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Onyeonoru, Ifeanyi P.; Omolawal, Samuel A.; Okunola, Rasheed A.

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Types of Corruption in Small and Micro Enterprises (SMEs) in Ibadan, Nigeria

Ifeanyi P. Onyeonoru Samuel A. Omolawal Rasheed A. Okunola

Department of Sociology University of Ibadan, Ibadan, Nigeria

Abstract

Corruption is a phenomenon that manifests in various types and forms especially among operators of Small and Micro Enterprises (SMEs). Many actions of the operators which constitute corrupt practices often tend to be overlooked in spite of their grave consequences for the success SMEs in Nigeria. The fight against corruption in Nigeria is more concentrated in the formal sector. This study was, therefore, designed to investigate various forms in which corrupt practices are carried out among Small and Micro Enterprises in Ibadan, Nigeria. Business owners, their employees, apprentices and consumers constituted the study population. Primary data were collected using questionnaire administered on 200 business owners, 150 employees and 150 apprentices randomly chosen in five business districts in Ibadan; and the conduct of 10 in-depth interviews with purposively selected participants. Quantitative data were analysed at uni-variate level using simple percentages and frequencies while qualitative data were content analysed. Findings from the study revealed that corrupt practices were rampant among actors in SMEs and the common types of corrupt practices included stealing (60%), deception of customers (78.4%), tax evasion (62%), sale of fake products (76%), sale of expired products (65.2%), tampering with measurement scales (69.6%), bribery (82.4%), and poor service delivery (73%). The study concludes that the level of corruption in SMEs calls for concern and government should extend the fight against corruption to the informal sector in Nigeria.

Keywords: Small and micro enterprises, entrepreneurs, corruption, informal sector

Introduction

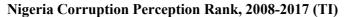
With the rising level of unemployment in the formal sector, the number of those seeking for opportunities in the informal sector, especially in Small and Micro scale Enterprises (SMEs) has continued to swell. In its latest report, the National Bureau of Statistics (NBS) revealed that the country's unemployment rate rose from 14.2 per cent to 18.8 per cent in 2017. The informal sector, which is also referred to as 'grey economy' is the part of an economy that is neither taxed, nor monitored by government. Unlike the formal economy, activities of the informal economy are not included in the gross national product (GNP) and GDP of a country. In fact, the International Monetary Fund (IMF) recently pointed out that unregistered household enterprises comprise a

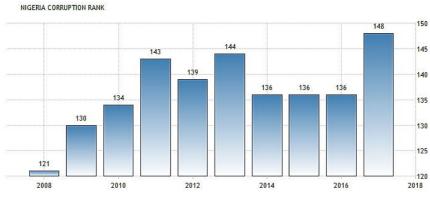
significant portion of Nigeria's economy, accounting for as high as 65 per cent of the country's Gross Domestic Product (GDP).

Even though the SMEs provide an opportunity for generating reasonable incomes for many people, most informal workers are without secure income, employments benefits and social protection. This explains why informality often overlaps with poverty. For instance, in countries where informality is decreasing, the number of working poor is also decreasing and vice versa. In spite of its promise for lifting many people out of poverty, SMEs face corruption challenges that tend to inhibit its growth. Beyond poverty and social issues, the prevalence of informal activities is closely related to an environment characterized by corrupt practices perpetrated not only by actors in SMEs but also promoted by weaknesses in three institutional areas, namely taxation, regulation and private property rights. Lack of effective regulatory mechanisms make it easy for operators in SMEs to engage in various corrupt practices including arbitrary inflation of prices and provision of sub-standard products and services. Also higher taxes and complicated fiscal process may prevent informal sector operators from formalizing their activities. Long requirements for registration as well as licensing and inspection requirements are also issues constraining the informal sector (THISDAY, 10 January, 2019).

The widely held World Bank definition of corruption as "the abuse or misuse of public office for private gains" portrays the phenomenon as a menace occurring in the public domain alone. However, a cursory look at the reality shows that corruption is ubiquitous, as it pervades both the public and the private sectors, in both the developed and the developing countries of the world. The existing body of knowledge on corruption in Nigeria tilts to its public, state-centric, official, macro and bureaucratic nature, to the neglect of the private, informal, micro and unofficial side. Limited studies have been focussed on the nature of corruption in SMEs - either throwing sand or greasing the wheel of commerce (Mendoza, Lim and Lopez, 2013). It has however, been opined that the informal side of corruption, which has often suffered neglect from scholars and public affairs analysts, has far more reaching consequences on the state, than the widely acclaimed public corruption (Ipadeola, 2016). This is because of its wide socio-economic scope and its engagement with the mass of people in developing countries. Hence there is a need for a re-definition of corruption to embrace the private or informal arena and for researchers and scholars to take more than a passing interest in the informal sector.

