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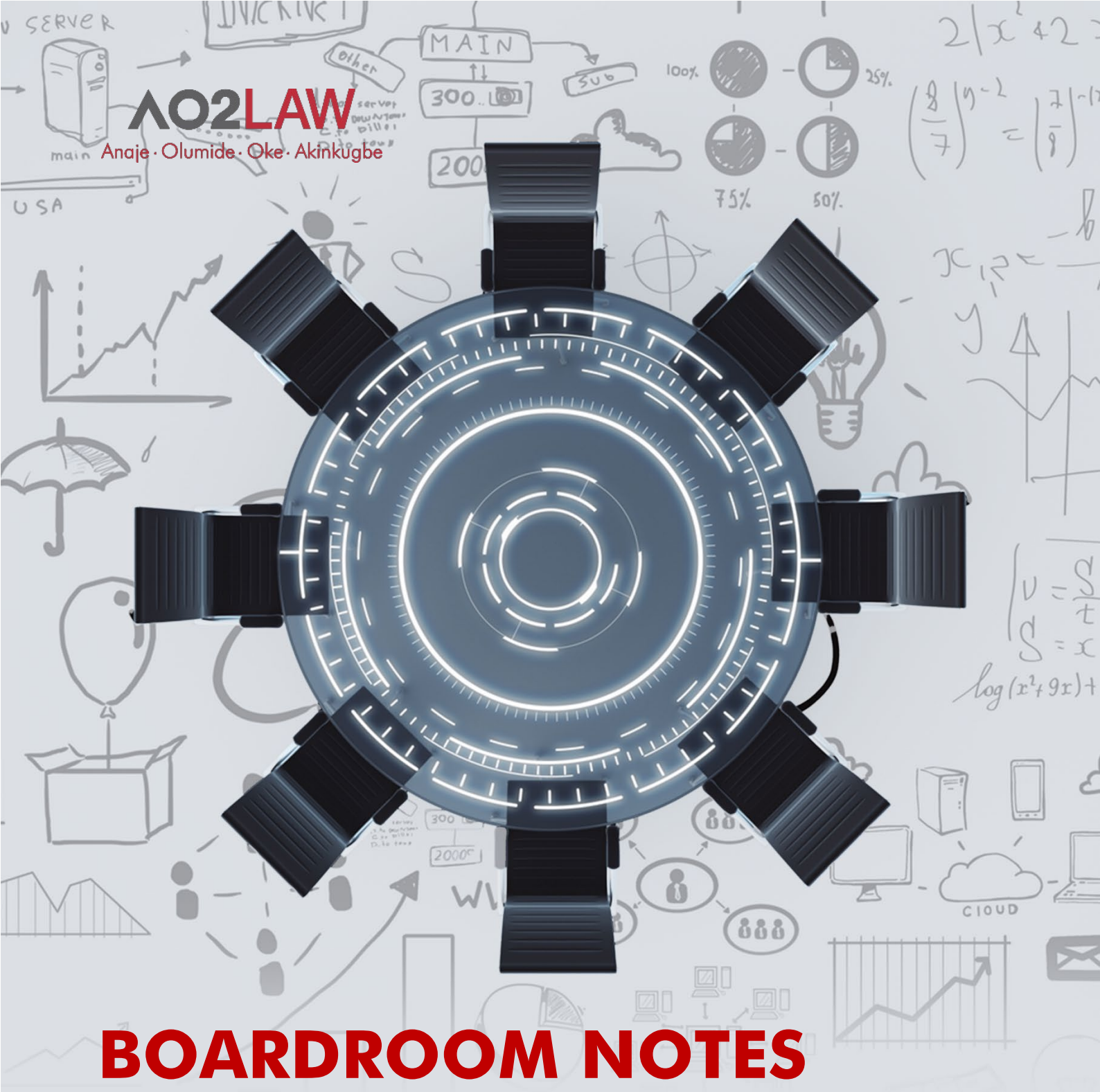


BOARDROOM NOTES

A Publication of AO2LAW's Growth Boardroom (GBR), a specialized law and related practice focused on emerging and scalable businesses.

BALANCING INNOVATION AND OVERSIGHT: 2025 TECH REALITIES + 2026 REGULATORY ROADMAP

Insights on AI, Data Protection and Emerging Technologies...

February 2026 Edition

The Growth Boardroom

AO2LAW® created the "The Growth Boardroom" to provide legal and related services for scalable startups by helping them navigate the complexities of Nigeria's legal and regulatory landscape. The initiative focuses on proactive legal advisory, representation and management across all aspects of Nigerian corporate law, taxation, data security, dispute resolution, intellectual property protections, and all other regulatory requirements. The practice gives entrepreneurs the assurance they need to focus on their businesses, as GBR provides all the legal and related Boardroom and Management support that they need.

Furthermore, "The Growth Boardroom" promotes an ecosystem in which legal support is strategically integrated into business operations, transforming traditional legal services from reactive problem-solving to a value-creating tool that directly contributes to startup resilience, scalability, and long-term success in Nigeria's dynamic entrepreneurial landscape.

Introduction

2025 was a watershed moment in the evolution of the global and Nigerian technology sectors. Beyond a continuation of existing growth, it marked an expansion of effect, investment, innovation, and regulatory attention.

Nigeria's status as Africa's leading technology hub was solidified by 2025. According to the Dealroom Global Tech Environment Index 2025, Lagos has emerged as the world's fastest-expanding tech environment, surpassing established locations like Istanbul and Pune. Despite continued infrastructure restrictions, enterprise value growth and innovation production have remained consistent. Since 2017, the Lagos ecosystem has grown in value by an estimated 11.6 times, led by renowned unicorns such as Interswitch, Flutterwave, Jumia, OPay, and Moniepoint.

Africa's tech startups raised $3.5 billion in 2025, a roughly 59% increase from 2024, with Nigeria leading the way. This financial rebound included fintech, edtech, healthtech, and clean energy startups, indicating diversified innovation beyond conventional sectors and increasing global investor confidence in Nigerian entrepreneurs.

Advances in connectivity, which is a core pillar of digital economies, have also recorded historic progress. Nigeria's broadband penetration crossed 50% for the first time in 2025, opening potential for digital services, remote education, e-commerce, and cloud computing usage across the country.

The ecosystem's growth was further supported by systemic innovation programmes, such as nationwide startup hunts led by the National Information Technology Development Agency (NITDA) across Nigeria's six geopolitical zones in the run-up to GITEX Nigeria 2025. The year also witnessed the 6th African Data Security Conclave organised by Taxtech®, focused on Artificial Intelligence in Africa. These initiatives helped secure continental and global perspectives on emerging issues while uncovering and elevating local tech solutions, connecting early-stage innovators with national and global stage opportunities.

Despite these achievements, structural issues continued to pose a significant danger to long-term growth. Stakeholders continued to warn that uneven power supply and energy shortfalls have a significant impact on productivity and innovation potentials, serving as a reminder that physical infrastructure must evolve alongside digital adoption.

Globally, 2025 consolidated several key macro-tech developments. According to industry analysts, global IT spending was expected to reach $4.9 trillion in 2025 and exceed $6 trillion by 2026. This growth is driven by investments in AI infrastructure, cloud services, cybersecurity, and digital transformation initiatives by enterprises and governments. Spending specifically on AI technologies was projected by Gartner to top $1.5 trillion in 2025, and $2 trillion in 2026.

However, these achievements coincide with increased scrutiny of supervision and governance. As artificial intelligence's economic footprint grew, including more capital allocation by big technological businesses, questions grew about accountability, transparency, and governance disclosures. According to a Reuters investigation, only a minority of tech companies disclose full ethical AI accountability frameworks, despite tightening regulatory regimes in regions such as the European Union and calls for corporate boards to improve AI governance.

The dual challenge facing businesses and policymakers alike is how to foster and capitalise on digital transformation while integrating frameworks that protect consumer rights, data security, regulatory compliance, and ethics. This is encapsulated by the juxtaposition of rapid innovation and rising regulatory demand.

The Collision Point: Innovation, Risk, and Regulation in 2025

Nigeria was not an exception to the global trend of technological innovation colliding with legal frameworks in 2025. The need to strike a balance among innovation, supervision, risk management, and societal safeguards emerged as a recurring issue throughout the year as policymakers wrestled with the potential and drawbacks of emerging technology.

