



Tax Transparency in Africa



Africa
Initiative
Progress
Report

2018

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Global Forum on Transparency and Exchange of Information
for Tax Purposes

Tax Transparency in Africa

Africa Initiative Progress Report 2018

February 2019

The Global Forum on Transparency and Exchange of Information for Tax Purposes

(The Global Forum)

The Global Forum is the world's leading multilateral body within which 154 jurisdictions, including all G20 and OECD members, all key international financial centres, and a large and increasing number of developing countries work together to combat tax evasion by implementing the two internationally agreed Standards of exchange of information for tax purposes: exchange of information on request (EOIR) and automatic exchange of financial account information (AEOI).

Currently, 29 African countries are members of the Global Forum and 18 organisations, including the United Nations, the World Bank Group, the African Development Bank Group, the African Tax Administration Forum, and the Cercle de Réflexion et d'échange des Dirigeants des Administrations Fiscales, are observers to the Global Forum and endorse its work.

The Global Forum is funded by its members, with a self-standing Secretariat hosted in the Organisation for Economic Co-operation and Development (OECD). Each member participates on an equal footing and contributes annually to its budget. The Global Forum reports regularly to the G20 Leaders and Ministers of Finance.

The mandate of the Global Forum is to support countries' efforts to counter tax evasion and avoidance by increasing global tax transparency, facilitating

international cooperation and ensuring the transparency of corporate bodies, arrangements and financial information. It has an important responsibility to help its developing country members implement these Standards to benefit from improvements in global tax cooperation which in turn supports their domestic resource mobilisation efforts. To that end, the Secretariat of the Global Forum has a dedicated team in place to support members, mainly through bilateral capacity building, peer-to-peer learning and the creation of new of tools to facilitate effective implementation of the Standards. Since 2015, each new developing country member has benefited from a comprehensive mentoring programme (Induction Programme), while other members enjoy “à la carte” technical assistance programmes. Currently, 12 African countries are benefitting from Induction Programmes.

The Global Forum’s assistance activities are funded by voluntary contributions from donors and are a collaborative effort between the Secretariat, member jurisdictions and various international organisations and development agencies.

The Africa Initiative is evidence of the engagement of the Global Forum, its African members, various development partners and African organisations in raising awareness and providing assistance to ensure that African countries can use exchange of information effectively to tackle illicit financial flows.

For more information on the work of the Global Forum, visit
<http://www.oecd.org/tax/transparency/>

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Abbreviations

AEOI	Automatic exchange of information
AfDB	African Development Bank
ATAF	African Tax Administration Forum
ATI	Addis Tax Initiative
AU	African Union
BO	Beneficial Ownership
CREDAF	Cercle de Réflexion et d'échange des Dirigeants des Administrations Fiscales
DfID	Department for International Development of the United Kingdom
DRM	Domestic resource mobilisation
ECOWAS	Economic Community of West African States
EITI	Extractive Industries Transparency Initiative
EOI	Exchange of information
EOIR	Exchange of information on request
EU	European Union
GIABA	<i>Groupe inter-gouvernemental d'action contre le blanchiment d'argent et le financement du terrorisme en Afrique de l'Ouest</i> – Inter-Governmental Action Group against Money Laundering and Terrorism Financing in West Africa
Global Forum	Global Forum on Transparency and Exchange of Information for Tax Purposes
HLP	High Level Panel
IFF	Illicit financial flow
IMF	International Monetary Fund
ISM	Information Security Management
MAC	Convention on mutual administrative assistance in tax matters – Multilateral Convention
Norad	Norwegian Agency for Development Cooperation
OECD	Organisation for Economic Co-operation and Development
OHADA	Organisation pour l'Harmonisation en Afrique du Droit des Affaires – Organisation for the Harmonization of Business Law in Africa
SECO	Swiss State Secretariat for Economic Affairs
UN	United Nations
UNECA	United Nations Economic Commission for Africa
WAEMU	West African Economic and Monetary Union
WATAF	West Africa Tax Administration Forum
WBG	World Bank Group

Preface

Recognising the special circumstances of African countries, which suffer the greatest loss from Illicit Financial Flows (IFFs), the Global Forum, in 2014, together with a number of its African members launched a specific programme – the Africa Initiative – aimed at helping unlock the potential for tax transparency and exchange of information in Africa.

The aim of the Africa Initiative is to support the achievement by African countries of the Sustainable Development Goals of domestic resource mobilization (DRM) and enhance their ability to fight against IFFs. This is achieved by encouraging engagement and participation in international tax cooperation and by exploiting the tremendous improvements in global tax transparency and exchange of tax information, which have occurred in the last few years.

At the 5th meeting of the Africa Initiative framework held in Accra, Ghana, on 25-26 July 2018, the members of the Africa Initiative agreed to reflect progress achieved in improving tax transparency in Africa (including progress in meeting individual country targets and commitments) in an annual report of the Africa Initiative.

This 2018 Africa Initiative Progress Report is the first in what will be a series of annual reports. This report was made possible thanks to the African members of the Global Forum and the various development partners, which contribute to and support the Africa Initiative. Finally, the report was approved by members of the Africa Initiative at the 6th meeting of the Initiative held in Kigali, Rwanda from 28 February to 1 March 2019.

This report was approved at the 6th Africa Initiative Meeting (see Annex C).



Part I.

Introduction

Magnitude of Offshore Tax Evasion and Avoidance

Tax evasion and avoidance is a global concern that reduces government revenue and undermines trust in the tax system. This concern is particularly acute in developing countries. In African countries, tax revenues account for only approximately 18% of GDP,^[1] while the average tax-to-GDP ratio is 34% in OECD countries.

The low capacity of some African tax administrations to enforce tax laws and tackle illicit financial flows (IFFs) is one reason for this problem. Sub-Saharan Africa has one of the highest ratio of IFFs of any region in the world. The amount lost annually by Africa through IFFs – much of it due to tax evasion – was thought to exceed USD 50 billion in 2015.^[2] The former South African President Thabo MBEKI indicated at the African Union High Level Panel (HLP) on IFFs inter-ministerial meeting in Abuja in October 2018 that the loss had increased to about USD 80 billion by today.

In the outcome document of the United Nation's Third International Conference on Financing for Development held in Addis Ababa 13-16 July 2015, Heads of State and Government and High Representatives committed to "*redouble efforts to substantially reduce illicit financial flows by 2030, with a view to eventually eliminating them, including by combating tax evasion and corruption through strengthened national regulation and increased international cooperation...*".

The post-2015 Sustainable Development Goals call for a global partnership "*to strengthen domestic resource mobilization, including through international support to developing countries, to improve domestic capacity for tax and other revenue collection*" (Target 17.1).

These messages recognise that a modernised and effective tax system and a tax administration, which effectively engages in global cooperation efforts, are essential for raising revenues for sustainable development.

1 OECD/ATAF/AUC (2018), *Revenue Statistics in Africa 2018*, OECD Publishing, Paris.

2 Report of the High Level Panel on Illicit Financial Flows from Africa commissioned by the AU/ECA Conference of Ministers of Finance, Planning and Economic Development (2015)

Role of Tax Transparency and International Tax Cooperation

Informational asymmetry between taxpayers and tax authorities creates opportunities for abuse of the tax system. For instance, it allows hiding wealth abroad by a section of taxpayers with limited risk of being caught. This results in increasing inequality and diminishing public morale which, in turn lead to a lower level of voluntary compliance with tax laws. Recent tax leaks and scandals clearly undermined public trust in the fairness of tax systems and generated strong demand for effective counter-measures.

