



WORLD CUSTOMS ORGANISATION – WEST AND CENTRAL AFRICA

Report of the Finance & Audit Committee Work Mission to Abuja: January 23 to February 15, 2021: Review and audit of the WCO-WCA Regional Fund

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2. INTRODUCTION

In his letter referenced No. 140/OMC-AOC/VP-CAB of 12 January 2019, Mr. Guénolé MBONGO KOUMOU, Vice-Chair of the World Customs Organization for the West and Central African Region (WCO-WCA), initiated a working mission of the Finance & Audit Committee based on the recommendation of the Extraordinary virtual Conference of Directors General of Customs held on December 29, 2020.

I. Mission Objective

The main objective of the Finance and Audit Committee's work mission is to provide a report on the status of the Regional Fund, which will be presented at the Directors General Conference.

II. Scope of the mission

The mission was to cover the following:

- To Audit the financial operations covering the last four (4) periods.
- To review the collection and disbursement procedures.
- To carry out additional interventions, not covered by the Engagement letter, in the context of diligence directly linked to the audit mission.
- To make proposals and recommendations.

III. Length of mission

Initially planned for one month (1) as follows:

- On January 15, 2021, video-conference work planning,
- January 23 to February 6, 2021 work in Abuja, Nigeria,
- 06 to 15 February 2021, preparation of the mission report for submission to the Vice-Chair (for presentation to the DGs Conference).

Due to additional interventions and other information requirements, the mission was extended by an additional week.

IV. Team composition

- Gambia: **Mr. Alhajie Saihou Denton**, Director of Finance & Accounting (**Team Leader / Co-Ordinator**)
- Sierra Leone: **Mr. Edwin Conteh**, Deputy Finance Director
- Democratic Republic of Congo: **Mr. Felly Luyindula Mavambu**, Customs Inspector
- Nigeria: **Mrs Linda Mark**, Assistant Comptroller of Customs

3. BACKGROUND

The World Customs Organisation (WCO) is comprised of several regional bodies based on their geographical location. The membership is made up of Customs and Revenue Administrations of countries in each of these regional blocks. Our block is the West and Central Africa Region (WCO-WCA) comprising of twenty-three (23) member countries. It is managed through a Vice Chair, represented by a member Customs or Revenue Administration for a period of two (2) years with the possibility of an extension of another term. The current Vice Chair is the Republic of Congo. The regional body is financed through annual membership contributions of €10,000 each plus donor funding by various partners, and Technical assistance as well as the main WCO parent body (in Brussels).

The member countries of the WCO-WCA are Benin, Burkina Faso, Cameroon, Cape Verde, Central African Republic, Chad, Republic of Congo, Côte d'Ivoire, Democratic Republic of the Congo, Gabon, The Gambia, Ghana, Guinea, Liberia, Mali, Mauritania, Niger, Nigeria, Senegal, Sierra Leone, and Togo.

The WCO-WCA has 6 regional structures focused on managing the various issues and activities of the region. These are detailed below:

- Regional Training Centre (RTC) – Ouagadougou.
- Regional Training Centre (RTC) – Abuja.
- Regional Training Centre (RTC)- Brazzaville.
- The Regional Office for Capacity Building (ROCB) - Abidjan.
- The Regional Intelligence and Liaison Office (RILO) – Dakar (West Africa).
- The Regional Intelligence and Liaison Office (RILO) – Doula (Central Africa).

4. CREATION OF ELECTRONIC ACCOUNTING RECORDS

4.1. CASHBOOK AND BANK RECONCILIATION

Upon initial review of the records given to us in the form of manual documents such as Bank Statements and Administrative files, we realised that there was no systemic record of all transactions in a manner engendering easy accounting, analysis, review, or reporting.

Furthermore, transactions were not recorded in electronic form as would typically be the case using accounting software or other office tools such as Excel. Hence, we concluded that if we are to carry out a thorough analysis and audit of the transactions during the period, it would be pertinent to create a database of transactions using Excel. This would serve our immediate needs, as well as provide a springboard, to enable the practice of keeping a permanent electronic record of all financial activities relating to the Regional Bank Account.

Thus, utilising the Bank Statements, we created a Cashbook on Excel and recorded:

- 1) All inflows to the account, comprising mainly of Membership Contributions, Bank Interest earned and some third-party funds and cash deposits.
- 2) All outflows of funds from the account, comprising mainly of transfers to Regional Structures, Cash withdrawals and Bank charges.

Establishing the above record was quite tedious and took a lot of time to complete. It was nonetheless quite essential and helped us to identify many issues which are highlighted in the report. However, there were several information gaps in the Bank Statements relating to Payee and Payer names which required the Bank to supply us Telex and SWIFT reports for us to fill the gaps. As at the time of writing this report, much of the information is still outstanding from Ecobank.

Pursuant to the successful detailed-recording of all the Expenses and Income reflected in the Bank Statements for the period from April 1, 2016 to January 17, 2021, we created Summary tables outlining the monthly totals for transfers out, various Bank charges, as well as Contributions & deposits. In addition, the monthly transactions were reconciled to the Bank balance at the end of each month i.e., Bank reconciliation ([refer to Appendix 1](#)).

For the period April 1, 2016 to March 31, 2017, the following was noted:

- ✓ Total transfers and withdrawals amounted to €808,373.70. A large chunk of this amount, €599,545.06, related to funds transferred by Ecobank in May and returned in July 2016 (explained later in the report).
- ✓ Bank charges on transfers and account operations amounted to €1,466.15.
- ✓ Bank interest earned on the funds in the account totalled €460.81.
- ✓ Contributions and other deposits totalled €736,109.04. This included €599,545.06 returned by Ecobank in July (explained later in the report). There was an extremely low compliance

level of merely 6 payments of Contributions, including arrears, the largest being €40,000.00 from Gabon. The balance of the credits to account of €26,698.98 related to a return of unutilized budget funds.

For the period April 1, 2017 to March 31, 2018, the following was noted:

- ✓ Total transfers and withdrawals for WCO-WCA activities amounted to €292,242.70.
- ✓ Bank charges on transfers and account operations amounted to €2,694.22.
- ✓ Bank interest earned on the funds in the account totalled €645.98.
- ✓ This period witnessed the highest level of compliance by Member countries in paying their dues. Contributions and other deposits totalled €382,188.80. There were 23 payments of Contributions, including arrears, the largest being €66,624.29 from Mauritania, €40,000 from Central Africa Republic and €30,000 from Cape Verde.

For the period April 1, 2018 to March 31, 2019, the following was noted:

- ✓ Total transfers and withdrawals for WCO-WCA activities amounted to €204,248.69.
- ✓ Bank charges on transfers and account operations amounted to €2,045.23.
- ✓ Bank interest earned on the funds in the account totalled €582.23.
- ✓ Contributions and other deposits totalled €183,352.19. There was a drop in level of contribution payments from 23, the previous period, to 14, including arrears, the largest of which was €20,000 from Cape Verde. Other deposits accounted for €3,800, being return of unutilised budget funds.

For the period April 1, 2019 to March 31, 2020, the following was noted:

- ✓ Total transfers and withdrawals for WCO-WCA activities amounted to €328,202.62.
- ✓ Bank charges on transfers and account operations amounted to €3,305.49.
- ✓ Bank interest earned on the funds in the account totalled €412.66.
- ✓ Contributions and other deposits totalled €125,821.40. The compliance level of contribution payments dropped further from 14, the previous year, to 12 including arrears. Return of unutilised funds accounted for €7,925.00.

For the period April 1, 2020 to January 17, 2021, the following was noted:

- ✓ This was a period that was hugely impacted by the Covid-19 pandemic.
- ✓ There were only 2 transfers of funds in August 2020 for WCO-WCA activities totalling €4,296.00.
- ✓ Bank charges on transfers and account operations amounted to €87.20.
- ✓ Bank interest earned on the funds in the account totalled €281.08.
- ✓ Contributions and other deposits dropped significantly to €77,106.12. The compliance level of contribution payments plunged from 14, the previous period, to 7. The only other inflow, related to funds transferred in relation to GIZ Gambia Project.

4.2. MEMBERSHIP CONTRIBUTION

With respect to Membership contributions, the record available was simply a table listing all the members and the amount paid for each of the years. There was no record of the actual transactions as to when payments were received, nor was there information stating the cumulative amount outstanding from each Member country and for the entire region. We therefore took steps to try to remedy the situation.

4.2.1 RECORD OF PAYMENT OF CONTRIBUTIONS

Since we were reviewing records from 2016 and had Bank statements from that period, we decided to record all payments from 2016 up to January 17, 2021. Therefore, we had to assume that records, as outlined on the Contributions Table, were accurate up to the end of 2015. All contributions from January 1, 2016 were only recorded if confirmed, as received, in the Bank Statements.

However, we had a challenge where some contributions received, reflected on the Bank Statement, did not have the name of the Member country, and we did not have the funds transfer reports (SWIFT) from Ecobank. These were recorded but not assigned to a Member country.

4.2.2 CONTRIBUTIONS STATEMENT AND ARREARS STATUS

We created a ledger for each Member country detailing annual invoice of €10,000.00 from 2011 to date. Payments for the period up to the end of 2015 were assumed correct as per the Contributions table provided by the Fund Manager, hence entered as such.

Inflows of contributions from 2016 onwards were entered registering the exact date received and the amount reflected in the Bank Statements. This was brought up to date as per the last Bank Statement cycle i.e., up to January 17, 2021.

The records for some countries are therefore fully up to date whilst for others, some of their contributions are not yet confirmed due to insufficient details on the Bank Statements. For these, we are waiting on Bank transfer information requested from Ecobank.