Artificial intelligence (AI) remained the subject of considerable regulatory activity on a global scale. Even as competition to control AI markets heats up, regulators are actively working to develop regulations that aim to govern data and AI infrastructure as key national assets, according to the International Association of Privacy Professionals' worldwide AI law tracker.

Countries throughout Africa implemented key tech laws in 2025, including Nigeria's multiple legislative and regulatory actions. According to TechCabal, Nigerian legislators have introduced some of the continent's most technology-oriented measures, signifying a regulatory awakening across several areas. For example, the Nigerian Fintech Regulatory Commission Bill advanced through the House of Representatives, proposing a unified oversight body for fintech to streamline licensing and enhance consumer protection, consolidating functions now spread across the CBN, SEC, NITDA, NDPC, and FCCPC.

Data governance has emerged as a major regulatory subject. In March 2025, the Nigeria Data Protection Commission (NDPC) issued the General Application and Implementation Directive (GAID) for the Nigeria Data Protection Act, 2023 (NDPA), which went into effect on September 19, 2025, replacing the erstwhile NDPR and providing better implementation guidelines, a critical event for privacy regulation in the country.

In a strategic regulatory move to strike a balance between innovation and control over vital data assets, NITDA mentioned plans to finalise a data classification framework in early 2025, with a draft of a National Cloud Policy subsequently released in September 2025, to promote cloud use and draw investment while reaffirming data sovereignty. This is in line with more general conversations on AI governance throughout Africa, as policy discourse highlights the necessity of institutionalising moral and risk-aware behaviour in addition to the economic potential of AI, which is expected to be in the billions for the continent.

Nigeria's regulatory environment also responded to industry concerns about fragmented oversight. A Central Bank of Nigeria (CBN) report revealed that fintech operators are divided on whether the current regulatory landscape enables or constrains innovation, highlighting persistent challenges around licensing delays, unclear guidance, and uneven enforcement. Fintech firms themselves pushed for a National Fintech Committee to improve policy dialogue and reduce compliance barriers, further illustrating how innovation is bumping up against existing regulatory frameworks. (See report by Nairametrics)

In the digital finance space, regulators took concrete steps toward consumer protection and ethical lending practices. The Federal Competition and Consumer Protection Commission (FCPPC) issued the Digital, Electronic, Online or Non-Traditional Consumer Lending Regulations 2025, expanding oversight of digital lenders and embedding data governance and disclosure requirements designed to counter predatory practices.

According to Deloitte's outlook for 2025, evolving cyber threats in Nigeria necessitate proactive regulatory responses and robust policy execution to secure infrastructure and important data systems, highlighting how risk is now at the forefront of regulatory debate alongside innovation.

At the global level, debates about internet governance and platform regulation continued to evolve. A Freedom House report noted that the future of internet freedom will hinge on how governments balance incentives and controls in managing the next wave of technological innovation, highlighting broader questions about rights, access, and state power in the digital age.

In response to these accelerating regulatory pressures, Nigeria is considering more comprehensive legal frameworks. A proposed AI bill would require broad documentation, ethical transparency, and local approval for foreign AI systems deployed in the country, an attempt to steward AI adoption responsibly while imposing accountability mechanisms.

Startups

Against the backdrop of major capital movements and regulatory scrutiny, startup performance in Nigeria and throughout Africa in 2025 revealed both fundamental obstacles and potential. An estimated $3.5 billion in declared funding was raised by startups across the continent, a 59% increase over the previous year's totals and an indication that investor interest was rebounding following the 2023 and 2024 downturn. Despite this overall increase, Nigeria's funding share decreased, making up only 8% of all startup capital disclosed across Africa's four largest ecosystems (Nigeria, Kenya, South Africa, and Egypt) in 2025. This is the lowest level since at least 2019 and suggests that investor capital is shifting relative to rivals like South Africa and Kenya.

Funding activity remained significantly concentrated among a limited number of prominent startups, notwithstanding Nigeria's smaller share. Data indicate that 11 firms received almost 83% of the $442.8 million received by 98 Nigerian startups in disclosed investments. This implies that investors chose scale-ready company models in the face of increased risk aversion and tighter global liquidity.

In a recent piece, we discussed how the legal and regulatory environment for startups matured significantly in 2025, partly due to changes in fiscal law. Nigeria's tax landscape for startups underwent a significant transformation with the enactment of the Tax Reform Acts, which amended the Nigeria Startup Act, 2022, harmonised and updated incentives originally established under the Nigeria Startup Act. The Pioneer Status Incentive, which had allowed labelled startups to claim up to five years of corporate income tax exemption, was repealed and replaced by the Economic Development Incentive, a performance-driven scheme offering a five percent annual tax credit on qualifying capital expenditure for five years, subject to approval by the President via NIPC and the Finance Ministry.

The reforms also broadened reliefs for small companies, raising the thresholds for automatic exemption from corporate income tax, capital gains tax, and the 4% Development Levy to firms with annual turnover up to N100 million and fixed assets up to N250 million, thereby extending benefits beyond labelled startups. For investors, Section 163 of the NTA provides exemptions on gains from the disposal of assets in startups held for a minimum of 24 months, encouraging patient capital, boosting valuations, and promoting ecosystem development through tax-free exits for angel investors, venture capitalists, and incubators. Overall, the 2025 Tax Reform Acts shift Nigeria's fiscal support from blanket, sector-based incentives to measurable, performance-linked reliefs, requiring startups and investors to reassess tax strategies to optimise compliance, funding structures, and growth opportunities in 2026.

The interplay between innovation and regulation was also evident in Nigeria's evolving data protection and digital economy laws. Although the Nigeria Startup Act remained a foundational piece of legislation intended to provide incentives and legal certainty for qualifying ventures, startups in 2025 needed to navigate it alongside other frameworks such as the NDPA and associated implementation directives. Under the NDPA's GAID. Startups handling personal data, including most digital businesses and technology platforms, were required to follow stricter compliance processes.

Fintech remained the standout category within the startup ecosystem, but it was also one of the most heavily regulated. The Federal Competition and Consumer Protection Commission (FCCPC) issued the Digital, Electronic, Online or NonTraditional Consumer Lending Regulations 2025 in response to rapid growth in digital credit platforms, requiring greater transparency, data usage oversight, and consumer protections. Founders and compliance teams reported that aligning internally with these new rules absorbed significant operational focus during 2025. -Traditional Consumer Lending Regulations 2025, in response to rapid growth in digital credit platforms, require greater transparency, data usage oversight, and consumer protections. Founders and compliance teams reported that aligning internally with these new rules absorbed significant operational focus during 2025.

Beyond sector-specific rules, infrastructure constraints remained a persistent theme affecting startup performance in 2025. Continued challenges with energy supply and broadband costs pushed founders to innovate in cost structures and cloud strategies, while also spotlighting national policy priorities related to connectivity and digital inclusion. Observers noted that unless structural constraints were addressed, startups could face persistent operational drag that competitors in better-connected ecosystems did not encounter.

Globally, investors continued to show interest in AI-native startups, or those whose business models or products rely heavily on AI. However, regulatory requirements for algorithmic transparency, documentation, and safety testing also made governance readiness a criterion for capital allocation. Even the European Union (EU) and other governments indicated stricter regulation, analysts noted in 2025 that only a small percentage of AI ventures had formalised complete accountability and risk disclosure policies.

2026 Regulatory Roadmap

Looking ahead to 2026, the regulatory horizon for startups is expected to remain active and increasingly complex. With the Nigeria Tax Act fully in force, founders and investors are likely to place even greater emphasis on tax optimisation, compliance frameworks, and legal risk mitigation, particularly for startups transitioning from early-stage models to growth or revenue-generating phases. Compliance and governance readiness will remain as important to valuation prospects as core product metrics by late 2026.

Furthermore, as the EU AI Act matures and other jurisdictions refine AI and data regimes, startups looking to operate or raise capital on a global scale must build compliance architectures that meet multiple regulatory standards at the same time, potentially driving demand for legal and risk management expertise among early-stage teams.

To summarise, the year 2025 revealed that Nigerian entrepreneurs are financially resilient, strategically adaptable, and heavily influenced by legislative changes. While capital flows reflected cautious investor confidence, regulatory change, ranging from tax reform to consumer protection and data governance, emerged as a defining force impacting business models, compliance planning, and long-term competitiveness as we approach 2026.

