CHALLENGES IN THE IMPLEMENTATION OF THE EXTRATERRITORIAL PROVISIONS OF THE FEDERAL COMPETITION AND CONSUMER PROTECTION ACT 2018*

Abstract
Competition law in Nigeria is governed by the Federal Competition and Consumer Protection Act 2018. The FCCPA guides all commercial conducts by firms within Nigeria which its effect is felt in Nigeria. This implies that all commercial activities which are concluded in Nigeria, whether the business is registered under the CAMA or otherwise, fall under the category of undertakings contemplated under the FCCPA as long as the effect of the activities of the undertaking is felt within Nigeria. However, the extraterritorial provision of the FCCPA raises some questions and hence faces some challenges in its implementation. Some of the attendant challenges include; the absence of a cooperation agreement, non signatory and ratification of international Treaties/Conventions, lack of technology, corruption and the overwhelming influence of multinational corporations. It was recommended that the FCCPC under the power to make regulations, come up with the relevant regulations for an effective implementation of the extraterritorial provision.

Keywords: Federal Competition and Consumer Protection Act 2018, Extraterritorial Provisions, Implementation, Challenges, Nigeria

1. Introduction

Competition in the commercial setting is a series of contentious and continuous endeavours where vendors of goods and services strive to win customers and take over businesses. Competition establishes a continuous productive activity of exchange between buyers and sellers.[1] Competition is a tussle between businesses to gain an economic edge over other businesses that are equally interested in the subject matter of the tussle.[2] In the marketplace, effective competition exists where a vendor actively strives to sell his products and services at a rate cheaper than his contemporaries while a buyer effectively negotiates lower prices for his transactions.[3] Its major objective is to drastically lower price to its barest minimum, which inadvertently compels sellers who ordinarily will selfishly seek to further their interest into seeking the general good of all consumers.[4] Competition generally entails a conscientious effort by businesses to outperform other businesses and be more successful than they are.[5] In Nigeria, Competition law is governed by the Federal Competition and Consumer Protection Act 2018. All corporate bodies, agencies of the Federal Government or subsidiaries of Federal Government agencies who are engaged in any form of commercial activity are bound by the provision of this FCCPA. Similarly, any Federal, State, Local Government or other agencies of the government at any level which has any affiliation and controlling interest in a body corporate engaged in the least form of commercial activity, will fall within the purview of the FCCPA.[6] In fact, all forms of commercial activities aimed at maximization of profit in a bid to satisfy any form of public demand is regulated by the FCCPA.[7] From the above provisions, it seems that commercial activities which are concluded in Nigeria, whether the business is registered under the CAMA or otherwise, fall under the category of undertakings contemplated under the FCCPA as long as the effect of the activities of the undertaking is felt within Nigeria. Section 2 of the FCCPA provides that the Act shall apply extraterritorially to the conducts of citizens of Nigeria or to non-Nigerian citizens who are ordinarily domiciled in Nigeria. Similarly the activities of all corporate bodies which are incorporated in Nigeria or which do business in Nigeria fall within the purview of the FCCPA. In relation to the buying of goods or services or the supply of same within Nigeria or into Nigeria, the parties to such transactions are constrained by the provisions of FCCPA. Finally, where shares are acquired by individuals or a body corporate outside the borders of Nigeria and such acquisition fully or partly alters the composition in the control of the structure of a business or the ownership of assets which accrue to a particular business within Nigeria the provisions of the FCCPA will be applied.[8]

In *United States* v *Aluminum Company*,[9] the US alleged that the Aluminum Company and others engaged in concerted practices, conspiracy and other anticompetitive conduct to monopolize and restrain trade by limiting the production of ingot and consequently entered into a conspiracy. There was also an allegation of an anticompetitive cartel involving several foreign corporations from Canada, Switzerland, Germany, and Great Britain with the intention to fix a quota on aluminum imported into the US. The court held that a State could enforce its laws in respect of acts which took place outside the borders of the State, even on individuals who are not its citizens, where the conduct in question produces unwanted results within its borders. In this case, the intended result was targeted at and indeed disrupted imports.[10] The court extended the scope of the Sherman Act to conducts and transactions which took place outside the US. It stated that irrespective of the place of residence or the place of transaction of anticompetitive conduct, once an adverse effect is elicited in the economy of the US, the antitrust laws of the US will apply. The territorial principle was jettisoned while the effect doctrine was applied, the court having found the conduct which took place outside the territory of the US to have an adverse effect within the US.