International tax cooperation through exchange of information (EOI) between tax authorities is a powerful enforcement tool, which allows tax authorities to reach out to offshore information sources. The mere availability of information to tax authorities also has a strong deterrent effect by making the risks of evasion higher. This in turn enhances the public belief in the fairness of the tax system and thus strengthens the motives for tax compliance.

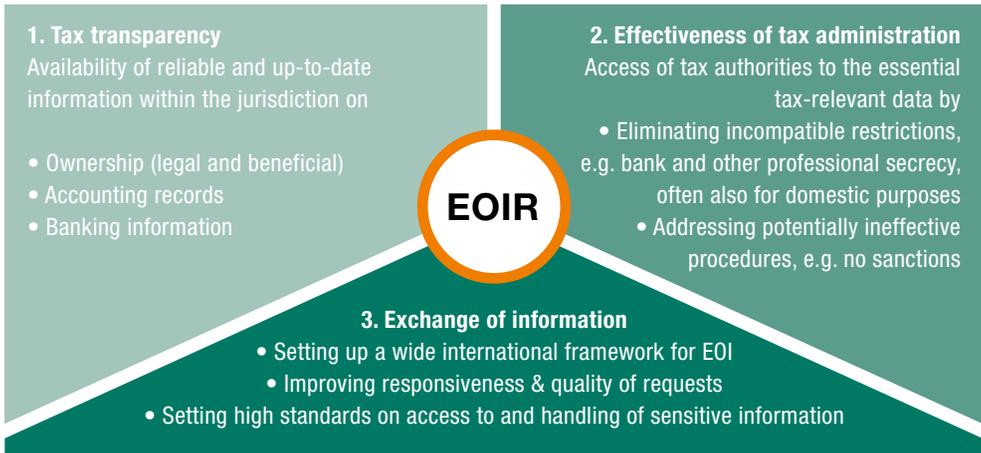
Intergovernmental cooperation aiming at addressing cross-border tax evasion – a major source of IFFs – has grown rapidly over the past few years. Tax transparency and exchange of information are two of its key components.

The Global Forum has been at the forefront of promoting this cooperation by ensuring the implementation of the two complementary international standards for transparency and exchange of tax information.

The Exchange of Information on Request Standard (EOIR)

The EOIR standard requires a tax authority to provide, on request, information to another tax authority that is relevant for that administration to investigate and enforce its tax laws. Three types of information are at the heart of these exchanges: i) ownership information of all relevant legal entities and arrangements (legal and beneficial ownership), ii) accounting records and iii) bank information. All 154 members of the Global Forum have committed to the implementation of the EOIR standard and their implementation is assessed by its peer review process, which rates each jurisdiction as compliant, largely compliant, partially compliant, or non-compliant.

The effective implementation of the Standard generates benefits going beyond the exchange of information and has a positive impact on the effectiveness of tax administration and enforcement more generally. Some of the key aspects include:



The Automatic Exchange of Financial Account Information Standard (AEOI)

16. The AEOI standard requires financial institutions to report financial account information of non-residents to their tax authorities, who in turn automatically exchange this information with the tax authorities of the account holders' country of residence under the globally-agreed Common Reporting Standard (CRS). This substantially improves the ability of tax authorities to detect tax evasion, including in cases where there was no initial indication of non-compliance.



Similar to the EOIR Standard, the implementation of AEOI creates a wide scope of benefits.

AEOI and EOIR are complementary international tax standards. While AEOI provides bulk financial information to a tax authority about their taxpayers' assets abroad, without a preliminary need to make a request, EOIR enables follow-up requests on any suspicious information reported. Further EOIR covers a very wide scope of information and can be useful in any ongoing investigation. Out of the 108 jurisdictions committed to start AEOI by 2020, 90 have started their first automatic exchanges by 2018. Already, the impact of the implementation of AEOI is tangible with around EUR 95 billion in additional tax revenue collected following voluntary compliance mechanisms and offshore investigations prior to the commencement of first AEOI exchanges; approximately 500 000 individuals have disclosed offshore assets worldwide.

Tax Transparency and the Development Agenda

Tax transparency fits into a broader development agenda by generating positive spillovers beyond the exchange of information. Improvements in making domestically available relevant information, such as legal and beneficial ownership information, also serve other legitimate purposes such as anti-money laundering and anti-corruption. In addition, although information obtained through tax cooperation can be used for tax purposes only, exceptions exist where the EOI partners can agree to wider use, including anti-money laundering and anti-corruption.

Due to these close links with a wider tax and development work, the Global Forum cooperates and coordinates its activities with other international organisations. The global advancement in these directions will ultimately lead to a more equitable tax system and higher domestic resource mobilisation (DRM) which will bring developing countries closer to achieving the post-2015 Sustainable Development Goals as well as the African Union (AU) 2063 Agenda.



Part II.

The Case for an Africa Initiative

Despite significant benefits that international tax cooperation can bring to jurisdictions, economically advanced jurisdictions have made far more rapid and evident progress towards greater tax transparency, in the past decade, than developing countries. Tax cooperation is indeed reaching an unprecedented level with all the financial centres implementing the international standards. However, non-G20 developing countries have much smaller exchange of information networks, make far fewer exchange of information requests and, for the most part, do not participate in automatic exchange of information. This observation is more apparent in African countries.

This may be due to either lack of awareness or reluctance on the part of African countries to embrace the initial political and operational changes required to realize the benefits of international tax cooperation. Much of it is also due to capacity and other resource-related constraints.

The Genesis of the Africa Initiative

Given the high levels of IFFs from African countries and recognizing the potential of tax transparency and exchange of information to raise resources for development, the Africa Initiative was launched at the Global Forum plenary meeting in 2014 as a partnership between the Global Forum and a number of its African members. It drew support from a number of regional and international organisations and development partners: African Tax Administration Forum (ATAF), Cercle de Réflexion et d'Échange des Dirigeants des Administrations Fiscales (CREDAF), World Bank Group (WBG), France (Ministry of Europe and Foreign Affairs) and the United-Kingdom (Department for International Development – DfID).

Initially set up for a period of three years (2015-2017) and focused on meeting specific EOIR related targets (see table below), the Africa Initiative was renewed for a second phase (2018-2020) in November 2017 at the Global Forum plenary meeting held in Yaoundé, Cameroon. With encouraging first results, additional development

partners joined the Africa Initiative: African Development Bank Group (AfDB), European Union (EU), Norway (Norwegian Agency for Development Cooperation – Norad), Switzerland (State Secretariat for Economic Affairs – SECO) and the West Africa Tax Administration Forum (WATAF). An ambitious work programme was agreed to develop and consolidate a culture of transparency and EOIR in African countries and to progress toward the implementation of AEOL.