Artificial Intelligence & Other Emerging Technologies

In 2025, AI and other emerging technologies advanced fast, while regulatory frameworks struggled to keep up, with global regulators adopting increasingly sophisticated governance techniques and countries like Nigeria actively positioning themselves for leadership in the digital economy. Across Africa, multilateral and national forums highlighted AI's economic potential, with the Carnegie Endowment forecasting that AI could contribute between $2.9 billion and $4.8 billion to the continent's economy by 2030, pushing adoption in industries such as health, agriculture, and transportation.

Simultaneously, new data and tech legislation in South Africa and Nigeria in 2025 emphasised that compliance with privacy, breach reporting, and handling high-risk data is now required by law for startups and large digital companies. Emerging technologies and AI have transformed banking and payments in Nigeria's financial sector. As part of larger trends in digital transformation, fintech companies are incorporating machine learning and predictive analytics into credit scoring, fraud detection, and consumer interaction.

Within Nigeria, government and industry initiatives mirrored these global dynamics. NITDA reaffirmed Nigeria's strategic commitment to becoming a key AI player, grounded in President Bola Tinubu's innovation agenda and broader economic diversification goals. States such as Kwara hosted AI Summit 2025 events to catalyse policy-industry dialogue, bringing together government, academia and international partners to bridge policy, talent and innovation. Nigeria also launched an ambitious digital ecosystem support, including 75 funded research projects aimed at deepening innovation and positioning domestic research closer to global competitiveness.

Given the increasingly digital nature of infrastructure and services, sector regulators like the Nigerian Communications Commission (NCC) have started examining outdated telecom laws to address AI, 5G, and cybersecurity imperatives. This legislative modernisation is essential. As AI becomes increasingly ingrained in decision-making, human rights organisations like the National Human Rights Commission have started interacting with tech businesses to make sure AI governance frameworks are human-rights-centred. This has increased the conversation on human supervision and rights due diligence.

Adoption across sectors was widespread. With 88% of adults in Nigeria reported using AI tools for learning or work, the country experienced high AI usage in education and workforce development. This is far higher than the global average, suggesting that AI is quickly permeating society and is not just found in high-end tech industries. We believe that Nigeria has the potential to move from being largely an AI consumer to a producer with the right investment and skill development. Tech ecosystem leaders also emphasised the importance of domestic infrastructure and talent development, such as specialised academic programs and government cooperation with industry, in maintaining AI growth. A continental move away from regulatory fragmentation using shared governance techniques was indicated by African state collaborations, such as the agreements on digital policy and AI cooperation between Ghana and Lesotho.

Beyond AI, other emerging technologies shaped the 2025 landscape:

Quantum computing continued to gain strategic momentum as major global technology firms and governments intensified investments in next-generation computing capabilities, with the UN designating 2025 as the International Year of Quantum Science and Technology to raise awareness of its potential impact on cybersecurity, data processing, and cryptography. Although large-scale quantum computers that can break today's encryption remain in development, regulators and cybersecurity bodies worldwide are already planning for a future when quantum machines could render current cryptographic systems obsolete.

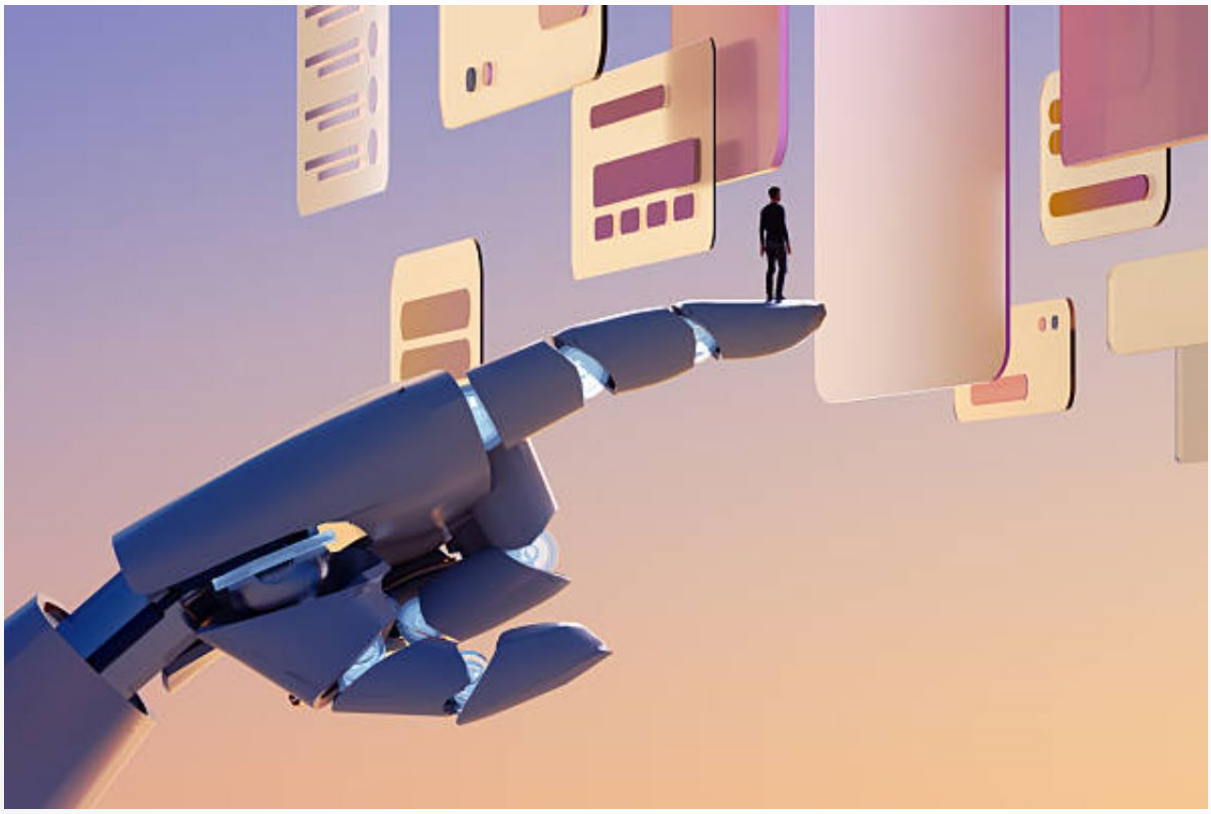
For example, the UK's National Cyber Security Centre issued guidance urging organisations to adopt post-quantum cryptography to guard against quantum-based attacks as early as the next decade. The World Economic Forum has noted that quantum technologies are changing cybersecurity risk landscapes, driving proactive governmental and business responses to quantum-resistant encryption as an emergent compliance issue.

In Nigeria, the Securities and Exchange Commission (SEC) identified quantum computing as a transformative frontier for its capital markets, actively engaging researchers and innovators to develop regulatory frameworks that balance investor protection with innovation potential, particularly in risk modelling, fraud detection, and advanced analytics. The SEC's approach illustrates how emerging technology governance in Nigeria is becoming part of broader financial market reform, with regulators acknowledging that quantum innovations could reshape capital market efficiency, asset pricing and digital securities.

Extended Reality (XR), a merger of virtual reality (VR), augmented reality (AR), and mixed reality (MR), also saw significant growth in 2025, as organisations adopted immersive technology for training, collaboration, and digital services delivery. Globally, XR has grown beyond entertainment to include enterprise use cases, allowing for virtual collaboration in remote work locations and new types of digital engagement. Although specific Nigeria-focused XR news was less widely reported in 2025, the adoption of digital interfaces in education, enterprise, and retail sectors increased, in line with policymakers' emphasis on investments in digital literacy and infrastructure at national tech events and industry summits. Policymakers and regulators are becoming aware that XR raises novel legal issues related to data privacy, accessibility requirements, content moderation, and consumer protection, as immersive platforms capture sensitive biometric and behavioural data.

Blockchain and distributed ledger technologies (DLTs) matured further in 2025, supporting use cases in financial services, digital identity, supply chain verification and tokenised asset markets. In Nigeria, the SEC and fintech stakeholders have embraced blockchain innovation as a pillar of future capital market development, including frameworks to support digital securities, tokenised assets and green bonds, while maintaining investor protections. National initiatives to develop domestic knowledge and protect data sovereignty are reflected in the NITDA and other agencies' plans to set up technological research centres with an emphasis on blockchain, AI, and IoT in each of the six geopolitical zones. Despite NITDA's 2024 announcement of ambitions to create an indigenous blockchain known as "Nigerium," there was little to no development reported in 2025. We intend to monitor this

year. Decentralised governance models, fiduciary responsibility, anti-money-laundering (AML) compliance, digital custody laws, and consumer rights in decentralised finance (DeFi) contexts are among the legal issues brought up by these developments.



