



AFRICA REGULATORY INTELLIGENCE GUIDE

November 2025 – April 2026

Legal and Regulatory Developments Across Africa

Period Coverage: November 2025 – April 2026

15+ Jurisdictions | Chronological Tracker | Action Items



Prepared by Moroom Africa Legal Consults | Working Group Member,
EuroCham Nigeria
Lagos · Abuja

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1. EXECUTIVE SUMMARY

The five (5) months between November 2025 and April 2026 have produced the most concentrated burst of regulatory change in recent African history. In Nigeria, the period witnessed the formal Federal Inland Revenue Service (FIRS) to Nigeria Revenue Service (NRS) transition, the commencement of the Nigeria Tax Act (NTA), the NRS's announcement of a ₦40.7 trillion revenue target, and the fast-approaching Central Bank of Nigeria's (CBN) recapitalisation deadline of 31 March 2026. Immigration reforms including the mandatory expatriate insurance and \$15 daily visa overstay penalties have moved from announcement to active enforcement.

South Africa, Burkina Faso, Mozambique, and Nigeria were officially delisted from the Financial Action Task Force (FATF) grey list, "jurisdictions under increased monitoring", on 24 October 2025. However, removal does not relax domestic obligations and previously identified action points. The South African National Treasury, for instance, published an exposure draft of the General Laws (Anti-Money Laundering and Combating Terrorism Financing) Amendment Bill 2025 (the "AML/CFT Bill") on 14 January 2026, and the implementation of the new Crypto-Asset Reporting Framework (CARF) effective from 1 March 2026.

Ghana's climate-related financial risk directive became effective for banks on 1 January 2026. The African Continental Free Trade Area (AfCFTA) entered its execution phase with the launch of the Africa Infrastructure Financing Facility on 14 February 2026 aimed at accelerating the preparation and financing of priority cross-border infrastructure projects in line with agenda 2023, the Pan -African Payment and Settlement System (PAPSS) expansion to over 150+ banks across 16 African countries, and the February 2026 approval of automotive rules of origin requiring that any vehicle or component with at least 40% African content can move across 54 African borders duty-free. African Growth and Opportunity Act (AGOA), a United States of America (USA) trade policy providing duty-free and limited non-reciprocal preferential market access to the USA market for eligible Sub-Saharan African Countries was extended through December 2026 on 3 February 2026.

On data protection, 2025 was characterised as the year African enforcement "grew teeth"—with 44 countries having enacted data protection laws, rising fines, criminal convictions, and the race to enact Africa's first dedicated Artificial Intelligence (AI) law underway. Angola issued cybersecurity presidential decrees in December 2025, and the Common Market for Eastern and Southern Africa (COMESA) Competition Commission introduced a suspensory merger regime with early 2026 clarifications.

This guide tracks each development chronologically, identifies the specific compliance obligations arising during this period, and provides a practical action matrix for Moroom Africa's clients and partners.

2. REGULATORY TIMELINE: NOVEMBER 2025 – APRIL 2026

This guide highlights significant legal and regulatory events during the reporting period. Each entry is dated to the extent verifiable from official sources.

November 2025

24 Oct 2025 South Africa, Burkina Faso, Mozambique, and Nigeria Exit FATF Grey List

South Africa, Burkina Faso, Mozambique, and Nigeria were officially delisted from the Financial Action Task Force (FATF) grey list, “jurisdictions under increased monitoring”. The exit validates strengthened Anti-Money Laundering and Combating Terrorism Financing (AML/CFT) frameworks but triggers the next phase: the 2026–2027 FATF Mutual Evaluation, which will assess practical implementation effectiveness.

Nov 2025 FSCA Aligns to COFI Bill Ahead of Enactment

The Financial Sector Conduct Authority (FSCA) confirmed it has begun aligning its supervisory approach to the principles of the Conduct of Financial Institutions (COFI) Bill despite the COFI Bill not yet being enacted, signalling a defacto shift to outcomes-based regulation. The COFI Bill was published on 14 January 2026 by the National Treasury for public comments.

Nov 2025 Liberia: Cybercrimes Act 2025 Passed

Liberia's Parliament passed the Cybercrimes Act 2025, expanding the functions of the Liberia Computer Emergency Response Team and criminalising offences including identity intrusion.