In *United States* v *Nippon Paper Industries Co*[11] , the Japanese company was charged for colluding with others to fix prices of goods in the US, which is an offence under the Sherman Act. At the court of first instance, it was held that the Sherman Act did not apply to conduct which took place outside the United States. This decision was overturned by the Court of Appeal. The judge stated that the antitrust laws of the US have an extraterritorial reach and consequently applied same to the price-fixing conspiracy before it. The court

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[1] E T Sullivan and J I Harrison, *Understanding Antitrust and its Economic Implications* (Mathew Blender and Co Inc. LexisNexis Group 2003) 1.
[2] B A Garner (ed), *Black's Law Dictionary* (9th edn, Thomson Reuters Business, 2009) 1252.
[3] R V Den-Bergh, *Comparative Competition Law and Economics* (Edward Elgar Publishing Ltd. 2017) 17.
[4] *Ibid.*
[5] 'What is Competition' < https;//dictionary.cambridge.org > accessed 31 May, 2021.
[6] *Ibid*, s 2 (2) (a) (b).
[7] *Ibid*, s 2 (2) (c).
[8] FCCPA, s 2 (3) (a) (b) (c) (d)
[9] (1993) 509 US 764.
[10] T Kojima, 'International Conflicts over the Extraterritorial Application of Competition Law in a Borderless Economy' (2002) 3-4 < https://researchgate.net > accessed 9 March 2022.
[11] (1977) 109 F 3d 8-9.

further stated that the principle of comity does not exclude the government of the US from prosecuting the Japanese company as doing otherwise will create a leeway for foreign undertakings to engage in anticompetitive conduct and thereafter come up with various forms of résistance to avoid prosecution. [12] The EU applies the effects doctrine and the implementation doctrine in accessing the nature of anticompetitive conduct in order to determine whether to apply its laws extraterritorially. The implementation doctrine is also based on the territorial principle. The purport of the implementation doctrine is that the geographical location where a conduct prohibited under the Treaty of the Functioning of the European Union was concluded is immaterial as long as such prohibited conduct was implemented within the EU and the member states were affected adversely by the outcome of the conduct; the TFEU will apply extraterritorially. The EU applied its competition law extraterritorially in *Grosfillex-Fillistorf*.[13] Here the court held that the effect of an agreement between undertakings in the EU single market is the exclusive and most important consideration in determining the outcome of the scope of the EU competition law. This implies that neither place of incorporation of a firm nor the geographical location where an anticompetitive agreement was executed is considered in matters of this nature.

2. Challenges in the Implementation of the Extraterritorial Provisions of the Federal Competition and Consumer Protection Act 2018

Going by the provision of the FCCPA, the question arises as to the particular court that will try an errant company engaged in an anti-competitive activity that has an adverse effect on the economy of Nigeria. Again, the means of enforcement of the judgment and the punishment for such offences are uncertain. Other challenges to the extraterritorial application of the FCCPA are discussed hereunder.

Absence of Cooperation Agreement

One of the major challenges faced in the extraterritorial application of competition law since the prohibited conduct occurs outside the jurisdiction of a state is that the cooperation of other states is needed. The enforcing state may require information regarding the subsidiaries of the errant entity, goods, and bank account details *inter alia*. There is no guarantee that the state whose corporation is needed will grant such a request willingly. Cooperation may be obtained through multilateral treaties specifying the conditions for such cooperation. Where none exists, extraterritorial enforcement becomes difficult and almost impossible as there will be great difficulty in getting the cooperation of the other states. The Hague Convention[14] provides that subject to certain limitations, states are required to cooperate with each other in the request for evidence by one or more states. The lack of willingness of states to freely share information may likely be a result of a lack of trust on the part of the states to release information about their citizens residing in other jurisdictions. With the presence of a multilateral treaty, states will be obligated to share such information with the knowledge that the other states will reciprocate the gesture when the need arises, which serves as a justification for providing such information. Furthermore, where the cooperation is related to some specific industry which is of utmost importance to a state, the requesting state will be perceived as meddlesome. This is because a state is supposed to protect policies and industries which yield high returns for the state. In addition, the disparity in the mode of operation of the various legal systems is an important factor for consideration. Some States have practices which vary from that of the US. In the area of evidence collection, while the US relies greatly on the discovery process, other states may not be willing to provide such, which may cause tension between the states involved. This has led to states enacting blocking statutes which are aimed at restricting the effect of the US antitrust laws.[15]