2015-2017 Targets	2018-2020 Work Programme
<p>These targets constitute the minimum requirements for enabling effective tax cooperation. Unless they are met, a country cannot benefit from tax transparency. The targets for the period 2015-2017 were focused on EOIR, which is the most accessible type of tax cooperation. The Africa Initiative works to help all African members to meet them.</p>	<p>Following the first three years of the Africa Initiative, the work to enhance tax cooperation in Africa is expanding and accelerating to incorporate preparations for AEOL as well.</p>
<ol style="list-style-type: none"> 1. Establishing a functional EOI unit within the tax administration with adequate resources. 2. Delegating the competent authority function from the Ministry of finance to operational level. 3. Broadening the network of exchange of information partners through the signing of the Multilateral Convention. 4. Increasing the use of tax cooperation by making a minimum number of EOI requests to partner countries (at least 30 requests). 5. Measuring the impact of EOI by monitoring the additional revenue gained from requests sent. 	<ol style="list-style-type: none"> 1. Meeting the 2015-2017 Targets for new members. 2. Definition and implementation of a tax cooperation strategy to tackle international tax evasion. 3. Taking steps toward the implementation of the AEOL standards, in particular undergoing a diagnostic of members' confidentiality and data safeguard frameworks. 4. Committing to start AEOL in a reasonable timeframe for a critical number of African countries. 5. Annual Report measuring progress

The Africa Initiative Report on Progress – Tax Transparency in Africa

This first Africa Initiative Report, which is based on data provided by African members, aims at publicising the advances made in transparency and EOI in Africa and identifying the remaining challenges. By sharing good practices and successes

stories, the Report will provide incentives for African members of the Global Forum to replicate these stories and make further progress, open the way to common solutions and help towards improving the delivery of technical assistance to African tax authorities. It also provides an opportunity to commend the progress being made by an ever increasing number of African countries to improve transparency and use EOI.

Eventually, the Report is expected to become a barometer of tax transparency in Africa, built to document and follow-up progress in the implementation of the EOI Standards and EOI infrastructure by African countries and to measure gradually their impact in terms of DRM.

This Report, which details the progress achieved since 2015, will be the baseline for future annual reports. It will help individual African countries, the African Union (AU), the Regional Economic Communities (RECs), the United Nations Economic Commission for Africa (UNECA) and the AfDB lead the African tax transparency agenda and inform stakeholders on its delivery.

The progress highlighted in the Report has been made possible by the support provided by various international partners through the funding of the Global Forum's technical assistance activities in Africa, as well as the partnership built by the Global Forum with the African regional technical organisations, in particular ATAF.



Part III.

Building a Sustainable Legacy in African Tax Authorities

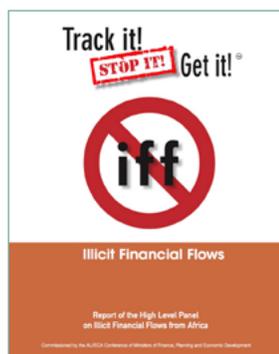
While many of the challenges that developing countries face in implementing the international Standards of transparency and EOI can be remedied through intensive technical assistance, it cannot solve all of the issues. The overriding obstacle is often of a political nature rather than a technical one. In some instances, it is a lack of awareness and, in others, it is a matter of priorities where more immediate challenges and reforms are higher up a government's agenda. In other instances, however, EOI may be seen as a sensitive matter, which may undermine certain financial interests and is perceived with caution.

Apart from specific implementation challenges which are addressed through the Global Forum's and other international organisations extensive technical assistance programme, the Africa Initiative also focuses on constructive engagement with governments to build and maintain the political will for the reforms needed to implement the Standards. The main drivers of a sustainable engagement with developing countries in tax transparency are: i) political leadership and support, and ii) improving the capacity of the tax authorities.

The Africa Initiative is built on these two pillars.



Building a Political Momentum

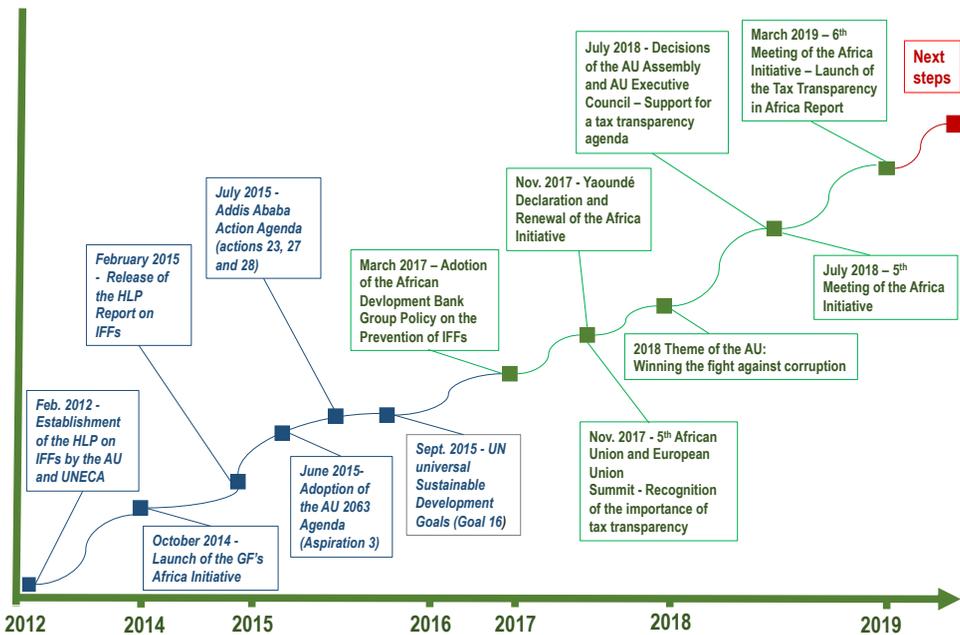


The launch of the Africa Initiative was to some extent a precursor to the identification of the special need for African countries to improve tax transparency and use EOI instruments to combat tax related IFFs, especially international tax fraud and evasion. By raising awareness, the Africa Initiative helped to build a political momentum that has contributed to the understanding of decisions-makers of tax transparency's role in the fight against IFFs. In 2015, a critical first step in the integration of tax transparency into the development

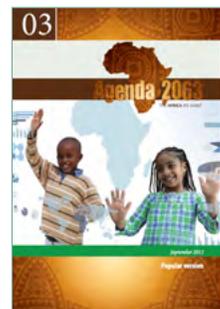
agenda was taken when the landmark report from the High Level Panel (HLP) on IFFs from Africa³ identified tax transparency as a tool to combat IFFs. For instance, the implementation of and participation in automatic exchange of information as well as the implementation of a beneficial ownership transparency regime for all legal entities and arrangements were recommended.

Since then, the events that have propelled tax transparency to the forefront of the development agenda in Africa are retraced in the graph below and discussed in the following text.

³ UNECA (2015). *Illicit financial flows: report of the High Level Panel on illicit financial flows from Africa*. Addis Ababa. <http://hdl.handle.net/10855/22695>.



- In June 2015, the AU adopted its 2063 Agenda, which includes an aspiration for an Africa of good governance, democracy, respect for human rights, justice and the rule of law (Aspiration 3). The actions identified by the AU to achieve these aims included strengthening DRM and reversing all forms of IFFs from the continent, in order to build effective, transparent and harmonised tax and revenue collection systems and public expenditure.