Nov 2025 Kenya: National AI Strategy 2025–2030 Launched

Kenya launched its National AI Strategy alongside a draft AI Code of Practice and preparations for a forthcoming Robotics and AI Bill. The strategy covers skills, infrastructure, ethical frameworks, and safety mechanisms. A draft Data Protection Amendment Bill was also advanced to strengthen user rights.

December 2025

Dec 2025 Nigeria: FIRS Formally Rebrands as NRS

The FIRS formally rebranded as the Nigeria Revenue Service (NRS) following the enactment of the Nigeria Revenue Service Establishment Act, 2025. At a ceremony on 30 December 2025, NRS Executive Chairman Dr. Zacch Adedeji unveiled the new logo and corporate identity, describing it as “a renewed commitment to a unified, service-driven revenue system.” The NRS has an expanded mandate covering all federal tax and non-tax revenue collection.

Dec 2025 **Botswana: Cybersecurity build deliberation**

Botswana's Parliament deliberated on the draft Cybersecurity Bill to strengthen the institutional framework for protecting critical information infrastructure.

Dec 2025 **South Africa: Draft AML/CFT Amendment Bill Published**

The National Treasury published the exposure draft of the General Laws (Anti-Money Laundering and Combating Terrorism Financing) Amendment Bill 2025 for public comment until 13 February 2026. The Bill proposes amendments to four (4) statutes: FIC Act (record-keeping extended from 5 to 7 years, enhanced RMCP obligations, lifestyle audits), FSRA, Companies Act (deregistration for non-compliance), and NPO Act (expanded oversight and administrative sanctions).

January 2026**1 Jan 2026** **Nigeria Tax Act 2025 – Full Implementation Commences**

The four Tax Reform Acts took full effect, replacing six major tax statutes with a unified regime. The NRS commenced operations as Nigeria's central revenue authority with AI-driven enforcement tools, mandatory e-invoicing, and a ₦800,000 personal income tax-free threshold. TIN became mandatory for bank accounts, insurance, and securities trading. Small companies (turnover below ₦100M) are fully exempt from CIT, CGT, and the new 4% Development Levy.

1 Jan 2026 **Ghana: Climate-Related Financial Risk Directive – Banks Compliance**

The Bank of Ghana's Climate-Related Financial Risk Directive became effective for all banks. Regulated financial institutions must have aligned governance arrangements, risk management frameworks, and internal policies by this date. Specialised deposit taking institutions (SDIs) and Non-bank financial institutions (NBFIs) have until 31 December 2026 for governance alignment and 1 January 2027 for full compliance respectively.

15 Jan 2026 **Uganda: General Election**

Uganda held its general election on 15 January, with results contested by the opposition. The political environment has implications for regulatory predictability and investment climate assessments.

Mid-Jan 2026 **Nigeria: CBN Recapitalisation Update – 16 of 34 Banks Compliant**

CBN's Deputy Governor Dr. Muhammad Abdullahi disclosed that 16 of 34 licensed commercial banks had met the new minimum capital requirements, with 13 banks yet to submit full compliance reports ahead of the 31 March 2026 deadline.

February 2026

3 Feb 2026 US Congress Extends AGOA Through December 2026

Congress passed legislation H.R. 7148 on 3 February 2026, extending the African Growth and Opportunity Act (AGOA) through 31 December 2026—a one-year extension only, creating significant uncertainty for longer-term trade planning. AGOA provides duty-free access on 1,800+ products for eligible sub-Saharan African countries.

14 Feb 2026 Africa Infrastructure Financing Facility (AIFF) Launched

African Heads of State launched the AIFF during the Third Presidential High-Level Dialogue of the Alliance of African Multilateral Financial Institutions, targeting the continent's \$221 billion annual infrastructure funding gap and aiming to deploy portions of Africa's \$2.5 trillion domestic capital pool.

Feb 2026 AfCFTA: Automotive Rules of Origin Approved

The 39th African Union (AU) Summit approved automotive rules of origin requiring at least 40% African content for preferential trade—a breakthrough for continental vehicle and component supply chains. The AfCFTA Secretariat also signed a partnership with AGRA to reduce non-tariff barriers and strengthen food security. PAPSS now connects 150+ commercial banks across the continent.

