****

9B19M124

GHANA INVESTMENT FUND LIMITED: ETHICAL ISSUES

Darrold Cordes and Won-Yong Oh wrote this case solely to provide material for class discussion. The authors do not intend to illustrate either effective or ineffective handling of a managerial situation. The authors may have disguised certain names and other identifying information to protect confidentiality.

This publication may not be transmitted, photocopied, digitized, or otherwise reproduced in any form or by any means without the permission of the copyright holder. Reproduction of this material is not covered under authorization by any reproduction rights organization. To order copies or request permission to reproduce materials, contact Ivey Publishing, Ivey Business School, Western University, London, Ontario, Canada, N6G 0N1; (t) 519.661.3208; (e) cases@ivey.ca; www.iveycases.com. Our goal is to publish materials of the highest quality; submit any errata to publishcases@ivey.ca. i1v2e5y5pubs

Copyright © 2019, Ivey Business School Foundation Version: 2019-10-22

On September 29, 2017, Richard Dawson, the chief executive officer of RenY Corporation (RenY) based in Hong Kong, was onboard a flight from Accra, Ghana to his home in Las Vegas. Dawson had just spent two challenging weeks establishing the Ghana Investment Fund Limited (GIF), which aimed to invest in the entrepreneurial ideas of university graduates in Ghana. The establishment of GIF went smoothly in the hands of Derik Badu, a graduate from the University of Ghana, and Charles Kweku, a business consultant who had previously worked in the United Kingdom for several years, and Dawson had come to know them both well. For GIF to operate in Ghana as a foreign-owned entity, it had to be registered at the Registrar General’s department. To bid for government contracts, GIF had to be registered at the Ministry for Works and Housing (MWH). This process was proceeding smoothly until Dawson was confronted with a dilemma he could not immediately resolve: he had just learned that the awarding of major government contracts in Ghana lacked transparency, and that successful outcomes may require inducement payments that Dawson believed to be unethical.

background

Country Overview: Ghana

Ghana, a country in West Africa, was a former British colony that became a democratic republic in 1957. The country had retained many of the former institutions of government including the parliamentary system, legal system, and many government structures. According to the World Factbook Ghana 2017:[[1]](#footnote-1)

* In 2016, Ghana had a population of 28,206,728 with a real gross domestic product (GDP) of approximately $46 billion.[[2]](#footnote-2)
* Ghana had an abundance of natural resources, but agriculture made up about 20 per cent of its GDP and more than 50 per cent of its workforce.
* Gold and cocoa were the major exports.
* The full exploitation of recently discovered off-shore oil reserves had been mitigated by declines in the world prices for oil and gas.
* Following a period of sustained growth, Ghana was experiencing the effects of a depreciating currency, and large budget and current-account deficits.
* The austerity programs accompanying an International Monetary Fund (IMF) loan in 2015 had focused attention on decreasing inefficiencies in the public sector, eliminating subsidies, and increasing tax revenues.[[3]](#footnote-3)

Company Background: RenY Corporation (RenY)

RenY was established by Dawson in Hong Kong in 2010 as a management consulting and corporate advisory entity, with clients in the United States, China, and Australia. The company consulted on oil, gas, and commercial property development projects in China, and also provided a range of expert services related to small public company restructuring and raising capital from private investors in Australia. RenY was positioned to take advantage of the attractive corporate and tax environment in Hong Kong, its efficient banking system, and excellent foreign exchange provisions, as it was on the doorstep of the highly industrialized Guangdong province of Southern China. RenY had been contracted to undertake preliminary investigations into opportunities in Ghana for importing and wholesaling a range of seafood and other related products manufactured in China. RenY was also contracted by clients in the United States to assess markets in West Africa for sugar, rice, cooking oil, and other food products to be imported from Asia and South America. Dawson had travelled to Ghana many times since 2011 to develop a comprehensive understanding of the business and political environment, and to learn about the public infrastructure needed to more fully inform RenY’s clients.

RenY Corporation in Ghana

During these visits, Dawson observed the lack of public infrastructure, inadequate public health services, poor education facilities and programs (especially in rural areas), and increased urban stress due to economically inspired migration from rural areas to the cities by young people. The delivery of health, education, energy, transport, telecommunication services, and programs to stimulate jobs and economic growth was exacerbated by corruption at every level of government, by the legal systems, and by hegemonic political and business groups.

