, Côte d'Ivoire, Cameroon, Ghana, Liberia, Nigeria, Senegal, Afghanistan, Canada

Legend: Government Effectiveness, Rule of Law, Control of Corruption

Context: Corruption in Nigeria

Corruption is pervasive in Nigeria, affecting all sectors and public and private domains. A high share of government revenue arising from natural resources facilitates corruption, as does an entrenched system of political patronage and rent-seeking among public officials. A UN report estimates that in 2016 more than 80 million bribes were paid to Nigerian public officials worth a total of USD 4.6 billion. In another recent report, PwC projects the costs of bribery over a 15-year period to amount to hundreds of billions of dollars in lost productivity. A high level of vigilance in vetting third-party vendors, consultants, and other business partners is recommended across all sectors and transaction types.