The prevalence of corrupt practices in various aspects of our lives has a tremendous adverse effect on the quality of life of the country, people's living the national psyche and growth and development entrepreneurship. Corruption at any level does not do any nation good. The resources meant for the provision of social goods such as water supply, roads, education, health and other basic and social services that are captured and stolen by a handful of Nigerians through corrupt acts stultify economic and social development hence creeping poverty all over the place. Notwithstanding the establishment of anti-corruption agencies such as the Economic and Financial Crimes Commission (EFCC) and the Independent Corrupt Practices Commission (ICPC), corruption tend to be on the increase as shown on the corruption ranking of the Transparency International below:





SOURCE: TRADINGECONOMICS.COM | TRANSPARENCY INTERNATIONAL

Nigeria recorded 27 percent on the 2018 Corruption Perceptions Index (CPI) reported by Transparency International. The CPI in Nigeria was reported to have averaged 20.76 Points from 1996 until 2018, reaching an all time high of 28 Points in 2016 and a record low of 6.90 Points in 1996 (https://tradingeconomics.com/nigeria/corruption-index).

The Corruption Perceptions Index however concentrates on the public sector; it is based on questions regarding how corrupt the public sector of the countries is perceived to be. Similarly, the anti-corruption agencies of the Federal Government of Nigeria namely Economic and Financial Crimes Commission (EFCC) and in particular the Independent Corrupt Practices Commission (ICPC) tend to concentrate their activities on the formal Sector/Public Sector. The informal sector where SMEs are located is relatively left out (https://icpc.gov.ng/our-role/).

The efforts should not be limited to the formal sector, rather it should be extended to the informal sector with particular reference to SMEs where it will be easier to consider moral decadence in the context of societal and cultural values. Attention has rarely been drawn to corruption in these "low places" despite the renewal of national interests in controlling corruption through the establishment of anti-corruption commissions in 1999 and 2003 respectively. It is against this back drop that this study sought to investigate the types of corruption in the informal sector with emphasis on the SMEs in Ibadan, Nigeria. The SMEs in the study refer to owner accounting businesses employing not more than 10 employees at the time of the study.

Small and Micro Enterprises and the Corruption Question

Any business activity that is not covered by government regulation and barely conforms to the standard economic pattern as may be instructed either by local or national authority, is considered informal. Thus, irrespective of the purpose, the level of operation, product and service type, location and modus operandi, so far the activity is unlicensed or threatens the corporate existence, the business remains informal. Considering the function of informal economic activities in their concentration especially in less developed nations like in Africa, it is apt to suggest that because regulatory institutions in subject countries are defective, corruption tends to thrive. (Ouedraogo, 2017). In Nigeria, Corruption among SMEs is evident in the forms of bribery, misappropriation of monies by employees, extortion, fraud, kickbacks among others. The escalating volume of corruption is a major threat posed by the absence of strong financial system to the development of SMEs in the country (Alabladejo & Schmitz, 2006)

The existence of corruption, the abuse of official position for private gain, accentuates deficiency in institutional functioning, affects the integrity of business and endangers the moral economy and society. Corruption and informal economy are viewed as two corresponding variables with positive relationship - the higher the level of corruption, the greater the activities of informal or unregulated production activities. A popular approach among scholars in this area, considers the burden of institutions and the price implication of going formal as the forces behind seeking refuge in informal technicality. Hence, Johnson, Kaufmann and Shleifer (1997 in Oudraogo, 2017) opine that corruption can be seen as an extra tax that worsens bureaucratic regulation and motivates businesses to operate in the shadow. Using a tax collection model that puts together a taxpayer and potentially corruptible tax inspector, Djankov, La Porta, Lopez-de-Silanes and Shleifer (2002) emphasize the effect of regulation on corruption and showed a positive correlation between regulatory intensity and the size of the unofficial economy. A relatively too much of cost implication that manifests from the burden of bureaucracy, corruption, and legal environment better explain the level of the unofficial economy (Beuhn and Schneider, 2012).

