Reconciling Global Workplace Inclusion Mandates with Cultural Resistance in Multinational Organizations in Sub-Saharan Africa

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ABSTRACT

Multinational corporations (MNCs) have intensified efforts to implement global inclusion mandates (GIMs) to advance equity, diversity, and inclusion across subsidiary operations worldwide. However, the implementation of GIMs in sub-Saharan Africa (SSA) is frequently met with cultural resistance grounded in history, divergent value systems, indigenous social structures, and Ubuntu, the region's locally embedded understandings of fairness and belonging. This review examines the sources of this tension to understand how GIMs may be reconciled with contextual realities rather than imposed as universal templates. Drawing on institutional, postcolonial, cultural intelligence, intersectionality, and stakeholder theories, together with research on organizational change, the review reconceptualizes cultural resistance as a socially constructed response to perceived threats to local identity, authority structures, and established relational norms, rather than as simple opposition to inclusion itself. The review argues that the legitimacy of global inclusion practice within SSA subsidiaries depends on the extent to which MNCs engage in contextual adaptation, stakeholder participation, and culturally responsive implementation. Rather than treating resistance as an impediment, the review positions it as a diagnostic mechanism that reveals underlying tensions between global organizational expectations and local institutional environments. Following a thematic literature review of scholarly and institutional sources published between 2020 and 2026, the review maps intra-regional variation in resistance to GIMs, the political economy of corporate diversity initiatives, and contested local philosophical frameworks, with particular emphasis on Ubuntu. The review contributes to international business and diversity management scholarship by challenging Western-centric conceptions of inclusion and advancing a more pluralistic, context-driven understanding of GIMs, with theoretical, policy, and managerial implications for MNCs seeking sustainable inclusion outcomes that respect culturally embedded interpretations of equity, identity, and organizational belonging.

Keywords: global inclusion mandates; cultural resistance; sub-Saharan Africa; multinational corporations; Ubuntu; diversity, equity and inclusion; institutional theory; postcolonial theory

INTRODUCTION

Workplace inclusion is a central human resource strategy in global multinational corporations (MNCs), with policies such as globalization, environmental, social and governance (ESG) commitments, and diversity, equity and inclusion (DEI) frameworks pursued to establish gender equality, diversity, anti-discrimination, and disability inclusion in the workplace (Kasprowicz et al., 2023). Globally, sub-Saharan Africa (SSA) is classified among the most unequal regions, with 10 of the 19 most unequal countries worldwide located in the sub-region (Frankema et al., 2023). MNCs with subsidiaries in the sub-region face resistance in implementing inclusion policies owing to deeply embedded cultures rooted in religious belief, social norms, and status or ethnic hierarchies, among other factors (Shaikh-Grande & Garcia, 2024). This tension reflects broader historical and structural dynamics that make it difficult to transplant DEI strategies originating in Western settings into the African context (Asongu & Odhiambo, 2023; Jejeniwa et al., 2024). South Africa, for instance, has been identified as the most unequal society in the region, entrenched with a phenomenon termed “cultural convergence,” in which elites in leadership positions employ Western normative and behavioural strategies while relational and belief-based indigenous cultural orientations remain fixed among labour classes (Dingeldey & Schäfer, 2026; Innes et al., 2026).

The tension MNCs experience in applying global inclusion policies within local cultural realities manifests across multiple dimensions. Studies in Nigeria show that cultural ideals around hierarchical respect, for example, addressing senior colleagues by title rather than first name, directly conflict with global MNC policies promoting egalitarian workplace cultures. Dimensions such as sexual orientation face legal and cultural barriers in countries with laws that prohibit them, rendering global DEI standards on these dimensions largely ineffective (Adisa et al., 2024; Opuala-Charles & Adebisi, 2023). Some studies argue that MNCs adapt global workplace inclusion policies to the African context, which varies in culture, law, labour markets, and stakeholder expectations, to achieve stronger organizational performance (Nyiawung, 2021); practice areas subject to such adaptation include recruitment and selection, employee relations, performance management, and compensation (Bako, 2021).

Despite these findings, a significant theoretical gap remains: dominant cross-cultural management frameworks have not adequately examined how structural inequality, colonial legacies, and religious and spiritual beliefs shape workplace inclusion outcomes (Innes et al., 2026). This theoretical limitation has practical consequences, as MNCs often implement top-down DEI approaches that apply global standards with limited local adaptation, resulting in what practitioners describe as "box-ticking" exercises rather than meaningful inclusion strategies (Fonseca & Kogut, 2023). The African Union's Agenda 2063 has highlighted the need for an "African Cultural Renaissance," with goals to integrate indigenous culture, values, and languages into educational systems, a recognition that cultural legitimacy is critical to institutional efficiency and effectiveness in the sub-region. This policy emphasis underscores the urgency of understanding how global inclusion frameworks can be adapted to local cultural realities (Aboagye et al., 2025; Kinuthia, 2022; Njie, 2019).