- Also in 2015, the third International Financing for Development conference in Addis Ababa adopted the Addis Ababa Action Agenda, which was subsequently endorsed by the United Nations (UN) General Assembly. It recognises the importance of tax transparency in DRM and the need to support developing countries in this area and it welcomes the work of the Global Forum:



“We encourage countries, in accordance with their national capacities and circumstances, to work together to strengthen transparency and adopt appropriate policies, including [...] access to beneficial ownership information for competent authorities; and progressively advancing towards automatic exchange of tax information among tax authorities as appropriate, with assistance to developing countries, especially the least developed, as needed”.

It led to the launch of the Addis Tax Initiative (ATI), the main objective of which is to double the amount of Official Development Aid spent in support for technical cooperation in the area of taxation by 2020.

- The UN has also adopted the universal 17 Sustainable Development Goals which includes the goal to significantly reduce IFFs by 2030 (Goal 16.4) and to strengthen DRM, including through international support to developing countries, to improve domestic capacity for tax and other revenue collection (Goal 17.1).



- In March 2017, the AfDB adopted its Policy on the Prevention of IFFs. It committed to collaborate with other international partners, including the Global Forum, to assist its regional members to i) build institutional capacity to strengthen their system of information collection, ii) build human capacity and information technology to analyse information related to tax evasion and IFFs, iii) put in place appropriate legal framework for wider access to information and greater transparency, and iv) promote the implementation of AEOI.
- The 10th plenary meeting of the Global Forum held in Yaoundé, Cameroon in November 2017 provided an opportunity to review the progress of the Africa Initiative during its first phase (2015-2017). At this occasion, the Minister of Finance of Cameroon hosted a high-level meeting of African Finance Ministers and Heads of tax authorities.



- At that meeting, a call for action was made through the ground breaking Yaoundé Declaration which urges the AU to begin a high-level discussion on tax cooperation and IFFs and their link to DRM. To date, 23 African Ministers of Finance have endorsed the Declaration reinforcing its message that EOI is the most efficient way of improving cooperation between tax authorities around the world and that it is essential to promote this agenda in Africa in the coming years (See annex A). In the same spirit as the Yaoundé Declaration, a number of other political declarations and events clearly identify tax transparency and EOI as drivers of DRM for the sustainable development of the continent. The 5th AU-EU summit held on 29-30 November 2017 in Abidjan, Côte d'Ivoire, has also recognised the importance of this issue and emphasized that international cooperation is key to combat IFFs and tax avoidance.

Tax transparency was also a common focus in the political declarations related to IFFs and DRM in 2018.

- At the 31st AU Summit in Nouakchott, Mauritania in July 2018, the AU Executive Council called upon the AU Commission to lead in the tax transparency and EOI agenda for Africa, and foster stronger collaboration among countries and regions for tackling the root causes of IFFs. It also emphasised the need to strengthen tax cooperation to stem IFFs and enhancing DRM on the continent.
- At the same event, the AU Assembly decided to combat IFFs through measures such as the establishment of effective ownership registers, Country-by-Country reporting of financial information, participation in AEOI agreements, and support in strengthening tax authorities through the work of the ATAF. It also requested the AU Advisory Board on Corruption, the Commission and the UNECA together with other stakeholders to work on speeding up implementation of the recommendations of the High Level Panel on IFFs from Africa and undertake to progressively abolish bank secrecy jurisdictions and tax havens on the Continent.



The 5th meeting of the Africa Initiative in July 2018 marked a significant step towards a continental agenda with the participation of 63 delegates from

21 countries as well as development partners and African organisations, including for the first time the AU and UNECA. The importance of beneficial ownership, AEOI and the abolishment of bank secrecy, which are shared objectives with the AU, were recognised and it was agreed these should be advanced in Africa with the support of the Africa Initiative. To that end, the Secretariat was mandated to set up collaboration with the AU and the UNECA aimed at harnessing improvements in international tax cooperation to serve Africa's interests. It was also agreed to reflect the progress achieved in improving tax transparency (including progress made in meeting individual country targets and commitments) in an annual report of the Africa Initiative (see Annex B).

Taken together, these declarations provide a basis for an inclusive and coordinated engagement of all the key stakeholders on the continent. In line with the Yaoundé Declaration and the mandate of the Africa Initiative, the Global Forum continues to collaborate with the AU, the UNECA, the AfDB, the RECs and all the development partners and technical organisations in Africa such as ATAF, WATAF and CREDAF to promote tax transparency and show progress in Africa. Today, the Africa initiative has become a framework for concrete actions and measurable changes in tax transparency for the benefit of African countries.

Improving skills and organisational structures

With political support, tax authorities in developing countries can pursue the use of EOI as a revenue-raising tool and get on with the task of implementing the international standards. This requires the development of effective and supportive organisations within which policy, legal and operational officers can work in an enabling environment. Effective organisations with EOI-conscious and skilled individuals can, in turn, help address obstacles in the political sphere. The Global Forum, in collaboration with other international organisations, provides intensive technical assistance to tax authorities and other government agencies in Africa on their legal frameworks (domestic laws and treaties) and the practical arrangements they need to implement and make use of the international EOI standards.

The support provided to African countries is designed to meet their specific needs, as they are not at the same level of capability and experience. It falls into two broad categories depending on when the country joined the Global Forum.

- **New African members since 2015** qualify for an Induction Programme, which consists of an intensive medium-term mentoring and capacity building. It is intended to create awareness of the new member's rights and obligations, make them familiar with the tax transparency and EOI Standards, assist them in preparing for the peer review process and help them put in place the infrastructure that they will need to benefit from effective EOI and to enhance DRM.

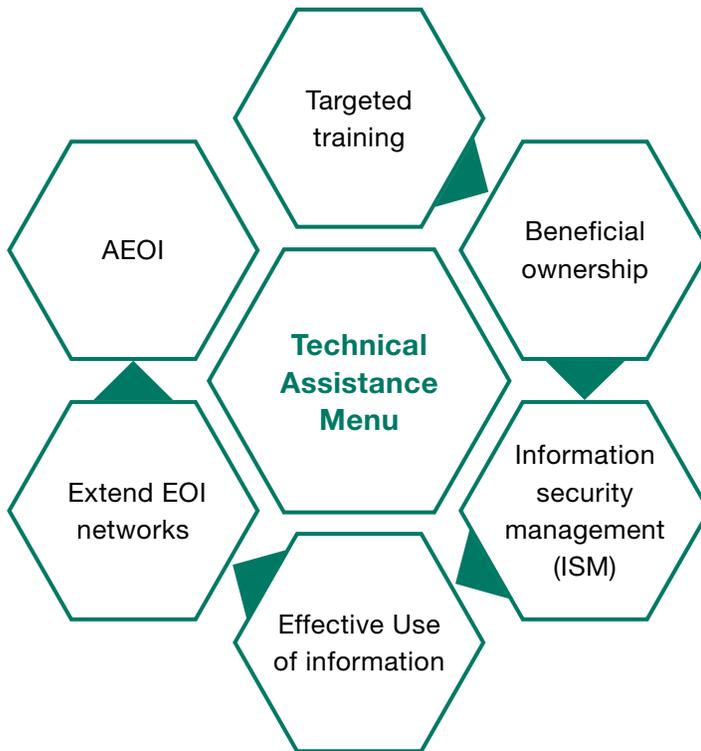
**African members (12) that are currently benefiting
from an Induction Programme**

Benin • Cabo Verde • Chad • Côte d'Ivoire • Djibouti • Egypt • Eswatini •
Madagascar • Niger • Rwanda • Tanzania • Togo.