24 Feb 2026 Nigeria: CBN Confirms 20 of 33 Banks Meet Recapitalisation Threshold

At the 304th MPC meeting, CBN Governor Olayemi Cardoso confirmed ₦4.05 trillion raised: ₦2.90 trillion (71.67%) from domestic sources and \$706.84 million (₦1.15 trillion, 28.33%) from foreign investors. S&P Global confirmed nine of the ten largest rated banks are compliant. Thirteen banks remain below threshold with 35 days until the deadline.

24 Feb 2026 ECOWAS Parliament: Extraordinary Session on AfCFTA

Stakeholders at the 2026 extraordinary session called for urgent action to strengthen AfCFTA implementation. Nigeria's Deputy Speaker highlighted that intra-ECOWAS trade is stalled at 11.5% despite a \$3.4 trillion market potential. The ECOWAS Parliament Speaker warned that member states that have not ratified the AfCFTA or defined national strategies are slowing coordinated implementation.

Feb 2026 COMESA: Suspensory Merger Regime Clarifications

The COMESA Competition Commission issued clarifications on its new suspensory merger control regime, providing guidance on merger notification approach. The COMESA Court of Justice ruled on Mauritius safeguard measures on edible oil imports, demonstrating continued willingness to police member state activities.

March 2026

13 Mar 2026 **Nigeria: CBN releases an Addendum to Revised BVN Regulatory Framework.**

The Central Bank of Nigeria has released an addendum to the Revised Regulatory Framework for Bank Verification Number (BVN) Operations and Watch-List for the Nigerian Banking Industry, aimed at enhancing fraud control mechanisms and safeguarding the integrity of customer data. Notable updates include the introduction of a temporary watch-list for BVNs linked to suspected fraudulent activity (effective for up to 24 hours), the imposition of a minimum age requirement of 18 years for BVN enrolment, and a restriction permitting only one modification to phone numbers associated with a BVN. Access to BVN data remains limited to CBN-licensed financial institutions. These enhancements are expected to enable faster fraud response measures, mitigate systemic risks, and improve overall stability within the financial system. The provisions will take effect from 1 May 2026, with all banks, other financial institutions, and payment service providers required to ensure full compliance.

13 Mar 2026 **Zimbabwe: Zimbabwe Launches National AI Strategy**

On 13 March 2026, Zimbabwe formally unveiled its National Artificial Intelligence Strategy (2026–2030), designed to advance digital transformation, stimulate economic growth, and modernise key sectors such as agriculture, mining, and education. The framework prioritises ethical, human-centred AI deployment, improved digital infrastructure, and the promotion of innovation to support a knowledge-based economy. It is structured around four core pillars: talent and capacity development, infrastructure sovereignty, AI adoption, and ethical governance.

18 Mar 2026 **Nigeria: SEC Issues Guidelines on Revised Minimum Capital for Regulated Entities**

On 18 March 2026, the SEC issued the Guidelines on the Revised Minimum Capital for Regulated Entities, prescribing updated capital requirements for capital market operators (“CMOs”) in Nigeria. The Guidelines introduce a revised capital framework aimed at strengthening market resilience, enhancing investor protection, and aligning capital requirements with the scale and complexity of regulated activities.

26 Mar 2026 **Ghana: Ghana’s parliament pass the Ghana Investment Promotion Authority Bill**

Ghana’s parliament has passed the Ghana Investment Promotion Authority Bill on March 26, 2026, replacing the old Ghana Investment Promotion Centre Act of 2013. The new law eliminates the general minimum capital requirements for most categories of foreign investors, introduces a formal investor grievance mechanism for the first time in Ghana’s investment history, regulates transfer technology agreement with stronger enforcement, and repositions the investment promotion body as a one-stop shop aligned with the African Continental Free Trade Area.

31 Mar 2026 Nigeria: CBN Banking Recapitalisation Deadline

DEADLINE. Commercial banks with international authorisation must hold ₦500 billion minimum capital; national banks ₦200 billion; regional banks ₦50 billion. Non-compliant banks face licence downgrades or forced mergers. 13 banks remain below threshold as of late February.