Autonomous systems and the Internet of Things (IoT) continued to grow in 2025, owing to expanded sensor installations, smart infrastructure efforts, and integration with AI analytics. While IoT growth improves productivity and connection in industries such as healthcare, shipping, and utilities, it also raises cybersecurity and data governance concerns since the increasing number of linked devices creates new attack surfaces for cyber threats. Nigerian policymakers and industry leaders have recognised these challenges in forums and policy discussions, encouraging collaborations to strengthen digital resilience and ensure that IoT systems comply with evolving data protection and network security standards. Academic research in Nigeria also highlighted the need for blockchain-driven secure communication frameworks for IoT networks to enhance trust and protect against tampering and cyberattacks, pointing to emerging intersections between IoT and distributed ledger technologies. These intersections pose regulatory questions around liability for IoT failures, data ownership and cross-device consent mechanisms when personal or sensitive information flows through interconnected systems.

Taken together, 2025 demonstrated that emerging technologies are growing in both application and regulatory significance, with quantum computing bringing cybersecurity preparedness to the forefront, XR influencing human-computer interaction norms, blockchain deepening decentralised trust models, and IoT embedding intelligence in everyday devices. Across all these technologies, legal and regulatory systems, including those in Nigeria, are shifting from broad principles to sector-specific governance

frameworks that aim to balance innovation with data protection, security, accountability, and systemic risk mitigation in an increasingly technology-driven economy.

Public sentiment remained cautiously optimistic despite the rapid pace of innovation. According to a 2025 Pew Research survey, most adults worldwide are aware of the advantages of AI, but many are also concerned about its social impact, transparency, and ethical use. This highlights the need for regulatory policy to address not only commercial opportunity but also public expectation and trust.

2026 Regulatory Roadmap

Looking into 2026, regulatory developments are expected to intensify. Nigeria's anticipated National Digital Economy and E-Governance Bill could empower NITDA as a super-regulator with authority to classify AI risks, mandate algorithmic transparency, and accredit AI auditors, creating a more cohesive domestic legal framework that coordinates with data protection and sector regulators. At the same time, global trends such as international AI safety reporting, multilateral tech supply chain initiatives like Pax Silica and evolving cybersecurity frameworks to combat AI-driven threats will raise standards for legal compliance and cross-border cooperation. As AI and emerging technologies become deeply embedded across sectors, legal professionals and regulators will need to prioritise frameworks for algorithmic accountability, privacy protection, human rights safeguards, economic inclusion, and national cyber resilience, ensuring that innovation is paired with governance that is robust, inclusive and aligned with global best practices.

TAX

Under the comprehensive Tax Reform Acts, Nigeria's tax ecosystem experienced a significant digital transition, with regulatory bodies using technology to modernise the administration and enforcement of taxes in real time, in addition to updating regulations. A key component of this change has been the Federal Inland Revenue Service (FIRS) being replaced by the Nigeria Revenue Service (NRS) under the new Nigeria Revenue Service (Establishment) Act (2025), which aims to promote unified, technologically enabled tax administration across the country.

To promote openness, accountability, and compliance, the 2025 reforms have prioritised the digitisation of tax processes. The reforms require e-invoicing and real-time VAT reporting systems, as well as all registered businesses to adopt electronic fiscal systems that automatically capture sales and transactions, laying the groundwork for real-time monitoring and audit capabilities, which is consistent with global best practices in tax digitalisation. The NRS is deploying the Electronic Fiscal System (EFS) to provide automatic, accurate digital sales recording and reporting, while the National Single Window Portal was introduced to expedite electronic lodging of documents, fee payments, and data provision, thereby enhancing trade transparency, revenue assurance, and cross-border efficiency. via a uniform online platform.

Simultaneously, the government has introduced technology-based solutions to streamline and integrate taxpayer identification. To expand the tax base and guarantee consistent compliance, efforts have been made to streamline TIN registration and verification, including linking with banking systems that demand TIN validation for financial transactions. The Tax Identification Number (TIN) has become a mandatory unified identifier across all tax types (VAT, withholding tax, corporate income tax, and more). The Tax ID retrieval process can be accessed by taxpayers using the designated portal.

Step-by-Step Guide to Retrieving a Tax ID

A. For Individuals

1. **Visit the Portal**
   Go to either:
   1.1. https://taxid.jrb.gov.ng
   1.2. https://taxid.nrs.gov.ng
2. On the homepage, click on the **"Individual"** tab.
3. Select **NIN (National Identification Number)** as your ID type.
4. Input your **11-digit NIN** carefully.
5. **Click "Retrieve Tax ID"**
6. Provide the following exactly as recorded by the National Identity Management Commission (NIMC):
   - First Name

- Last Name
- Date of Birth

7. Click **"Submit."**
8. Your **13-digit Tax Identification Number (TIN)** will be displayed on the screen.

B. For Corporate and Registered Entities

1. **Visit the Portal**
   Go to:
   1.1. https://taxid.jrb.gov.ng
   1.2. https://taxid.nrs.gov.ng
2. Click on the **"Corporate"** tab on the homepage.
3. Select the appropriate category of organisation.
4. Where required, input your **CAC Registration Number**.
5. **Click "Get Tax ID"**
6. **View Your Tax ID**
7. The **13-digit Tax Identification Number (TIN)** will be displayed.

To align with international tax technology standards and increase their digital capabilities, Nigeria's tax authorities have continued to promote partnerships with tech companies and foreign institutions. The FIRS and France's Direction Générale des Finances Publiques (DGFiP) inked a Memorandum of Understanding (MoU) in December 2025 to modernise data-driven auditing capabilities, strengthen automated compliance systems, and expedite digital tax reform. The partnership focuses on capacity building, workforce development, data analytics, and policy modernisation, and is expressly framed as advisory and non-intrusive, with Nigeria retaining full control over its tax data under domestic laws.

From a regulatory technology (RegTech) perspective, Nigeria's reforms mirror global trends in tax administration innovation. According to the OECD's 2025 Tax Administration Digitalisation and Digital Transformation Initiatives report, tax authorities worldwide are increasingly using AI for compliance management, risk assessment, and fraud detection, with more than 70 per cent of administrations incorporating AI tools to improve effectiveness and taxpayer services.

AI and machine learning models now enable digital administrations to prefill tax returns based on direct data feeds from business systems, help taxpayers forecast liabilities and optimise compliance strategies, and perform advanced analytics to detect emerging tax-evasion patterns. Such tools significantly reduce manual intervention and errors and allow revenue authorities to target enforcement intelligently.

Nigeria's reforms also explicitly address the digital economy and emerging assets, with rules requiring Virtual Asset Service Providers (VASPs), such as cryptocurrency exchanges, wallet services, and token platforms, to file monthly returns directly with the tax authority, to integrate digital finance into formal tax reporting and anti-money laundering frameworks. This demonstrates the regulatory desire to integrate taxation with technology innovation and guarantees that digital transactions are appropriately recorded for tax purposes.

On performance outcomes, the FIRS (NRS) reported record revenues in 2025: N22.59 trillion between January and September 2025, and N47.39 trillion over two years, representing 115% of its fiscal target at the time. Growth is attributed to reforms such as the implementation of national e-invoicing solutions, automated compliance mechanisms, and taxpayer education initiatives, as well as collaborations aimed at improving voluntary compliance across sectors.

2026 Regulatory Roadmap

The trajectory of tax digitalisation points to a deeper integration of AI, big data analytics, automated rule engines, and real-time transaction reporting into the fiscal ecosystem by 2026 and beyond. This will change the way compliance, auditing, and enforcement are carried out. To be compliant and take advantage of new technologies for tax planning, Nigerian firms, particularly startups and SMEs, will need to invest in digital accounting systems, data governance frameworks, and automated reporting tools as the digital tax infrastructure grows. By bringing Nigeria's regulatory framework into line with international standards and utilising technology to facilitate widespread economic participation in the formal economy, these developments hold the potential to improve taxation's transparency, efficiency, and predictability.