Corrupt practices loom in the SMEs the moment people evade the wherewithal that must be fulfilled to establish business in a formal and standard way. The reason sometimes though is generated by the expensive characteristic that is involved in operating formal production unit which can attract relatively stifling taxes, red-tapism and other bureaucratic complexities which daunt ordinary citizen from creating wishful business. Whereas, if people, many of who are not absorbed by formal institutions in white collar jobs, must survive, they can find a way to informally establish production unit at the backyard of government's costly procedures. Therefore, in trying to survive the hostile atmosphere of unemployment and under-employment which drives poverty, creating SMEs and sometimes moonlighting becomes an

alternative, but one which involves shadow activities. Hence, one can say that, if not all, most SMEs in informal sector are thriving on the foundation of corrupt existence as long as they operate outside the scope of government business regulatory mechanisms. Meanwhile, corrupt existence of the informal economy is also encouraged when authority is bereft of sufficient human and material resources needed to oversee the coverage of all business units, resulting in weak administration (Dutta, Kar and Roy, 2011).

Escaping the standard by the operators of informal production is without the involvement of public workers who exchange petty tips in form of bribe, just to overlook shady deals of grey economy. Thus, one can say the wheel of progress and development of the informal sector is greased by fickle authority who rarely differentiate between what is wholesome and what is not, for corporate existence in the society. Similarly, Okumu and Gorgues-Puccio (2014) posit that corrupt activities within informal sector breeds profiteering. This would have been efficiently controlled but for undisciplined bureaucrats who fail to represent the government as expected. From the empirical investigation conducted by Dutta et al. (2011), in finding the nexus between corruption and informal businesses in India, there were indications that corruption is a causal agent of informal production units which nevertheless indirectly increases employment in the country.

Some studies focus only on explaining why most SMEs decide to go informal in their operation in order to evade what seems to be costly if proper channel established by the authority is to be followed. Thus, this perspective of corruption in the informal sector highlights underground activities which may involve bribing officials, tax evasion etc. perpetrated by corporations, although, these organisations are duly recognized and licensed to operate by standard. But a different perspective to view corruption in the informal sector is the one represented by the study conducted by Lavalle and Roubaud (2014). They argue that the presence of active government agents will improve the level of informal business registration, so far payment of fine is involved. But, with frail law enforcement apparatus, informal business owners would continue to stay in the shadow.

The prevalence of corruption in the formal (public) is, therefore, a fertile ground for a variety of informal economic activities. Government officials sometimes cooperate with informal business activities by accepting tips in order to look the other side, thereby perpetrating corruption. It can therefore, be opined that corruption breeds informality in business while informality in business supports corruption.

Methodology

The study was conducted in purposively selected in 5 business districts in Ibadan the capital of Oyo State, Nigeria namely, Bodija, Samonda/Sango, Agodi/Gate, Mokola and Dugbe. The choice was due to their heterogeneous population structure and large concentration of Small and Micro Scale Enterprises. Both quantitative and qualitative approaches were adopted in order

to use the strength of one to support the weakness of the other. The study involved entrepreneurs of shops/business owners, their employees, apprentices and consumers randomly selected in the commercial areas. A total of 500 respondents (200 entrepreneurs, 150 employees and 150 apprentices) participated in the quantitative aspect of the study. Structured questionnaire was administered on the respondents by four trained research assistants. Also, the researchers conducted ten In-Depth- Interviews (IDIs) as follows: 2 business owners, 2 employees, 2 apprentices, and 4 consumers in purposively selected SMEs. Quantitative data were analysed at uni-variate level using simple frequencies and percentage while qualitative data were content analysed. Ethical standards were observed; appropriate steps were taken to protect the study participants and the information they provided.

During the pilot survey for the study, it was realised that there were language barriers to the meaning of corruption in the local parlance. There was no word or phraseology that could explain corruption in vernacular. Hence, attempt was made to capture the respondents' views on corruption. Some of the concepts provided were utilized in the questionnaire.