In the case of Guinea, for example, the account is fully updated and is as follows:

Guinea

WCO-WCA Annual Contribution Statement

Year	Date	Details	Invoice	Payment	Bal
2011	1st April 2011	Invoice	-€ 10,000.00	-	-€ 10,000.00
2011	2011	Payment	-	€ 10,000.00	€ 0.00
2012	1st April 2012	Invoice	-€ 10,000.00	-	-€ 10,000.00
2012	2012	Payment	-	€ 10,000.00	€ 0.00
2013	1st April 2013	Invoice	-€ 10,000.00	-	-€ 10,000.00
2013	2013	Payment	-	€ 10,000.00	€ 0.00
2014	1st April 2014	Invoice	-€ 10,000.00		-€ 10,000.00
2014	2014	Payment	-	€ 10,000.00	€ 0.00
2015	1st April 2015	Invoice	-€ 10,000.00		-€ 10,000.00
2015	2015	Payment		€ 10,000.00	€ 0.00
2016	1st April 2016	Invoice	-€ 10,000.00		-€ 10,000.00
2016	2016	Payment		€ 10,000.00	€ 0.00
2017	1st April 2017	Invoice	-€ 10,000.00		-€ 10,000.00
2017	Wednesday, April 19, 2017	Payment		€ 10,000.00	€ 0.00
2018	Sunday, April 1, 2018	Invoice	-€ 10,000.00		-€ 10,000.00
2018	Wednesday, April 11, 2018	Payment		€ 10,000.00	€ 0.00
2019	Monday, March 4, 2019	Payment		€ 10,000.00	€ 10,000.00
2019	Monday, April 1, 2019	Invoice	-€ 10,000.00		€ 0.00
2020	1st April 2020	Invoice	-€ 10,000.00		-€ 10,000.00
2020	Monday, July 6, 2020	Payment		€ 10,000.00	€ 0.00

From the individual Member Country Contributions accounts created, we have established an arrears position, subject to change, when we confirm the remaining inflows. This means that going forward, we can tell what is owed by each member country and hence the total arrears status. This would aid the WCO-WCA towards effective mobilisation of annual contributions and efficient management of the outstanding arrears. The schedule is as follows:

WCO - WCO

Annual Contribution Status as at 17.01.2021

Country	Details	Outstanding Balance
Democratic Republic of Congo		-€ 10,020.00
Cameroun		-€ 9,052.96
Senegal		-€ 30,115.96
Ghana		-€ 20,000.00
Nigeria		-€ 10,025.00
Liberia		-€ 20,103.60
Guinea Bissau		-€ 89,999.00
Benin		-€ 60,057.00
Congo		-€ 10,075.00
Cote D'ivoire		-€ 20.00
Togo		-€ 20,120.00
Gabon		-€ 40,000.00
Tchad		-€ 65,093.31
Niger		-€ 62.00
Cape Verde		€ 0.00
Sao Tome & Principe		-€ 70,515.74
Guinea		€ 0.00
Sierra Leone		-€ 60.00
Mauritania		-€ 33,375.71
Mali		-€ 9,746.85
Gambia		-€ 12,103.10
Central African Republic		-€ 30,000.00
Burkina Faso		-€ 152.00
Total		-€ 540,697.23

Note: this is subject to change once information is received to confirm some payments reflected in the Bank Statement without sufficient details to identify the Payer

5. AUDIT AND ANALYSIS OF THE RECORDS AND PROCEDURES

12 February 2021

Directors General,
World Customs Organisation, West & Central Africa
C/O the Vice Chair, Republic of Congo
WCO-WCA

Dear All,

Management Letter on the review and audit of the Regional Fund (01.04.16-17.01.2021)

We have completed the audit of the WCO-WCA Regional Fund for the period from April 1, 2016 to January 17, 2021. We have detailed below, matters which came to our attention during the audit, worth highlighting. We have also given our recommendations for improvement on the weaknesses in the accounting of contributions and disbursements, current procedures, and internal controls.

It should be noted that the matters detected during the audit are the direct results of an audit, designed to meet the objectives as per the Engagement letter. It does not represent an exhaustive list of all possible issues, and improvements, in the system of accounting, internal control and governance, which a more extensive examination might reveal.

During our audit, we maintained close contact with the staff we were linked with, and discussed issues, information requirements as well as explanations when required. We also briefed them about the key findings before our departure from Abuja.

This report has been prepared solely for the use of the Directors General for the purpose stipulated in the Engagement letter and in the context of running the WCO-WCA regional body. No responsibility to any third party is accepted, as the report has not been prepared and is not intended, for any other purpose. The recommendations in this audit report are intended to engender improvements in the shortcomings identified during the audit.

We seize this opportunity to express our deep appreciation to the Comptroller General and staff of the Nigeria Customs Service for the co-operation and assistance rendered during the audit. We also want to thank the Vice Chair and his team for enormous support and work done behind the scenes to facilitate the process.

We remain amiable to assisting in the implementation of our recommendations.

Yours faithfully,

Alhajie Saihou Denton (Team Leader)

For: Finance & Audit Team, WCO-WCA Abuja Mission (Refer to Appendix 7)

5.1 Executive Summary

5.1.1 Background

The Vice Chair engaged us to carry out the audit of the WCO-WCA Regional Fund and to make recommendations for the last four periods. For the necessary due diligence, the audit covered the period from April 1, 2016 up to the last available Bank Statement date, January 17, 2021.

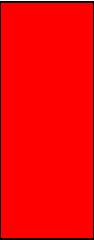
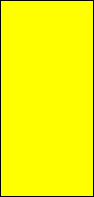
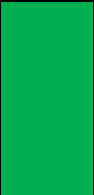
The work we performed during the audit included assessments of the design of the selected controls within the cycles evaluated as detailed below.

Process / Business Objective	Number of findings identified as:			Summary of Evaluation
	Low Risk	Medium Risk	High Risk	
Internal Control	0	1	7	8
Accounting issues	0	1	2	3
Total	0	2	9	11

The detailed and related recommendations follow by cycle in the order below:

- **High Risk Control Recommendations:** (Reflected in Red) are those where control deficiencies exist, which could allow losses to take place, and not be detected on a timely basis, and which should be remediated as a matter of priority.
- **Medium Risk Recommendations:** (Reflected in Yellow) relate to audit findings which imply that some control deficiencies have been identified, that potentially increases the likelihood that losses could occur.
- **Low Risk Control Recommendations:** (Reflected in Green) denotes a control environment that, while meeting acceptable standards, does not provide total assurance to the early detection of material losses.

5.1.2 Summary of Evaluation

Inadequate		Internal controls do not meet minimum acceptable standards, because significant deficiencies exist, which could allow material losses to take place and not be detected and managed on a timely basis in the ordinary course of business.
Requires Improvement		Internal Controls meet minimum acceptable standards but should be improved, because control deficiencies exist which could allow losses to take place.
Adequate		Internal controls meet acceptable standards and provide reasonable, but not absolute, assurance that the process covered is reliable and material losses will be detected in the normal course of business.

5.2 Control Issues

5.2.1 Bank transfer of funds (and related charges) without Payee names (High Risk)

Observation

Upon review of the Bank Statement for the above period, we observed that there were 24 transfers (outflows) made without stating the name of the beneficiary. By the same token, the associated bank charges i.e., SWIFT fee, Commission on outward transfer and VAT were also without payee details.

The total value of the transactions is €104,718.06 of which €103,629.94 relates to the transfer and €1,088.12 is the total bank charges. The transactions are as follows:

DATE	PAYEE	DETAILS	TRANSFER /WITHDRAWAL	COT	SWIFT FEE	VAT	TOTAL
15.07.16	??	Funds Transfer to ??	€ 10,790.00	€ 52.15	€ 7.93	€ 3.01	€ 10,853.09
31.08.16	??	Funds Transfer to ??	€ 10,000.00	€ 49.25	€ 7.04	€ 2.81	€ 10,059.10
28.11.16	??	Funds Transfer to ??	€ 2,298.22	€ 36.30	€ 7.72	€ 0.96	€ 2,343.20
29.11.16	??	Funds Transfer to ??	€ 5,000.00		€ 7.74	€ 1.63	€ 5,009.37
14.12.16	??	Funds Transfer to ??	€ 2,010.00	€ 10.07	€ 7.71	€ 0.89	€ 2,028.67
14.12.16	??	Funds Transfer to ??	€ 2,060.00	€ 10.72	€ 7.71	€ 0.52	€ 2,078.95
14.12.16	??	Funds Transfer to ??	€ 3,000.00	€ 15.04	€ 7.71	€ 1.14	€ 3,023.89
15.09.17	??	Funds Transfer to ??	€ 2,416.00	€ 12.08	€ 6.87	€ 0.60	€ 2,435.55
17.10.17	??	Funds Transfer to ??	€ 2,515.00	€ 12.58	€ 6.93	€ 0.63	€ 2,535.14
16.02.18	??	Funds Transfer to ??	€ 4,500.00	€ 72.50	€ 6.55	€ 1.12	€ 4,580.17
12.03.18	??	Funds Transfer to ??	€ 3,360.00	€ 66.80	€ 6.65	€ 0.84	€ 3,434.29
12.03.18	??	Funds Transfer to ??	€ 7,623.08	€ 88.12	€ 6.65	€ 1.91	€ 7,719.76
23.03.18	??	Funds Transfer to ??	€ 10,000.00	€ 100.00	€ 6.65	€ 2.50	€ 10,109.15
10.12.18	??	Funds Transfer to ??	€ 7,000.00	€ 35.00	€ 7.17	€ 1.75	€ 7,043.92
18.12.18	??	Funds Transfer to ??	€ 5,275.64	€ 26.38	€ 7.16	€ 1.32	€ 5,310.50
05.04.19	??	Funds Transfer to ??	€ 2,110.00	€ 30.55	€ 6.18	€ 0.53	€ 2,147.26
17.04.19	??	Funds Transfer to ??	€ 4,196.00	€ 40.98	€ 6.14	€ 1.05	€ 4,244.17
17.04.19	??	Funds Transfer to ??	€ 2,102.00	€ 30.51	€ 6.14	€ 0.53	€ 2,139.18
08.05.19	??	Funds Transfer to ??	€ 2,613.00	€ 33.07	€ 6.20	€ 0.65	€ 2,652.92
09.09.19	??	Funds Transfer to ??	€ 2,000.00	€ 30.00	€ 6.25	€ 0.50	€ 2,036.75
18.10.19	??	Funds Transfer to ??	€ 3,478.00	€ 37.39	€ 6.21	€ 0.87	€ 3,522.47
20.12.19	??	Funds Transfer to ??	€ 2,790.00	€ 33.95	€ 6.19	€ 0.70	€ 2,830.84
21.01.20	??	Funds Transfer to ??	€ 3,373.00	€ 36.87	€ 6.23	€ 0.84	€ 3,416.94
12.03.20	??	Funds Transfer to ??	€ 3,120.00	€ 35.60	€ 6.01	€ 1.17	€ 3,162.78
		OVERALL TOTAL	€ 103,629.94	€ 895.91	€ 163.74	€ 28.47	€ 104,718.06

Implications

Omitting the payee details clouds the audit trail and creates a lack of transparency. Considering that the transfers were done by Ecobank, to specific individuals and institutions, it is quite negligent of them not to show these important details.

Omission of key details, such as Payee name, may lead to fraudulent transfers being done and not easily detected. It makes the reconciliation exercise even more difficult also.

Recommendations

The Bank statement is a primary source of information and a key accounting and audit document. Thus, we recommend that all transfers and other withdrawals indicate details of the payee and a brief description of the transactions.

Management responses

Action Plan:	
Responsibility:	
Timeframe:	

5.2.2 Contributions and deposits (inflows) without Payer Names (Medium Risk)

Observation

Upon review of the Bank Statements for the period from April 1, 2016 to January 17, 2021, we observed that there were 34 transfers (inflows) into the account without relevant details of the paying institution (refer to Appendix 4).