MNCs operating in SSA thus struggle to implement global workplace inclusion policies within cultural contexts where these mandates are resisted or selectively adopted (Adeniyi et al., 2024). This encompasses cultural value conflicts, structural and historical asymmetries, implementation gaps and awareness deficits, legal and governance barriers, and unintended consequences (Fordjour et al., 2025; Nwambuko et al., 2026). GIMs presume Western cultural values, such as individualism, egalitarianism, and direct communication, that conflict with indigenous cultural assumptions privileging hierarchy, communal identity, and indirect expression; this mismatch creates performative compliance rather than genuine cultural integration (Omodan, 2024; Opuala-Charles & Adebisi, 2023; Shaikh-Grande & Garcia, 2024). Structural and historical asymmetries in SSA extend beyond culture: colonial institutions, race- and class-based discrimination, and unevenly weighted economic dualism have produced a "culture-power differential," in which Western corporate leadership schemas enjoy hegemonic and privileged status while indigenous or hybrid labour belief systems are marginalized (Ashiagbor, 2021; Innes et al., 2026). This power asymmetry generates cultural resistance rooted in dissatisfaction with externally imposed frameworks (Lerutla & Steyn, 2025; MacGregor et al., 2024).

Research further documents implementation gaps and awareness deficits: understanding of DEI is often restricted to leadership or human resource managers, while front-line employees lack knowledge of policies meant to benefit them (Nkansah-Dwamena, 2024), and top-down implementation strategies with limited local adaptation exacerbate resistance (Aboagye et al., 2025; Nwambuko et al., 2026). Legal and governance frameworks in several SSA countries directly oppose global DEI mandates, creating a governance gap in which policies exist on paper but cannot be meaningfully implemented (Izugbara et al., 2020). Cultural resistance has correspondingly been identified as a barrier to DEI initiatives, alongside limited funding and uneven policy implementation (Nwambuko et al., 2026). As MNCs expand across SSA, and as African nations assert their cultural identities through frameworks such as Agenda 2063, the gap between global inclusion aspirations and local implementation realities has become a governance challenge with significant reputational and operational consequences (Njie, 2019).

Against this background, the review pursues three objectives: first, to critically evaluate the theoretical frameworks explaining the culture-inclusion nexus, accounting for power asymmetries and colonial legacies; second, to identify and categorize the dimensions of cultural resistance encountered by MNCs implementing GIMs across SSA; and third, to analyze the implementation, adaptation, and governance strategies MNCs employ to reconcile GIMs with local realities, and their effectiveness. These objectives are addressed

through three corresponding research questions: how adequate are existing cross-cultural and institutional theories for explaining DEI implementation tensions in SSA, accounting for historical power asymmetries and colonial legacies; what are the key dimensions of cultural resistance encountered by MNCs across SSA, and how do these vary across contexts; and what implementation, adaptation, and governance strategies do MNCs employ to reconcile GIMs with local realities, and what factors facilitate or impede their effectiveness. The remainder of the paper is organized as follows. Section 2 reviews the theoretical and empirical literature on cultural resistance and GIMs, mapping intra-regional variation and the political economy of inclusion mandates before synthesizing the mediating mechanisms that bridge global expectations and local realities. Section 3 sets out the review methodology. Section 4 discusses the implications of the review for theory, policy, and managerial practice. Section 5 concludes, outlining the review's limitations and an agenda for future research.

LITERATURE REVIEW

Core Concepts

Global inclusion mandates (GIMs) are standardized, headquarters-driven policies that MNCs deploy across their subsidiaries to advance diversity, equity, and inclusion (Shaikh-Grande & Garcia, 2024). Recent scholarship has moved beyond viewing these mandates as benign administrative procedures, defining them instead as normative instruments carrying embedded Western cultural assumptions about selfhood, equality, and justice, whose global rollout constitutes a form of moral universalism (Udenigwe et al., 2026). Crucially, the mandate is no longer limited to gender and race; it increasingly encompasses sexual orientation, gender identity, disability, and neurodiversity, each of which carries distinct cultural sensitivities in the African context (Adeniyi et al., 2024). GIMs are frequently tied to performance metrics, ESG ratings, and employer-branding strategies in home markets, meaning their deployment is driven as much by external stakeholder pressure as by internal ethical commitment (Noamene, 2026).

Cultural resistance (CR) is defined in the contemporary literature not as simple bigotry or ignorance but as a complex, multi-layered phenomenon (Lilja, 2022), conceptualized as the active or passive rejection of foreign-originating management practices perceived to threaten indigenous value systems and social cohesion (Oyo, 2025). This resistance operates at three levels: the macro-level of national legislation and institutional voids, the meso-level of organizational culture and leadership norms, and the micro-level of individual employee identity and psychological safety (Livingstone et al., 2023).

Resistance is not uniformly distributed across the workforce; it varies by generation, with younger, urban, digitally connected employees in cities such as Lagos and Nairobi often more receptive to global inclusion norms than their older, rural-origin counterparts, creating intra-organizational generational tensions that complicate the MNC’s response (Hepzibah & Owolabi, 2026).