Findings and Discussion

Types of Corrupt Practices in Small Scale Enterprises in Ibadan

Findings from this study indicate that there are a number of corrupt practices that take place among operators of the small and micro scale enterprises. These are tabulated and discussed as follows:

Table 1: Frequency Distribution of respondents on types of corrupt practices in SMEs

What types of corrupt practices do you commonly witness at your place of work?	Frequency N=500	Percentage (%)
Stealing	423	84.6%
Bribery	412	82.4%
Deception of customers	392	78.4%
Is cheating of customers a common occurrence in the SMES?	Frequency	Percentage
Yes	380	76
No	106	21.2
No comment	14	2.8
In what ways do people in your place of work	Frequency	Percentage
or line of business cheat customers?		(%)
Selling of fake products	380	Yes (76%)
Provision of poor services	365	Yes (73%)
Inflated charges	378	Yes (75.6%)
Tampering with measuring scales	348	Yes (69.6%)
Sale of expired products	326	Yes (65.2%)
Has tax ever been paid for this business/enterprise?	Frequency	Percentage
Yes	183	36.6

No	293	58.6
No response	24	4.8

Source: Field Survey

The table above presents data on types of corrupt practices commonly witnessed in the study area. On the types of corrupt practices commonly witnessed, majority of the respondents (84.6%) indicated that stealing is a very prevalent type of corrupt practice among operators of SMEs and this was expected because stealing is a common corrupt practice that people can easily engage in, considering their environment and places of work.

Respondents explained that stealing is very rampant among people in the SMEs. Stealing of cash, stealing of items for sale, stealing of spare parts, stealing of materials and the likes. While majority of the business owners heaped the blame on their employees and apprentices, some employees and apprentices also pointed accusing fingers at their bosses. The following verbatim quotes support the above:

I hardly leave my shop in the hands of my workers. I have had very bad experiences with some people in the past. There was a time I went out. In my absence, he sold goods worth of N8, 500. When I came back, he claimed he did not sell anything. It was not until the following week that another customer came claiming his friend recommended this shop and that he was satisfied with what he bought last week. To cut a long story short, that was how I knew my staff made a sale and kept the money. If you want your business to survive, don't leave your staff alone there. Many of them are bad. (IDI/Female/Wholesale-Retail/Sango)

An apprentice however explains that his boss steals from his customers by tampering with items in the building stock:

When I was still an apprentice with my bricklayer boss, in the evening when going home, my boss will take one or two bags of cement on his *okada*, telling us the owner of the house has given him. We knew he was stealing it. But we could not in any way alert the house owner. But that God I did not learn that from him. (IDI/Male/House Construction/Samonda)

From the above, it could be seen that stealing among operators of SMEs is a common occurrence and points to corruption in the sub-sector. Stealing comes in various dimensions according to the respondents. Some mechanics siphon fuel in their customers cars, some construction workers steal items bought for the construction of their master's house, some electricians and plumbers engage in over-invoicing - submit invoice estimates that cannot be exhausted – to enable them profiteer from it. Shanmugan (2012) and Kanu (2015) argue that corruption among SMEs is due to embezzlement and stealing by employees of SMEs and that fraud in the sector has negative effects on SMEs.

The study also identified bribery as a major corrupt practice among actors in SMEs as indicated by 82.4% of the respondents. Small and micro scale businesses operate under circumstances and in environments that call for monitoring and regulations, so they are ready to bribe any government official who wants to threaten their operations. This finding supports the view of Herzfeld and Weiss (2003). Sherazi et al. (2013) and Nyamwanza (2014) argue that bribery is a major corrupt practice in SMEs and that bribery is not just an established and renowned form of corruption affecting SMEs, but that the practice encourages owners/managers to evade tax compliance. Herzfeld and Weiss (2003) also argue further that entrepreneurs may bribe public official to secure their unofficial or informal activities. Firms operating underground may also share several characteristics that make them more vulnerable to corruption. Indeed, given their "illegal status" informal enterprises might even be more exposed to demands for bribes by public officials than formal firms. Kanu (2015) also concluded that bribery has the most devastating effect on SMEs performance. This finding was corroborated by a male respondent during an IDI session. His words:

> We are ready to give money to government agents who come to monitor our business, because we don't want problem for ourself. If we don't, they can close our shop or use the police to harass us. When it gets to that stage, we will spend bigger amount. (IDI/Female/Mokola/Food Business)

The above findings support Onaiyekan (2007) and Nwoba et al. (2018) who identified bribery and outright stealing as common forms of corruption in Nigeria. To them, bribery is payment in cash or kind which is given or taken in a corrupt relationship and it manifests in kickbacks and pay-offs among others.