31 Mar 2026 Nigeria: CBN issues Baseline Standards for AML, CFT, and CPF Solutions

In a move to reinforce the resilience and credibility of Nigeria's financial system, the Central Bank of Nigeria has introduced minimum standards governing the deployment of automated solutions for Anti-Money Laundering (AML), Countering the Financing of Terrorism (CFT), and Countering Proliferation Financing (CPF). The framework outlines requirements for real-time transaction monitoring, reporting of suspicious activities, and the adoption of advanced technologies to strengthen compliance and financial crime risk management. Regulated institutions are required to implement integrated AML systems connected to Know-Your-Customer (KYC) processes within an 18 to 24-month transition period.

31 Mar 2026 South Africa: Prudential Oversight Transition

Key prudential oversight functions for pension funds, collective investment schemes, and friendly societies transfer from the FSCA to the Prudential Authority.

April 2026**9 April 2026 Nigeria: CBN issues Draft Guidelines for the Mediation and Dispute Resolution Panel (MDRP), under Secured Transactions in Movable Assets.**

On 9 April 2026, the Central Bank of Nigeria issued a circular inviting stakeholder comments on the draft Guidelines for the Mediation and Dispute Resolution Panel (the "MDRP"), established under the Secured Transactions in Movable Assets Act, 2017 (the "STMA Act"). The draft Guidelines seek to advance a transparent, efficient, and structured dispute resolution mechanism. It confers first-instance jurisdiction on the MDRP over disputes arising from the implementation of the Act, while access and eligibility of parties are conditional upon the existence of a valid security agreement containing an MDRP mediation clause and a perfected security interest registered on the National Collateral Registry. The CBN will appoint thirty (30) persons from whom panels of three members each will be constituted. Decisions are to be delivered within ninety (90) days of the first hearing.

17 April 2026 South Africa: National Treasury published a draft Capital Flow Management Regulations, 2026.

On April 17, 2026, the National Treasury published a draft Capital Flow Management Regulations, 2026 for public comments. The draft regulations set out how cross-border transactions will be regulated under revised system.

It intends to, among other things, include crypto assets within the ambit of the exchange control framework, align the exchange control framework with Organisation for Economic Co-operation and Development and Financial Action Task Force recommendations aimed at combating money laundering, terrorist financing and proliferation of illicit financial flows; clarify exemptions, permissions, and conditions; and imposes sanctions for non-compliance.

April 2026**Zimbabwe: The Government extends Company Re-registration Deadline**

The Zimbabwean Government, through Statutory Instrument 76 of 2026, has officially extended company re-registration deadline from 20 April 2026 to 20 April 2028. The re-registration process is part of Zimbabwe's shift from a paper-based system to a digital registry designed to improve transparency and accuracy.

April 2026**Uganda: The Government extends Company Re-registration Deadline**

The Ugandan government is considering a draft Protection of Sovereignty Bill 2026 (the "Bill"), which proposes sweeping restrictions on foreign influence over domestic policy, governance and public affairs. While its stated objective of safeguarding national sovereignty from external influence reflects a legitimate policy concern recognised in many jurisdictions, its scope appears significantly broader than comparable laws elsewhere. The provisions extend beyond political lobbying to capture ordinary commercial dealings, foreign investment activities, development financing, and the exercise of fundamental rights.

3. NIGERIA: TAX REFORM — NTA IMPLEMENTATION

What Changed on 1 January 2026

The Nigeria Tax Act 2025, signed on 26 June 2025, replaced six major statutes (Companies Income Tax Act, Personal Income Tax Act, Petroleum Profits Tax Act, Value Added Tax Act, Capital Gains Tax Act, and Stamp Duties Act) with a single unified regime. Over 70 fragmented taxes were consolidated into fewer than 10 clearly defined categories. The FIRS formally rebranded as the Nigeria Revenue Service on 30 December 2025, commencing operations under the new mandate on 1 January 2026.

Corporate Income Tax — Tiered Structure

Company Size	Threshold	CIT Rate
Small	Turnover < ₦50M, fixed asset < ₦250M	0% (fully exempt from CIT, CGT, Dev. Levy)
Other Companies	Turnover > ₦50M	30%
Large	Turnover > ₦1B	30%

Personal Income Tax

New ₦800,000 annual tax-free threshold. Progressive rates from 0% to 25%. All income sources—including freelance, digital, gig economy, and virtual asset gains—must be declared. Rent deduction of 20% of annual rent now available (capped). Gratuities, prizes, honoraria, and grants are now taxable. Share sale exemptions apply where annual proceeds are below ₦150 million and gains below ₦10 million.