Foreign investment failed to produce transformational change in the region under the United Nations Millennium Development Goals[[4]](#footnote-4) and the United Nations Economic Commission for Africa (UNECA) objectives.[[5]](#footnote-5) The UNECA Sustainable Development Report on Africa Managing Land-Based Resources for Sustainable Development (2011) stated that sustainable development

. . . calls for integrating economic growth, social development and environmental management as interdependent, mutually supportive and reinforcing pillars of long-term development. It calls for participatory and multi-stakeholder approaches to dealing with development issues, involving a wide range of actors—government, private sector, civil society organizations, institutions of higher learning, and research and development partners. [[6]](#footnote-6)

In 2013, Dr. Daniel Twerefou at the University of Ghana produced a reporton West Africa for the UNECA in which he noted that

Economic growth within the subregion has been driven more by donor inflows rather than domestic savings . . . [and] FDI [foreign direct investment] failed to generate the employment needed to increase incomes and reduce poverty in the subregion. This was mainly because it focused more on capital-intensive extractive industries/sectors, especially the exploitation of mineral resources without value addition to these resources.[[7]](#footnote-7)

The World Investment Report 2015 stated that West African FDI was focused on projects that had low job creation, such as telecommunications, mining, retail, and financial services.[[8]](#footnote-8) Health concerns such as the Ebola crisis had resulted in a significant drop in FDI in West Africa since early 2014.[[9]](#footnote-9) Twerefou also noted that

. . . most countries in the sub-region are not undergoing the structural transformation needed to improve the quality of life of the people and ensure sustainable development. The shrinking of the agricultural sector’s contribution to GDP, accompanied by a decrease, or at best, a stagnation of the manufacturing sector, suggests a pseudo-transformational process whose overall impact on growth and poverty should be properly assessed.[[10]](#footnote-10)

On the long flight home, Dawson reflected on his long career as a manufacturer of information technology and in service delivery of information systems. He had expertise in small business start-ups, business restructuring, and capital funding. He was convinced that graduates from Ghana’s many tertiary institutions could be agents for transformational change if they were provided with the right business stimuli, mentoring, and collaborative support. Dawson was aware of the plight of these graduates who, after having satisfied their national service obligations, were unlikely to gain employment in their fields of expertise. Dawson believed he could muster the resources needed to stimulate economic growth in Ghana through graduate-led small business development, and he was motivated to commit to this goal despite the ethical dilemma he now faced. He saw this as a large profitable opportunity for RenY, which could also address low-income deprivation in the region and reach many of the United Nations Sustainable Development Goals (see Exhibit 1).

vision for transformational change

Research

Dawson had been given anecdotal information on the potential number of Ghana’s graduates who were unemployed—between 200,000 and 400,000 graduates were not employed or were employed in areas not aligned with their professional expertise. One report suggested that one million graduates could be unemployed, but this number could not be verified. These numbers were derived from news media reports and from the membership of the Graduates Ghana (GaG) and Entrepreneurs Ghana (ENG) groups—two student and youth advocacy groups seeking to provide better career paths for graduates and vocationally trained youth.

During the first half of 2017, Dawson commissioned a study to try to determine a more accurate measure of the number of unemployed graduates, their interest in entrepreneurial pursuits, and their business interests. He engaged with both ENG and GaG in an Internet and social-media campaign to invite graduates to register their interests and ideas for development. This led to the construction of several websites and social-media profiles that focused attention on a registration website. Social-media campaigns targeted graduates who listed one of three universities in their social-media profiles. In the space of about three weeks, more than 9,000 likes were recorded along with almost 2,000 graduates submitting detailed ideas about what they would like to do if they were funded. Analysis of the registrations indicated that approximately 500,000 of Ghana’s graduates were unemployed or not employed in areas they were trained for. The business proposals covered a wide range of ideas in agribusiness, construction, manufacturing, retail, and services. This highly encouraging outcome reinforced Dawson’s belief that he could access a considerable pool of intellectual capital vital to his ideas for business development.

Electronic Commerce

Dawson was impressed with the degree of interconnectedness of graduates discovered during the research. Internet access and social media had great reach into communities across all regions of Ghana. Further, he observed that mobile payments were expanding rapidly as an alternative to traditional banking facilities. With mobile payments, people were able to transfer small amounts of money to each other and to pay merchant accounts via their mobile phones. Cash could be collected at locations designated by the telecommunications carrier. These transactions were convenient and cost less than traditional bank services.