Telecommunications

As the industry faced technological upheaval and the necessity for modern governance, Nigerian telecommunications regulation underwent dramatic changes in 2025 in terms of policy, investment direction, licensing frameworks, and legal modernisation.

The effort to revise the Nigerian Communications Act, 2003 (NCA), has been a significant ongoing development. Regulators, legislators, and industry stakeholders have generally recognised that the law is out of date and inadequate for modern digital realities, including 5G, AI, IoT, and new service models in cybersecurity. In 2025, the Nigerian Communications Commission (NCC) formally declared its plan to amend the 22-year-old Act to include provisions for stronger cybersecurity, innovation hubs, regulatory sandboxes, adaptive licensing, and formal coordination with other organisations like the National Information Technology Development Agency (NITDA), which oversees data protection and standards for the digital economy.

In regulatory governance and oversight, stakeholders called for stronger legislative protections to shield the telecoms sector from overlapping state laws that can undermine service delivery and regulatory certainty. Industry representatives, including operators and the Association of Licensed Telecommunications Operators of Nigeria (ALTON), urged legislative strengthening of the NCC's independence and called for smart licensing regimes, general authorisation frameworks and sandbox environments that allow experimentation and access to data for startups and innovators.

Other areas of focus in 2025 were planning and spectrum policy. To guide spectrum allocations, the NCC released a Draft Spectrum Roadmap (2025–2030). This roadmap included lower bands like 450 MHz and 600 MHz for increased coverage as well as ongoing optimisation of higher-capacity bands to enable data-intensive services. According to the strategy, the number of active mobile subscriptions will increase from around 171.6 million in 2025 to over 220 million by 2030. It also predicts that mobile data traffic may almost triple during this time, underscoring the scale of infrastructure needs and the ambition of policy.

In response to economic constraints and the need to boost network investment, the NCC approved a tariff revision in early 2025, allowing mobile network operators to increase voice, data, and message charges by up to 50%, a significant shift after years of stagnant consumer pricing. This move led to almost $1 billion in new investment in the sector. Operators now have more money to support infrastructure upgrades, such as 4G and fibre deployment.

Licensing and innovation models also continued to evolve. Reports confirmed plans for Nigeria's telecommunications company (NTEL)'s re-entry into the Nigerian telecoms market in 2026 under a new Mobile Virtual Network Operator (MVNO) model, which relies on strategic partnerships and spectrum-sharing agreements instead of extensive physical infrastructure build-outs. This reflects a broader regulatory and industry recognition that innovative business models are critical to sector growth and to broadening service diversity.

Another notable regulatory move was the issuance of satellite permits to global broadband providers like Amazon's Project Kuiper and companies like BeetleSat and Satelio IoT Services. These seven-year licenses were given under the NCC's commercial satellite communications rules, which are part of a concerted effort to incorporate next-generation satellite broadband services into Nigeria's connectivity ecosystem and increase high-speed access across the country.

Notwithstanding the sector's advantages, foreign direct investment fell precipitously in the first half of 2025. As a result, the NCC implemented governance frameworks to improve operator transparency, risk management, and oversight in an effort to regain investor trust and promote sustainable capital flows.

Future-proofing the telecom legal framework to handle AI integration, cybersecurity concerns, infrastructure sharing, broadband expansion, fair competition, and the introduction of new service models like MVNOs and satellite broadband is evidently important across all of these regulatory trends. Nigeria's dedication to bringing its telecom regulatory environment into line with international best practices while striking a balance between innovation, consumer protection, and economic sustainability is demonstrated by the continuous discussions surrounding legislative reform, adaptive licensing, spectrum optimisation, and investment incentives.

Digital infrastructure expansion was also a key focus. The Nigerian government and World Bank approved $500 million under the BRIDGE project to enhance national fibre-optic connectivity and broadband access, targeting underserved communities. Lagos State also announced the Telecommunication Infrastructure Regulatory System (TIRS) to digitise permits and reduce deployment bottlenecks, scheduled for launch in 2026. Private sector partnerships were strengthened through licensing for hyperscale data centres, positioning Nigeria to host significant digital infrastructure and attract foreign investment.

2026 Regulatory Roadmap

Nigeria’s telecommunications regulatory trajectory in 2026 is expected to consolidate the structured reform momentum initiated in 2025, particularly the formal review of the Nigerian Communications Act 2003. It is reasonable to assume that an amendment Bill or repeal-and-reenactment legislation might be formally introduced before the end of 2026, given the start of stakeholder consultations and the concurrent review of the National Telecommunications Policy.

To meet anticipated subscriber and data growth, the 2025–2030 Spectrum Roadmap is also anticipated to expedite future spectrum auctions and re-farming of important 5G bands like 3.5 GHz and 2.3 GHz. After the influx of international players in 2025, it is anticipated that investments in the sector will improve in 2026. Along with a more stable and modern regulatory environment, this will boost investor confidence.

Infrastructure

The year 2025 marked a period of structural realignment for global infrastructure. Following the volatility of post-pandemic construction and investment cycles, infrastructure markets entered a phase defined by digital integration, sustainability requirements, and regulatory evolution. Global investment priorities increasingly converged around energy transition, smart transport corridors, and technology-enabled asset management. For Nigeria, 2025 was significant as digital backbone expansion, renewable energy integration, and transport corridor projects began to reposition the country within a more competitive, compliance-driven infrastructure ecosystem.

The energy sector faced pressures. Grid expansion in North America, Europe, and Asia was accelerated to support rising demand from digital infrastructure, notably hyperscale data centres. Utilities such as Duke Energy projected over $100 billion in capital expenditure from 2025 to 2030, reflecting the dual need for physical expansion and digital management systems. At the same time, global climate policy pushed infrastructure planners toward renewable integration, energy efficiency, and net-zero aligned project design.

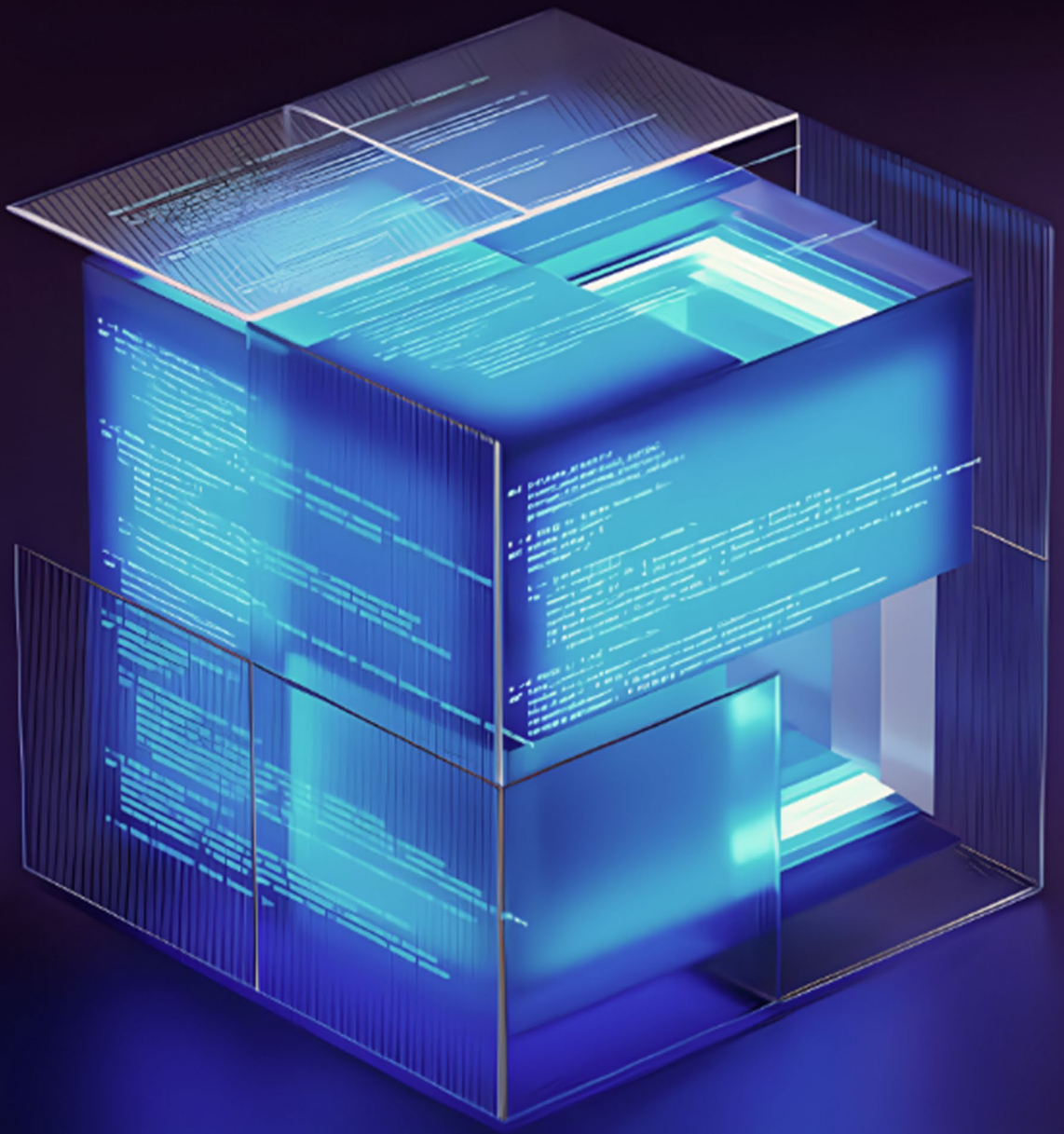
In Nigeria, infrastructure development in 2025 was characterised by measurable growth across transport, digital networks, and energy. The Lagos-Calabar Coastal Highway remained a strategic national project, with financing structures exceeding $747 million to ensure corridor connectivity and regional integration. Discussions on the Fourth Mainland Bridge progressed, signalling continued urban transport expansion, notwithstanding the recent news on PPP hesitation to fund the project. Also, in its continued strategic investments in major transport corridors, Nigeria's planned transit systems, like the $3 billion Green Line metro project, which was unveiled in 2025 in Lagos, gained visibility, aiming to relieve congestion and provide modern urban mass transit solutions.