Respondents in this study also identified deception of customers as a common type of corruption among SMEs operators as indicated by 78.4% of the respondents. Deception of customers involves not providing true explanations to customers before they part with their money or providing services contrary to the explanations made upon which the customer based his decision to transact business. This manifests in different ways. Some participants shed more light on the issue as follows:

> Take your car to some dubious mechanics, they will explain to you that the fault is serious or that several things need to be repaired. They calculate some money for spare parts, collect the money and tell you to come back in the evening. Whereas, what is wrong with the car is what can be fixed right in your presence. But because they want to take money from you, they deceive you into believing that many things are wrong. (IDI/Male/ Customer/Agodi/Gate)

Another participant also corroborated the above:

If they want to refill the gas of air conditioner of your car, do you know how much they fill in? But they will tell you, it is full. Many of them deceive their customers by filling it half way and collecting the money for full and there is no way you can know. (IDI/Female/Customer/Bodija)

The above are indications of the fact that many actors in the SMEs engage in the deception of their customers by illegally extoling money from them after carefully providing them with false information.

As many as 76% of the respondents indicated that cheating is another common type of corrupt practice among operators of SMEs in the study location. Probing further, the study identified a number of ways through which cheating takes place. A total of 76% of the respondents agreed that selling of fake products constitutes cheating of customers. Nigerian market is full of fake products sold to unsuspecting customers of various items. The above finding was further corroborated by a respondent during an IDI session. He argued that the rate of fake products calls for concern in Nigeria because most of the commodities displayed for sale in open markets are fake and sub-standard. His words:

> People deliberately make and sell fake products in Nigeria. If you are not smart, they will sell fake products to you instead of the good one you need. If you are smart, then be ready to pay prices for original products. (IDI/Male/Agodi-Gate/Mechanic Business)

Another participant spoke in a similar vein:

Go to Agbowo, both fake and original products are displayed openly and you make your choices. However, many times, they attempt to sell the fake ones to unsuspecting customers, so people need to shine their eyes. (IDI/Male/Sango/Car Wash)

According to Kang Seuw and Wong Ee Lin (2018), "these days, counterfeit or fake goods can range from branded consumer products, spare parts, batteries and business-to-business goods to common consumer goods such as toothpaste, cosmetics and food." According to a 2013 report, the OECD estimated that counterfeit goods accounted for 2.5% or US\$461 billion of global trade. Generally, trade in counterfeit goods not only negatively affects economic growth, but it poses a serious threat to the health of consumers as the goods are produced and distributed without any standards or norms. The majority view confirms one of the characteristics of the informal sector that as a result of absence of quality control and regulations, the informal sector in Nigeria is filled with sharp practices such as selling of fake products and arbitrary inflation of prices by business men after studying the environmental situation (Fajana, 2000).

Many service providers among the SMEs are also noted for poor service delivery (as revealed by 73% of the respondents), not necessarily because of

their inefficiency or lack of skill, but because of the sharp practices some of them engage in. For example, it is generally believed that if you contract your house to a bricklayer, carpenter or other work-man, you need to sit with them to monitor what they are doing, otherwise they may end up not providing the desired services which you paid for. This was captured better as follows:

> Among us, some people are not truthful. Some people will steal your materials and then patch up your work without standard measurement. (IDI/Male/Bricklayer/Bodija)

> You need to see what some workmen do if you don't stay with them. Instead of using three gallons of paint to paint a room, they will use two and tell you they used three. Very soon the paint becomes shallow. We try to warn them in our central meetings to do good job for their customers, but some will not listen. (IDI/Female/ Customer/Dugbe)

The Small and Micro Enterprises are also noted for arbitrary inflation of their charges and prices. A total of 75.6% of the respondents indicated this. They increase their prices not necessarily due to good quality of service, or because the prices have changed from the suppliers/producers but because they perceive that the customer is not well informed.

Participants shed more light as follows:

The small businesses are known for increasing their prices at will when they study the business environment or when a particular season or festival is coming very soon. Unfortunately there is nobody to control them. (IDI/Male/Customer/Sango)

The study also revealed that many actors in the SMEs usually shortchanged their customers by tampering with standard measuring scales (69.6%). Common examples cited by respondents included petrol stations noted for adjusting their pumps thereby short-changing the customers in terms of the volume paid for. Many fruit sellers, frozen fish and meat sellers are also in the habit of adjusting their scales such that the measure sold fall short of the actual weight. Study participants captured the practice thus:

> In Ibadan, apart from a few notable petrol stations, most of them have adjusted their pumps so that their one litre of petrol does not amount to one litre in the real sense. This way they are cheating their customers. You see this trends among many business owners who use scales for their measurement. The scales are not complete. Even the people selling raw rice and beans in the markets don't use standard measurement bowls. They have devised their own systems. It is very common. (IDI/Female/ Customer/Agodi-Gate)

The study also identified sale of expired products to unsuspecting customers as a corrupt practice common in SMEs. This was revealed by 65.2% of the respondents. Respondents explained further that this is possible in the Nigerian business environment as a result of weak regulatory mechanisms put in place to control the economy. They cited examples of drugs in chemist shops, consumable goods such as provision shops, soft drinks, spare parts as some of the products that get expired after some times. Despite the fact that some of the sellers know the expiry date, they still retain them on the shelves for unsuspecting and illiterate customers to buy.

On whether tax has ever been paid in respect of their business, majority of the respondents (58.6%) indicated 'No', which is an indication of the high level of tax evasion which is a common practice in Nigeria. Tax evasion is a common corrupt practice in the Nigerian informal sector and a major factor is that there are no reliable statistics to capture the operators in the informal sector and so collecting taxes from them is a herculean task (Ogunleye, 2000; Fajana, 2000). Furthermore, majority of the respondents (33.2%) indicated that the last time tax was paid was months ago, which further supports the views expressed about tax evasion in the informal sector. Tax evasion is therefore a common type of corrupt practice in the informal sector of the economy in Nigeria. Put in another way, Fajana (2000) argues that another noticeable practice is that most of the informal sector enterprises operate in obscure places far from the eyes of the law enforcement agents and governments' revenue collector, and this could also serve as a factor promoting tax evasion in the

Responses during interview sessions were very revealing. While a respondent agreed that most business owners in the informal sector were not ready to pay tax, another respondent contradicted him and put the blame on the government as having no good system of tax collection among small scale businesses. She argued further that people are ready to pay their taxes if the government empowers and equips the tax collectors, you don't expect people to pay taxes to officials who can not be identified or even officials who can not access the locations of these businesses. However, as revealed from this study, business owners alone should not be blamed for the situation, as government also has its own role to play in reducing tax evasion in the country. Whatever the case may be, the fact remains that most small and micro scale owners engage in tax evasion either because of failure on the part of the government or the negligence/deliberate act on the part of the business owners.

Responding to an open ended question on how much trust respondents had in the quality of the products/services among the SMEs, majority of them indicated they had low level of trust. This is worrisome and a further indication that sharp practices prevalent in the sub-sector make it difficult for people to trust the quality of products or services provided. For example, a mechanic respondent revealed that when customers made enquiries about spare parts, both original and fake parts will be boldly presented to them by the shop attendants - with different prices. Some however, out rightly sell the fake parts

that cost less to their customers as original parts at high price, thereby profiteering.

The above findings showed the types of corrupt practices people engaged in, in small scale businesses in the study area. This situation is pronounced by the fluidity and absence of adequate regulatory processes in the sector. For example, Fajana (2000) had argued that most activities of the informal sector are located in obscure places which shield them from the eyes of the regulatory agencies. It has been argued that corrupt officials and institutional failures to enforce compliance with legislations (Kanu, 2015) and the loss of social and ethical values in the Nigerian society (Onyeonoru, 2002) account for some of the corrupt practices found among SMEs. Olopoenia (1998) stated that during the era of the Babangida military regime in Nigeria, corruption became entrenched and elevated to the level of state policy. The informal sector having been part of the system and in the light of weak institutional fight against corruption, it is not surprising that manifestations of corruption are rife in SMEs.

Conclusion

Findings from this study revealed that corrupt practices are commonplace in the informal sector with particular reference to Small and Micro enterprises. Such corrupt practices include cheating of customers, stealing, bribery, inflated prices, tampering with measuring scales, selling of fake products, sale of expired products, provision of poor services among others. Such corrupt practices have negative implications for the growth and survival of businesses in the informal sector. Actions and attempts being taken to address corrupt practices in the formal sector should therefore be extended to the informal sector so as to have a holistic approach towards reducing corruption in the country. Government needs to empower and equip the agencies responsible for tax collections in the country to enable them do their job well and reduce tax evasion in the informal sector.

If the SME landscape is viewed as the economic backbone of economies in developing countries like Nigeria, as widely conceived (World Bank 2018), there is a need to pay more attention to it – to provide an appropriate ethical content and context for operations in the sector.

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