This information inspired Dawson to consider electronic commerce (e-commerce) as a platform for enabling graduate-led businesses to gain access to local, national, and global markets for the sale of goods and services. This could lead to the disintermediation of agents that typically extracted most of the value from the supply chains and could also allow graduate-led businesses to access these markets by dealing directly or through collaborative portals. Dawson had a strong background in information technology and felt confident that e-commerce delivery platforms could be built and proliferated at reasonably low costs. He could see many small businesses, each with its own professional e-commerce website, reaching out to markets everywhere. Coupled with proven social-media skills, all the basic ingredients for market research and market reach were in place.

Financial Capital

Dawson needed to find methods to raise money to cover start-up and initial operating costs of the graduate-led businesses. Could these projects be funded the traditional way? Typically, start-ups were funded through the entrepreneur’s own funds, and family and friends. Analysis of the submissions by graduates during the research phase indicated that $3,000 to $10,000 covered most of the start-up capital estimated by the graduates for their ideas. The initial idea trialed by Dawson was to crowd-fund the capital needed for each project through donations. A donor website was set up and several projects listed for funding. Graduates could use social media to channel their connections to their online profiles and encourage them to contribute. However, this plan failed because the donor website was not promoted through radio and television exposure, and the graduates themselves were unable to muster the support of their immediate circle of family and friends to the extent that was hoped.

Dawson realized that a different approach was needed to escalate the project’s visibility to get independent coverage from national and international media outlets. He subsequently decided to fund the initial stages from his own resources and then work to engage other private sector investors over time.

Mentoring and Collaboration

Dawson realized that the graduate-led projects could not be supported in isolation. Providing mentoring to help the graduates formulate and operationalize their business ideas had many benefits. Mentors would be drawn initially from a handful of motivated and successful businesspeople who could share their time among several graduate-led projects.

The idea was to seed the first few projects with these mentors who would then develop graduates to become mentors for new graduate projects over time. The mentoring would take place using electronic media and face-to-face meetings. This approach would also assist in the development of collaborative groups in similar industry sectors. ENG and GaG would play an important role in facilitating collaboration through special events, industry seminars, social-media promotions, and competitions. They would also act as advocates for graduates to gain exposure to, and benefit from, government and business initiatives—through support programs, contracts, and employment.

The next stage

Dawson had mustered the ingredients for what he believed would make this a successful venture. His research had shown that many graduates were eager to start and that e-commerce could deliver many benefits and increased market scope. He also knew that the financial capital was adequate to get multiple projects underway simultaneously while building the supporting infrastructure for a much larger expedited roll-out in the future.

He was also confident that he had the resources on the ground to build this project as a Ghanaian-inspired initiative with genuine indigenous roots. The success of this undertaking could lead to economic, social, and environmental growth in many low-income communities and aligned with the objectives of the United Nations Sustainable Development Goals (see Exhibit 1); this plan would also be a for-profit undertaking for GIF and for each of the graduate-led projects.

The next stage was the “doing,” but as Dawson sat through the last part of his flight, he reflected further on the challenges that were ahead of him.

dilemma

The meetings in Ghana with officials at the Registrar General’s Office went well, and GIF was subsequently registered as a foreign-owned entity with little difficulty. Similarly, the process at the Ministry for Works and Housing also proceeded with no apparent difficulties, and the license to bid as a contractor for government contracts was issued. With all the proper paperwork in hand, the trio of Dawson, Badu, and Kweku proceeded to a meeting at Stanbic Bank for the account opening.

Dawson wanted a US$ foreign currency account and a local Ghanaian cedi account so that foreign remittances could be held as hard currency and local payments could be processed efficiently. Dawson was aware of certain foreign-exchange restrictions that imposed limits on the repatriation of funds and on the amount of foreign currency cash that could be withdrawn, but he felt he could work within these restrictions initially, so the accounts were duly opened.

Dawson, Badu, and Kweku then returned for a celebratory dinner at the hotel where Dawson was staying. At this dinner, Kweku dropped a bombshell. He said, “You must realize Mr. Dawson that the contractor’s license is not really worth anything. We are unlikely to get any government contracts under that license.” Dawson was astonished and said, “But we went through the process and we paid the fees and got the license. What more should we have done?”

