

NIGERIA'S NEW BANKING CHARGES FRAMEWORK: WHAT EVERY CLIENT NEEDS TO KNOW

Introduction

On 21st April 2026, the Central Bank of Nigeria issued an exposure draft of its revised Guide to Charges by Banks and Other Financial Institutions in Nigeria, 2026 (the '2026 Guide').¹ The 2026 Guide, signed by Dr Rita Sike, Director of the Financial Policy and Regulation Department, represents the most significant overhaul of Nigeria's banking charges framework since the 2020 edition. It operates within the broader regulatory mandate of the Central Bank under the Central Bank of Nigeria Act 2007 and the Banks and Other Financial Institutions Act 2020 to promote a safe, sound and transparent financial system.²

Background: From 2020 to 2026

The 2020 Guide³ was itself a reform document, but the passage of six years has brought significant changes to Nigeria's financial landscape, the proliferation of fintechs and mobile money operators, rising transaction volumes, growing consumer complaints about opaque bank charges, and a legislative scrutiny that culminated in the House of Representatives initiating proceedings to summon the CBN and commercial banks to account for their fee practices. Against this backdrop, the 2026 Guide is as much a political response as it is a regulatory one.⁴

¹Central Bank of Nigeria, 'Exposure Draft of the Guide to Charges by Banks and Other Financial Institutions in Nigeria, 2026', Circular signed by Dr Rita Sike, Director, Financial Policy and Regulation Department (21 April 2026) [Exposure Draft of the Guide to Charges by Banks and Other Financial Institutions in Nigeria, 2026 \(The Guide\) — CBN — NG — RegAlert](#) accessed on 30 April 2026.

²Central Bank of Nigeria Act 2007 (as amended), s 2(d); Banks and Other Financial Institutions Act 2020, s 57.

³Central Bank of Nigeria, 'Guide to Charges by Banks and Other Financial Institutions' (2020) [hereinafter '2020 Guide'].

⁴Abigail Ikhagh, 'CBN Unveils Revised Bank Charges Guide, Tightens Disclosure Rules' (The Guardian Nigeria, 25 April 2026) <<https://guardian.ng/news/cbn-unveils-revised-bank-charges-guide-tightens-disclosure-rules/>> accessed 30 April 2026.

The revised framework applies across the entire spectrum of licensed financial institutions: commercial banks, merchant banks, payment service banks, non-interest banks, microfinance banks, finance companies, primary mortgage banks, development finance institutions, credit guarantee companies and mobile money operators. No participant in the formal financial system falls outside its reach.

Changes Introduced by the 2026 Guide

i. One-time phone number change for BVN holders

One of the most significant changes is the restriction on updating BVN-linked phone numbers. From now on, customers will only be allowed to change the phone number attached to their BVN once in their lifetime. This policy is aimed at reducing SIM-swap fraud, in which fraudsters gain access to customers' bank accounts by taking control of their registered phone numbers. Additionally, only individuals aged 18 can independently register for a BVN⁵

ii. Electronic Transfers and ATM Charges

One of the most immediate tangible changes is the revised fee structure for electronic funds transfers and ATM withdrawals. Under the 2026 Guide, interbank electronic transfers of up to ₦5,000 are now entirely free of charge. Transfers between ₦5,000 and ₦50,000 attract a flat fee of ₦10, while amounts above ₦50,000 are capped at ₦50 per transaction.⁶ This is a meaningful reduction for customers who previously faced higher variable charges on mid-range transfers.

For ATM withdrawals, the guide distinguishes between on-site and off-site machines. Withdrawals from another bank's ATM within the same premises attract ₦100 per ₦20,000 withdrawn, while off-site ATMs carry an additional surcharge of up to ₦500 per ₦20,000,

⁵ Pascal Oparada, 'See the new CBN BVN rule starting May 1st and how they affect you' (April 30 2026) [See the new CBN BVN rule starting May 1 and how they affect you](#) accessed 30 April 2026.

⁶2026 Guide (n 1), s 3.2 (Electronic Funds Transfer).

which must be disclosed clearly at the point of transaction.⁷ Withdrawals from one's own bank's ATM remain free.

iii. Card Issuance, Maintenance and Virtual Cards

The cost of issuing or replacing a standard Naira debit or credit card has been raised from ₦1,000 to ₦1,500. Whilst this represents a 50 per cent increase in the card fee, the CBN has simultaneously abolished the ₦50 monthly maintenance charge previously applied to Naira-denominated cards, meaning that the long-term cost of card ownership for regular users is in fact reduced.⁸ Premium and hybrid cards remain negotiable. Significantly, virtual cards will be issued entirely free of charge, a provision that signals the CBN's clear policy preference for digital payment adoption. Foreign currency-denominated cards continue to attract an annual maintenance fee of \$10.

iv. Point of Sale Transactions and Merchant Service Charges

The 2026 Guide contains an unambiguous directive: cardholders shall not bear any charges for transactions conducted at a merchant's point of sale terminal. The Merchant Service Charge ('MSC') of 0.5 per cent per transaction, capped at ₦10,000, is to be borne solely by the merchant, regardless of the payment technology or method used.⁹ This rule, which had in practice often been passed on to customers informally, is now unequivocally codified. For businesses that accept card payments, this charge is a compliance and accounting reality they must factor into their cost of operations.

v. Account Maintenance and Statement Charges

The Current Account Maintenance Fee ('CAMF') has been placed on a phase-out schedule. In 2026, the maximum CAMF is ₦0.5 per mille. By 2027, it is to be abolished entirely.¹⁰

⁷ibid, s 3.4 (ATM Withdrawals).