Enforcement outside the jurisdiction of a state can be cost-intensive and rigorous.[16] The process of obtaining evidence extraterritorially can also be difficult. Hence there is a need for cooperation amongst all the States and parties involved. So far, there is no bilateral agreement between Nigeria and any other country on cooperation in obtaining evidence, information gathering, and enforcement.[17] Bilateral and multilateral agreements can also be entered at the regional and international levels. Through such bilateral agreements, Nigeria can also become a beneficiary of the fruits of cross-border enforcement by other countries. Such agreements will also cushion the effect of the cost of enforcement which ordinarily would be borne by one party.

Non-Signatory and Ratification of International Treaties/Convention

Nigeria is not a signatory to the Hague Evidence Convention.[18] The Hague Convention which sets out the modalities for obtaining evidence abroad in respect of civil and commercial transactions to obtain evidence abroad in cases where the evidence required in the course of the trial is obtainable in another jurisdiction.[19] The Hague Convention made provisions for the means of obtaining evidence abroad. This is only applicable to countries that are signatories to the Convention. The Convention provides for the means by which states can request evidence from another state which is a signatory to the Convention. This could be through the issuance of a letter of request, the appointment and use of commissioners and the use of diplomatic officers.[20] Nigeria is not a signatory to the Hague Convention; therefore, it will almost be impracticable to collect evidence for extra-territorial investigation and enforcement from other states.

Comity Rule

The purpose of positive comity is to assign the power to scrutinize and possibly prosecute anticompetitive conduct to the state amongst the states whose interests have been affected and which possess the appropriate legal and administrative machinery to handle such. It is usually a voluntary arrangement between countries targeted at deterring anticompetitive conduct. Where the economy of two or more

[12]M M Dabbah, *The Internalization of Antitrust Policy: International and Comparative Competition Law* (Cambridge University Press 2003) 176.
[13](1964) 3 CMLR 237.
[14]Hague Convention on Taking of Evidence Abroad 1970.
[15]*Ibid*, 5.
[16]N Dimgba, The Need and the Challenges to the Establishment of a Competition Law Regime in Nigeria (2021) < https://www.aacedemia.edu > accessed 18 May 2022.
[17]J O Enyia and N U Udodia, 'Challenges and Prospects to the Implementation of the FCCPA 2018, (2022) (3) (25) *Journal of Legal, Ethical and Regulatory Issues* 7.
[18] (n 80).
[19]*Ibid*, art 1.
[20](n 80) art1,17, 15.

states has been affected by an anticompetitive activity, the states can voluntarily assign the investigation to any affected states to handle such investigation and prosecute same. The states appointed for investigation may accept or reject the offer and notify the other states. Where a country accepts the offer to prosecute the alleged anticompetitive conduct, it will apply its local laws to the conduct. The principle of comity restricts states from applying their national laws to anti-competitive conduct, which occurs outside the jurisdiction of a state where the anticompetitive conduct did not produce an adverse economic effect.[21] Thus comity principle diminishes the extraterritorial application of competition law by states. For the principle of comity to achieve relative success, there must be a similitude of congruence between the political, economic and legal structures of the states entering the enforcement agreement. This ensures that the states operate from the same footing or at least on the closest possible footing. Comity agreements require an element of trust amongst states. The states need to be assured that the state whose law they have deferred will apply its laws effectively to address the prevalent concerns, as this will serve as a means of deterrence and, at the same time, effectively punish the perpetrators of anticompetitive conduct. Comity essentially underscores the principle of equality amongst sovereign and equal states. It reflects the ideals and policies which a state authorizes within its jurisdiction.[22] Where states apply their competition laws individually to anticompetitive conduct in order to regulate such conduct, there is a possibility for duplicity, which might have negative consequences in the long run. Concurrent application of extraterritorial provisions over competition law enforcement might result in duplicity of punitive measures, conflicting antitrust policies and higher administrative expenditure. Concurrent enforcement could equally lead to a lack of certainty in the general competition law framework. For instance, where different countries have varying criteria for approving mergers, mergers with pro-competitive benefits may be desirable to one state yet prohibited by another. However, where the principle of comity is adopted, the states involved adopt policies which enhance the efficiency outlook, thereby enhancing competition.[23]