The SSA context is increasingly theorized with nuance, rejecting the uniform treatment found in earlier literature. Central to this context is the philosophy of Ubuntu, often summarized by the maxim umuntu ngumuntu ngabantu (“a person is a person through other persons”) (Mugumbate et al., 2023). Ubuntu is not a uniform cultural artefact but a dynamic, contested ethic that varies across the region’s 46 countries (Gwagwa et al., 2022), providing the foundational logic for a communitarian worldview that privileges relational harmony over individual self-actualization and that GIMs must ultimately encounter (Abubakre et al., 2021).

Ubuntu is also not static: it is actively being reinterpreted by younger Africans seeking to reconcile its communitarian core with global discourses of individual rights, creating a hybrid ethical space that MNCs have largely failed to engage with (Matolino, 2024). Beyond Ubuntu, other cultural logics shape the reception of global inclusion mandates, including indigenous gender and disability norms, ethnolinguistic identities, post-colonial power hierarchies, and religious conceptions of dignity and social order (Channak, 2026; Innes et al., 2026).

THEORETICAL FOUNDATIONS

Institutional Theory and the Legal-Rational Lens

Institutional theory remains a cornerstone for understanding the macro-level clash of GIMs in SSA. It posits
that GIMs must be translated through local logics, value systems, and organizational fields rather than mechanically implemented (Ciuk et al., 2022); otherwise, they will be perceived as coercive, normative isomorphic pressure from MNC headquarters, misaligned with the host country's institutional environment (Stavrou et al., 2021). Institutional theory's classic focus on decoupling, whereby institutions formally endorse policies while allowing local manipulation to suit operational needs (Meyer & Rowan, 1977), explains how MNCs maintain organizational autonomy in institutionally diverse settings. However, such decoupling can reduce the quality of employee and organizational outcomes, weaken the strength of global mandates, and encourage internal power struggles (Firsova et al., 2022; Read & Sedgwick, 2024).

The concept of institutional logics, the societal rationales that shape individual identity and cognition within and beyond organizations, extends this analysis: the conflict between a market-logic of global inclusion, in which DEI is linked to innovation and employer branding, and a community-logic of social harmony, in which belonging is defined by conformity to communal norms rather than individual distinctiveness, accounts for many implementation challenges (Anderson-Gough et al., 2022). In Uganda, for example, legislation restricting LGBTQ+ advocacy has widened the gap between global policy and local law, creating an unresolvable compliance paradox for subsidiary managers (Izugbara et al., 2020). Organizational blending and segmentation, through network and recruitment diversification, legislative compliance training, and flexible working practices, have been employed by some MNCs to reduce resistance to GIMs (Anderson-Gough et al., 2022; Lounsbury et al., 2021).

Institutional theory is further strengthened by the concept of institutional voids applied specifically to the DEI dimension: the absence of robust anti-discrimination legal frameworks and limited resource availability, combined with laws that actively criminalize certain identities, stifle institutional operation and create grey zones that generate an actively hostile institutional environment (Dieleman et al., 2022). MNCs operating in such contexts face what may be termed an institutional trilemma: they cannot simultaneously satisfy global DEI commitments, local legal compliance, and consistent ethical standards across their operations. A detailed case study of this trilemma in northern Nigeria illustrates how Sharia-inspired legal codes in several states create an institutional environment fundamentally at odds with global inclusion mandates on both gender roles and sexual orientation (Husain et al., 2024).

Postcolonial Theory and the Power-Critique Lens

A growing and influential body of work applies a postcolonial lens to argue that GIMs constitute a new form of epistemic colonialism (Bamberger & Morris, 2025; Vickers, 2020). Despite promises of technological neutrality in SSA, the digital revolution, including artificial intelligence, augmented reality, open educational resources, big data, and global knowledge infrastructures, reproduces and entrenches historical patterns of inequality and exclusion, re-establishing colonial hierarchies and Eurocentric paradigms (Chibueze & Wei, 2026; Ghajiga et al., 2026; Seleke, 2026). Digital colonization occurs through data extraction from the Global South to the Global North without compensation, algorithmic bias that upholds historical discrimination through epistemic violence against marginalized groups, and epistemic marginalization arising from a digital divide in which Western languages, cultures, and knowledge dominate online technological design and content, rendering other worldviews invisible. Merely performing technical fixes is inadequate to address this "coded coloniality"; scholars call instead for an in-depth digital transformation that reconsiders its epistemic foundations (Ghajiga et al., 2026; Petrakaki et al., 2023).

Western-centred DEI policies have similarly been argued to be ineffective and detrimental in SSA contexts because they perpetuate legacies of colonialism, neocolonialism, and epistemic injustice, placing little or no value on African cultural ethos of community and collective wellbeing (Sihela & April, 2024). Proposed remedies include embedding African indigenous knowledge systems in global DEI mandates, drawing on

the Bantu-Kongo Mbongi concept, implementing decolonial inclusive leadership, and adopting a transversal approach to importing DEI practices from other contexts (Seleke, 2026; Sihela & April, 2024). True global inclusion, on this view, requires MNCs to treat African humanism as an equal partner in defining what belonging means, rather than as a local obstacle to a global best practice (Ibeh et al., 2022).