⁸'CBN Raises ATM Card Fee to ₦1,500, Scraps Monthly Maintenance Charge' (Nigeria Info FM, 24 April 2026) <<https://www.nigeriainfo.fm/port-harcourt/news/homepage/cbn-raises-atm-card-fee-to-n1500-scraps-monthly-maintenance-charge/>> accessed 30 April 2026.

⁹2026 Guide (n 1), s 4.1 (Merchant Service Charge).

¹⁰2026 Guide (n 1), s 2.3 (Current Account Maintenance Fee – Phase-out Schedule).

Monthly account statements, whether printed or electronic, are free of charge. Special printed statements remain capped at ₱20 per page. Where an electronic statement is requested for delivery to a third party, a charge of ₱200 applies, while personal use electronic statements remain free.

vi. Failed Transaction Reporting and Compliance Architecture

A notable institutional innovation in the 2026 Guide is the requirement for Chief Compliance Officers and Heads of Information Technology to jointly submit monthly electronic reports to the CBN detailing all failed transactions across ATMs, POS terminals, mobile banking platforms, internet channels and related systems.¹¹ This is a direct regulatory response to the persistent problem of customers being debited for transactions that do not complete successfully. The reporting regime is complemented by an accountability structure that requires executive management to ensure that banking systems are configured to post only charges recognized under the guide.¹²

What This Means for Individual Clients

For individual account holders, the 2026 Guide is, on balance, a net positive. The elimination of monthly card maintenance fees, the capping of transfer charges and ATM surcharges, the abolition of the CAMF by 2027, and the protection from POS surcharges collectively reduce the cost of everyday banking. Customers also gain a formally recognized right to negotiate certain fees and, critically, a right to receive all lending costs expressed as an APR before they commit a loan. The reporting requirements on failed transactions should, over time, improve the reliability of digital channels and reduce the frustration of unresolved debit disputes.

What This Means for Business Clients

¹¹'CBN Urges Banks to Report Failed Mobile, ATM Transactions Monthly' (Megastar Magazine, 24 April 2026) <<https://www.megastarmagazine.com/banking-finance/cbn-urges-banks-to-report-failed-mobile-atm-transactions-monthly>> accessed 30 April 2026.

¹²2026 Guide (n 1), General Provisions – Compliance and Enforcement.

For businesses, the regulatory changes carry both obligations and opportunities. On the cost side, merchants who accept card payments must now absorb the 0.5 per cent MSC as a matter of law. There is no longer any ambiguity about who bears this charge, and businesses that have been passing it to customers by way of surcharge will need to discontinue that practice and adjust their pricing models accordingly. Businesses with significant cash management needs will want to revisit their current account arrangements before the CAMF phase-out schedule eliminates the fee entirely in 2027.¹³

Our Commentary

The 2026 Guide is a credible attempt by the CBN to rebalance the relationship between financial institutions and their customers. It arrives at a moment when public confidence in the banking system has been strained by years of unexplained deductions, failed digital transactions, and opaque lending costs. The introduction of APR-based disclosure alone could, if properly enforced, transform the lending market by making the true cost of credit visible and comparable across institutions.¹⁴

That said, the guide is still an exposure draft, and several of its provisions invite scrutiny. The 50 per cent increase in card issuance fees, though offset by the abolition of monthly maintenance charges, will disproportionately affect lower-income account holders who replace cards frequently. The off-site ATM surcharge structure, which permits an additional ₦500 levy above the base fee, also requires vigilance: in under-served communities where alternative ATM networks are unavailable, this surcharge may function less as a market mechanism and more as a tax on geography.

¹³Dave Ibemere, 'CBN Moves to Protect Bank Customers, Gives Order to Banks on Failed Transactions' (Legit.ng, 24 April 2026) < [CBN Issues Instructions to Banks on Failed Mobile, ATM Transactions - Legit.ng](#) > accessed 30 April 2026.

¹⁴Nairametries, 'CBN Caps Bank Fees, Mandates Transparency in Proposed Guidelines' (23 April 2026) < [CBN caps bank fees, mandates transparency in proposed guidelines - Nairametries](#) > accessed 30 April 2026.

Our firm will continue to monitor the finalization of the 2026 Guide following the 8th May 2026 consultation deadline and will advise clients on any material amendments before the framework takes full effect.