The transactions are summarised as follows:

- ✓ 4 inflows totalling €53,213.98 from April 1, 2016 to March 31, 2017,
- ✓ 9 inflows totalling €151,970.72 from April 1, 2017 to March 31, 2018,
- ✓ 8 inflows totalling €89,886.50 from April 1, 2018 to March 31, 2019,
- ✓ 10 inflows totalling €97,921.40 from April 1, 2019 to March 31, 2020,
- ✓ 3 inflows totalling €30,000.00 from April 1, 2020 to January 17, 2021.

Summed together, there were 34 transactions totalling €422,992.60 received during the period from April 1, 2016 to January 17, 2021 without indicating the name of the paying Administration.

It is to be noted that the details showing on the Bank Statement is a function of the sending Bank and responsibility of the Member Country (Customs Administration / Revenue Authority). Such transfers are not under the Control of the Receiving Bank (Ecobank, Nigeria).

Implications

Lack of Depositors' details makes it extremely difficult to obtain accurate annual contributions and arrears listings. This clouds the audit trail and affects transparency.

Not being able to identify the source of the inflows makes the reconciliation exercise very difficult and may lead to errors. In addition, this lack of first-hand information makes it difficult to update the status of contributions for each Administration as well as the level of arrears. This may in turn affect the timeliness and level of contributions received, since the Office of the Vice Chair may not have up-to-date information to enable effective follow up on payments.

Recommendations

All contributions by member countries should be made with adequate description of the payment. Bank transfers should state Payer name and the contributions being paid for.

Pursuant to payment of contributions, Member Administrations should send a copy of the SWIFT report to the Regional Fund Manager and copy to the Vice Chair.

Management responses

Action Plan:	
Responsibility:	
Timeframe:	

5.2.3 Funds transferred out by Ecobank: €599,545.06 (High Risk)

Observation

During our review of the Bank Statement, we observed that on May 9, 2016, Ecobank transferred out an amount of €599, 545.06, value dated May 6, 2016, from the Regional Bank account, leaving a balance of ZERO. The details shown on the Bank Statement for this entry stated “Journal Entry – NON COT ENGFT213/16 TRF IRO TSA CUST FOR FCY DEP BO WEST AND CENTRAL AFRICA REGION”

We further noted that on July 22, 2016, the funds were returned to the Bank account through a credit of €599, 545.06, value dated July 21, 2016. The details shown on the Bank Statement for this entry was “Journal Entry – NON COT ENGFT213/16 TRF IRO TSA CUST FOR FCY DEP BO WEST AND CENTRAL AFRICA REGION”

For such a transfer to take place, it should have to be approved by the Vice Chair of WCO-WCA and further authorised by the Comptroller General of Nigeria Customs Service (NCS), for instructions to be sent to Ecobank for action. Our review of NCS files and information did not show any official document sanctioning this transaction.

We visited the Ecobank Branch to discuss this and other queries and they supplied us a copy of a letter written by the Fund Manager at NCS at the time, Anyanwu Bede. In fact, Bede’s letter was a reaction to a transaction alert from Ecobank and hence geared towards getting Ecobank to reverse the “erroneous transfer of our account balance of 599, 545.06 Euro to TSA”.

Thus, we subsequently wrote an email to Ecobank to provide responses as to why this transfer was done, who authorised it, whether it was invested and what the benefit was for WCO-WCA.

Implications

Transferring the entire funds from the account runs the risk that the WCO-WCA would not be able to fund its budgeted activities.

The fact that Mr Anyanwu Bede, the NCS Fund Manager’s letter to correct the account, was written on May 10, 2016, one day after the funds were transferred by Ecobank, shows proactiveness on the side of the staff. Despite this, the funds were not returned until 74 days later, on July 22, 2016. The WCO-WCA was only able to fund its operations because of the fortunate receipt of outstanding annual contribution of €40,000 from Gabon.

The lack of an officially approved documentation authorising this transfer may indicate possible wrongful use of the funds in the account by Ecobank, possibly for investment purpose. The response we received from Ecobank stated that the funds were moved to the TSA (Treasury Single Account) at the insistence of the Central Bank of Nigeria (CBN). Whilst this may be true, no document was provided to us proving that this was the case.

Furthermore, funds transferred to TSA are only supposed to be that of Government or its Ministries, Departments and Agencies, and WCO-WCA quite clearly does not fall in this category.

Recommendations

Given that the initial transfer of funds out of the WCO-WCA was done by Ecobank without prior official notification, the onus is on the Bank to give a satisfactory explanation.

With respect to the Bank’s claim that the transfer was done on the behest of CBN, they should provide documentary evidence from CBN to support this. In addition, they should also provide official confirmation that this transfer was duly authorised by Ecobank Management.

In the absence of the above proof, there are two key likely reasons for the transfer, that is,

- a) it could have been a mistake by Ecobank in treating the funds as falling under the realms of the TSA or
- b) it could have been wrongful or fraudulent use of the funds for investment or other purposes.

Whatever the case may be, the fact remains that by moving the funds, the WCO-WCA was denied the use of its funds as well as the possibility of earning interest on them, during that period. We therefore recommend that Ecobank pays a compensation based on interest calculated on the “standard interest rate x €599, 545.06 x 74 days”.

Management responses

Action Plan:	
Responsibility:	
Timeframe:	

5.2.4 Cash withdrawals by the Fund Managers (High Risk)

Observation

During our review of the Bank Statements and expenses for the period, we noted significant amount of cash withdrawals without adequate description of purpose or reason for withdrawing cash rather than sending a bank transfer.

Overall, there were 19 cash withdrawals, through issuance of cheques totalling €117,539.00.

These were split as follows:

- ✓ 9 cash withdrawals by Mr Anyanwu Bede totalling €65,760.00 from April 1, 2016 to March 31, 2017,
- ✓ 6 cash withdrawals by Mr Anyanwu Bede totalling €40,570.00 from April 1, 2017 to March 31, 2018,
- ✓ 4 cash withdrawals by Mr Mamu Badisa totalling €11,209.00 from April 1, 2018 to March 31, 2019,
- ✓ There were no further cash withdrawals thereafter.

Based on some information on the cheque stubs and explanations offered by Mr Anyanwu Bede, we noted that some of the funds were to meet the requests of the Regional Coordinators of ROCB, RILO and RTC (people such as Souleymane Sangare, Samba Thiam, Tafili Ebenezer and Tsetek Gomez). These were for tickets, per diem and expenses of certain meetings. The reason given was that due to internal delays, the best way to save the situation to enable participation of members was to withdraw cash and deliver personally to them.

Although there were no documents signed by the recipients of the cash, we found emails and submissions from them confirming receipt, as part of the evidence provided in the Nigeria Customs Service forensic audit report concerning Mr Anyanwu Bede.

In the case of Mr Mamu Badisa, the cash withdrawn was to meet the requests of some participants at the 21st Experts meeting held in Abuja from November 19-21, 2018. He explained that there were internal delays due to backlog and handover transition challenges as he took over from Mr Anyanwu Bede. Since the team arrived without receiving their money, cash was withdrawn as an emergency measure to resolve the issue.

Mr Badisa stated that he photocopied the cheques and got the recipients to sign them, although we could only see one on file. It was stated that cash was handed to Sama II Etienne, Tsetek Gomez, Zrae Bi Alfred and Birame Sidy Kane.

Implications

Carrying out official transactions through such cash withdrawals is highly risky and susceptible to fraud. In addition, it does not create the necessary audit trail for ease of reference and hinders transparency.

Recommendations

The Fund Manager should desist from making cash withdrawals and meet all demands for funds through Bank transfer. Requests for funds must be sent at least 2 weeks before an event to allow enough time for the approval process and funds transfer to complete.

Even in the event of a major emergency, where cash withdrawal may be unavoidable, the reason must be clearly spelt out and approval sought from the Vice Chair before being authorised for processing by the relevant authorities at NCS. The cheque must be photocopied and signed as received by the beneficiary. Furthermore, this must be properly filed with the original request for funds, and the document of approval to pay by cash, to clearly show the audit trail. Nonetheless, it is best to avoid cash transactions altogether.

It should be noted that in our Exit meeting with the NCS Deputy Comptroller of Customs, she stated that they no longer allow cash withdrawals. The evidence seems to support this as the last cash withdrawal was on November 11, 2018.

Management responses

Action Plan:	
Responsibility:	
Timeframe:	

5.2.5 Cash deposits by the Fund Managers (High Risk)

Observation

During our audit, we observed that there were cash deposits in the Bank Statements amounting to €117,230.00 for the period under review. Apart from some banking slips, some details in the Bank Statements and explanations given by the respective Fund managers, we found no other documentary evidence of the source of the funds. The table below details the transactions concerned:

NO.	Date	Payer	Details	Contribution & other deposits	Cash Banked by
1	Friday, January 6, 2017	Bede Anyanwu	Return of Budget funds	€ 8,560.00	Bede Anyanwu
2	Friday, February 17, 2017	Bede Anyanwu	Return of Budget funds	€ 14,870.00	Bede Anyanwu
3	Monday, April 24, 2017	Nigeria	Yearly Contribution	€ 10,000.00	Bede Anyanwu
4	Tuesday, May 2, 2017	Ivory Coast	Yearly Contribution	€ 10,000.00	Bede Anyanwu
5	Tuesday, May 2, 2017	CAR	Yearly Contribution	€ 40,000.00	Bede Anyanwu
6	Monday, July 10, 2017	Republic of Congo	Yearly Contribution	€ 10,000.00	Bede Anyanwu
7	Wednesday, February 28, 2018	Nigeria	Yearly Contribution	€ 10,000.00	Bede Anyanwu
8	Monday, April 30, 2018	Republic of Congo	Yearly Contribution	€ 10,000.00	Bede Anyanwu
9	Wednesday, November 28, 2018	Mamu Badisa	Return of Budget funds	€ 3,800.00	Mamu Badisa
			TOTAL	€ 117,230.00	

Through discussions with the respective Fund Managers, we were informed that:

- ✓ €27,230.00 related to a return of unutilised budget funds (€23,430.00 by Mr Anyanwu Bede and €3,800.00 by Mr Mamu Badisa).
- ✓ €90,000.00 related to annual contributions given in cash by representatives of Member Administrations in settlement of their dues.
- ✓ The largest single day banking was €50,000.00 on May 2, 2017 being €10,000.00 for Ivory Coast and €40,000.00 for Central Africa Republic deposited by Mr Anyanwu Bede.

According to Mr Anyanwu Bede, the cash was handed to him by officials of Member Administrations, as payment of their annual contribution, when they met at various meetings, the largest of which was at the conference of the Directors General in Dakar in 2017.