Kweku was experienced in representing international clients in infrastructure and resource projects in Ghana, and he was well qualified to address this question. He replied,

Mr. Dawson, there is a way of doing business here that is a little different to what is publicly announced. You must understand that large government contracts in Ghana attract interested groups from China, India, Turkey, and elsewhere. They each have their own way of doing business and it is not exactly what you would like to hear. They come in with large pockets of cash, and they ask to see what contracts are available and they pay for the right to win contracts of their choice. We have not done that. We have followed the letter of the law, and you wanted that from the outset. The reality is different.

Dawson looked at Kweku; he could tell that this was how it worked. “Why didn’t you tell me that from the beginning,” Dawson inquired. Kweku replied, “It is not in the national interest for me to be discussing such things so openly, and I did not want to allow this knowledge to impact on your judgment of how to organize in Ghana. We have worked within the law, and it was my obligation to help you with that.” Kweku went on to explain the different levels of contractor licensing and the process for getting favourable treatment in government contracts. Kweku finished by saying, “If you want to bid for certain projects you must play by these rules, otherwise the rule of the purse will defeat you.”

Dawson retired to his hotel room to prepare for his departure the following day. He was troubled by what he had just been told because certain infrastructure projects such as community housing, renewable energy, water supply, and sanitation aligned well with his plan for mobilizing coalitions of graduates and industry expertise to bid for and deliver on these contracts. This was a major setback—how could he condone unethical institutional practices while insisting and supporting the ethical development of graduate-led businesses?

Compliance with the law of the land and cultural norms was essential for the success of these businesses; to do otherwise would lead to the proliferation of corrupt and unethical business practices resulting in loss of reputation for the fledgling Ghanaian businesses. This weighed heavily on Dawson’s mind during his journey home to Las Vegas.

decision

Dawson wondered if the contract award process was indicative of the operations of other government agencies and whether or not he and his team could work within an overall environment that might have entrenched unethical practices and corrupt motives (see Exhibit 2).

RenY was subject to the laws of Hong Kong. Under the Prevention of Bribery Ordinance (see Exhibit 3) bribery was unlawful in the public and private sectors within Hong Kong, but it did not explicitly prohibit bribery elsewhere. Dawson was an Australian citizen living as a permanent resident (i.e., a Green Card holder) in the United States, and he had just formed a new company that would undertake research across Sub-Saharan Africa. Was he subject to the Foreign Corrupt Practices Act (see Exhibit 4) in the United States, which prohibits the bribery of government officials anywhere outside of the United States? Was he also subject to any other similar ordinance in Australia?

Dawson was also concerned about the reputation of Ghana and other West African countries with respect to money laundering, and wondered if there was any risk of being inadvertently caught up in investigations caused by the movement of funds related to his business objectives. He also recalled that in 2015 the Judicial Council of Ghana suspended 22 circuit court judges and magistrates and placed 12 high court judges under investigation for alleged bribery.[[11]](#footnote-11)

A pattern was emerging in Dawson’s mind—Ghana’s government institutions could not be trusted and the enforcement of the rule of law was not assured (see Exhibit 5). Dawson had also experienced bank fraud relating to a wire transfer from Hong Kong to a purportedly reputable bank in Ghana. The wire transfer was redirected to another account, and the Ghanaian bank sent fraudulent responses to inquiries from Dawson’s bank in Hong Kong. The Economic and Organized Crime Office in Ghana seemed powerless to intervene; officials connected to the Presidency of Ghana had to take action to resolve the matter.

Dawson was enthusiastic about his ideas for engaging Ghana’s graduates in sustainable development projects in communities across the nation. Ghana was a peaceful country without internal violence since its independence from Britain in 1957.[[12]](#footnote-12) Its electoral processes had generally been conducted transparently without evidence of fraud. The country had made significant improvements in the reduction of poverty and had met the United Nations Millennial Development Goal of a 50 per cent reduction in poverty by 2015.[[13]](#footnote-13) Initiatives in education had reduced illiteracy rates, and increased food nutrition had reduced developmental health issues in children.

Dawson had spent the best part of the previous five years cultivating contacts and researching business opportunities in West Africa. Against this backdrop of challenges and opportunities Dawson had to decide—was this investment going to result in nothing, or was there a way to move forward?

