

CORPORATE & COMMERCIAL PRACTICE GROUP

Q4 Compliance Check: What CAC Enforcement Changes for Company Secretaries

The Corporate Affairs Commission (CAC) began actively enforcing the statutory requirements for company business letters on 1 August 2026. In a public notice dated 8 July 2026, the Commission described the exercise as part of its drive to improve corporate accountability and to help customers, investors and regulators identify businesses and their directors. With the final quarter of the year under way, this is a good moment for company secretaries and compliance teams to confirm that business letters, and the rest of the company's statutory filings, are fully up to date.

What the CAC Is Enforcing

Under the Companies and Allied Matters Act (CAMA) 2020, a company's business letters must carry prescribed particulars in legible characters. These include the company's registered name and registration number, the present forename or initials and surname of each director, any former forename and surname, and the nationality of every director who is not a Nigerian. The requirement applies to registered companies regardless of size or industry. The CAC has told companies to review their letterheads and other official correspondence, and has warned of sanctions for non-compliance.

Review Letterheads, Invoices and Notices

The first task is a document audit. Printed stationery and digital templates should be checked, including email signatures and any letter template stored in an accounting or document management system. The company name should match the CAC register exactly, the registration number should be correct, and the list of directors should reflect the current board. Where directors have joined, left or changed their names, the CAC record should be updated first and the templates revised to match. The same discipline is sensible for invoices, receipts and official notices, which should also carry the company name and registration number.

Check the Rest of the Statutory Record

Enforcement attention on business letters is a useful prompt to test every other statutory obligation. Annual returns should be filed and current at the CAC, with no missed years. The register of members and the register of directors should show the latest details and agree with what has been filed. Where records and filings differ, the gap is best closed now, before it is raised by the regulator, a counterparty or an investor carrying out due diligence.

Share Allotments and Transfers

Changes in shareholding deserve particular care. Every allotment or transfer of shares should have been properly documented and filed with the CAC, and the register of members should reflect it. Unfiled changes are a common cause of delay when a company raises capital, sells a stake or undergoes due diligence, because the public record and the company's own register tell different stories.

A Practical Q4 Checklist

A short checklist keeps the exercise manageable: update business letters, invoices and notices to match the CAC directive; confirm annual returns are filed and current; check that the registers of members and directors are accurate; and verify that every share allotment or transfer has been filed. Assigning an owner and a date to each item makes it easier to evidence compliance if the CAC, a bank or an investor asks.

As accredited CAC agents, we manage these filings in-house for our clients, from reviewing business letters and updating company records to preparing and submitting annual returns and share-related filings.

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