However, in the absence of written source documents from the Member Administrations that gave the cash contribution, we could not verify the accuracy and completeness of such deposits.

Implications

Cash transactions are highly risky and susceptible to fraud and can be easily manipulated. Absence of documents indicating the source, timing and value of cash handed over makes it difficult to verify the accuracy and completeness of such transactions.

Recommendations

All contributions by Member countries should be made through Bank Transfer media, such as SWIFT, clearly stating the Paying Member Administration with adequate description of purpose of payment.

Management responses

Action Plan:	
Responsibility:	
Timeframe:	

5.2.6 Bank Account operational terms: charges & Interest (High Risk)

Observation

During our audit, we observed that there were a multiple of charges associated with every outgoing transfer, namely, Commission on Outward Transfer (COT), SWIFT fee and Value Added Tax (VAT). There were also Other Bank Charges levied for cash withdrawals and special statement requests, as well as a monthly charge for WHT. On the income side, interest was credited at the end of each month, as earned on the funds in the account.

There was no documentary evidence of the account operational terms i.e., the terms agreed with Ecobank clearly stating the basis of charges and the interest to be earned on funds kept in the account.

Based on our initial review, we noted inconsistencies in the charges especially for COT where many transfers were charged at €20, others at €50 whilst some were charged twice. We discussed this and other observations when we met with the Bank staff managing the account, and later followed up with an email requesting for clarification.

The Bank replied stating the basis of charges as follows:

- a) COT charged on transfer N2,500 (Fixed)
- b) SWIFT fee charged on transfer \$25 (Fixed)
- c) VAT charged at 0.75% and 0.05% of the amount transferred.

Upon review of the COT for the period from April 1, 2016 to January 17, 2021, we noted that COT was charged twice for 103 transfers. One charge was a fixed charge of €20 or €50 and then an additional charge of 0.5% of the transfer. This resulted in an overcharge of €2,828.10 (refer to Appendix 6)

A test of the calculations of Fixed charge of COT, by converting N2,500 to Euro based on prevailing conversion rates, could not be aligned to the charges by Ecobank. The same was the case for the SWIFT charges.

The above indicated that the Bank was not consistent and have overcharged the Regional Account at times. This also showed the lack of review by the Fund Managers as this was not detected.

The interest earned could not be verified as the basis of the calculation was not supplied by Ecobank.

Implications

Absence of documents stating clear terms of the Bank account operations may lead to overcharging by the bank. In the same vein, interest paid by the Bank on funds left in the account may be underpaid. In both cases, lack of regular review and verification of the calculations will lead to errors or fraudulent charges going unnoticed.

Recommendations

The Bank must clearly explain the discrepancies of its charges from the basis advised, as per their email response to our audit queries.

Where there has been an overcharge, as in the case of the extra COT totalling €2,828.10, the Bank must refund the amount in full.

The bank should state the terms of the Bank Account operation (for all charges and interest paid) on official letterhead to be sent to the Fund Manager at NCS. Henceforth, the Fund manager should do a monthly review of the charges to confirm correctness and alignment to the terms.

Management responses

Action Plan:	
Responsibility:	
Timeframe:	

5.2.7 Lack of Financial Procedures Manual (High Risk)

Observations

The value of, and necessity for the effective management of financial records is critical to organizational success. However, during our review of the financials, we noted that there was no documented Procedures manual to guide the management of financial transactions.

Implications

Lack of guidelines creates inconsistencies in practice, and as such, monitoring and accountability could be impaired. This further increases the risk of fraud, error or material misstatement.

Recommendations

The WCO-WCA should develop a documented framework in the form of policy or manual etc., for the effective management of financial transactions, to ensure that standard practice is adopted across the organization.

Management responses

Action Plan:	
Responsibility:	
Timeframe:	

5.2.8 Approval issues (High Risk)

Observations

It is of great pertinence that expenses transacted through the Regional account are all duly approved in a timely manner in accordance with relevant procedures.

A review of the Requests for funds in the files indicated that almost all were duly approved by the Vice Chair and subsequently approved by the CG at NCS for payment. There were however, cases where the document on file was not the one signed and stamped by the Vice Chair. Rather, it was the copy from the Regional Structure sent for approval. The explanation was that it was used to expedite the process before getting the approved one from the Vice Chair. These were corroborated with the documents supplied by the Vice Chair.

In some cases, we noted that the date of the Request for funds and the final transfer date was more than 2 weeks. For some, this led to the use of cash withdrawals rather than the required Bank transfer. The Request documents, however, do not indicate the date the approval was given by the Vice Chair so cannot pinpoint where the delay emanated.

Furthermore, a review of the Bank mandate revealed that in the earlier years, although there were at least 2 signatories, it only required 1 Authority to sign. However, the current mandate requires an Authority of 2 to sign for any transaction to be actioned.

Implications

Allowing the processing of Requests for funds without the approval of the Vice Chair could easily lead to fraud. Even if the copy of the Request from the Regional Structure is used to obtain Internal Authorisation from NCS to expedite the process, the Bank Transfer form should not be signed by mandated signatories unless the Request approved by the Vice Chair is submitted.

Furthermore, if Approved Requests for funds are signed but not dated, it will be difficult to tell when action was taken. This in turn will make it impossible to establish the time taken between the Initial Request and the Approval of the Vice Chair as well as the time taken before funds are transferred. Thus, lack of such information will make it difficult to improve the process.

Having a Mandated Authority of “Any 1 to sign” is very risky and susceptible to fraud; thankfully, this is not currently the case.

Recommendations

The Request for funds document should be amended to include:

- ✓ The Head of the Regional Structure } Name, Signature, Date and Stamp
- ✓ Vice Chair } Name, Signature, Date and Stamp

All Requests for funds must be sent to the Vice Chair for approval at least 2 weeks before the budgeted event or activity.

All Requests for funds must be approved by the Vice Chair within 2 days, provided they are budgeted for.

Only Requests for funds, duly approved by the Vice Chair, should be submitted to the Comptroller General at the NCS for authorisation of payment.

The VP-approved Request for funds document must be attached to an internal memo requesting authorisation for payment from the NCS Comptroller General. The email sent by the Vice Chair, in forwarding the approved document, should also be printed, and attached as additional evidence.

The Fund Manager should complete the Bank Transfer request form ensuring that details of the Beneficiary and purpose of payment are clearly stated.

Upon sending the transfer request to the Bank, the Bank should transfer the funds on the same day, and clearly state the name of the Beneficiary and purpose of payment, as detailed on the Bank Transfer request form. This vital information, must be reflected on the Bank Statements.

The entire process at the level of NCS from, receiving the VP-approved Request for funds, to sending the Bank transfer document to the Bank should target 3 days. Therefore, internal channels should facilitate fast-tracking of these regional activity requests for authorisation and payment.

All relevant documents related to each transfer (Internal memo, VP-approved Request for funds, minutes of authorisation by the NCS CG, and Bank Transfer request form) must be stapled together, referenced, and systematically filed by the Fund Manager.

For the Regional Bank Account mandate, NCS should maintain a pool of 3 to 4 signatories at any one time. The mandated Authority should remain as “Any 2 to sign” always.

Management responses

Action Plan:	
Responsibility:	
Timeframe:	

5.3 Accounting Issues

5.3.1 Record keeping (High Risk)

Observations

The importance of keeping proper records and books of accounts is at the heart of effective accounting and financial management. This is usually enabled through maintenance of a hybrid of electronic record of transactions and hard copies of relevant source / back-up documents.

During our review of the records, we noted that there was no electronic record of the financial transactions, such as is typical using an accounting software, database, or Excel. Thus, expenses and income were not recorded in a systematic format for easy review, analysis, or perusal as information.

With respect to manual records, some files were kept containing information regarding payments. These included memos written to obtain authorisation from the Comptroller General to transfer funds, based on attached approved requests for funds by the Vice Chair. These generally showed a good audit trail, but the payment document was delinked from the Bank transfer forms.

Furthermore, there were few instances where the request for funds document attached was unsigned by the Vice Chair, though we corroborated these with the records of the Vice Chair which indicated approval. The reason given for such occurrences was that the copy from the Regional Structure was used to expedite the process, prior to getting the approved copy from the Vice Chair.

It is to be noted that the manual files given to us mainly covered the period from 2018 to 2020; those covering 2016 and 2017 were not provided / could not be found. Nonetheless, various copies of relevant documents covering this period, were enclosed as appendices in the NCS forensic audit report concerning Mr Anyanwu Bede, provided to us.

Implications

Lack of a systematic electronic record of accounting transactions makes it difficult to prepare financial reports and is prone to error and misstatements.

Lack of proper filing of all relevant documents, securely kept with easy access for accounting and audit purposes, undermines the governance process. It makes it very difficult to verify the authenticity and completeness of transactions during the period under review.

Furthermore, given the risk of fraud, error, or misstatement, it makes accountability and accurate financial reporting very difficult.

Recommendations

An electronic record of all transactions (income and expenditure) should be maintained and reconciled to the Bank statement on a regular basis.

Manual files should be kept containing all the documents pertaining to income and expenditure. All documents relating to one transaction should be stapled together and referenced and securely filed in a manner that ensures easy access and availability for accounting, reporting and audit.

Management responses

Action Plan:	
Responsibility:	
Timeframe:	

5.3.2 Income: Yearly Contribution (High Risk)

Observation

We noted some inconsistencies between records kept as yearly contributions received and figures in the bank statement.

The following are three examples:

- I. In the case of Senegal, an amount of €39,920 paid in 2016, to cover that year's contribution as well as the arrears of 2013, 2014 and 2015, was recorded as a total in 2016 and recorded individually in each of the preceding years. This means that it duplicates the payment of the arrears of those 3 years.
- II. In the case of Gambia, the contribution figure for 2018 was wrongly recorded whilst the 2019 contribution was not omitted.
- III. Nigeria was recorded on the Contributions table as having paid for 2020. However, the payment could not be found on the Bank Statement.

Implications

Amounts disclosed as income from contribution may be inaccurate and consequently arrears listing may be wrong.

Recommendations

The Fund Manager should ensure that all contributions are regularly reconciled with the bank statements and that arrears listing are reflective of this.

Management responses

Action Plan:	
Responsibility:	
Timeframe:	

5.3.3 Income: Contribution Arrears (Medium Risk)

Observation

During our review of bank statements, and SWIFT reports made available by the bank, we note outstanding contributions amounting to € 540,697.23 for the period under review. We wish to emphasize that this is based on available information and the assumption that records kept by the Fund Manager up to 2015 (used as our baseline) were accurate.

Please note that there are some contributions received which have not yet been confirmed and accounted for, because the Depositors' name does not appear on the Bank statement. In addition, we are yet to receive the requested SWIFT reports from the Bank or the proof of payment from the Member Administration. Once received and confirmed, the arrears level will change.