In the gender domain, postcolonial analysis argues that Western corporate feminism fails to resonate with African women whose goals align with communal upliftment and intergenerational responsibility (Biwa, 2020). Indigenous feminist theories that existed in the precolonial era, including Motherism, Stiwanism, and Ubuntu Feminism, are argued to be better suited to modern feminism in the region, incorporating traditional African ideals while offering solutions to contemporary challenges; this literature calls for an "Afro-communitarian feminism" that MNCs could adopt as a more legitimate framework for gender inclusion in the sub-region (Onwuliri, 2024).

Cultural Intelligence and the Managerial-Capability Lens

At the micro-level, cultural intelligence (CQ) theory offers a less politically charged, more operational framework within MNCs. CQ, a managerial trait, enables leaders to function effectively in culturally diverse settings by translating global policies into practices suited to the local environment (Mammadov & Wald, 2025). A study of 234 expatriates assigned to eight MNCs in Ghana found that CQ promoted local embeddedness, which in turn enhanced work performance (Gyensare et al., 2025); within the Ghanaian construction industry, senior managers with high cultural intelligence improved team collaboration, dynamism, and decision-making (Eyiah et al., 2025), and CQ training among expatriates operating in Ghana has been linked to more efficient communication and higher job performance (Mensah, 2024). Two mechanisms link CQ to the success of MNCs in local contexts: leaders with high CQ use behavioural adaptation to translate the global policy intent of dignity, safety, and fairness into local idioms derived from Ubuntu, and they use cognitive cultural awareness to identify where a global policy threatens local norms and adapt a dialogic rather than directive implementation approach (Opuala-Charles & Adebisi, 2023; Setti et al., 2020).

Intersectionality Theory

A significant gap in the literature is the treatment of "local employees" and "African culture" as relatively homogenous categories. Intersectionality theory, originating with Crenshaw (1989), posits that individual identity is multifactorial, constituted by intersecting social positions and power structures (Apitsa, 2021; Wyatt et al., 2022). The African woman's identity, for instance, has been theorized as an amalgamation of the negative power structures of colonialism, imperialism, global capitalism, and neo-colonialism, alongside social contexts such as culture, age, motherhood, ethnicity, and class, rather than gender identity alone as more commonly observed in the Global North (Yacob-Haliso, 2025).

Applying an intersectional lens, a systematic review grounded in Crenshaw's (1989) framework attributes the gender disparity in girls' participation and success in Science, Technology, Engineering, and Mathematics (STEM) education across Cameroon, Kenya, Nigeria, Ghana, and South Africa to deep-rooted socio-cultural, economic, and institutional barriers, including early marriage, adolescent pregnancy, institutional neglect, and gender-biased curricula (Ojong & Kareem, 2025). Discrimination against neurodivergent individuals in Liberia, resulting from perceptions of supernatural influence, similarly intersects with gender and poverty: female caregivers of persons diagnosed with autism face financial hardship and reduced social support, and their children are less likely to complete primary education (Kamara et al., 2025). Young men in Kenya and Namibia must balance entrenched tradition with new opportunities rather than rejecting either outright (Rotzinger et al., 2025). The refusal of low-paying jobs by young South African men amid mass unemployment has been read as rooted in the precariousness and racialized inequality of the society, and a political demand for socioeconomic inclusion, rather than mere unwillingness to work (Dawson, 2022). This creates both a challenge and an opportunity for MNCs: the workforce is not uniformly resistant, and generational change may shift the terrain of the debate (Adam et al., 2026).

Stakeholder Theory

Stakeholder theory is indispensable to this literature, yet it remains underused in the specific DEI-in-Africa context. MNCs do not manage employee resistance in a vacuum; they navigate a complex web of stakeholder pressures from governments, communities, families, and employees themselves (Appiah & Adeyeye, 2021; Rajak & Dolan, 2024). The strongest constraint on DEI practice in many countries is the host country's legal framework, followed by regional rules and regulations; certain regulations may inhibit organizations' access to knowledge and resources, underscoring MNCs' need to align with jurisdiction-specific legal standards (Chowdhury et al., 2023; Follmer et al., 2024).

The appointment of local directors in Nigerian MNC subsidiaries has been found to promote sustainable growth and performance through sustained corporate social responsibility engagement with host communities, consistent with stakeholder theory's expectation that local directors, possessing firm-specific knowledge and community standing, are better positioned to champion relevant programmes (Tawiah et al., 2024). More broadly, the Common African Position adopted by the African Union in 2014 marked a transformative shift in Africa's engagement with global development, playing a critical role in shaping the Sustainable Development Goals and strengthening Africa's collective bargaining position globally (Mahlatsi, 2021); acknowledging African ideas and perspectives in this way helps redress epistemic inequalities and creates space for African-led solutions to developmental problems (Ayodele, 2023).