Induction programmes last from three to four years and track the following template.



- **Other African members** receive “à la carte” technical assistance focused on advanced transparency requirements such as beneficial ownership and AEOI. Depending on a jurisdiction's need, this could consist of support in preparing for a Global Forum peer review, legislative advice or AEOI implementation support, including support with information security management. In 2018, efforts to support African countries improve their legal infrastructure to ensure the availability of beneficial ownership (BO) information were intensified as the availability of BO information in African jurisdictions is key to their accessing BO information from abroad.



Targeted Training

The Africa Initiative has highlighted the need to move away from a training only approach toward more customised long-term support for African members, aimed at involving Finance Ministries to obtain essential political buy-in, building sustainable capacity, and working closely with regional partners. Nevertheless, training seminars and activities designed to sensitise tax administrations and officials about the importance of tax transparency and encourage the use of EOI to tackle cross-border tax evasion remain an important tool. Since 2015, over 23 in-country and regional training seminars have been held in Africa to build awareness of over 1 000 officials on the benefits of EOI. Many of these seminars are conducted in conjunction with partner organisations (ATAF, CREDAF, EU, Middle East and North Africa (MENA) Fund, Organisation Internationale de la Francophonie (OIF), WBG) and donor countries (France, UK, Switzerland).

Training seminars organised in Africa over the period 2015-2018

Host country	Participants and facilitators	Topics covered	Number of participants
2015			
Cameroon	Cameroon, Benin, Congo, Mauritania	Use of EOI in tax audits	56
Ghana	Ghana	Use of EOI in tax audits	33
Kenya	Kenya, Botswana, Zambia, Tanzania	Use of EOI in tax audits	47
Tunisia	Tunisia, <i>France</i>	EOIR Standard	30
2016			
Burkina Faso	Burkina Faso, <i>France</i>	Use of EOI in tax audits	80
Gabon	Gabon, <i>France</i>	Use of EOI in tax audits	49
Côte d'Ivoire	Benin, Burkina Faso, Central African Republic, Comoros, Côte d'Ivoire, Djibouti, Guinea, Madagascar, Mali, Morocco, Senegal, DRC*, Togo, CREDAF, WAEMU, WBG, OIF and IMF*	Tax Transparency	46
Morocco	Morocco, <i>France</i>	Use of EOI in tax audits	32
Senegal	Benin, Burkina Faso, Burundi, Chad, Comoros, Congo, Côte d'Ivoire, Djibouti, Gabon, Guinea, Guinea Bissau, Mali, Morocco, Mauritania, Niger, DRC*, Senegal, Togo, Tunisia, CREDAF, <i>France</i> (and one non-African country)	EOI and transfer pricing	50
Tunisia	Tunisia, <i>France</i>	EOI and transfer pricing	26
Uganda	Botswana, Cabo Verde, Cameroon, DRC*, Ethiopia, Ghana, Guinea, Kenya, Lesotho, Liberia, Mauritius, Nigeria Senegal, Seychelles, Uganda, Tanzania, ATAF, ESAAMLG*, EITI, USAID, UK, South Africa, Jersey	Beneficial ownership	81
2017			
Liberia	Liberia	Use of EOI in tax audits	66
Morocco	Morocco, <i>France</i>	EOI and transfer pricing	28
Nigeria	Nigeria	Use of EOI in tax audits	54
Nigeria	Nigeria, Senegal, Ghana, Uganda, Togo, Benin, Cameroon, Liberia, ATAF, WATAF and ECOWAS*	AEIO Standard	28
Tunisia	Tunisia	EOIR Standard	130
Tunisia	Tunisia	Use of EOI in tax audits	30
Uganda	Uganda	Use of EOI in tax audits	41

2018			
Egypt	Egypt	EOIR Standard and beneficial ownership	16
Morocco	Morocco, <i>France</i>	AEOI Standard	20
Senegal	Benin, Burundi, Cabo Verde, Cameroon, Chad, Côte d'Ivoire, Gabon, Guinea, Madagascar, Mali, Mauritania, Morocco, DRC*, Senegal, Togo, <i>France, WBG, OHADA, EITI, GIABA*</i> , AfDB	Beneficial ownership	52
South Africa	Cameroon, Nigeria, Liberia, Lesotho, South Africa, Kenya, Tanzania, Uganda, Botswana, Ghana, Seychelles, <i>ATAF</i> (and 15 non-African countries)	EOIR Standard and beneficial ownership	60
Tunisia	Tunisia	Use of EOI in tax audits	30
TOTAL	23 events		1 085

* DRC (Democratic Republic of Congo); ECOWAS (Economic Community of West African States); ESAAMLG (Eastern and Southern Africa Anti-Money Laundering Group); GIABA (Inter-Governmental Action Group against Money Laundering and Terrorism Financing in West Africa); IMF (International Monetary Fund); WAEMU (West African Economic and Monetary Union).



Partnership with African Tax Administration Forum (ATAF) in the promotion of EOI in Africa

ATAF is the key partner to the Global Forum in the promotion of tax transparency and EOI in Africa. Since the launch of the Africa Initiative, ATAF has increased its role in the promotion of EOI in Africa by putting in place an extensive programme to support its members across the continent in putting in place the infrastructure needed to use EOI. It has also set up a Technical Committee on EOI with the aim of opening avenues for African countries to support each other through a group of EOI experts on the continent. ATAF also has a regional EOI agreement (the “Agreement on Mutual Assistance in Tax Matters”) opened to signature by African countries.

The cooperation between the Global Forum and ATAF has intensified within the framework of the Africa Initiative. The Global Forum supports ATAF’s EOI programme, including the Consultative meeting of EOI Competent Authorities and the EOI Technical Committee through technical expertise.

A Global Forum staff member has been working closely with the ATAF Secretariat since 2016 (e.g. the Global Forum’s staff has carried out 14 missions to support ATAF’s programmes between January 2016 and December 2018).



Part IV.

Measuring the Impact

The effective implementation of the transparency and EOI Standards is a stepping-stone to their effective use in the fight against tax evasion.

The following section assesses the impact of the Africa Initiative since its commencement. It is a first step in what is expected to develop into a more comprehensive approach to EOI impact assessment in Africa. It takes time to build a supportive environment across stakeholders, including in Finance Ministries, to implement the Standards and promote their effective use. Lower functioning administrations require more time, attention, and intensity of assistance. This section reviews some key indicators of progress in the tax transparency agenda in Africa since the start of the Africa Initiative. However, the full impact of the Initiative will only be measurable in the long run.

It is followed by country progress reports for each African member of the Global Forum.

More African Countries look to improve Tax Transparency

Prior to the Africa Initiative, the involvement of the African countries in the implementation of the international standards was relatively low, in comparison to other continents with only 17 African country members of the Global Forum. Although there had been a great deal of high-level support and momentum for enhanced transparency and EOI internationally (e.g. G20 leaders Communiqués), African countries were not as strongly committed to this agenda.

These 17 African countries acknowledged the importance of tax transparency and EOI, committed to implement the Standards and were the pioneers of an outreach process that led to the Africa Initiative. They helped dispel a number of persistent myths around EOI. These included the belief that EOI is costly and complex for developing countries and beyond their capabilities, and the assumption that there are still secrecy jurisdictions around the world where African countries cannot obtain information needed for their domestic tax purposes.