**Exhibit 1: UNIted nations sustainable development goals**

|  |  |
| --- | --- |
| **Goal #** | **Outcomes** |
| 1 | No poverty |
| 2 | Zero hunger |
| 3 | Good health and wellbeing |
| 4 | Quality education |
| 5 | Gender equality |
| 6 | Clean water and sanitation |
| 7 | Affordable and clean energy |
| 8 | Decent work and economic growth |
| 9 | Industry, innovation, and infrastructure |
| 10 | Reduced inequalities |
| 11 | Sustainable cities and communities |
| 12 | Responsible production and consumption |
| 13 | Climate action |
| 14 | Life below water |
| 15 | Life on land |
| 16 | Peace, justice, and strong institutions |
| 17 | Partnerships for the goals |

Source: “Do You Know all 17 SDGS?,” YouTube video, 1:24, posted by United Nations, April 20, 2018, accessed April 10, 2019, https://youtu.be/0XTBYMfZyrM.

**Exhibit 2: Corruption perceptions index (partial)**

|  |  |  |
| --- | --- | --- |
| **Rank** | **Score** | **Country** |
| 1 | 88 | Denmark |
| 13 | 77 | Australia |
| 14 | 76 | Hong Kong |
| 22 | 71 | United States of America |
| 78 | 41 | Ghana |
| 180 | 10 | Somalia |

Source: “Corruption Perceptions Index 2018,” Transparency International, accessed April 11, 2019, www.transparency.org/cpi2018.

**EXHIBIT 3: hong kong prevention of bribery ordinance (pobo)**

Hong Kong’s Prevention of Bribery Ordinance (POBO) does not criminalize the payment of bribes to foreign government officials. Hong Kong’s companies are also not liable. Outside of Hong Kong, directors and employees may have criminal liability in jurisdictions where the bribery of public officials is an offence.

Source: “Cap. 201 Prevention of Bribery Ordinance,” Hong Kong e-Legislation, November 7, 2018, accessed April 10, 2019, www.elegislation.gov.hk/hk/cap201.

**EXHIBIT 4: United stateS’ foreign corrupt practices act (fcpa)**

The Foreign Corrupt Practices Act of 1977, as amended, 15 U.S.C. §§ 78dd-1, et seq. ("FCPA"), was enacted for the purpose of making it unlawful for certain classes of persons and entities to make payments to foreign government officials to assist in obtaining or retaining business. Specifically, the anti-bribery provisions of the FCPA prohibit the willful use of the mails or any means of instrumentality of interstate commerce corruptly in furtherance of any offer, payment, promise to pay, or authorization of the payment of money or anything of value to any person, while knowing that all or a portion of such money or thing of value will be offered, given or promised, directly or indirectly, to a foreign official to influence the foreign official in his or her official capacity, induce the foreign official to do or omit to do an act in violation of his or her lawful duty, or to secure any improper advantage in order to assist in obtaining or retaining business for or with, or directing business to, any person. Since 1977, the anti-bribery provisions of the FCPA have applied to all U.S. persons and certain foreign issuers of securities. With the enactment of certain amendments in 1998, the anti-bribery provisions of the FCPA now also apply to foreign firms and persons who cause, directly or through agents, an act in furtherance of such a corrupt payment to take place within the territory of the United States. The FCPA also requires companies whose securities are listed in the United States to meet its accounting provisions. See 15 U.S.C. § 78m. These accounting provisions, which were designed to operate in tandem with the anti-bribery provisions of the FCPA, require corporations covered by the provisions to (a) make and keep books and records that accurately and fairly reflect the transactions of the corporation and (b) devise and maintain an adequate system of internal accounting controls.

Source: “Foreign Corrupt Practices Act,” The United States Department of Justice, February 3, 2017, accessed April 10, 2019, www.justice.gov/criminal-fraud/foreign-corrupt-practices-act.

**EXHIBIT 5: GHana criminal offences act (gcoa)**

Despite corruption levels in Ghana being low compared to other African countries, rampant corruption, weak rule of law and an under-regulated property rights system are significant impediments to business confidence. Low-level government employees may ask for a “dash” (tip) in return for facilitating license and permit applications, and companies applying for licenses and permits are frequently confronted with demands for facilitation payments. Companies also contend with high corruption risks when dealing with Ghana’s public procurement system. While there is no singular piece of legislation to tackle corruption, the Ghana Criminal Offices Act (GCOA) criminalizes corruption in the form of active and passive bribery, extortion, wilful exploitation of public office, use of public office for private gain, and bribery of foreign public officials. Moreover, corruption is deemed illegal, and both agent and principal are liable, regardless of nationality. Corruption under section 239 of the GCOA is defined as “corruption of a public officer,” and subsequent clauses define various forms of corruption, including bribery and extortion. This definition does not include corporate or private bribery offences, and bribery between citizens is not outlawed.