Key Structural Changes

Development Levy: Unified 4% levy on assessable profits replaces Tertiary Education Tax, IT Levy, and other earmarked taxes.

E-Invoicing: Mandatory fiscalisation system for VAT collection—Nigeria is among Africa's first adopters.

Global Minimum Tax: Top-up tax for Nigerian parent companies to meet minimum effective tax rate; CFC rules require taxation of undistributed foreign subsidiary profits.

Digital Enforcement: AI-driven cross-referencing of bank transactions, fintech data, payroll records, and tax filings. TIN now mandatory for bank accounts, insurance, and securities trading.

Digital Assets: Gains from digital assets (crypto currencies) are now formally subject to capital Gains Tax.

Penalties

Late filing: ₦100,000 first month, then ₦50,000 per month.

False declarations: fines up to ₦1 million or three years imprisonment, or both.

Non-registration: restriction on financial services access.

Transfer pricing non-compliance: audits, penalties, and disallowance of intercompany expenses.

Revenue Target

The NRS has set a ₦40.7 trillion revenue target for 2026, up 44% from the ₦28.23 trillion collected in 2025. The higher target reflects the transfer of petroleum and mineral royalty revenues to the NRS under the new framework.

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Immediate actions: (1) Conduct a full impact analysis across corporate structure, transfer pricing, and compliance processes. (2) Update ERP and accounting software for e-invoicing and new rate structures. (3) Ensure all income earners hold valid TINs. (4) Separate personal and business bank accounts for sole proprietors. (5) Set up a tax risk register. (6) Engage the NRS on advance tax rulings for complex transactions. (7) Train finance and HR staff on new filing obligations and penalty thresholds. (8) Review intercompany transactions for transfer pricing compliance under the new CFC rules.

4. NIGERIA: BANKING RECAPITALISATION – FINAL STRETCH

The CBN's recapitalisation programme, launched March 2024, enters its final month. As of 24 February 2026, 20 of 33 participating banks have met the new thresholds, collectively raising ₦4.05 trillion (₦2.90 trillion domestic, \$706.84 million foreign). S&P Global confirms nine of the ten largest rated banks are compliant, accounting for roughly 80% of total banking system assets.

Category	Minimum CAPITAL
Commercial – International	₦500 billion
Commercial – National	₦200 billion
Commercial – Regional	₦50 billion
Merchant / Non-Interest (National / Regional)	₦50B / ₦20B / ₦10B

Thirteen banks remain below threshold and are pursuing compliance through capital raises, mergers, or strategic partnerships. Non-compliant banks face licence downgrades or forced mergers after 31 March. The CBN has assured that depositor funds remain secure under continued supervisory oversight.

WATCH POINT

Clients with significant exposure to mid-tier or non-compliant banks should urgently: (1) Confirm compliance status with their banking partners. (2) Assess counterparty risk and credit facility continuity. (3) Diversify banking relationships where concentration risk is elevated. (4) Monitor M&A activity for potential restructuring of facility terms.

5. NIGERIA: IMMIGRATION UPDATES

- **Visa System Overhaul (E-Visa):** The Nigeria Visa Policy (NVP) 2025, fully effective, replaced the Visa on Arrival (VoA) regime with a fully automated e-Visa system. Approvals are centralized at the Immigration Service Headquarters in Abuja. Visa applications are now processed within 72 hours for business and short-term travel. A new, 30-day maximum stay limit for short-visit e-Visas (not extendable) is in place.
- **Stricter Enforcement on Foreigners (August 2025 onwards):** A nationwide crackdown on foreign nationals with expired, improper, or non-compliant documentation has been intensified, with AI-powered tracking now used for enforcement.
 - **Penalties for overstaying:** A fine of \$15 per day is imposed for overstays. Overstaying for over 3 months results in a 5-year ban, and over 1 year leads to a 10-year ban.
- **Mandatory Insurance:** Expatriates are required to have Expatriate Personal Liability Insurance to cover potential deportation costs (premiums \$500–\$1,000).