Since 2015, a further 12 African countries have joined the Global Forum bringing to 29, the number of African countries participating in the tax transparency agenda and committed to implement the Standards.

Global Forum members in 2014 and 2018

■ African countries ■ Other countries



Source: Tax Transparency, Reports on progress (2014 and 2018).

In addition, African countries actively participate in the work of the Global Forum either by providing assessors for the EOIR peer review process or by participating in its working groups and by attending its plenary meeting to which they bring the voice of the African continent. Nine African countries have contributed assessors to 56 peer review assessments. Between 2015 and 2018, five African countries were members of the Global Forum's Peer Review Group^[4], six were members of its AEOI Group^[5] and three were members of its Steering Group^[6]. The Global Forum was chaired by Mr Kosie LOUW of South Africa from 2012-2016.

4 The Peer Review Group discusses and approves the assessment reports on the compliance of Global Forum members with the EOIR Standard. These are then submitted for adoption by the Global Forum.

5 The AEOI Group is a voluntary working group tasked with creating a mechanism for monitoring and reviewing the implementation of the AEOI Standard.

6 The Steering Group prepares and guides the future work of the Global Forum.

Contribution of African countries in the peer review process

Country	Number of assessors provided
Cameroon	4
Gabon	1
Ghana	4
Kenya	3
Mauritius	15
Morocco	2
Seychelles	3
South Africa	23
Uganda	1
Total	56

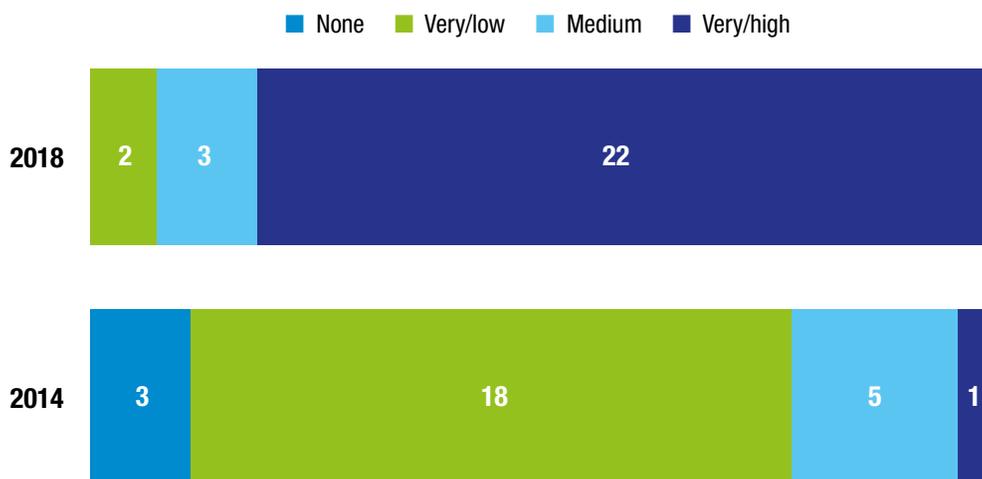
Participation of African Countries to the Global Forum's working groups

Country	Peer Review Group	AEOI Group	Steering Group
Ghana	01/01/2014-31/12/2016	Since 01/01/2014	Since 07/02/2017
Kenya	-	-	Since 01/01/2012
Mauritius	02/09/2009 – 12/06/2016	Since 05/07/2016	-
Nigeria	-	Since 04/10/2017	-
Seychelles	Since 13/06/2016	Since 07/02/2014	-
South Africa	02/09/2012-31/12/2016	Since 07/02/2014	02/09/2012-31/12/2016
Uganda	Since 01/01/2017	Since 16/04/2017	-

EOI is becoming a priority for African Countries

Beyond supporting the fight against tax evasion, the implementation of the tax transparency standards also strengthens tax systems in general, as it requires institutional and operational changes. This can only happen if EOI is considered a priority for the tax administration as a whole. The advocacy of the Africa Initiative has resulted in a substantial change in the priority accorded to tax transparency in African tax authorities. In 2014, only six of the 29 African countries that are members of the Global Forum considered that EOI was a medium or high priority for them. In 2018, this number had risen to 24. Five African countries are of the view that EOI now represents a very high priority.

Level of priority of EOI for tax authorities



Note: This table reflects the situation for the 27 African members of the Global Forum that have provided data.

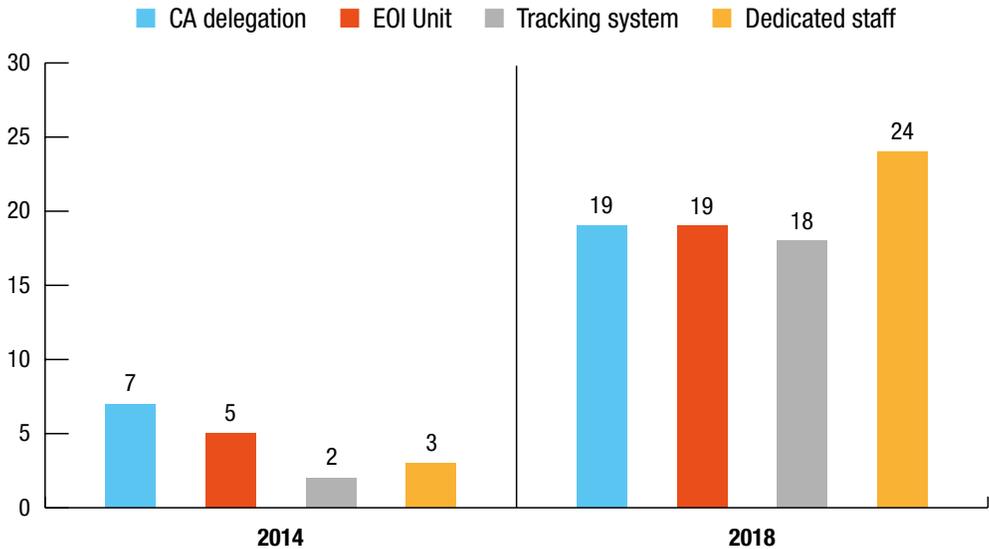
Source: Responses provided to questionnaires by members of the Global Forum.

EOI Infrastructure on the Continent is improving

African country members of the Global Forum are progressively developing a culture of EOI built on an EOI infrastructure, which includes but is not limited to (i) an EOI unit, (ii) an EOI manual, (iii) a delegation of competent authority power to the tax administration, and (iv) dedicated and trained staff.

Before the launch of the Africa Initiative, only two countries (Mauritius and South Africa) had a suitable infrastructure to deal with EOI on the continent. Since then, the situation has greatly improved. More than half of the 29 Global Forum members in Africa now have an EOI unit with a delegated competent authority power, EOI manual and dedicated staff. The number of tax administration officials assigned to EOI has increased from 23 in 2014 to 79 in 2018 for all 29 Global Forum members in Africa.

Evolution of the EOI infrastructure



Note: This table reflects the situation for the 29 African countries that are members of the Global Forum.

Source: Responses provided to questionnaires by members of the Global Forum.