Intra-Regional Variation: Beyond the Homogenisation of "Africa"

Ubuntu and Global Inclusion Mandates

Recent literature describes Ubuntu as a broad philosophical touchstone emphasizing human interconnectedness, with core dimensions of dignity, interdependence, mutual aid, consensus, and collective responsibility. Countries across Africa, however, exhibit significant variation arising from differing economic and institutional environments, and Ubuntu does not necessarily resonate uniformly across the continent, with direct operational implications for MNCs implementing GIMs (Anofuechi & Klaasen, 2024; Gwagwa et al., 2022; Wuta, 2025).

Variations in the legal terrain across African countries lead to corresponding differences in GIM implementation. South Africa's legal environment is widely described as the most progressive, with constitutional provisions protecting sexual orientation (Ofori et al., 2024), while more than thirty African countries criminalize LGBT+ identities, with Mauritania and northern Nigeria imposing the death penalty (Ganesh, 2025). Between these poles lies a complex spectrum: Botswana, Kenya, and Mozambique have decriminalized discrimination based on sexual orientation through court rulings, while Ghana has recently passed legislation intensifying restrictions (Izugbara et al., 2020; Shamrock et al., 2026), and in Senegal, same-sex conduct is criminalized on paper but rarely prosecuted, creating a legally ambiguous operating environment (Ferguson, 2021). A GIM fully applicable in Cape Town may thus expose an organization to criminal liability in Abuja (Ofori et al., 2024).

Differences in religious conviction and practice across Africa also shape conceptions of social obligation, morality, and dignity independently of Ubuntu. A study among companies in Kenya, Botswana, Zimbabwe, and Nigeria found that religion held a strong cultural-cognitive influence among executives in local firms, compared with leaders in developed-country multinationals (Barnard & Mamabolo, 2021); resistance to LGBT inclusion in Senegal, for instance, is rooted in Sufi Islamic tradition rather than Ubuntu (Kaoma, 2023). With respect to disability, the picture is mixed: some religious traditions have championed disability inclusion across social and educational institutions, while other Christian and traditional belief systems promote marginalization by framing disability as demonic, a curse, or punishment for sin in Nigeria, Namibia, and Zimbabwe (Amadhila et al., 2023; Nkansah-Dwamena, 2022).

Other studies show that intra-country variation in GIM implementation, driven by urbanisation, education, and generational difference, can exceed inter-country variation. Maternal health and social inclusion policy implementation and monitoring show substantial sub-national variation across SSA (Wigley et al., 2020),

and while Ghana and South Africa rank among the top performers on disability inclusion in transportation policy in SSA, South Africa also shows strong internal disability exclusion arising from variation in municipal policy and service delivery failures (Vanderschuren & Nnene, 2021). Weak enforcement of inclusion mandates for vulnerable groups, including women and people living with disabilities, has similarly been documented at the district level, owing to inaccessible infrastructure and poor disaggregated data despite ratified conventions (Akwetey & Mutangi, 2022), with comparable patterns observed for financial inclusion mandates in Nigeria and Kenya even under an overarching national legal framework (Dafe, 2020).

A significant debate concerns Ubuntu's role as a barrier or a bridge to GIMs. Ubuntu is neither static in any sense nor a static resource; it is a dynamic, contested resource that different actors mobilize for different purposes. It functions as a bridge where it promotes relationality, dignity, mutual care, and collective responsibility over individual competition, in AI governance, education, social work, and development policy; it may equally be perceived as a barrier, owing to variation in local epistemologies, its communitarian orientation, and gaps between policy rhetoric and practice (Anofuechi & Klaasen, 2024; Chauke et al., 2025; Gwagwa et al., 2022). The strategic question for MNCs is therefore not whether Ubuntu is friend or foe, but how to engage with the ongoing, generational negotiation over what Ubuntu means in the twenty-first century (Rotzinger et al., 2025).

The Political Economy of Global Inclusion Mandates

Global inclusion mandates are generated mainly by transnational coalitions of states, donors, and private actors with differing political agendas; the literature identifies weak agreement on definitions, uneven focus on beneficiaries, and recurring accountability failures (Cappellaro et al., 2024). The success or failure of GIMs in Africa, often framed as political projects, tends to reflect the strength of political institutions, governance quality, and incentive structures in the relevant region or nation (Emeka et al., 2024; Ofori et al., 2024).

The influence of political economy on the applicability of GIMs in Africa has been described as a form of neoliberal capture, whereby DEI is repurposed to serve corporate branding, risk management, and investor-relations goals rather than social justice (Bay & Walwema, 2025), a dynamic also captured by the concept of inclusion hypocrisy (Beckert & Koch, 2025). MNCs in Kenya have been found to emphasize inclusive markets and women's empowerment as a GIM policy to capture moral currency, while failing on actual supplier inclusion, leaving small firms leveraged and dependent rather than autonomous (Rajak & Dolan, 2024). In South Africa, some DEI rhetoric has been found to produce fairness deficits and intensified exclusion amid job scarcity (Bosch, 2024), and Nigeria has recorded incidents of neoliberal capture among MNCs whose diversity management is explicitly traceable to Anglo-centric Global North theorizing (Akobo, 2017; Umeh et al., 2022).