African Regional Immigration Trends (Nov 2025 - Feb 2026)

Economic Community of West African States (ECOWAS), through its Authority of Heads of State and Government, has approved a series of measures aimed at reducing the cost of air travel within the West African region which is to take effect from 1 January 2026.

South Africa – Launch of Citizenship Reinstatement Portal

Effective from 24 November 2025, South Africa’s Minister of Home Affairs announced the launch of the Citizenship Reinstatement Portal, a fully digital platform designed to support South Africans abroad whose citizenship status may have been affected by prior legislative provisions.

South Africa – Implementation of Electronic Travel Authorisation (ETA) System

Additionally, South Africa commenced the rollout of its Electronic Travel Authorisation (ETA) system, marking a transition from traditional paper-based visa processing to a fully digital immigration model.

Active Enforcement Measures

Mandatory Expatriate Insurance: All expatriates must now hold Expatriate Comprehensive Insurance (\$500–\$1,000 annually) covering personal liability and repatriation costs, purchased at the time of e-CERPAC application.

Visa Overstay Penalties: \$15 daily fine effective since 1 August 2025. Three-month overstay triggers five-year re-entry ban; one-year overstay triggers ten-year ban.

EQAP Digitalisation: All Expatriate Quota (EQ) applications now processed exclusively through the online Expatriate Quota Approval Portal. Approval authority elevated to Minister/Permanent Secretary level, which is extending processing timelines.

e-CERPAC Digitalisation: Fully digitised with QR-code verification. Electronic landing and exit cards now mandatory.

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(1) Audit all expatriate workforce EQ/CERPAC status immediately. (2) Update localisation and succession plans. (3) Budget for mandatory insurance. (4) Regularise any overstaying expatriates. (5) Factor in extended processing timelines due to elevated approval authority.

6. DATA PROTECTION & AI GOVERNANCE: ENFORCEMENT SURGE

The November 2025– April 2026 period has confirmed the transition from theoretical compliance to tangible enforcement across the continent. Key developments during this window:

South Africa (November–December 2025)

The Information Regulator (IR) reported a 40% increase in security compromise incidents (1,947 since April 2025). Infringement notices issued to Blouberg Municipality (R500,000), Lancet Laboratories (R100,000), and FT Rams Consulting (R100,000). Ongoing litigation against the Department of Justice over a security breach and the Department of Basic Education over matric results publication. The IR is pursuing a test case on the Protection of Personal Information Act (POPIA's) application to telephone marketing. The FSCA issued over 300 crypto asset service provider licences. The Draft AML/CFT Amendment Bill extends record-keeping from 5 to 7 years and strengthens Risk Management and Compliance Programme (RMCP) obligations.

Nigeria

The Nigeria Data Protection Commission (NDPC) joined sixty (60) other Data Protection Authorities in endorsing the “Joint Statement on AI-Generated Imagery and the Protection of Privacy.” The Joint Statement was coordinated by the International Enforcement Cooperation Working Group (IEWG) of the Global Privacy Assembly to ensure the responsible use of AI. The NDPC has directed that the Compliance Audit Returns (CAR) will serve as a medium to monitor and evaluate responsible use of AI for data processing in Nigeria.

Somalia – Parliament Approves Cybersecurity Law

The House of the People of the Federal Parliament of Somalia has officially approved the long-awaited Cybersecurity Law, a major step toward bolstering the country's digital security landscape.

Namibia – Accelerates Cybercrime Legislation & Data Protection Law

Namibia moves to fast-track cybercrime and data protection legislation while expanding internet access in rural and underserved communities. In addition, the Data Protection Bill is set to be resubmitted to Cabinet, before it is tabled in parliament. This will improve privacy amid rapid digitalisations.

Liberia: Cybercrimes Act 2025 passed.

The Liberian Senate has passed the Cybercrime Act of 2025 aimed at establishing a modernized digital and cyber security legal framework in the country.

Djibouti: Bill presented to establish National Cybersecurity Authority.

Djibouti has taken a major step toward fortifying its digital infrastructure with the introduction of a bill to establish the National Cybersecurity Authority (NCA).

Madagascar: National cybersecurity strategy development launched.