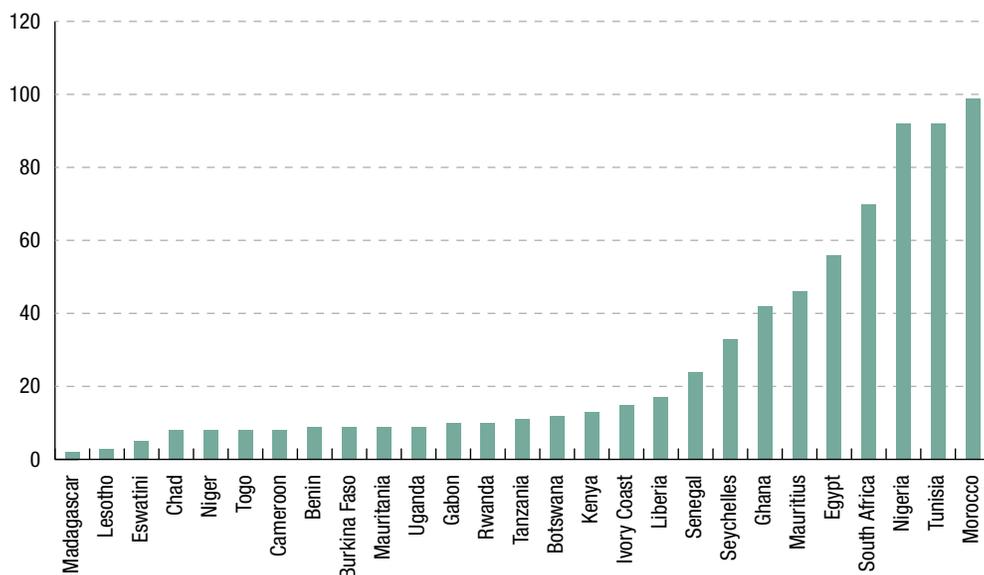
African countries are broadening their EOI networks

There is no EOI without international agreements into force. Accordingly, the first step towards an effective EOI system is the signing and ratification of EOI agreements with relevant partners.

However, the number of EOI agreements – double tax conventions in most cases – entered into by African countries in 2014 was very low. Where such EOI agreements were in place, they were generally not up to the international standard and did not cover all relevant partners, in particular financial centres. In 2013, all African countries together had 685 EOI relationships. Of these, 12 countries had less than 10 EOI instruments and some had less than 5.

Accordingly, an important objective of the African Initiative was to help African countries to broaden rapidly their EOI network while avoiding the complex, long and sometimes unwilling negotiation of taxing rights. To that end, African countries

EOI relationships of African countries before 2014



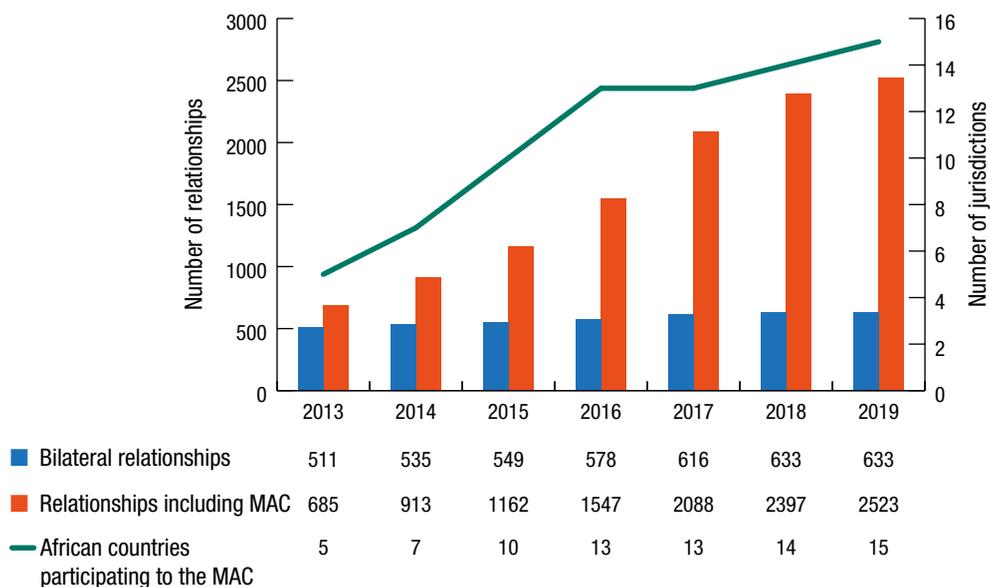
Note: This table reflects the situation for the 27 African members of the Global Forum that have provided data.

Source: Responses provided to questionnaires by members of the Global Forum.

were helped to become parties to the Convention on Mutual Administrative Assistance in Tax Matters (the Multilateral Convention - MAC). The Multilateral Convention is the most powerful EOI instrument of all covering 127 jurisdictions, including all OECD, EU and G20 countries, all financial centres, and an increasing number of developing countries.

Since 2015, African countries have tripled their number of EOI relationships from 685 to 2 343. This multiplies their opportunities to send and receive information for tax purposes that they have under international agreements signed with foreign jurisdictions. While the number of bilateral agreements entered into by African countries has slowly increased, their EOI networks have substantially expanded due to their participation in the Multilateral Convention.

EOI Relationships created by African Countries since 2013



Note: This table reflects the situation for the 27 African members of the Global Forum that have provided data as of February 2019.

Source: Responses provided to questionnaires by members of the Global Forum.

Since 2013, nine African countries have ratified the Multilateral Convention and six African countries have signed it. In addition, four other countries are in the process of signing, which will significantly increase the number of EOI relationships. African countries are systematically sensitised by the Global Forum of the benefits of joining the Multilateral Convention and it is expected that more will join in the coming years. The Multilateral Convention enables all forms of tax cooperation, including the automatic exchange of country-by-country reports and

Status of African countries with respect to the Multilateral Convention

	Number	Countries
African countries that have ratified the Multilateral Convention	9	Cameroon; Ghana; Mauritius; Nigeria; Senegal; Seychelles; South Africa; Tunisia; Uganda
African countries that have signed the Multilateral Convention	6	Mauritania, Morocco; Burkina Faso; Gabon; Liberia; Kenya
African countries in the process of signing the Multilateral Convention	4	Benin; Madagascar; Togo; Angola

Note: Angola is not member of the Global Forum and it has not participated to the Africa Initiative so far.

the mandatory spontaneous exchange of tax rulings, which are key elements of the Base Erosion and Profit Shifting agenda particularly relevant for African countries.

African countries are implementing the EOIR Standard

Preparing African members for their EOIR peer review assessments has been an important element of the work on the Africa Initiative. These preparations focus on the building the country's legal framework and organisational structure.

As a consequence of improvements in their legislation and administrative frameworks, 15 African countries received a Largely compliant rating in the first round of assessments. A second round of assessments against reinforced criteria, which now includes availability and access to BO information, was launched in June 2016. Only Ghana and Mauritius have been rated so far. While Mauritius and Ghana were previously rated "Largely compliant" in their first evaluation, Mauritius

Outcomes of the reviews of African members implementation of the EOIR standard*

	Rating
Botswana	Largely compliant
Burkina Faso	Largely compliant
Cameroon	Largely compliant
Gabon	Largely compliant
Ghana	Partially compliant**
Kenya	Largely compliant
Lesotho	Largely compliant
Liberia	Rating in 2019
Morocco	Largely compliant
Mauritania	Largely compliant
Mauritius	Compliant**
Nigeria	Largely compliant
Senegal	Largely compliant
South Africa	Compliant
Seychelles	Largely compliant
Tunisia	Rating in 2019
Uganda	Largely compliant

*: African new members benefiting from an Induction Programme are yet to be reviewed.