GIMs in telecommunications corporations in Ghana were similarly found to be inadequately aligned with societal context, contributing to implementation failures such as targets for increased female representation in management (Appiah & Adeyeye, 2021). Global LGBT inclusion policies present another instance of inclusion hypocrisy in Africa, where employees must conceal their sexual orientation for fear of discrimination, imprisonment, or the death penalty (Izugbara et al., 2020); this reframes local resistance as a rational response to the perception that local employees are required to bear cultural costs for the benefit of MNC brand management (Izugbara et al., 2020). Studies in Nigeria and Ghana further report unequal treatment of local managers relative to expatriates in top management, alongside apathy among indigenous employees, as evidenced by underreporting, low employee voice, and weak implementation of exclusion-related GIMs (Nkansah-Dwamena, 2024; Utam et al., 2020). This political economy lens does not invalidate GIMs. Still, it demands a higher standard of corporate integrity: MNCs should be transparent about the local drivers of their GIMs, the financial implications for local stakeholders, and the reciprocal benefits accruing to both MNCs and stakeholders (Jentjens et al., 2025).

Mediating Mechanisms: Towards a Synthesis

The literature converges on a multilevel set of mediating mechanisms that bridge the gap between local

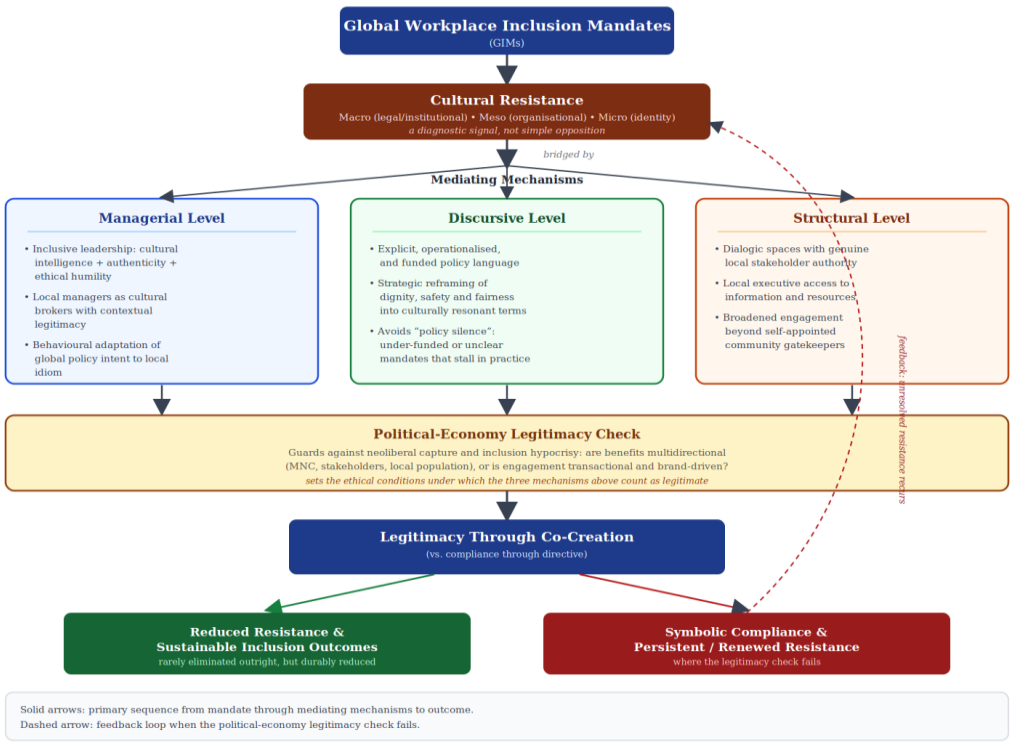
acceptance and the implementation of GIMs. At the managerial, discursive, and structural levels, legitimacy for GIMs is rooted in legal and procedural regimes, the history, socio-cultural, and religious norms of the region, and multidirectional benefits accruing to MNCs, stakeholders, and local populations alike (Taggart & Haug, 2024). Figure 1 summarizes the mediating mechanisms identified in the literature that can bridge the implementation gaps documented above.

At the managerial level, the quality of inclusive leadership, whether exercised by local or expatriate managers, can overcome cultural resistance. This managerial quality combines cultural intelligence with authenticity and ethical humility (Singh, 2024). Local managers may be more effective cultural brokers than expatriates, possessing cultural legitimacy and the capacity to translate global principles into locally authentic language (Gyensare et al., 2025; Mulumba & Walugemba, 2024; Nsokele & Kika, 2024). Although gender inclusion policies in Africa remain largely symbolic rather than substantive, some studies report improved firm performance where female leaders bring stronger communication, relatability, and teamwork (Issah et al., 2026), while in Kenya no clear gender-based difference in managerial quality or outcomes has been observed, notwithstanding persistent leadership inequalities (Anaya, 2023).

