BANWO & IGHODALO

REGULATORY UPDATES

CORPORATE AFFAIRS COMMISSION

July 21, 2026

The Corporate Affairs Commission ("**CAC**" or the "**Commission**") is the statutory body responsible for the registration and oversight of companies and other legal entities in Nigeria. In furtherance of its regulatory mandate under the Companies and Allied Matters Act, 2020 ("**CAMA 2020**"), the CAC continues to enforce measures aimed at strengthening corporate governance, promoting transparency and improving corporate compliance.

Against this backdrop, the CAC recently introduced enforcement initiatives that have important compliance implications for companies operating in Nigeria. This regulatory update highlights two (2) significant regulatory developments and the practical steps companies should consider in ensuring compliance with the Commission's requirements.

A. ENFORCEMENT OF STATUTORY REQUIREMENTS RELATING TO COMPANY BUSINESS LETTERS

Pursuant to a Public Notice issued by the CAC on July 7, 2026, the Commission has announced that, with effect from August 1, 2026, it will commence the full enforcement of the statutory requirement for every company to include the following particulars in its trade circulars, show cards and business letters:

I. its registered name;
II. registration number;
III. registered office address;
IV. the present forename or initials and surname of every director. Where applicable, any former forename and surname of a director must also be stated; and
V. the nationality of every director who is not a Nigerian.

These requirements are prescribed under Sections 304(1), 304(2) and 729(1)(c) of CAMA 2020. In addition, Section 304(3) of CAMA 2020 provides that where a company fails to comply with these disclosure requirements, both the company and every officer of the company in default shall be liable to such penalty as may be prescribed by the CAC.

According to the Public Notice, the CAC will commence the enforcement of these statutory requirements, together with the applicable sanctions for non-compliance with effect from **August 1, 2026**.

In light of this development, companies are advised to review their letterheads, business letters, trade circulars, show cards and other official correspondence to ensure that they comply with the disclosure requirements prescribed under CAMA 2020.

Given the commencement of full enforcement from **August 1, 2026**, companies are advised to take immediate steps to achieve compliance in order to minimize the risk of regulatory sanctions.

B. COMMENCEMENT OF ANOTHER ROUND OF STRIKING OFF OF COMPANIES FROM THE CAC REGISTER

The requirement for companies to file annual returns in accordance with Section 420 of CAMA 2020 remains one of the fundamental statutory obligations of every registered company in Nigeria. In furtherance of its enforcement mandate, Section 692(3) and (4) of CAMA 2020 empowers the CAC to strike the name of a company off the Register of Companies (the "**Register**") where the Commission has reasonable cause to believe that the company has not carried on business or has not been in operation for a consecutive period of ten (10) years, or has failed to comply with the provisions of CAMA 2020 for the same period.

Before exercising this power, the Commission is required to notify the affected company of its intention to strike off its name from the Register and afford the company an opportunity to demonstrate that it remains in operation or to regularise its statutory filings within a prescribed period.

Pursuant to these provisions, the CAC, by a Public Notice dated July 15, 2026, announced the commencement of another round of striking off companies from the Register. According to the Commission, the names of approximately 100,000 companies have been published on its official website (www.cac.gov.ng), being companies liable to be struck off for failing to comply with their statutory obligations.

In line with the foregoing, the CAC has directed all affected companies to regularise their records within ninety (90) days of the Public Notice by filing all outstanding annual returns together with the requisite Persons with Significant Control (Beneficial Ownership) information. The CAC further requires evidence of such compliance to be forwarded to its designated email address - struckoffcompanies@cac.gov.ng within the prescribed period. Companies that fail to comply with these requirements within the stipulated timeline may be struck off the Register without further notice.

Companies should therefore promptly verify whether their names appear on the list of affected companies published by the CAC. Where a company has been listed, immediate steps should be taken to regularise all outstanding statutory filings, including annual returns and beneficial ownership disclosures, within the prescribed timeline to avoid being struck off the Register.

More broadly, this development serves as a timely reminder of the importance of maintaining ongoing corporate compliance. Companies should ensure that annual returns and other statutory filings are made as and when due and should periodically review their corporate records to confirm that they remain up to

date. Failure to do so may expose the company to regulatory sanctions, including removal from the Register, with the attendant legal and commercial consequences.

Banwo & Ighodalo possesses extensive expertise in advising local and international investors on establishing and operating businesses in Nigeria. Our services span the entire business life cycle, from company incorporation and the procurement of requisite post-establishment permits & licenses to ensuring ongoing compliance with applicable regulatory and statutory obligations.

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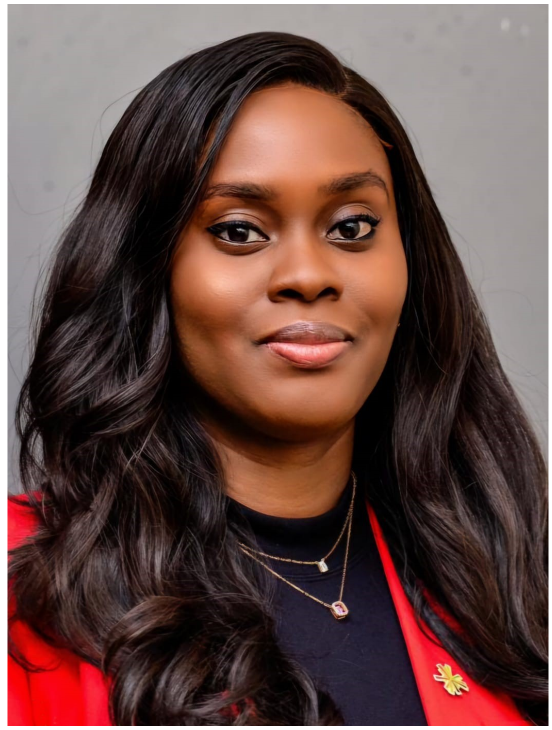

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