Implications

Non-payment of contributions may lead to loss of much needed income to fund the activities of the organization. Furthermore, it might be difficult to track and recoup contribution arrears if up to date records are not kept and monitored.

Recommendations

The Fund Manager should regularly update and reconcile contributions from Member countries against the annual invoices sent.

The updated Arrears list should be used to follow up Member countries to pay their outstanding arrears.

Management responses

Action Plan:	
Responsibility:	
Timeframe:	

6. OTHER RECOMMENDATIONS

Apart from the recommendations emanating from the audit observations highlighted above, there are other areas which if improved can benefit the governance and efficiency of the financial operations of the WCO-WCA. These recommendations are as follows:

6.1 Reporting

Reporting on the financial activities of the region is largely limited to the annual exercise of presenting Finance & Audit Committee reports at the Conference of the Directors General. There are no other reporting requirements hence, getting information from the different stakeholders can be very difficult. This is especially so at the time of preparing financial statements and budgets at the end of the period.

For improved accountability, transparency, and governance, we recommend regular reporting as follows:

6.1.1 Regional Fund Manager

The Fund Manager should maintain records of all transactions in relation to the operation of the Regional Bank Account and:

- a) Send a soft copy of the monthly Bank statements to the Vice Chair and copy to the Finance & Audit Committee after the end of every month.
- b) Send a soft copy of the Contributions Statements and Arrears status to the Vice Chair and copy to the Finance & Audit Committee after the end of every quarter (1st week of January, April, July, and October).
- c) Send a soft copy of the Cashbook (Income and Expenditure as updated on Excel template) to the Vice Chair, and copy to the Finance & Audit Committee after the end of every quarter (1st week of January, April, July, and October).

6.1.2 Regional Structures (ROCB, RILO, RTC)

The Heads of the Regional structures should maintain records of all requests and utilisation of funds in respect to the budgeted activities. In the same vein, they should:

- a) Prepare a report of its transactions detailing out: all funds requested and utilised during the quarter in relation to specific budget activities. Any unused funds should be reported and returned by transfer to the Regional Bank Account.
- b) Report any budgeted activity not implemented and give reasons why.
- c) Send the above reports via email to the Vice Chair and copy to the Regional Fund Manager and the Finance & Audit Committee after the end of every quarter (1st week of January, April, July, and October).

6.1.3 Vice Chair

The Vice Chair should maintain records of all requests and utilisation of funds in respect to the budgeted activities. In the same vein, the Vice Chair should:

- a) Prepare a report of its transactions detailing out: all funds requested and utilised during the quarter in relation to the Contingency fund, if there was reason to use it. Any unused funds should be reported, and arrangements made to return by transfer to the Regional Bank Account.
- b) Prepare a report listing all the Requests for funds approved during the period, giving details of dates, Regional Structure, amounts, Budget codes, and budget balance (as is currently done).
- c) Send the above reports via email to the Regional Fund Manager and copy to the Finance & Audit Committee and Regional Structures, after the end of every quarter (1st week of January, April, July, and October).
- d) Send the final updated report of transactions approved for the whole year, at the end of the financial period.
- e) Send the Contributions Statement to each Member country annually. If any member country has arrears of contribution, send the Contributions statement as a means notifying them of their status.
- f) Send annual Contributions invoices to Member countries at the beginning of the year (with a Statement attached) to request for payment.

Management responses

Action Plan:	
Responsibility:	
Timeframe:	

6.2 Change of Accounting Period

The accounting period for the WCO-WCA straddles 2 Calendar years: i.e., beginning from April 1st one year and ending on March 31st the following year. This poses certain challenges:

- a) Most Member countries, if not all, have financial years running as per the calendar year i.e., January 1 to December 31 the same year. This is at odds with the Regional cycle and may pose Budget alignment issues.
- b) Preparing the Financial Statements in time for the Conference of the Directors General (DG), usually held around mid-March, means that any transactions after the meeting up to 31st March cannot be factored that year. This poses a problem of aligning the cost to the budget for the relevant period.
- c) The timing of any audit of the financial transactions would also be a challenge as per (b) above.

We therefore recommend that the Accounting period be changed to run from 1st January to 31st December of the same year. Such a change:

- ✓ Will align the financial period of the WCO-WCA to that of Member countries and may make budget execution and payment of Contribution easier.
- ✓ Will engender the preparation of timely and more complete Financial Statements. It will, in addition, aid the review as well as audit of the financial records.
- ✓ Will enable a thorough audit to be carried out on the financial activities for the year.

Management responses

Action Plan:	
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Responsibility:	
Timeframe:	

6.3 Annual Finance and audit exercise

This audit highlights the importance and benefits of having a thorough review of the financial operations of the WCO-WCA. It is an opportunity to:

- ✓ verify the authenticity of financial transactions,
- ✓ examine the strength of controls,
- ✓ review governance arrangements and increase transparency.
- ✓ gain easy access to records to enable preparation of financial statements.
- ✓ gives assurance to the accuracy of the Accounts through an audit.

We therefore recommend that:

- a) a Finance & Audit work mission to Abuja be held annually.
- b) 2 members be sent: 1 from Finance and 1 from Audit Committee
- c) The team members to have technical Accounting and Audit competence i.e., Qualified Accountants preferably.
- d) The mission to be funded by the WCO-WCA and catered in the budget.

Management responses

Action Plan:	
Responsibility:	
Timeframe:	

6.4 Banking Arrangements

There is a case to consider as to the future relationship with Ecobank. Some of the things to have come out of the audit are:

- ✓ There have been cases of overcharging by the bank (whether deliberate or not)
- ✓ There have been cases of inefficiency and / or possible dishonesty.
- ✓ Getting information has been a major challenge especially with respect to Bank transfer reports. Some requests made since January are still to be received from the Bank.

The DGs should consider:

- a) changing banks and negotiating terms that allow for lesser bank charges and higher rates of interest on deposits,
- b) staying with Ecobank but negotiating better terms, recovering the amounts overcharged and demanding an improvement in the administration of the account.

Management responses

Action Plan:	
Responsibility:	
Timeframe:	

7. CONCLUSIONS

The mission has helped to highlight several key issues which has a bearing, not only on the Regional Fund operations, but on the wider management of WCO-WCA financial affairs.

We hope that bold steps will be taken to address the issues to bring about the necessary improvements, thereby engendering efficiency, effectiveness, more transparency, and better governance.

Furthermore, now that a baseline has been created with respect to financial records using Excel, we hope that this will be maintained and backed up by regular reporting from across the regional offices.

We hope that everyone concerned will take the report in a positive light and work as a team to add value to our set up and operations.

We would like to thank the DGs through the Vice Chair for entrusting us with this mission and our CGs for allowing us to take part in this noble cause.

8. APPENDICES

Appendix 1: Summary of transactions in the Regional Account

Monthly Summary of Transactions in the Regional Account from 1st April 2016 to 31st March 2017

Month	Withdrawal / Transfer	SWIFT Fee	Commission on Transfer	VAT	Other Bank Charges	Withholding Tax	Contributions & other Deposits	Bank Interest Earned	Month End Cashbook Balance	M/END BANK STATEMENT BALANCE
	BANK BALANCE BROUGHT FORWARD FROM PREVIOUS PERIOD: MARCH 31, 2016								570,868.92	
Apr-16	1,360.00	0.00	0.00	0.34	6.80	4.81	30,000.00	48.09	599,545.06	599,545.06
May-16	599,545.06	0.00	0.00	0.00	0.00	0.82	0.00	8.19	7.37	7.37
Jun-16	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	7.37	7.37
Jul-16	26,572.00	23.87	119.27	7.60	9.00	1.98	649,495.06	19.85	622,788.56	622,788.56
Aug-16	13,000.00	14.24	64.19	3.92	0.00	5.31	29,915.00	53.06	639,668.96	639,668.96
Sep-16	7,818.50	7.07	38.51	2.28	0.00	5.19	0.00	51.90	631,849.31	631,849.31
Oct-16	23,862.00	7.29	61.81	6.32	107.50	5.20	0.00	51.99	607,851.18	607,851.18
Nov-16	7,298.22	15.46	36.30	2.59	0.00	4.99	3,268.98	49.91	603,812.51	603,812.51
Dec-16	39,422.74	46.27	117.20	11.87	81.54	4.87	0.00	48.70	564,176.72	564,176.72
Jan-17	20,256.18	39.13	151.25	9.51	0.00	4.63	8,560.00	46.30	552,322.32	542,322.32
Feb-17	40,279.00	23.04	75.23	6.19	125.50	9.04	14,870.00	40.37	526,714.69	516,714.69
Mar-17	28,960.00	38.45	144.80	9.22	1.50	4.25	0.00	42.45	497,598.92	487,598.92
Total	808,373.70	214.82	808.56	59.84	331.84	51.09	736,109.04	460.81	497,598.92	487,598.92

Monthly Summary of Transactions in the Regional Account from 1st April 2017 to 31st March 2018

Month	Withdrawal / Transfer	SWIFT Fee	Commission on Transfer	VAT	Other Bank Charges	Withholding Tax	Contributions & other Deposits	Bank Interest Earned	Month End Cashbook Balance	M/END BANK STATEMENT BALANCE
	BANK BALANCE BROUGHT FORWARD FROM PREVIOUS PERIOD: MARCH 31, 2017								487,598.92	
Apr-17	24,004.00	7.70	16.52	6.38	103.50	4.16	59,818.08	41.60	523,316.34	523,316.34
May-17	23,679.00	37.18	84.40	6.56	10.00	4.93	89,978.00	49.31	589,521.58	589,521.58
Jun-17	5,533.00	14.58	27.67	2.11	0.00	5.35	101,505.98	53.54	685,498.39	685,498.39
Jul-17	18,845.62	14.02	94.23	5.41	0.00	5.89	30,475.00	58.90	697,067.12	697,067.12
Aug-17	4,115.00	6.94	20.58	1.38	0.00	6.04	30,000.00	60.41	722,977.59	722,977.59
Sep-17	13,490.00	20.55	67.46	3.37	0.00	5.90	0.00	58.95	709,449.26	709,449.26
Oct-17	41,784.00	48.84	208.93	10.46	0.45	5.83	0.00	58.34	667,449.09	667,449.09
Nov-17	18,125.00	28.26	68.38	3.53	4.22	5.37	0.00	53.74	649,268.07	649,268.07
Dec-17	0.00	0.00	0.00	0.00	0.00	5.52	397.74	55.15	649,715.44	649,715.44
Jan-18	26,752.00	26.54	183.77	6.69	0.00	5.46	0.00	54.60	622,795.58	622,795.58
Feb-18	20,508.00	32.80	232.43	4.22	2.21	4.87	70,014.00	48.69	672,073.74	672,073.74
Mar-18	95,407.08	86.27	1,106.06	22.92	2.10	5.28	0.00	52.75	575,496.78	575,496.78
Total	292,242.70	323.68	2,110.43	73.03	122.48	64.60	382,188.80	645.98	575,496.78	575,496.78