Lack of Technology

The extraterritorial reach of the FCCPA extends to activities done in other parts of the globe that impact economic activities in Nigeria. Accessing the activities of entities suspected to be engaged in anticompetitive conduct, which adversely affects competition, especially in the digital space, requires technology deployment. Detection of antitrust activities involves the scrutiny of the activities of firms across various platforms. Antitrust enforcement requires the exchange of information across these various platforms through the use of technology. Competition law in the digital space and emerging markets involves a high volume exchange of information. Consequently, competition enforcers in modern times are required to stay abreast of a large volume of information exchange through the scrutiny of the activities of these entities with the help of technology.[24] In *Ohio* v *American Express*[25], the American Supreme Court was faced with dealing with antitrust issues emanating from a two-sided market. The allegation against the defendant bothers on the effect of an 'anti steering' clause imposed by the defendant, which made it impossible for dealers to employ an alternative means of payment with charges lower than the defendants. The court held that the defendant's conduct was anti-competitive in nature, resulting in the payment of higher merchant fees for consumers. It is important to note that some antitrust conducts are not easily detected at face value; hence, competition law enforcers should be abreast of the workings of the digital platform. Similarly, in October 2022, the Competition Commission of India fined the tech giant Google the sum of Rs 1,338 Crore for abuse of its dominant position in its multiple markets using the Android Operating System. The investigation was achieved through information gathered by three digital economy enthusiasts. The process of acquiring the information required a comprehensive compilation of information dossiers of the tech giants. The Competition Commission of India speedily launched an investigation by examining the various ecosystems that Google operates in, such as; the smart phone ecosystem, the app development ecosystem and the mobile operating system ecosystem.[26] All these were achieved through the use of technology

Governments, in the bid to maintain an efficient market, must deploy technology in a world where companies constantly innovate. Instead of the innovations in technology becoming overwhelming for the government and its agencies, the relevant government agencies should get an in-depth understanding and insight into the activities of the digital market and harness the potential offered by the digital market in maintaining a competitive market.[27] To further buttress the importance of technology in competition law enforcement, the EU has enacted the EU Digital Market Act to regulate unfair practices by large online companies, which act as gatekeepers in the online platform economy to intercept conducts with the potential of creating bottlenecks in the digital economy. The gatekeepers will include technology companies engaged in core platform services such as; online markets, search engines, social networks, and web browsers. The gatekeepers must enable interoperability with the services of rivals at no cost, ensure ease of uninstallation of software, and easy transfer of data from one platform to another, in addition to giving notices to the EC about proposed digital-related mergers. The platforms identified as gatekeepers will have six months from the date of coming into force of the Act to comply.[28] The FTC, in 2019, unveiled its taskforce for technology drive to oversee anticompetitive activities in the digital platform and monitor proposed mergers within the technology-related industries, which form an integral part of the market.[29] The competition authorities of the developed countries keep striving to acquire a deeper insight into the working of algorithms and their potential to be used against consumers by deploying the services of data scientists and other experts in the field. The EC is investigating the activities of Amazon in relation to non-public data derived from the activities of independent sellers in its marketplace for its retail business that competes with those sellers. The investigation also involves keeping tabs on Amazon to ensure that Amazon keeps up its commitment to refrain from making use of

[21] *Ibid*, 4.
[22] P C De Sousa, 'The Three Body Problem; Extraterritoriality, Comity and Cooperation in Competition Law' (2021) *SSRN Electronic Journal* 11 <https://papers.ssrn.com>.
[23] *Ibid*, 12.
[24] J B Baker, Can Antitrust Keep Up: Competition Policy in High Tech Markets < https://www.brookinggs.edu/can-antitrust-keep-up-with-competition-policy-in-high-tech-markets >> accessed on 3 November 2022.
[25] (2018) 138 S. Ct 2274.
[26] Indian Regulators Fine Google for Anticompetitive Conducts <https://www.reuters.com/world/india-competitionregulators-fines-google -for-anticompetitive-practices > accessed on 3 November 2022.
[27] G Massaraotto, Using Tech to fight Big Tech <https://news.bloomberglaw.com/tech-and-telecom-law/using-tech-to-fight-big-tech> accessed 3 November 2022.
[28] European Commission, Digital Markets Act: Rules for Digital Gatekeepers to Ensure Open market Enter into Force <https://ec.europa.eu/commission> accessed 3 November 2022.
[29] Antitrust Enforcement Centers on Technology Industry <https://www.ftc.gov> accessed 3 November 2022.

the said data.[30] Competition law has far advanced beyond the traditional market as we know it into the digital markets. For the FCCPC to actively and efficiently play its role in regulating competition law and cross-border enforcements, the FCCPC must position itself to harness all the benefits provided by technology. The Federal Government needs to support the FCCPC to acquire the needed digital skill and knowledge.