Source: Kaunain Rahman, “Overview of Corruption and Anti-Corruption in Ghana,” U4 Anti-Corruption Resource Centre, 2018, accessed April 10, 2019, www.u4.no/publications/overview-of-corruption-and-anti-corruption-in-ghana-2018-update.

1. “The World Factbook: Ghana,” Central Intelligence Agency, July 18, 2018, updated October 1, 2019, accessed April 10, 2019, www.cia.gov/library/publications/resources/the-world-factbook/geos/gh.html. [↑](#footnote-ref-1)
2. All dollar amounts are in US$ unless otherwise specified. [↑](#footnote-ref-2)
3. “IMF Survey: Ghana Gets $918 Million IMF Loan to Back Growth, Jobs Plan,” International Monetary Fund, April 3, 2015, accessed April 10, 2019, www.imf.org/en/News/Articles/2015/09/28/04/53/socar040315a. [↑](#footnote-ref-3)
4. United Nations, *The Millennium Development Goals Report 2015*, accessed April 10, 2019, www.un.org/millenniumgoals/

   2015\_MDG\_Report/pdf/MDG%202015%20rev%20(July%201).pdf. [↑](#footnote-ref-4)
5. United Nations Economic Commission for Africa,” *MDG Report 2015*: *Lessons Learned in Implementing the MDGS,* *Summary*,”September 2015, accessed April 10, 2019, www.uneca.org/sites/default/files/PublicationFiles/mdg-report-2015\_eng\_summary\_rev2sept15.pdf. [↑](#footnote-ref-5)
6. “Sustainable Development Report on Africa I: Managing Land-Based Resources for Sustainable Development,” United Nations Economic Commission for Africa, January 2011, accessed April 10, 2019, http://repository.uneca.org/handle/10855/14946. [↑](#footnote-ref-6)
7. Daniel Kwabena Twerefou, “Report on Sustainable Development Goals for the West Africa Subregion: Summary,” United Nations Economic and Social Council, October 23, 2013, accessed April 10, 2019, www.uneca.org/sites/default/files/

   uploaded-documents/SDG/2013/sdg2013\_draft-sdgs-report-west-africa\_en.pdf. [↑](#footnote-ref-7)
8. United Nations Conference on Trade and Development: UNCTAD, *World Investment Report 2015: Reforming International Investment Governance*, accessed April 10, 2019, https://unctad.org/en/PublicationsLibrary/wir2015\_en.pdf. [↑](#footnote-ref-8)
9. “The Economic Impact of the 2014 Ebola Epidemic: Short and Medium Term Estimates for West Africa,” The World Bank, October 8, 2014, accessed April 10, 2019, www.worldbank.org/en/region/afr/publication/the-economic-impact-of-the-2014-ebola-epidemic-short-and-medium-term-estimates-for-west-africa. [↑](#footnote-ref-9)
10. Twerefou, op. cit. [↑](#footnote-ref-10)
11. “22 Judges Suspended,” Joyonline, September 9, 2015, accessed April 10, 2019, www.myjoyonline.com/news/2015/

    september-9th/breaking-22-judges-suspended.php. [↑](#footnote-ref-11)
12. Muhammad Dan Suleiman, “Global Insecurity and Local Conflicts in Ghana,” *Peace Review: A Journal of Social Justice* 29, no. 3, (2017): 315–324, doi: 10.1080/10402659.2017.1344759. [↑](#footnote-ref-12)
13. UN Communications Group (UNCG) and CSO Platform on SDGs, *The Sustainable Development Goals (SDGs) in Ghana: Why They Matter & How We Can Help*, November 2017, accessed April 10, 2019, www.undp.org/content/dam/unct/ghana/

    docs/SDGs/UNCT-GH-SDGs-in-Ghana-Avocacy-Messages-2017.pdf. [↑](#footnote-ref-13)