Monthly Summary of Transactions in the Regional Account from 1st April 2018 to 31st March 2019

Month	Withdrawal / Transfer	SWIFT Fee	Commission on Transfer	VAT	Other Bank Charges	Withholding Tax	Contributions & other Deposits	Bank Interest Earned	Month End Cashbook Balance	M/END BANK STATEMENT BALANCE
BANK BALANCE BROUGHT FORWARD FROM PREVIOUS PERIOD: MARCH 31, 2018									575,496.78	
Apr-18	27,293.32	33.10	386.48	6.82	0.00	4.78	49,940.00	47.80	597,760.08	597,760.08
May-18	0.00	0.00	0.00	0.00	0.00	5.32	39,970.00	53.23	637,777.99	637,777.99
Jun-18	31,668.43	27.76	358.35	7.92	0.00	5.14	9,915.41	51.39	615,677.19	615,677.19
Jul-18	8,737.00	13.92	43.69	2.19	0.00	5.18	0.00	51.79	606,927.00	606,927.00
Aug-18	0.00	0.00	0.00	0.00	0.00	5.16	0.00	51.55	606,973.39	606,973.39
Sep-18	6,000.00	6.99	30.00	1.50	0.00	5.02	9,795.28	50.17	610,775.33	610,775.33
Oct-18	0.00	0.00	0.00	0.00	0.00	5.19	0.00	51.87	610,822.01	610,822.01
Nov-18	14,209.00	7.22	15.00	1.04	5.66	0.01	3,800.00	43.24	600,427.32	600,427.32
Dec-18	38,619.94	71.69	193.11	9.66	0.00	0.01	0.00	48.97	561,581.88	561,581.88
Jan-19	37,568.00	29.96	247.85	9.41	0.00	0.01	9,985.00	46.14	533,757.79	533,757.79
Feb-19	18,802.00	30.61	194.02	4.71	0.00	0.01	9,983.50	40.74	524,750.68	524,750.68
Mar-19	21,351.00	36.72	226.77	5.44	1.80	0.01	49,963.00	45.34	553,137.28	553,137.28
Total	204,248.69	257.97	1,695.27	48.69	7.46	35.84	183,352.19	582.23	553,137.28	553,137.28

Monthly Summary of Transactions in the Regional Account from 1st April 2019 to 31st March 2020

Month	Withdrawal / Transfer	SWIFT Fee	Commission on Transfer	VAT	Other Bank Charges	Withholding Tax	Contributions & other Deposits	Bank Interest Earned	Month End Cashbook Balance	M/END BANK STATEMENT BALANCE
BANK BALANCE BROUGHT FORWARD FROM PREVIOUS PERIOD: MARCH 31, 2019									553,137.28	
Apr-19	25,618.00	49.20	288.09	6.42	0.00	0.01	10,000.00	44.55	537,220.11	537,220.11
May-19	92,015.80	30.97	560.09	23.00	0.00	0.01	0.00	41.32	444,631.56	444,631.56
Jun-19	17,196.00	24.78	165.98	4.30	0.00	0.01	27,885.00	36.13	455,161.62	455,161.62
Jul-19	34,422.34	30.88	272.13	8.61	0.00	0.01	0.00	37.03	420,464.68	420,464.68
Aug-19	16,159.11	24.80	160.80	4.05	0.00	0.01	0.00	34.73	404,150.64	404,150.64
Sep-19	18,316.00	37.69	211.59	4.58	0.00	0.01	9,955.00	32.57	395,568.34	395,568.34
Oct-19	15,878.00	37.42	199.40	3.97	0.00	0.01	19,990.00	34.23	399,473.77	399,473.77
Nov-19	19,893.37	37.56	199.47	4.97	0.00	0.01	18,016.40	32.27	397,387.06	397,387.06
Dec-19	46,593.00	31.00	332.97	11.65	0.00	0.01	9,975.00	32.57	360,426.00	360,426.00
Jan-20	12,199.00	24.80	141.00	3.05	0.00	0.01	10,000.00	30.23	358,088.37	358,088.37
Feb-20	18,198.00	25.32	171.00	6.83	0.00	0.01	0.00	27.92	339,715.13	339,715.13
Mar-20	11,714.00	24.04	138.57	4.39	0.00	0.01	20,000.00	29.11	347,863.23	347,863.23
Total	328,202.62	378.46	2,841.09	85.82	0.00	0.12	125,821.40	412.66	347,863.23	347,863.23

Monthly Summary of Transactions in the Regional Account from 1st April 2020 to 31st March 2021

Month	Withdrawal / Transfer	SWIFT Fee	Commission on Transfer	VAT	Other Bank Charges	Withholding Tax	Contributions & other Deposits	Bank Interest Earned	Month End Cashbook Balance	M/END BANK STATEMENT BALANCE
	BANK BALANCE BROUGHT FORWARD FROM PREVIOUS PERIOD: MARCH 31, 2020								347,863.23	
Apr-20	0.00	0.00	0.00	0.00	0.00	0.01	0.00	28.51	347,891.73	347,891.73
May-20	0.00	0.00	0.00	0.00	0.00	0.01	10,000.00	29.85	357,921.57	357,921.57
Jun-20	0.00	0.00	0.00	0.00	0.00	0.01	0.00	29.34	357,950.90	357,950.90
Jul-20	0.00	0.00	0.00	0.00	0.00	0.01	10,000.00	31.17	367,982.06	367,982.06
Aug-20	4,296.00	10.94	61.48	1.62	0.00	0.01	0.00	31.09	363,643.10	363,643.10
Sep-20	0.00	0.00	0.00	0.00	0.00	2.98	0.00	29.81	363,669.93	363,669.93
Oct-20	0.00	0.00	0.00	0.00	0.00	3.27	40,000.00	32.69	403,699.35	403,699.35
Nov-20	0.00	0.00	0.00	0.00	0.00	3.35	7,106.12	33.52	410,835.64	410,835.64
Dec-20	0.00	0.00	0.00	0.00	0.00	3.51	10,000.00	35.10	420,867.23	420,867.23
Jan-21									420,867.23	420,867.23
Feb-21										
Total	4,296.00	10.94	61.48	1.62	0.00	13.16	77,106.12	281.08	420,867.23	420,867.23

Appendix 2: Sample of Contributions Statement: Guinea

Guinea

WCO-WCA Annual Contribution Statement

Year	Date	Details	Invoice	Payment	Bal
2011	1st April 2011	Invoice	-€ 10,000.00	-	-€ 10,000.00
2011	2011	Payment	-	€ 10,000.00	€ 0.00
2012	1st April 2012	Invoice	-€ 10,000.00	-	-€ 10,000.00
2012	2012	Payment	-	€ 10,000.00	€ 0.00
2013	1st April 2013	Invoice	-€ 10,000.00	-	-€ 10,000.00
2013	2013	Payment	-	€ 10,000.00	€ 0.00
2014	1st April 2014	Invoice	-€ 10,000.00		-€ 10,000.00
2014	2014	Payment	-	€ 10,000.00	€ 0.00
2015	1st April 2015	Invoice	-€ 10,000.00		-€ 10,000.00
2015	2015	Payment		€ 10,000.00	€ 0.00
2016	1st April 2016	Invoice	-€ 10,000.00		-€ 10,000.00
2016	2016	Payment		€ 10,000.00	€ 0.00
2017	1st April 2017	Invoice	-€ 10,000.00		-€ 10,000.00
2017	Wednesday, April 19, 2017	Payment		€ 10,000.00	€ 0.00
2018	Sunday, April 1, 2018	Invoice	-€ 10,000.00		-€ 10,000.00
2018	Wednesday, April 11, 2018	Payment		€ 10,000.00	€ 0.00
2019	Monday, March 4, 2019	Payment		€ 10,000.00	€ 10,000.00
2019	Monday, April 1, 2019	Invoice	-€ 10,000.00		€ 0.00
2020	1st April 2020	Invoice	-€ 10,000.00		-€ 10,000.00
2020	Monday, July 6, 2020	Payment		€ 10,000.00	€ 0.00

Appendix 3: WCO-WCA Contributions Arrears (status of Contributions)

Annual Contribution Status as at 17.01.2021

Country	Details	Outstanding Balance
Democratic Republic of Congo		-€ 10,020.00
Cameroun		-€ 9,052.96
Senegal		-€ 30,115.96
Ghana		-€ 20,000.00
Nigeria		-€ 10,025.00
Liberia		-€ 20,103.60
Guinea Bissau		-€ 89,999.00
Benin		-€ 60,057.00
Congo		-€ 10,075.00
Cote D'ivoire		-€ 20.00
Togo		-€ 20,120.00
Gabon		-€ 40,000.00
Tchad		-€ 65,093.31
Niger		-€ 62.00
Cape Verde		€ 0.00
Sao Tome & Principe		-€ 70,515.74
Guinea		€ 0.00
Sierra Leone		-€ 60.00
Mauritania		-€ 33,375.71
Mali		-€ 9,746.85
Gambia		-€ 12,103.10
Central African Republic		-€ 30,000.00
Burkina Faso		-€ 152.00
Total		-€ 540,697.23

Note: this is subject to change once information is received to confirm some payments reflected in the Bank Statement without sufficient details to identify the Payer