Innovation also underpinned infrastructure development. Smart city pilots, IoT-enabled urban traffic systems, and AI-enhanced monitoring for bridges, highways, and energy networks began to move beyond experimental phases. This technological integration reflects a recognition that physical assets alone no longer define competitiveness; digital and operational efficiency metrics are critical to long-term success.

Looking to 2026, three interrelated forces are likely to define the Nigerian infrastructure landscape. First, sustainability and climate resilience requirements will shape planning and capital allocation, with green incentives tied to compliance with renewable integration and low-carbon standards. Second, public-private partnerships and financing frameworks will determine the pace of project delivery, with performance-based KPIs and regulatory alignment critical to attract investment.

For policymakers and regulators, the task in 2026 is clear: align physical, digital, and energy infrastructure with evolving global norms, climate objectives, and technological standards. This requires enforceable digital infrastructure policies, integrated planning mechanisms, and sustainable funding structures to ensure Nigeria's infrastructure is not only expanded, but resilient, efficient, and globally competitive.

Data Security



The NDPC issued its General Application and Implementation Directive (GAID) on March 20, 2025, which took effect on September 19, 2025, replacing the previous Nigerian Data Protection Regulation, 2019 (NDPR).

This marked a significant maturation of Nigeria's data security regulatory field in 2025, as the Nigeria Data Protection Act (NDPA) 2023 advanced from statute to an operational regime. The GAID made compliance obligations more specific and enforceable for data controllers and processors across sectors, including telecoms, finance, health, and digital platforms. The GAID specifies detailed requirements for data governance, lawful bases for processing, breach reporting, compliance audits, DPIAs (data protection impact assessments), and cross-border transfers, which means that organisations can no longer operate on broad principles but must map processing activities and meet clear standards to avoid sanctions.

To facilitate compliance readiness for companies of all sizes, the NDPC licensed Data Protection Compliance Organisations (DPCOs), trained hundreds of Data Protection Officers (DPOs) through domestic certification programs, and pursued capacity building and market development to support implementation and increase understanding. These actions are intended to increase professional competence and lessen dependency on foreign certifications. The Commission has also signalled that data protection enforcement will deepen in 2026 with expanded audits, breach investigations and enforcement actions under the GAID as mandatory provisions for reporting and accountability (e.g., 72-hour breach notifications and compliance audit returns) become fully effective.

Economically, Nigeria's data protection ecosystem is becoming a revenue driver, as the NDPC projected N13.8 billion in receipts for 2025, up around 15% from 2024's N12 billion, spurred by growth in DPCO registrations and compliance services, reflecting that compliance is now a business stream as well as a regulatory requirement; this demonstrates data protection's expanding role in the formal digital economy rather than being purely an administrative obligation. The NDPC also engaged in broad awareness efforts, including calling on traditional institutions to support public understanding of data rights and to enhance grassroots compliance, recognising data protection as both a social trust mechanism and an economic enabler for investment and citizen confidence.

Practical results are showing up on the enforcement front: the NDPC has licensed hundreds of DPCOs, registered tens of thousands of data controllers and processors of major importance, and started compliance audit procedures with enforcement actions against non-compliant entities. Detailed enforcement statistics are anticipated in 2026, signalling a change from the issuance of static rules to active regulatory supervision (reported amounts in early 2026 suggest billions of naira accumulated from compliance revenues and actions).

2026 Regulatory Roadmap

Looking ahead to 2026, the regulatory roadmap shows further prioritisation of data security and governance as a pillar of digital economy regulation. Key expectations include: continued enforcement of the GAID framework, expanded breach reporting and DPIA

enforcement, clarification of cross-border data transfer rules and adequacy mechanisms, and sector-specific guidance for emerging technologies such as AI systems and Internet of Things (IoT).

The NDPC's experience in 2025, as well as its professionalisation and awareness programs, indicates that compliance enforcement will become more systematic and apparent. There is also projected to be more punitive enforcement and penalty regimes for erring organisations and institutions, and enterprises may need to prioritise compliance by design more than ever before. Although Nigeria is developing its own regime independent of global developments, global trends, such as the EU's evolving AI governance, which is nominally linked to data protection, will have an indirect impact on expectations for transparency, algorithmic accountability, and secure data processing in multinational and cross-jurisdictional digital operations.

Shipping

The year 2025 marked a decisive recalibration for the global maritime shipping industry. After the extraordinary volatility of the post-pandemic recovery years, shipping markets transitioned into a phase defined less by crisis and more by structural correction. Capacity expansion, geopolitical rerouting, environmental regulation, and digital transformation converged to reshape not only operational economics but also the regulatory architecture governing global trade flows. For Nigeria and other emerging maritime economies, 2025 was equally consequential, as infrastructure modernisation, legislative reform, and digital governance initiatives began repositioning ports within a more competitive, compliance-driven global trade ecosystem.

Globally, maritime trade growth in 2025 remained modest, but volatility persisted. The United Nations Conference on Trade and Development reported that geopolitical tensions and tariff disputes continued to disrupt established shipping lanes, forcing rerouting and extending voyage distances. Average maritime haul distances increased significantly compared to pre-pandemic baselines, reflecting longer and less predictable trade corridors. Projections for 2026 to 2030 indicate annual seaborne trade growth of approximately 2 percent, with containerised trade growing slightly above that average. The Red Sea disruptions in particular altered container flows, increased insurance and fuel costs, and reduced scheduling reliability.

Simultaneously, the industry confronted the consequences of aggressive fleet expansion undertaken during the freight boom years. Major carriers, like Maersk, signalled concern about excess container capacity entering the market, with vessel supply growth projected to outpace trade growth into 2026. The result is downward pressure on freight rates and margin compression risk. Shipping has thus returned to cyclical fundamentals, but within a far more regulated environment than previous downturns.

If freight markets reflected cyclical correction, environmental governance reflected structural transformation. In April 2025, the International Maritime Organization adopted a landmark framework introducing a global carbon pricing mechanism for shipping emissions, establishing mandatory financial contributions tied to greenhouse gas output from 2028. This represents the first global carbon pricing regime applied to an entire industrial sector and operationalises the sector's pathway toward net-zero emissions by or around 2050.

