

PRINCIPLES FOR THE ETHICAL CONDUCT OF BUSINESS IN NIGERIA

The following represents the minimum set of principles for ensuring ethics and transparency in business transactions in Nigeria arrived at through a process (see next page) guided by representatives from several key stakeholders including NESG, MAN, NACCIMA, NASSI, Business Action Against Corruption, the African Leadership Forum, SMEDAN, Transparency in Nigeria as well as representatives of relevant public sector entities and agencies, facilitated by the UNODC and UNIDO.

	PRINCIPLE	DEFINITION	INDICATORS	GUIDANCE
1.	Trustworthiness	“You are who you say you are”	As a matter of principle you are duly registered with the appropriate regulatory agencies and compliant with applicable laws and regulations	Do you have an open/internal record of the laws and regulations you have to comply with? Has an independent assessor verified it?
2.	Integrity	“You do the right thing even when no one is looking”	You have a track record of consistently living your ethical values regardless of changing circumstances	Do you encourage staff to discuss dilemmas? Are such dilemmas or violations recorded for learning?
3.	Reliability	“You do what you say you will do at the time you promise”	You consistently discharge your obligations to the time, budget and standards agreed	Do you encourage your stakeholders (customers, staff, suppliers, investors, regulators, etc.) to come forward with their complaints? Do you keep a record of stakeholder complaints?
4.	Transparency	“Those who observe you find that you are who you say you are”	You consistently disclose timely, comprehensive, accessible, accurate information about your activities.	Do your customers, press and other stakeholders, commend you for your transparency? Do you keep a record of such commendations?
5.	Accountability	“You answer to your stakeholders in appropriate	You are consistently tolerant of the scrutiny of your stakeholders	Do you have a regular forum that each stakeholder group can use to engage the

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		ways”	around information about your activities.	company on company activities that affect them? Do you keep an open record of such engagements?
6.	Honor	“You act in ways that protect and preserve your credibility”	You put processes in place to ensure that you comply with your own publicly stated business principles	Do you share your ethical values with your stakeholders? Do you do business with companies whose values do not agree with yours?
7.	Professionalism	“You strive for distinction in the quality and efficiency of what you do”	You put processes in place to ensure that the quality and efficiency with which you work consistently exceed expectations	Do you urge your customers and other stakeholders to clearly state their expectations to you? Do you keep a record of both met and unmet stakeholder expectations?

This framework of business principles represents a yardstick that business can use to judge actual or anticipated behavior, to develop codes of conduct for specific sectors of the economy, business associations or individual businesses, and to check the adequacy of existing codes of conduct to ensure they contain minimum standards required for ethics and transparency in business transactions in Nigeria. To this must be added mechanisms for compliance monitoring and enforcement with a view to ensuring effective self-regulation.

The Process – November 2008 – December 2009

1. A working group, composed of representatives of the NESG, MAN, NACCIMA, NASME, Business Action Against Corruption, the African Leadership Forum, SMEDAN, Transparency in Nigeria as well as representatives of relevant public sector entities and agencies, was inaugurated on 11 November 2008 to define and guide the process;
2. Desk research was conducted by Business Action Against Corruption to take stock of existing international models, as well as principles existing in other countries and the findings were presented to the working group on 14 May 2009

3. Subsequently four private sector-based Expert Groups were constituted to debate in-depth the minimum set of principles needed to ensure ethics and transparency in business transactions in Nigeria. Experts were in agreement that several principles encapsulated as “Trustworthiness” were needed in Nigeria.
4. Focus group discussions were convened with ordinary Nigerians to debate the issues. They came up with similar principles to those identified by the experts but thought the word “Integrity” best described the collection of principles. These focus groups involved 8 persons per session, a total of 4 sessions per location. The locations were Lagos, Port Harcourt, Abuja and Kano.
5. The findings of the expert and focus groups were presented to the working group for discussion, guidance and debate.
6. A questionnaire was developed to test the principles with the wider public. The questionnaire was approved by the working group on 18 August and then administered on 1005 respondents sampled at random in Lagos, Port Harcourt, Abuja and Kano. The public at large identified Integrity as the main principle as well as trustworthiness, reliability, transparency, accountability, honor and professionalism.
7. The findings from the field were presented to a cross section of the working group members and some business commentators 24 November 2009;
8. Business principles were then extracted for presentation to a wider cross section of the business community in Nigeria at the 15th Nigeria Economic Summit in Abuja
9. The comments of business at the NES#15 will be used to refine the principles before even wider circulation for review and adoption by businesses in Nigeria.

Members of the Working Group

1. Nigeria Economic Summit Group (NESG)
2. Manufacturer’s Association of Nigeria (MAN)
3. National Association of Chambers of Commerce, Industry, Mines and Agriculture (NACCIMA)
4. Lagos Chamber of Commerce & Industry (LCCI)
5. National Association of Small Scale Industrialists (NASSI)
6. Small & Medium Enterprises Development Agency of Nigeria (SMEDAN)
7. Business Action Against Corruption (represented by CBi)
8. Promaconas International Ltd.
9. Coalitions for Change (C4C)

10. MTN Nigeria
11. Access Bank
12. Transparency In Nigeria
13. Federal Ministry of Commerce & Industry
14. Technical Unit on Government Anti-Corruption Reforms (TUGAR)
15. Africa Leadership Forum (ALF)
16. Bureau for Public Service Reforms (BPSR)
17. Consumer Protection Council (CPC)
18. Public Complaints Commission (PCC)
19. Independent Corrupt Practices & Other Related Offences Commission (ICPC)
20. Code of Conduct Bureau (CCB)
21. Economic & Financial Crimes Commission (EFCC)
22. SERVICOM
23. Nigeria Labour Congress (NLC)
24. Federal Inland Revenue Service (FIRS)
25. UNDP
26. UNIDO
27. UNODC