Appendix 4: Contributions and deposits without Payer Names

01.04.16 to 31.03.2017:				
NO.	Date	Mode	Details	Contribution & other deposits Amount
1	Tuesday, April 12, 2016	SWIFT	Yearly Contribution	€ 20,000.00
2	Sunday, April 24, 2016	SWIFT	Yearly Contribution	€ 10,000.00
3	Wednesday, August 24, 2016	SWIFT	Yearly Contribution	€ 19,945.00
4	Friday, November 18, 2016	SWIFT	Returned Budget funds	€ 3,268.98
4	TOTAL			€ 53,213.98
01.04.17 to 31.03.2018:				
NO.	Date	Mode	Details	Amount
1	Wednesday, April 19, 2017	SWIFT	Yearly Contribution	€ 10,000.00
2	Tuesday, May 2, 2017	SWIFT	Yearly Contribution	€ 9,988.00
3	Friday, May 12, 2017	SWIFT	Yearly Contribution	€ 9,990.00
4	Monday, May 15, 2017	SWIFT	Yearly Contribution	€ 10,000.00
5	Thursday, June 8, 2017	SWIFT	Yearly Contribution	€ 66,624.29
6	Friday, June 23, 2017	SWIFT	Yearly Contribution	€ 24,926.69
7	Friday, December 29, 2017	SWIFT	Contribution's Charges repaid	397.74
8	Monday, February 12, 2018	SWIFT	Yearly Contribution	€ 10,044.00
9	Wednesday, February 14, 2018	SWIFT	Yearly Contribution	€ 10,000.00
9	TOTAL			€ 151,970.72
01.04.18 to 31.03.2019:				
NO.	Date	Mode	Details	Amount
1	Wednesday, April 11, 2018	SWIFT	Yearly Contribution	€ 10,000.00
2	Tuesday, April 17, 2018	SWIFT	Yearly Contribution	€ 10,000.00
3	Thursday, April 26, 2018	SWIFT	Yearly Contribution	€ 9,955.00
4	Thursday, January 3, 2019	SWIFT	Yearly Contribution	€ 9,985.00
5	Friday, February 8, 2019	SWIFT	Yearly Contribution	€ 9,983.50
6	Tuesday, March 19, 2019	SWIFT	Yearly Contribution	€ 10,000.00
7	Tuesday, March 26, 2019	SWIFT	Yearly Contribution	€ 19,975.00
8	Tuesday, March 26, 2019	SWIFT	Yearly Contribution	€ 9,988.00
8	TOTAL			€ 89,886.50
01.04.19 to 31.03.2020:				
No.	Date	Mode	Details	Amount
1	Thursday, June 20, 2019	SWIFT	Yearly Contribution	€ 9,985.00
2	Monday, September 16, 2019	SWIFT	Yearly Contribution	€ 9,955.00
3	Wednesday, October 2, 2019	SWIFT	Yearly Contribution	€ 10,000.00
4	Monday, October 28, 2019	SWIFT	Yearly Contribution	€ 9,990.00
5	Friday, November 29, 2019	SWIFT	Yearly Contribution	€ 9,008.20
6	Friday, November 29, 2019	SWIFT	Yearly Contribution	€ 9,008.20
7	Wednesday, December 4, 2019	SWIFT	Yearly Contribution	€ 9,975.00
8	Tuesday, January 21, 2020	SWIFT	Yearly Contribution	€ 10,000.00
9	Wednesday, March 11, 2020	SWIFT	Yearly Contribution	€ 10,000.00
10	Wednesday, March 18, 2020	SWIFT	Yearly Contribution	€ 10,000.00
10	TOTAL			€ 97,921.40
01.04.20 to 31.03.2021:				
NO.	Date	Mode	Details	Amount
1	Tuesday, May 19, 2020	SWIFT	Yearly Contribution	€ 10,000.00
2	Tuesday, October 6, 2020	SWIFT	Yearly Contribution	€ 10,000.00
3	Monday, October 26, 2020	SWIFT	Yearly Contribution	€ 10,000.00
3	TOTAL			€ 30,000.00
34	OVERALL TOTAL			€ 422,992.60

Appendix 5: Cash withdrawals by Fund Managers (for funds requested for expenses)

	<u>DATE</u>	<u>PAYEE</u>	<u>DETAILS</u>	<u>AMOUNT</u>
NO.	2016-17	01.04.16 to 31.03.17		
1	21.04.16	Bede Anyanwu	Cash withdrawn by issuance of Cheque No. 43	€ 1,360.00
2	08.07.16	Bede Anyanwu	Cash withdrawn by issuance of Cheque No. 44	€ 1,100.00
3	22.07.16	Bede Anyanwu	Cash withdrawn by issuance of Cheque No. 45	€ 700.00
4	07.10.16	Bede Anyanwu	Cash withdrawn by issuance of Cheque No. 46	€ 11,000.00
5	07.10.16	Bede Anyanwu	Cash withdrawn by issuance of Cheque No. 47	€ 4,500.00
6	14.10.16	Bede Anyanwu	Cash withdrawn by issuance of Cheque No. 48	€ 6,000.00
7	13.12.16	Bede Anyanwu	Cash withdrawn by issuance of Cheque No. 49	€ 16,000.00
8	08.02.17	Bede Anyanwu	Cash withdrawn by issuance of Cheque No. 50	€ 20,000.00
9	24.02.17	Bede Anyanwu	Cash withdrawn by issuance of Cheque No. 51	€ 5,100.00
9			TOTAL	€ 65,760.00
NO.	2017-18	01.04.17 to 31.03.18		
1	11.04.17	Bede Anyanwu	Cash withdrawn by issuance of Cheque No. 52	€ 20,700.00
2	23.05.17	Bede Anyanwu	Cash withdrawn by issuance of Cheque No. 53	€ 5,600.00
3	26.05.17	Bede Anyanwu	Cash withdrawn by issuance of Cheque No. 54	€ 1,200.00
4	10.11.17	Bede Anyanwu	Cash withdrawn by issuance of Cheque No. 55	€ 4,450.00
5	01.02.18	Bede Anyanwu	Cash withdrawn by issuance of Cheque No. 56	€ 4,420.00
6	22.03.18	Bede Anyanwu	Cash withdrawn by issuance of Cheque No. 57	€ 4,200.00
6			TOTAL	€ 40,570.00
NO.	2018-19	01.04.18 to 31.03.19		
1	21.11.18	Mamu Badisa	Cash withdrawn by issuance of Cheque No. 59	€ 2,409.00
2	21.11.18	Mamu Badisa	Cash withdrawn by issuance of Cheque No. 58	€ 3,000.00
3	23.11.18	Mamu Badisa	Cash withdrawn by issuance of Cheque No. 61	€ 3,000.00
4	23.11.18	Mamu Badisa	Cash withdrawn by issuance of Cheque No. 62	€ 2,800.00
4			TOTAL	€ 11,209.00
19			OVERALL TOTAL	€ 117,539.00

Appendix 6: COT charged twice on transfers by Ecobank.

<u>NO</u>	<u>DATE</u>	<u>DETAILS</u>	<u>TRANSFER /WITHDRAWAL</u>	<u>COT</u>	<u>EXTRA COT CHARGED</u>	<u>EXTRA CHARGE %</u>
1	07.10.16	Funds Transfer to Sangare Soulemane	€ 2,362.00	€ 50.00	€ 11.81	0.5%
2	24.01.18	Funds Transfer to Sama II Etienne	€ 3,072.00	€ 50.00	€ 15.36	0.5%
3	16.02.18	Funds Transfer to ??	€ 4,500.00	€ 50.00	€ 22.50	0.5%
4	16.02.18	Funds Transfer to Sangare Souleymane	€ 2,000.00	€ 50.00	€ 10.00	0.5%
5	19.02.18	Funds Transfer to Sama II Etienne	€ 1,207.00	€ 50.00	€ 8.02	0.7%
6	08.03.18	Funds Transfer to Thiam Samba	€ 6,130.00	€ 50.00	€ 30.65	0.5%
7	08.03.18	Funds Transfer to Sama II Etienne	€ 5,784.00	€ 50.00	€ 28.92	0.5%
8	08.03.18	Funds Transfer to Sama II Etienne	€ 5,000.00	€ 50.00	€ 25.00	0.5%
9	12.03.18	Funds Transfer to Sangare Souleymane	€ 8,866.00	€ 50.00	€ 44.33	0.5%
10	12.03.18	Funds Transfer to ??	€ 3,360.00	€ 50.00	€ 16.80	0.5%
11	12.03.18	Funds Transfer to ROCB	€ 8,687.00	€ 50.00	€ 43.44	0.5%
12	12.03.18	Funds Transfer to Sangare Souleymane	€ 9,271.00	€ 50.00	€ 46.36	0.5%
13	12.03.18	Funds Transfer to Sama II Etienne	€ 2,549.00	€ 50.00	€ 12.75	0.5%
14	12.03.18	Funds Transfer to ??	€ 7,623.08	€ 50.00	€ 38.12	0.5%
15	23.03.18	Funds Transfer to Thiam Samba	€ 8,937.00	€ 50.00	€ 44.69	0.5%
16	23.03.18	Funds Transfer to Thiam Samba	€ 5,000.00	€ 50.00	€ 25.00	0.5%
17	23.03.18	Funds Transfer to ??	€ 10,000.00	€ 50.00	€ 50.00	0.5%
18	23.03.18	Funds Transfer to Thiam Samba	€ 10,000.00	€ 50.00	€ 50.00	0.5%
19	11.04.18	Funds Transfer to Sangare Souleymane	€ 6,455.00	€ 50.00	€ 32.28	0.5%
20	11.04.18	Funds Transfer to Sangare Souleymane	€ 9,409.00	€ 50.00	€ 47.05	0.5%
21	11.04.18	Funds Transfer to Sama II Etienne	€ 3,759.32	€ 50.00	€ 18.80	0.5%
22	11.04.18	Funds Transfer to Thiam Samba	€ 3,470.00	€ 50.00	€ 17.35	0.5%
23	11.04.18	Funds Transfer to Tseket Gomez	€ 4,200.00	€ 50.00	€ 21.00	0.5%
24	14.06.18	Funds Transfer to Sama II Etienne	€ 3,197.43	€ 50.00	€ 15.99	0.5%
25	14.06.18	Funds Transfer to Thiam Samba	€ 4,000.00	€ 50.00	€ 20.00	0.5%
26	14.06.18	Funds Transfer to Sangare Souleymane	€ 14,471.00	€ 50.00	€ 72.36	0.5%
27	14.06.18	Funds Transfer to Sangare Souleymane	€ 10,000.00	€ 50.00	€ 50.00	0.5%
28	07.01.19	Funds Transfer to Sama II Etienne	€ 26,500.00	€ 20.00	€ 132.50	0.5%
29	11.01.19	Funds Transfer to Sawadogo Casimir	€ 3,038.00	€ 20.00	€ 15.19	0.5%
30	25.01.19	Funds Transfer to Sama II Etienne	€ 2,665.00	€ 20.00	€ 13.33	0.5%
31	14.02.19	Funds Transfer to Gnanago K.A.Harding	€ 2,270.00	€ 20.00	€ 11.35	0.5%
32	14.02.19	Funds Transfer to Birame Sidy Kane	€ 8,000.00	€ 20.00	€ 40.00	0.5%
33	14.02.19	Funds Transfer to Sama II Etienne	€ 3,150.00	€ 20.00	€ 15.75	0.5%
34	14.02.19	Funds Transfer to Mboumba Jean Yves	€ 2,825.00	€ 20.00	€ 14.13	0.5%
35	15.02.19	Funds Transfer to Esama Bokel Ipoka Jean I	€ 2,557.00	€ 20.00	€ 12.79	0.5%
36	01.03.19	Funds Transfer to Tafili Ebenezer Gebding	€ 2,185.00	€ 20.00	€ 10.93	0.5%
37	01.03.19	Funds Transfer to Birame Sidy Kane	€ 3,688.00	€ 20.00	€ 18.44	0.5%
38	08.03.19	Funds Transfer to Emilienne Pambo Bouass	€ 2,995.00	€ 20.00	€ 14.98	0.5%
39	22.03.19	Funds Transfer to Sawadogo Casimir	€ 3,787.00	€ 20.00	€ 18.94	0.5%
40	22.03.19	Funds Transfer to Tafili Ebenezer Gebding	€ 4,196.00	€ 20.00	€ 20.98	0.5%
41	25.03.19	Funds Transfer to Tafili Ebenezer Gebding	€ 4,196.00	€ 20.00	€ 20.98	0.5%
42	05.04.19	Funds Transfer to ??	€ 2,110.00	€ 20.00	€ 10.55	0.5%
43	05.04.19	Funds Transfer to C.G.Roger	€ 2,110.00	€ 20.00	€ 10.55	0.5%
44	17.04.19	Funds Transfer to Tseket Gomez	€ 4,000.00	€ 20.00	€ 20.00	0.5%
45	17.04.19	Funds Transfer to ??	€ 4,196.00	€ 20.00	€ 20.98	0.5%
46	17.04.19	Funds Transfer to Sawadogo Casimir	€ 4,000.00	€ 20.00	€ 20.00	0.5%
47	17.04.19	Funds Transfer to Tafili Ebenezer Gebding	€ 4,100.00	€ 20.00	€ 20.50	0.5%
48	17.04.19	Funds Transfer to ??	€ 2,102.00	€ 20.00	€ 10.51	0.5%
49	18.04.19	Funds Transfer to Sama II Etienne	€ 3,000.00	€ 20.00	€ 15.00	0.5%
50	08.05.19	Funds Transfer to ??	€ 2,613.00	€ 20.00	€ 13.07	0.5%
51	08.05.19	Funds Transfer to Mboumba Jean Yves	€ 2,252.00	€ 20.00	€ 11.26	0.5%
52	10.05.19	Funds Transfer to Sama II Etienne	€ 8,557.70	€ 20.00	€ 42.79	0.5%
53	16.05.19	Funds Transfer to Sama II Etienne	€ 3,593.10	€ 20.00	€ 17.97	0.5%
54	16.05.19	Funds Transfer to Ecole Natle Dovanes	€ 75,000.00	€ 20.00	€ 375.00	0.5%