Corruption

Corruption is a practice that happens worldwide and can be said to be as old as society. Corruption happens when people abuse power reposed on them as public officers for selfish gains. This stems from the inability to separate one's role in the workplace from one's role as an individual. It manifests in various forms, such as the use of funds meant for public use for personal gains, denying citizens access to justice which they are entitled to under the constitution, taking and receiving of bribes, requiring the illegal inclusion of a sub-transaction to the original transaction consequently changing the original event, engendering flawed judgment and betrayal of trust *inter alia*. Whatever form corruption assumes, it is a menace to society.[31] In government establishments, corruption manifests in receiving gratification to offer or to refrain from offering a service that an officer is ordinarily supposed to render in the ordinary course of his work. It may also be a lack of willingness to pursue a course of action which lies in the course of a person's line of work after some form of gratification has been received; or the pursuing a course of action that will only be in favour of someone who has given one form of gratification or another. When a public officer undertakes these courses of action, it distorts the established norms, which are the approved course of action.[32] Competition law is not immune from the activities of corrupt officials. One of the many ways corruption manifests in competition law is through bid rigging in the form of offering and receiving gratification by the parties to cover their tracks. In *United States* v *Marshak*, the defendant, in order to make a bidding process appear competitive, manipulated the bid documents and further forged certifications, which were sent to the Defense Department after he had received gratification for the contract stating that no such commission was paid. It was further found that the defendant not only received a generous amount for himself as a commission, but he had more commission paid to a company based in the US which was owned by a relative of his.[33] Corruption has been a course of concern in Nigeria, especially in the civil service and government parastatals. In Nigeria, corruption seems to be a prevalent practice and has resulted in low economic development. Members of the public, government officials, field operators and private individuals are major actors in the field of corruption.[34] Other ways in which corruption may manifest in competition law enforcement is through refusal to investigate and prosecute, failure to access the relevant records, nepotism, lack of transparency of competition officials and corrupt judicial officers. These activities distort the market economy of states and are adverse to consumer welfare.

Lack of Skill and Man Power

Effective enforcement in the area of competition law in relation to a globalized world and emerging markets requires constant skill upgrades. This will enable competition law enforcers to get acquainted with the economic foundation of their respective national competition laws and the legal technique to be adopted for efficient and effective competition law legislation and enforcement.[35] For competition and consumer protection laws to be properly implemented in Nigeria, there is a need to hire the right personnel and continuous training of such personnel in line with international best practices. Certain aspects of competition law are technical; therefore, there is need for continuous training and capacity building for competition law enforcers. The training will include consultative meetings to review existing competition and consumer protection law with government representatives as an essential step towards an improved competition and consumer protection regime. This includes and is not limited to; sessions for newly appointed commissioners on implementation of competition law; comprehensive and all-encompassing courses on competition and consumer protection law and policy, including lessons in evidence gathering in competition cases and sectoral consumer protection enforcement; intensive courses for judges on issues related to competition law and policy. The staff of FCCPC and the FCCPT as well as the judges of the Court of Appeal who preside over anticompetitive cases at the appellate level, need continuous training and re-trainings for effective enforcement of competition law, especially in the area of cross-border enforcement. The Federal Government of Nigeria should assist the FCCPC in acquiring and reinforcing corporate competence, acquiring the requisite technical knowledge and skill through the help of technology to be able to understand the workings of the digital market and liaise with competition regulators from well-established jurisdictions to broaden their knowledge and expertise in competition law.