Beyond carbon pricing, vessel operators continued grappling with compliance obligations under the Energy Efficiency Existing Ship Index and the Carbon Intensity Indicator regimes. These technical frameworks require vessel efficiency benchmarking, annual emissions performance ratings, and corrective action plans where thresholds are not met. The cumulative effect is profound: environmental compliance is now embedded within asset valuation, charter attractiveness, and long-term capital planning. Decarbonisation is no longer an aspirational corporate responsibility metric; it is a regulatory determinant of commercial viability.

While global markets adjusted, Nigeria's maritime sector experienced measurable throughput expansion. Container traffic rose significantly during 2025, with vessel calls also increasing. Lekki Deep Seaport consolidated its role as a strategic cargo hub within West Africa, reinforcing Nigeria's geographic advantage. However, growth occurred alongside intensified scrutiny of structural inefficiencies, regulatory fragmentation, and pricing opacity.

Digitalisation emerged as both reform tool and governance necessity. Federal authorities accelerated port modernisation initiatives, including paperless port systems, electronic call-up platforms, vessel tracking technologies, and port community system development. These reforms align with Nigeria's broader commitment to implementing a National Single Window framework in accordance with World Trade Organization Trade Facilitation Agreement obligations. The Single Window model aims to integrate customs, port authorities, maritime regulators, and trade agencies into a unified documentation and clearance ecosystem, reducing duplication and increasing transparency.

Yet digital integration also introduces regulatory risk. As port operations and vessel management systems become increasingly data-driven, cybersecurity vulnerabilities expand. Maritime infrastructure now qualifies as critical digital infrastructure. Governance in 2026 will therefore extend beyond physical safety and customs compliance into cyber resilience, system integrity, and data protection enforcement.

Institutional reform also advanced. In May 2025, the Federal Executive Council approved Nigeria's first National Policy on Marine and Blue Economy, establishing a ten-year strategic roadmap for harnessing maritime resources for economic growth, sustainability, and employment. The policy reframes shipping within a broader economic governance ecosystem, linking infrastructure development, environmental compliance, local content promotion, and private capital mobilisation.

Parallel to policy reform, attention returned to maritime financing architecture. The Cabotage Vessel Financing Fund, established under the Coastal and Inland Shipping (Cabotage) Act 2003, has long been criticised for delayed disbursement and limited impact on indigenous fleet ownership. In 2025, the Ministry directed renewed efforts toward operationalising the Fund, culminating in the January 2026 launch of a digital CVFF Application Portal. In one of our write-ups, we discussed the CVFF and what it means for indegenous shipping. Digitisation introduces transparency and structured eligibility assessment, but it also heightens oversight expectations. Financing reform will only strengthen indigenous participation if matched by disciplined enforcement of cabotage provisions, including stricter review of waiver regimes historically granted to foreign operators.

Legislative restructuring also remains central to the oversight conversation. The proposed Nigerian Ports Economic Regulatory Authority Bill seeks to establish an independent economic regulator for ports, consolidating tariff oversight, enhancing service-level accountability, and addressing long-standing concerns regarding overlapping mandates among maritime agencies. If enacted and effectively implemented, the Bill would mark a shift from administrative supervision to structured economic regulation, aligning Nigeria's port governance with global best practice and strengthening investor confidence.

Regionally, these reforms must be viewed through the lens of AfCFTA implementation. As intra-African trade corridors expand, port efficiency, regulatory clarity, and cost transparency will determine competitive positioning. Ghana, Senegal, and other West African ports continue investing aggressively in automation and trade facilitation. Nigeria's maritime reforms therefore carry continental significance: inefficiency risks diversion of cargo, while regulatory coherence could reinforce Nigeria's leadership in West African logistics.

Collectively, 2025 was not a year of dramatic collapse or exuberant expansion. It was a year of structural consolidation. Market correction, carbon governance, digital integration, financing reform, and legislative restructuring converged to redefine maritime oversight.

2026 Regulatory Roadmap

Looking into 2026, three interrelated forces are likely to define the maritime shipping landscape. First, freight markets are expected to remain under pressure due to persistent overcapacity. Carriers will focus on cost discipline, alliance coordination, and network optimisation. For African ports, this may create opportunities to attract traffic if efficiency gains offset freight rate compression.

Second, environmental compliance costs will begin shaping operational behaviour more directly as IMO carbon measures transition from agreement to implementation. Ports that invest early in green corridors, shore power, and alternative fuel infrastructure will be strategically positioned.

Third, digital transformation will move from reform rhetoric to operational necessity. The success of Nigeria's port modernisation and paperless systems will determine whether throughput gains translate into sustainable competitiveness.

As 2026 unfolds, the defining question will not be whether shipping grows, but how efficiently and sustainably it operates within tightening regulatory and technological frameworks. For policymakers, regulators, and maritime operators alike, the task is clear: align infrastructure, compliance, and digital resilience with a global industry that is no longer cyclical alone but systemically regulated.

Intellectual Property

Intellectual property in 2025 was shaped by the convergence of digital infrastructure, artificial intelligence, and regulatory scrutiny across global creative markets. The year did not merely produce isolated disputes; it exposed structural tensions between technological innovation and the legal frameworks designed to protect creative ownership.

One of the most consequential developments was the proposed acquisition of Warner Bros Discovery's studio and streaming assets by Netflix in December 2025, a transaction valued at approximately $82.7 billion (equity value of $72 billion). The scale of the deal prompted antitrust review in the United States, where regulators examined whether the consolidation of premium content libraries under a dominant streaming platform could substantially lessen competition. At issue was not simply corporate expansion but the concentration of intellectual property control within algorithm-driven distribution systems.

At the same time, platform-based licensing innovation accelerated. Roblox introduced an IP licensing platform allowing rights holders such as Netflix and Lionsgate to license characters and content directly to developers within its digital ecosystem. This move reflected a broader shift toward embedded, technology-enabled licensing that reduces transactional friction but complicates regulatory oversight. When licensing is internalised within global platforms, questions arise regarding transparency, royalty allocation, and cross-border enforcement.

Patent enforcement further illustrated the technological core of modern IP disputes. In November 2025, Nokia filed suit against Warner Bros, alleging infringement of video streaming patents relating to encoding and content delivery technologies. The litigation underscored how control of foundational software and compression technologies increasingly shapes bargaining power in digital media markets.

Artificial intelligence intensified these tensions. Also in 2025, AI-generated and AI-assisted songs continued to surface on mainstream platforms, reviving questions about authorship and copyright eligibility. Industry bodies argued that generative AI models were trained on copyrighted music without proper licensing, characterising such training practices as commercial-scale infringement. In response to mounting pressure, Warner Music reached a settlement with AI music company Udio and announced plans to develop a licensed AI music platform structured around revenue sharing with rights holders.

Internationally, IP governance also expanded in scope. The WIPO Treaty on Intellectual Property, Genetic Resources and Associated Traditional Knowledge continued progressing toward ratification in 2025, reflecting efforts to broaden recognition of knowledge systems within global IP norms. The treaty illustrates how IP law is simultaneously adapting to digital disruption and expanding to address equity in innovation ecosystems.

Nigeria's IP landscape in 2025 reflected parallel structural reform. The Federal Executive Council in November 2025 approved Nigeria's National Intellectual Property Policy and Strategy, marking the country's first unified national IP framework. Developed with support from the World Intellectual Property Organization, the policy aims to modernise IP administration, strengthen enforcement, and align Nigeria's regime with international standards including TRIPS and AfCFTA obligations. Implementation committees were inaugurated in early 2026 to coordinate inter-agency execution and monitor reform progress.

Administrative digitisation accompanied policy reform. The Nigerian Trademarks Registry implemented upgrades to its Industrial Property Administration System to enhance electronic filing, record management, and procedural efficiency. Registry modernisation addresses longstanding concerns about processing delays and transparency, which directly affect investor confidence and enforcement credibility.

Judicial capacity building was also prioritised. In April 2025, WIPO collaborated with the Nigerian judiciary to strengthen adjudication capacity in intellectual property disputes. As technology-driven disputes involving software, digital licensing, and AI-assisted works increase, specialised judicial competence becomes essential to maintaining legal certainty.

Taken together, 2025 demonstrates that intellectual property is no longer a peripheral compliance function. It is a central regulatory arena where technology, competition policy, and economic development intersect. Market concentration in streaming, platform-integrated licensing, AI-generated creativity, and national policy reform all reflect a broader recalibration of how creative and technological assets are governed.