At the discursive level, a critical finding is that the language of policy must be explicit, operationalized, and adequately funded for GIMs to be successfully implemented (Karianjahi, 2025). Inclusive education policy language that failed to account for diverse cultures in South Africa produced implementation lags owing to insufficient teacher training (Rinquest & Simba, 2024), and in Kenya, despite the existence of disability-inclusion laws and policies, “policy silence” persists owing to poor funding, limited professional capacity, and weak institutional coordination (Karianjahi, 2025). Effective reconciliation therefore requires strategic reframing that translates the principles of safety, dignity, and fairness into culturally resonant local frameworks, while addressing the institutional factors that continue to create barriers.

At the structural level, MNCs can pursue reconciliation through dialogic spaces, forums in which local stakeholders are given genuine authority to shape inclusion policy (Delgado & Perez-Aleman, 2021). Local executive leaders given access to information and resources to champion relevant programmes have successfully bridged the expectation gap between MNCs and host communities in Nigeria (Tawiah et al., 2024), and evidence from MNCs in Zambia similarly links better inclusion policy outcomes to local leadership support and culturally modified DEI approaches (Funsani, 2026).

Figure 1



Mediating Mechanisms for Global Workplace Inclusion Mandates. Source: Author's synthesis of the reviewed literature.

Literature describes a sequential and interdependent relationship among these mediating mechanisms. Institutional and postcolonial theories identify the macro-level power dynamics underlying resistance to GIMs; intersectionality and stakeholder theories disaggregate “African resistance” and “the MNC” into their constituent parts; and cultural intelligence and inclusive leadership provide the micro-level, interpersonal determinants of successful implementation. The synthesis of mediating mechanisms at managerial, discursive, and structural levels shows how the gaps identified in the literature can be bridged in practice, while the political economy critique sets the ethical conditions under which this bridging is legitimate. Taken together, the literature reframes the problem of overcoming resistance to GIMs as one of achieving legitimacy through co-creation rather than compliance through directive.

METHODOLOGY

This review adopts a thematic, narrative approach to synthesising literature on cultural resistance to global inclusion mandates in sub-Saharan Africa. Sources were drawn from open scholarly platforms, including Google Scholar; established academic publishers, including Taylor & Francis, Emerald, SAGE, Springer, and Wiley; repositories such as ResearchGate and institutional open-access journals; and the grey literature of credible international bodies, including the World Bank, the International Monetary Fund, the International Labour Organisation, McKinsey & Company, and the World Economic Forum. Search terminology comprised diversity management, global inclusion, DEI, affirmative action, employment equity, post-colonial power dynamics, and workplace resistance, combined with regional and organizational qualifiers such as sub-Saharan Africa, African context, MNCs, indigenous management, and Ubuntu, and dimension-specific terms including gender, disability, sexuality, ethnicity, and religion.

Priority was given to peer-reviewed publications from 2021 to 2026, supplemented by a small number of foundational contributions whose influence on the field is well established, and by institutional reports offering the best currently available data. The review is organized thematically, beginning with core concept definitions before moving through the key theoretical lenses that explain the global-local tension. It then maps intra-regional variation across SSA, with greater weight on South Africa, whose post-apartheid employment-equity era has been studied more extensively than that of any other African country, before interrogating the political economy of global inclusion mandates and the major debates in the field. Thinner and more fragmented strands of the literature, addressing DEI dimensions relating to gender, disability, sexuality, age, and ethnicity specifically, are integrated throughout rather than treated as a separate stream. The review concludes with an analysis of mediating mechanisms and the practical realities of implementation, from which the theoretical, policy, and managerial implications developed in Section 4 are derived.

DISCUSSION: IMPLICATIONS FOR THEORY, POLICY, AND PRACTICE

The synthesis developed in Section 2 carries implications across three domains: the theoretical frameworks used to study DEI implementation in international business, the policy environment within which MNCs and host governments operate, and the managerial practice of MNCs themselves.

Theoretical Implications

This review yields three significant implications for international business theory. First, institutional theory's dominant “institutional voids” paradigm is inadequate on its own for explaining DEI implementation tensions in SSA, since the underlying problem is frequently institutional conflict rather than institutional absence: beyond legal frameworks that criminalize particular identities, institutional demands such as prevailing work ethics and communal standards may themselves generate resistance to GIMs. International business theory may accordingly need to move from a deficit model, in which weak institutions are treated as an obstacle to be filled, toward a conflict model that treats institutional pluralism as a permanent feature of global business (Dieleman et al., 2022).

Second, cultural intelligence theory would benefit from moving beyond trait-based cultural models to acknow-ledge that responses to GIMs are also shaped by generation, urbanization, education, and cosmopolitanism (Fitzsimmons et al., 2023). African philosophical traditions, including Ubuntu and communitarianism, should be engaged as theoretical resources in their own right rather than treated merely as "local context" for otherwise Western frameworks (Anofuechi & Klaasen, 2024).