<u>NO</u>	<u>DATE</u>	<u>DETAILS</u>	<u>TRANSFER /WITHDRAWAL</u>	<u>COT</u>	<u>EXTRA COT CHARGED</u>	<u>EXTRA CHARGE %</u>
55	03.06.19	Funds Transfer to Emilienne Pambo Bouass	€ 3,212.00	€ 20.00	€ 16.06	0.5%
56	03.06.19	Funds Transfer to ROCB	€ 2,992.00	€ 20.00	€ 14.96	0.5%
57	03.06.19	Funds Transfer to Birame Sidy Kane	€ 8,000.00	€ 20.00	€ 40.00	0.5%
58	14.06.19	Funds Transfer to Oussou Yao Christian	€ 2,992.00	€ 20.00	€ 14.96	0.5%
59	12.07.19	Funds Transfer to Tafili Ebenezer Gebding	€ 1,500.00	€ 20.00	€ 7.50	0.5%
60	15.07.19	Funds Transfer to SCANCOM	€ 15,800.34	€ 20.00	€ 79.01	0.5%
61	15.07.19	Funds Transfer to Birame Sidy Kane	€ 7,925.00	€ 20.00	€ 39.63	0.5%
62	24.07.19	Funds Transfer to Birame Sidy Kane	€ 4,758.00	€ 20.00	€ 23.79	0.5%
63	24.07.19	Funds Transfer to Sama II Etienne	€ 4,439.00	€ 20.00	€ 22.20	0.5%
64	01.08.19	Funds Transfer to Birame Sidy Kane	€ 3,986.00	€ 20.00	€ 19.93	0.5%
65	01.08.19	Funds Transfer to Sama II Etienne	€ 4,785.00	€ 20.00	€ 23.93	0.5%
66	21.08.19	Funds Transfer to Birame Sidy Kane	€ 6,946.00	€ 20.00	€ 34.73	0.5%
67	22.08.19	Funds Transfer to Felix Dobgi	€ 442.11	€ 20.00	€ 2.21	0.5%
68	03.09.19	Funds Transfer to Sawadogo Casimir	€ 3,000.00	€ 20.00	€ 15.00	0.5%
69	03.09.19	Funds Transfer to Lemami Elsie	€ 2,800.00	€ 20.00	€ 14.00	0.5%
70	03.09.19	Funds Transfer to Tafili Ebenezer Gebding	€ 2,851.00	€ 20.00	€ 14.26	0.5%
71	09.09.19	Funds Transfer to Lemami Elsie	€ 3,317.00	€ 20.00	€ 16.59	0.5%
72	09.09.19	Funds Transfer to ??	€ 2,000.00	€ 20.00	€ 10.00	0.5%
73	16.09.19	Funds Transfer to Sama II Etienne	€ 4,348.00	€ 20.00	€ 21.74	0.5%
74	09.10.19	Funds Transfer to Tafili Ebenezer Gebding	€ 2,096.00	€ 20.00	€ 10.48	0.5%
75	18.10.19	Funds Transfer to ??	€ 3,478.00	€ 20.00	€ 17.39	0.5%
76	28.10.19	Funds Transfer to Birame Sidy Kane	€ 3,478.00	€ 20.00	€ 17.39	0.5%
77	28.10.19	Funds Transfer to Tafili Ebenezer Gebding	€ 1,913.00	€ 20.00	€ 9.57	0.5%
78	28.10.19	Funds Transfer to Kouabenan A	€ 1,913.00	€ 20.00	€ 9.57	0.5%
79	29.10.19	Funds Transfer to Tseket Gomez	€ 3,000.00	€ 20.00	€ 15.00	0.5%
80	07.11.19	Funds Transfer to Tafili Ebenezer Gebding	€ 2,096.00	€ 20.00	€ 10.48	0.5%
81	13.11.19	Funds Transfer to Sama II Etienne	€ 7,548.00	€ 20.00	€ 37.74	0.5%
82	26.11.19	Funds Transfer to Sawadogo Casimir	€ 2,336.00	€ 20.00	€ 11.68	0.5%
83	26.11.19	Funds Transfer to Goma Boueboue Eulalie	€ 2,668.00	€ 20.00	€ 13.34	0.5%
84	26.11.19	Funds Transfer to Birame Sidy Kane	€ 2,577.37	€ 20.00	€ 12.89	0.5%
85	11.12.19	Funds Transfer to Sawadogo Casimir	€ 3,650.00	€ 20.00	€ 18.25	0.5%
86	11.12.19	Funds Transfer to Sama II Etienne	€ 2,253.00	€ 20.00	€ 11.27	0.5%
87	17.12.19	Funds Transfer to Birame Sidy Kane	€ 35,000.00	€ 20.00	€ 175.00	0.5%
88	19.12.19	Funds Transfer to Birame Sidy Kane	€ 2,900.00	€ 20.00	€ 14.50	0.5%
89	20.12.19	Funds Transfer to ??	€ 2,790.00	€ 20.00	€ 13.95	0.5%
90	02.01.20	Funds Transfer to Sama II Etienne	€ 2,842.00	€ 20.00	€ 14.21	0.5%
91	10.01.20	Funds Transfer to Sama II Etienne	€ 3,142.00	€ 20.00	€ 15.71	0.5%
92	21.01.20	Funds Transfer to ??	€ 3,373.00	€ 20.00	€ 16.87	0.5%
93	24.01.20	Funds Transfer to Sama II Etienne	€ 2,842.00	€ 20.00	€ 14.21	0.5%
94	21.02.20	Funds Transfer to Tseket Gomez	€ 7,000.00	€ 20.00	€ 35.00	0.5%
95	21.02.20	Funds Transfer to Tafili Ebenezer Gebding	€ 5,434.00	€ 20.00	€ 27.17	0.5%
96	21.02.20	Funds Transfer to Gnanago K.A.Harding	€ 2,539.00	€ 20.00	€ 12.70	0.5%
97	21.02.20	Funds Transfer to Sawadogo Casimir	€ 3,225.00	€ 20.00	€ 16.13	0.5%
98	12.03.20	Funds Transfer to Lemami Elsie	€ 3,118.00	€ 20.00	€ 15.59	0.5%
99	12.03.20	Funds Transfer to Gnanago K.A.Harding	€ 3,118.00	€ 20.00	€ 15.59	0.5%
100	12.03.20	Funds Transfer to ??	€ 3,120.00	€ 20.00	€ 15.60	0.5%
101	12.03.20	Funds Transfer to Sama II Etienne	€ 2,358.00	€ 20.00	€ 11.79	0.5%
102	25.08.20	F/Trf to Clip Scan (R.E.C.B. magazine)	€ 1,296.00	€ 20.00	€ 6.48	0.5%
103	26.08.20	F/Trf to E.Sama (Bullet info)	€ 3,000.00	€ 20.00	€ 15.00	0.5%
		TOTAL	€ 565,192.45	€ 2,870.00	€ 2,828.10	0.5%

Appendix 7: Signed Management Letter

12 February 2021

Directors General,
World Customs Organisation, West & Central Africa
C/O the Vice Chair, Republic of Congo
WCO-WCA

Dear All,

Management Letter on the review and audit of the Regional Fund (01.04.16-17.01.2021)

We have completed the audit of the WCO-WCA Regional Fund for the period from April 1, 2016 to January 17, 2021. We have detailed below, matters which came to our attention during the audit, worth highlighting. We have also given our recommendations for improvement on the weaknesses in the accounting of contributions and disbursements, current procedures, and internal controls.

It should be noted that the matters detected during the audit are the direct results of an audit, designed to meet the objectives as per the Engagement letter. It does not represent an exhaustive list of all possible issues, and improvements, in the system of accounting, internal control and governance, which a more extensive examination might reveal.

During our audit, we maintained close contact with the staff we were linked with, and discussed issues, information requirements as well as explanations when required. We also briefed them about the key findings before our departure from Abuja.

This report has been prepared solely for the use of the Directors General for the purpose stipulated in the Engagement letter and in the context of running the WCO-WCA regional body. No responsibility to any third party is accepted, as the report has not been prepared and is not intended, for any other purpose. The recommendations in this audit report are intended to engender improvements in the shortcomings identified during the audit.

We seize this opportunity to express our deep appreciation to the Comptroller General and staff of the Nigeria Customs Service for the co-operation and assistance rendered during the audit. We also want to thank the Vice Chair and his team for enormous support and work done behind the scenes to facilitate the process.

We remain amiable to assisting in the implementation of our recommendations.

Yours faithfully,



Alhajie Saihou Denton (Team Leader)

For: Finance & Audit Team, WCO-WCA Abuja Mission