In the same vein, capacity building and stakeholder engagement have continued to deepen. In February 2025, the WIPO Nigeria Office marked its 5th anniversary by hosting the inaugural National Intellectual Property Stakeholders Forum, convening policymakers, industry experts, creators, entrepreneurs, academics and diplomats to discuss the role of IP in development, innovation and economic growth.

By providing modules on copyright, trademarks, patents, plant variety protection, traditional cultural expressions, and the role of intellectual property in development and entrepreneurship, WIPO-led education and empowerment initiatives, especially Project 1%, have been increasing IP awareness and skills among Nigerian youth, students, and innovators. The program aims to reach at least 1% of Africa's school-aged population by 2030. After starting as a pilot program in Nigeria, Project 1% has expanded to involve thousands of students in other nations and educational institutions.

Alongside education efforts, WIPO IP Labs projects, including the IP Labs 2.0 acceleration programme, have supported startups and early-stage entrepreneurs in integrating IP into business development and financing strategies. The second edition of IP Labs culminated in a demo exhibition where participants showcased how they leveraged IP for strategic growth, reflecting broader efforts to help innovators turn ideas into scalable, market-ready solutions.

2026 Regulatory Roadmap

Looking ahead, 2026 will likely be defined by operationalisation rather than experimentation.

Competition regulators are expected to intensify scrutiny of content consolidation and platform dominance, particularly where ownership of large IP libraries intersects with digital distribution control. Policymakers will continue refining standards for human authorship in AI-assisted works, clarifying thresholds for copyright eligibility and disclosure requirements. Licensing models that incorporate AI training and generation are likely to formalise revenue-sharing mechanisms to compensate underlying rights holders. In Nigeria, effective

implementation of the National Intellectual Property Policy and Strategy, alongside registry digitisation and judicial strengthening, will determine whether reform translates into predictable enforcement.

Intellectual property in 2026 will not be defined solely by registration statistics or litigation volume. It will be shaped by the credibility of regulatory systems confronting technological acceleration. The jurisdictions that succeed will be those that integrate AI innovation, platform economics, and competition safeguards into coherent, enforceable governance frameworks.

Real Estate

Real estate in 2025 saw the transition from isolated digital experiments to technology becoming integral to core market functions around valuation, asset management, and investor intelligence. According to the PwC Emerging Trends in Real Estate 2025 report, regulation was identified by 74% of industry leaders as one of the most important issues affecting their business, while AI was recognised as having a widespread impact on areas such as tenant retention prediction and energy usage optimisation.

AI adoption in real estate accelerated globally. A 2025 JLL Global Real Estate Technology Survey showed that while most organisations are still piloting AI, nearly all corporate real estate teams have begun experimenting with AI tools aimed at portfolio optimisation, energy management, and predictive workflows. Globally, advanced digital technologies altered property search and valuation. Virtual reality (VR) and augmented reality (AR) tools became mainstream in real estate marketing, with industry analysis showing that VR home tours and 3D walkthroughs significantly increased buyer engagement and listing views compared to traditional methods.

In Nigeria, similar technology adoption trends were visible. Local platforms began applying AI to generate tailored property listings, automate pricing trend analysis, and support predictive decision-making for buyers and investors. Domestic property professionals explicitly recognised the role of PropTech in transforming the market. Industry leaders in Nigeria described digital platforms, virtual tours, and blockchain-based transaction tools as elements that are reshaping how deals are struck and documented.

Despite these advances, regulatory frameworks lagged behind technological adoption. Nigeria's land administration system remains rooted in paper-based titling and consent protocols that often extend approval timelines and generate uncertainty for investors. Efforts to modernise cadastral systems to recognise electronic titles were underway, but legal recognition of digital records varied by state and was not yet uniform.

2026 Regulatory Roadmap

A primary area of reform will be the digitisation of land records and the legal recognition of electronic titles. In jurisdictions such as Nigeria, manual registries and paper-based consent systems continue to slow transactions and create exposure to fraud. Pilot blockchain registries may continue in limited contexts, but the more significant reform will be statutory amendments that expressly recognise digital titles and electronic documentation as legally conclusive. The objective is to reduce verification timelines, curb double allocations, and improve investor confidence.

Algorithmic pricing and automated valuation tools will also attract closer scrutiny. Artificial intelligence is now embedded in property search, rental optimisation, and valuation modelling. While these tools enhance efficiency and reduce subjectivity, they also raise competition and transparency concerns. In 2026, regulators are likely to refine standards requiring auditability, disclosure of methodology, and safeguards against unfair coordination or mispricing.

Consumer protection frameworks will similarly expand to address digital property transactions. Online platforms now manage listings, documentation, payments, and negotiations. This shift demands clearer rules around platform liability, verification obligations, dispute resolution, and data governance. Compliance with data protection

regimes will become central to PropTech supervision, particularly where platforms process sensitive identification and financial information. The regulatory emphasis will move toward accountability for digital intermediaries operating within property markets.

Sustainability compliance is also poised to become embedded within approval and financing standards. As environmental performance increasingly influences capital allocation decisions, regulators may integrate energy efficiency and climate risk considerations into planning approvals and lending frameworks. Building standards, disclosure requirements, and ESG-linked financing criteria are likely to become more coordinated rather than advisory.

Collectively, the 2026 trajectory suggests a regulatory shift from supervising physical assets alone to supervising digital infrastructure within property systems. Land registries, pricing engines, transaction platforms, and mortgage documentation are becoming data-driven environments subject to legal oversight. The credibility of real estate markets in 2026 will depend not only on capital availability or asset location, but on whether regulatory systems can adapt coherently to a technology-enabled property ecosystem.

Dispute Resolution

Technology-driven dispute resolution continued to gain regulatory and institutional traction as legal systems respond to growing demand for efficient, accessible and transparent conflict management in the digital economy.

As a demonstration of how technology is now essential rather than supplementary to contemporary ADR practice and knowledge exchange locally and regionally, the Chartered Institute of Arbitrators (CIArb), Nigeria Branch teamed up with digital infrastructure provider T2 last year to support its 2025 Annual Arbitration and ADR Conference with a "digital backbone" that includes high-speed connectivity, hybrid participation, digital engagement, and live streaming.

Regulators and policy actors are also paying attention to structural harmonisation of dispute mechanisms. In late 2025, the Attorney-General of the Federation announced that the Federal Government is working on a National Alternative Dispute Resolution Policy Framework to harmonise ADR standards across Nigeria, aiming to promote sector-specific dispute mechanisms, reduce fragmentation, and strengthen institutional arbitration and mediation capacity, an important regulatory development for technology and commercial disputes that often traverse multiple sectors.

International arbitration groups are paying more attention to the ways that technology and dispute resolution interact on a global scale. For instance, many arbitration institutions' procedural rules, such as those of the Regional Centre for International Commercial Arbitration (RCICAL) in Lagos, have included clauses allowing for remote participation, electronic submissions, and virtual hearings.

These developments occur against the backdrop of the updated Arbitration and Mediation Act 2023, which already envisions digital engagement, such as recognition of e-communication for arbitration agreements, virtual mediation and enforceability of electronically mediated settlements, showing that Nigeria's legal framework is catching up to technological realities in ADR processes.

2026 Regulatory Roadmap

Looking into 2026 and beyond, the regulatory and technology convergence in dispute resolution is likely to accelerate with anticipated initiatives such as:

- ✓ the formal launch of national ADR policy frameworks to unify standards across sectors;
- ✓ greater regulatory recognition of online dispute resolution (ODR) platforms;
- ✓ emerging discussions on ethical AI usage in litigation, arbitration and mediation;
- ✓ further adoption of hybrid and fully virtual hearing protocols; and
- ✓ integration of data analytics, AI case management and secure cloud collaboration tools into institutional ADR practices.

Conclusion

In 2025, we witnessed how Nigeria's technological ecosystem is developing at the nexus of digitalisation, innovation, and regulation. Businesses must increasingly incorporate compliance and governance into their basic operations, from startups navigating frameworks for tax, data, and consumer protection to the introduction of the National Intellectual Property Policy and Strategy. Initiatives such as "The Growth Boardroom" serve as prime examples of how proactive legal assistance may transform regulation from a barrier to growth. As 2026 approaches, Nigeria's digital economy will be characterised not only by technological innovation but also by the capacity to strike a balance between operational resilience, accountability, and transparency, establishing the nation as a safe and competitive centre for cutting-edge technology.

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