In December 2025, Madagascar launched groundwork on its national cybersecurity strategy during a kickoff workshop held in Antananarivo. The strategy is intended to serve as a basis for updating the regulatory framework, as Madagascar's 2014 cybersecurity law has become increasingly outdated amid rapidly evolving technologies and threats.

Zimbabwe: Zimbabwe Launches National AI Strategy.

On 13 March 2026, Zimbabwe formally unveiled its National Artificial Intelligence Strategy (2026–2030), designed to advance digital transformation, stimulate economic growth, and modernise key sectors such as agriculture, mining, and education. The framework prioritises ethical, human-centred AI deployment, improved digital infrastructure, and the promotion of innovation to support a knowledge-based economy. It is structured around four core pillars: talent and capacity development, infrastructure sovereignty, AI adoption, and ethical governance.

Continental: AU AI Strategy Phase 1

Phase 1 (2025–2026) of the AU Continental AI Strategy is underway, establishing governance structures and securing resources. Multiple countries—Eswatini, Mauritius, Namibia, Kenya—are finalising dedicated AI legislation. Africa's first dedicated AI law may be enacted by Q2 2026.

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(1) Map data processing activities against applicable national laws. (2) Conduct DPIAs for high-risk processing. (3) Review cross-border transfer mechanisms and consider SCCs where available. (4) Prepare for AI-specific compliance layering onto existing data protection. (5) Monitor South Africa's FATF Mutual Evaluation (2026–2027) for enhanced AML/CFT scrutiny.

7. AfCFTA: EXECUTION PHASE & AGOA EXTENSION

AfCFTA Milestones (February –March 2026)

The AfCFTA has entered its execution phase: 54 of 55 AU members have signed, 49 have ratified, 90% of tariffs cut, 92.4% of rules of origin finalised. The Africa Infrastructure Financing Facility launched 14 February 2026 to address the \$221 billion annual infrastructure gap. PAPSS now connects 150+ commercial banks, saving an estimated \$5 billion annually. A \$10 billion Adjustment Fund managed by Afreximbank is operational. Automotive rules of origin (40% African content) approved at the February 2026 AU Summit. AfCFTA-AGRA partnership signed to reduce non-tariff barriers for food trade.

Despite progress, intra-African trade remains at 15–18% of total trade. Non-tariff barriers impose effective costs of 18–300% ad valorem equivalent depending on sector and corridor. Road transport accounts for 29% of final goods prices within Africa versus 7% globally.

AGOA Extension (3 February 2026)

Congress passed H.R. 7148 extending AGOA through 31 December 2026—a single-year extension only. Duty-free access continues for 1,800+ products from eligible sub-Saharan African countries. The one-year horizon creates uncertainty for investment planning. US reciprocal tariffs under the second Trump administration affect African exports, though energy and mining commodities are largely exempted (weighted tariff increase of 0.8–2.6% versus 7.1% continental average). The European Union (EU) Carbon Border Adjustment Mechanism (CBAM) adds additional pressure on carbon-intensive exports.

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(1) Review tariff schedules and rules of origin. (2) Register for PAPSS cross-border settlement. (3) Verify AGOA eligibility and plan for December 2026 expiry scenarios. (4) Explore AfCFTA Adjustment Fund for competitiveness financing. (5) Assess exposure to US reciprocal tariffs and EU CBAM.

8. SOUTH AFRICA: FATF EXIT, COFI BILL & FINTECH

Key developments during November 2025–March 2026:

The Draft AML/CFT Amendment Bill:

South Africa's National Treasury has published a draft legislative package intended to strengthen the country's AML/CFT framework, including measures relating to targeted financial sanctions, beneficial ownership compliance, and information-sharing with border authorities, ahead of South Africa's next FATF mutual evaluation, expected to begin in mid-2026 and conclude in October 2027.

9. GHANA

Ghana

Bank of Ghana Climate-Related Financial Risk Directive effective for Specialised Deposit-taking Institutions (SDIs) from 1 January 2026 and Non-Banking Financial Companies (NBFCs) from 1 January 2027. Outsourcing Directive (November 2024) imposing new requirements on banking function outsourcing. Environmental protection, public procurement, and gender equality legislation advancing. Mining frameworks updated with tighter environmental and local participation requirements.