Overwhelming Influence of Multinationals

The activities of Multinational Companies are of great importance in the world economy, considering the network of supplies and distribution that they enhance. They are usually subsidiaries which hold equity shares which are controlled by a parent company. Foreign Direct investment is provided by the parent company, and this expedites the establishment of subsidiaries through the acquisition of facilities in foreign countries. MNCs also engage in cross-border mergers as a means of boosting business operations. The United Nations Conference on Trade and Development estimates that trade between various MNCs makes up a third of global export trade. MNCs dominate trade both nationally and internationally.[36] In the era of globalization, the transnational activities of MNCs have brought far-reaching transformation in the flow of international trade, technology transfer and investment. Their activities which include; outsourcing and offshoring, have extensively driven the global value chain. Similarly, the decisions of MNCs induce policy changes in different States irrespective of the political and economic dimensions in the area of taxation, immigration and investment protection. MNCs also may have strong political influence domestically. Indeed, their global economic dominance may go hand-in-hand with their

[30] G 7 Compendium of Approaches to Improving Competition in Digital Markets 12 October 2022 16-17.
[31] M Emmanuel and L Qijun, 'The Impact of Corruption on Government Public Services Quality, Justice and Cost of Businesses Regulations in Developing World' (2019) (1) (6) *International Journal of Innovation and Research in Educational Sciences* 124.
[32] W A Ademu, 'Eradicating Corruption in Public Office in Nigeria' (2013) (2) (7) *International Journal on Personal Relationships* 312-313.
[33] *U S* v *Marshak*<https://www.justice.gov/atr/case/us-v-yuval-marshak> accessed 3rd November 2022.
[34] Ademu, (n 109) 313.
[35] UNCTAD, Training Workshop on Competition Law and Policy for Staff of Trade Practice and Consumer Protection Authority Ethiopia <https://www.unctad.org> accessed 3 November 2022.
[36] G P Calliess, 'Transnational Corporations, Global Competition Policy and the Shortcomings of Private International Law' (2011) (8) *Indiana Journal of Global Legal Studies* 487.

powerful domestic political position.[37] The actions of MNCs are increasing in developing countries. These range from the purchase of raw materials, outsourcing production and selling to new consumers, new capabilities and financial incentives such as tax breaks by host governments. The activities of MNCs increase productivity, which ultimately scale up production, resulting in increased wages and better work conditions for workers. Irrespective of the numerous benefits resulting from the activities of the MNCs in their host countries and beyond, there have also been some negative impacts. MNCs may suppress economic development by limiting the economies of their host countries to poor value-added activities and saturating local investments and jobs.[38] More so, the MNCs, in some cases, engage in anticompetitive conducts which distort the markets of their host states, including cross-border anticompetitive conducts that adversely impact the economy and the domestic markets, including but not limited to various monopoly conducts, predatory pricing, market sharing, production cuts, price fixing. Owing to their large size and enormous financial strength, they find ways to evade the detection of the domestic antitrust laws of the host states. The MNCs tend to get away with anti-competitive conduct as the competition enforcers of the host state, in most cases, do not have the resources, the technology or the manpower needed to detect their activities and punish same accordingly. The MNCs may also likely engage in cross-border mergers that have the potential to create a dominant position and consequently stifle the existence of domestic firms.

3. Conclusion and Recommendations

From the foregoing, it can be concluded that the provision of the FCCPA relating to its extraterritorial application is inadequate to regulate cross border conducts and therefore should be amended. It is also important for the FCCPC under its powers to make guidelines, make the requisite guidelines which will consolidate the extraterritorial provision of the FCCPA especially with regards to evidence gathering, punishment for cross border anticompetitive conducts, role of FCCPC and the FCCPA in the enforcement of the extraterritorial provisions of the FCCPA. The guidelines perhaps will bring clarity to the extent of the extraterritorial application of the Act. The activities of foreigners and foreign entities doing business in Nigeria should also be addressed. There is need for FCCPC to enter into strategic alliances and partnership with other competition law enforcers on extraterritorial enforcements. Since information sharing is vital to extraterritorial enforcement, the FCCPC should actively seek for ways to liaise with their counterparts on information gathering and dissemination. Similarly, the members and staff of FCCPC need to be trained in order to be well equipped in competition and consumer protection enforcement for both domestic and extraterritorial enforcements. It is also important that Nigeria becomes a signatory to the Hague Evidence Convention as this will go a long way in the enhancement of cross bother information gathering.

[37]Multinational Corporations and their Influence through Lobbying on Foreign Policy <https://scholar.princeton.edu/hvmilner/home > accessed on 5 November 2022.

[38] World Benchmarking Alliance, The impact of multinationals in developing countries A framework for benchmarking May 2020 8.