Third, in relation to firms and their managers, the review suggests that MNCs should differentiate rather than homogenize their approach, given that standardized GIMs are not feasible across the variation observed between countries, regions, and generations. This differentiation can proceed through a logic of negotiation rather than eradication: non-negotiable principles, including human dignity, credibility, justice, and non-discrimination, should be upheld, while the means of their implementation are adapted to the local context. MNCs would additionally benefit from developing validated, context-sensitive measurement instruments adapted to local languages, establishing baselines, tracking progress, and demonstrating success through narrative evidence alongside quantitative metrics (Marano et al., 2024; Stavrou et al., 2021).

Policy Implications

With respect to policy and regional integration, host governments must weigh the financial and investment consequences of legal frameworks that impede GIMs. Labour law reform aimed at protecting against discrimination in employment, advancement, and compensation, rather than directly legislating culture, offers a more sustainable basis for reconciling global inclusion commitments with local sovereignty. The African Union's Agenda 2063 already provides a regional framework that recognizes cultural diversity, establishes minimum requirements for non-discrimination, and offers a template that national governments could extend to sector-specific labour and investment policy (Anthony, 2025).

Regulators and industry bodies also have a role in closing the governance gap identified in Section 2.3.2, in which GIM-related policy exists on paper without being meaningfully implementable. Strengthening disaggregated data collection on vulnerable groups, funding the professional capacity needed to enforce existing inclusion mandates, and coordinating across the fragmented institutional landscape that currently produces "policy silence" in several jurisdictions (Karianjahi, 2025) would materially improve the odds that inclusion policy commitments translate into practice, independent of any single MNC's actions.

Managerial Implications

The review's conceptual position suggests that MNCs should move from policy transmission toward policy co-creation as a genuine institutional practice. First, governance structures should be established so that local leaders possess real decision-making authority rather than merely advisory status. Second, MNCs should build their own legitimacy by explaining the drivers of their GIMs, whether ethical commitment, investor pressure, or brand management, their limitations, including legal and resource constraints, and the accountability mechanisms attached to them; legitimacy of this kind is earned through demonstrated acts of respect and fairness rather than asserted by policy statement alone. Third, MNCs should engage the full range of local stakeholders, including marginalized groups such as women, who are not typically included in "cultural" conversations conducted only with self-appointed community leaders; broadening engagement in this way limits the conflicts of interest that arise when legitimacy is sought from a narrow set of gatekeepers (Radom et al., 2025).

Fourth, MNCs should set context-sensitive goals that reflect the dimensions of success pertinent to a hybrid, co-created strategy. Beyond representation numbers, measures of legitimacy, inclusiveness, and cultural authenticity should be used to assess GIM implementation. Where MNCs build legitimate governance mechanisms to manage pluralism in contexts of historical inequality, through patience, sustained investment, and genuine commitment to local agency, resistance to GIMs can be reduced, though rarely eliminated outright (Ezeoha et al., 2022).

CONCLUSION

This review examined how MNCs operating in sub-Saharan Africa implement global inclusion mandates amid cultural resistance, and how the two might be reconciled. The evidence suggests that reconciliation is best achieved through hybrid recombination rather than either wholesale imposition or wholesale accommodation, and that successful implementation requires moving beyond symbolic compliance toward genuine cultural and structural change. Indigenous resources such as Ubuntu can provide a distinctive and locally credible foundation for implementing GIMs, while also revealing the limits of any single philosophical frame where communal belonging and individual rights diverge. The review's synthesis, from the theoretical foundations in Section 2.2, through the intra-regional variation and political economy analysis in Section 2.3, to the mediating mechanisms in Section 2.4, positions cultural resistance not as an obstacle to be overcome by better communication but as a diagnostic signal that reveals where global policy and local institutional reality have not yet been reconciled.

Four gaps stand out as priorities for future research. First, the geographic concentration of the existing evidence base in South Africa should be redressed through comparative work in West, East, and Central Africa, whose legal frameworks, colonial legacies, and religious practices differ substantially and are likely to exhibit different dynamics. Second, several DEI dimensions, including disability, ethnicity and kinship, and age, and their intersections, remain under-studied relative to gender and sexual orientation and require dedicated empirical attention. Third, the literature has not yet assessed, using research designs capable of supporting causal inference rather than illustrative case description, whether hybridized, Ubuntu-informed, or risk-tiered implementation strategies deliver measurably better inclusion outcomes than alternative approaches. Fourth, the experiences of African employees themselves, particularly those in marginalized groups, remain understudied relative to managerial and policy perspectives; research centering employees' own accounts would both deepen the evidence base and answer the postcolonial literature's call to take African voices seriously as a matter of method, not only of rhetoric.

For MNCs, the practical implication is that global inclusion mandates cannot be exported from the Global North to the Global South as a finished product. They must be modified in context to suit the local environment, in consultation with local actors, moral vocabularies, and legal regimes. This reconciliation is not a one-time event but an ongoing process, frequently requiring uncomfortable negotiation, and one whose legitimacy, per the theoretical contribution of this review, is established through co-creation rather than assumed through compliance.

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