Notably, on March 26, 2026, Ghana's parliament passed the Ghana Investment Promotion Authority Bill replacing the old Ghana Investment Promotion Centre Act of 2013. The new law eliminates the general minimum capital requirements for most categories of foreign investors, introduces a formal investor grievance mechanism for the first time in Ghana's investment history, regulates transfer technology agreement with stronger enforcement, and repositions the investment promotion body as a one-stop shop aligned with the African Continental Free Trade Area.

10. COMPETITION & ANTITRUST

COMESA has introduced a major overhaul of its competition framework.

The new COMESA Competition and Consumer Protection Regulations of 2025 and companion Rules replace the 2004 regime and materially tighten merger control, align procedures with international practice and introduce specific tools to capture and assess digital transactions.

Nigeria – FCCPC DEON Consumer Lending Regulations (2025)

The DEON Consumer Lending Regulations (2025) represent a decisive pivot from interim oversight to a rigorous, permanent regulatory regime for Nigeria's digital credit market. Issued by the FCCPC in mid-2025 and fully operational as of January 5, 2026, this framework mandates that all lenders transition to formal registration, backed by substantial fees, specifically a ₦100,000 application fee and a ₦1,000,000 approval fee. Beyond simple registration, the regulations codify strict ethical standards that criminalize predatory debt recovery tactics, such as borrower defamation and contact-list harvesting, while requiring total alignment with the Nigeria Data Protection Act. To ensure transparency, operators must now file comprehensive biannual reports on interest rates and transaction volumes, with non-compliance triggering severe penalties, including corporate fines of up to ₦100,000,000 and five-year disqualifications for erring directors.

11. COMPLIANCE ACTION MATRIX

The following matrix summarises the priority actions arising from developments during November 2025–March 2026.

Domain	Jurisdiction	Priority Action
Tax	Nigeria	Full NTA impact analysis; update ERP for e-invoicing; ensure all TINs registered; review transfer pricing under new CFC rules
Immigration	Nigeria	Audit expatriate workforce; update succession plans; budget for insurance; regularise overstayers; transition to EQAP
Data Protection	Continental	Map processing activities; conduct DPIAs; prepare for AI-specific compliance; review cross-border transfer mechanisms
AML/CFT	South Africa	Update RMCPs; review record-keeping (5→7 years); strengthen beneficial ownership reporting
Financial Services	South Africa	Prepare for COFI Bill; audit conduct frameworks; assess crypto exposure against new standards
Climate/ESG	Ghana	Align governance and risk frameworks with BoG Climate Directive; prepare quarterly implementation updates
Trade	Continental / US	Verify AGOA eligibility; register for PAPSS; review AfCFTA tariff schedules and rules of origin
Competition	COMESA / National	Map multi-jurisdictional merger filing requirements; build filing timelines into transaction planning

13. UPCOMING DEADLINES: MARCH – DECEMBER 2026

Date	Jurisdiction	Deadline / Event
31 Mar 2026	Nigeria	CBN banking recapitalisation compliance deadline
Q2 2026	Nigeria	National Digital Economy & E-Governance Bill – potential passage
Q2 2026	Continental	Potential enactment of Africa's first dedicated AI law
H1 2026	South Africa	COFI Bill expected to be introduced in Cabinet
2026	South Africa	FATF Mutual Evaluation commences
2026	Continental	AU Continental AI Strategy Phase 1 completion
31 Dec 2026	US / Africa	AGOA extension expires (current one-year authorisation)
1 Jan 2026	Ghana	SDIs climate directive governance alignment deadline
1 Jan 2027	Ghana	SDIs/NBFIs full climate directive compliance

ABOUT MOROOM AFRICA

Moroom Africa Legal Consults is a full-service commercial law firm advising clients across Nigeria and the African continent on corporate and commercial transactions, dispute resolution, regulatory compliance, tax advisory, debt recovery, and cross-border matters. As working group member and legal resource partner with EuroCham Nigeria, the firm maintains active engagement with European businesses operating across the continent.

This guide covers the period November 2025 to April 2026 and is published as part of Moroom Africa's periodic regulatory intelligence service. For advisory engagements, tailored compliance audits, or further intelligence, please contact your Moroom Africa relationship partner.

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