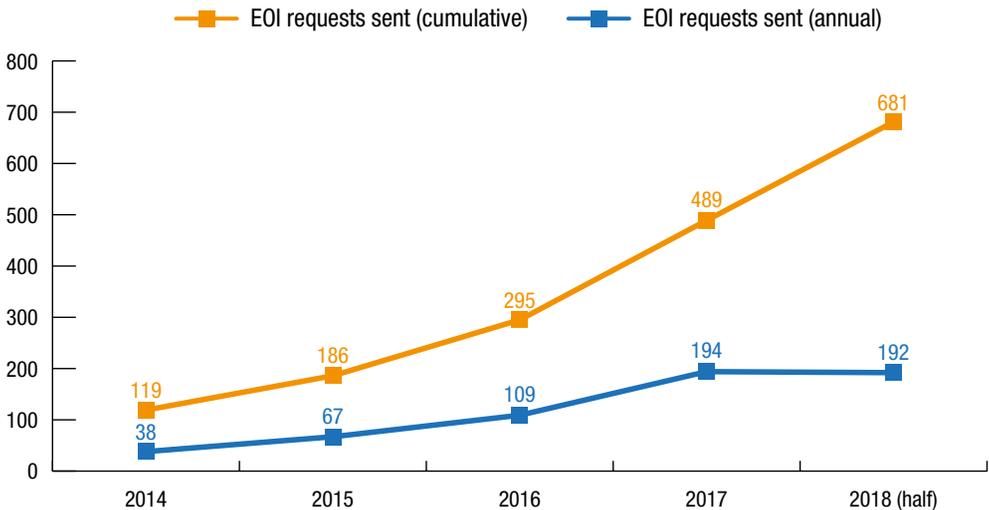
** : Second round of assessments.

has been found “Compliant” and Ghana “Partially compliant” in the second cycle. Ghana, is working to fix the identified shortcomings with the support of the Global Forum in order to request a new assessment. The evaluations of Liberia and Tunisia are ongoing and should be finalised in 2019.

African Countries are now sending EOI Requests

EOI relationships are not enough on their own. The real power of international tax cooperation comes from using improvements in global transparency to identify income and assets on which tax has been evaded. This can only be done if tax administrations are able to send EOI requests to and/or receive the information from their treaty partners. Unfortunately, the number of requests made by African countries has been incredibly low in a global context. This situation was due, in part, to the limited capacities of African tax administration including the lack of EOI infrastructure, a narrow network of EOI partners and the lack of awareness and skills on EOI and its benefits.

EOI Requests by African Countries



Note: This table reflects the situation for the 27 African members of the Global Forum that have provided data as of mid-2018.

Source: Responses provided to questionnaires by members of the Global Forum.

Before 2014, the cumulative number of EOI requests ever sent by the 27 African countries that have provided data was 81 and only five countries out of the 29 had ever sent an EOI request. South Africa alone had sent 53 requests. The situation has improved since then. As at mid-2018, the number of countries sending EOI requests was 18 out of 29 and the cumulative number of requests sent by these countries was 681.

African Countries are now collecting Taxes

The objective of tax cooperation is to support the investigative efforts of the tax authorities. However, converting information obtained through EOI into revenues takes time and requires certain skills. Although revenue gains generated by EOI were not tracked so far, a growing number of African members now register tangible first results. In 2018, five countries reported having collected additional taxes of over USD 22 million as a result of EOI. Some success stories are highlighted in the table below.



In 2016, Togo received an EOI request from a treaty partner. The investigations carried out by the Togolese tax administration to respond to the request led to the detection of unknown activities by a hidden taxpayer. USD 1 million of compromised taxes was recuperated.



In 2018, Tunisia received a reply from an EOI partner, which confirmed the existence of an undeclared foreign bank account used to hide assets. This has generated almost USD 2 million of additional taxes.

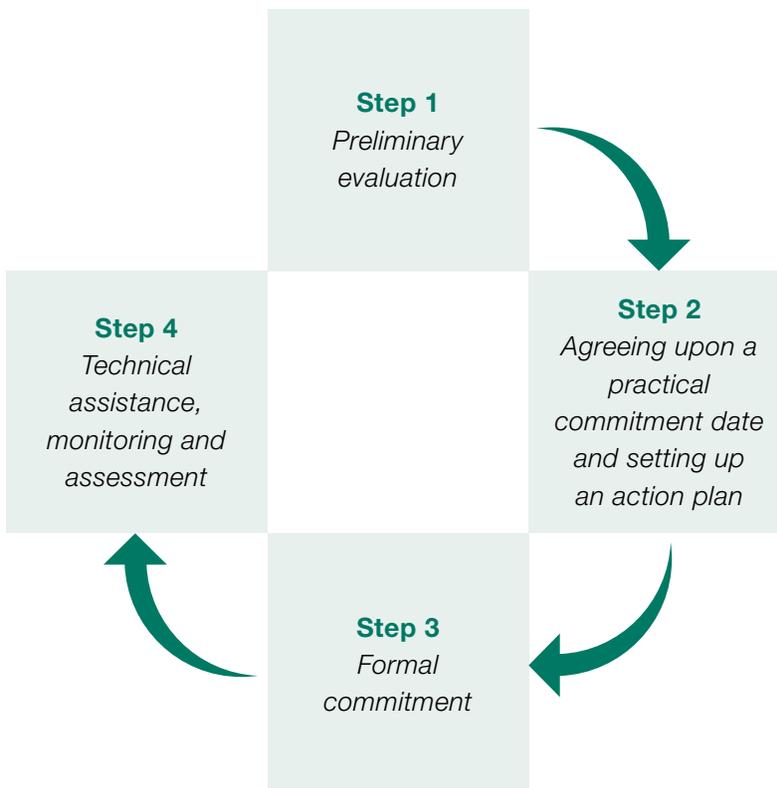


Uganda recovered over USD 14 million in taxes as a result of EOI in 2015 - 2018, having made its first requests in 2014.

Source: Responses provided to questionnaires by members of the Global Forum.

African Countries are now starting to implement the AEOI Standard

Unlike other Global Forum member countries, developing countries that do not host a financial center were not called on to start the implementation of AEOI by a specific deadline of 2018 applicable to all other members. Instead, given the complexity of AEOI and the resources needed for its implementation, the Global Forum adopted a *Plan of Action for Developing Countries Participation in AEOI* in 2017. This plan is based on a step-by-step approach to implement this powerful tool which is now being actively pursued by a number of African countries. The Plan envisaged a four-step process for implementation.



So far, as highlighted in the table below, five African countries have implemented (three countries) or are implementing (two countries) AEOI with the support of the Global Forum and its partners. Morocco and Egypt are also partnering respectively with France and UK in pilot projects facilitated by the Global Forum. AEOI has already had an impact of revenue gains in Africa as shown in the box below.

AEOI implementation in Africa

Country	Year of the first AEOI	Number of partners that each jurisdiction sent information to in 2018
Seychelles	2017	54
South Africa	2017	57
Mauritius	2018	54
Ghana	2019	-
Nigeria	2019	-

Source: Global Forum on Transparency and Exchange of Information for Tax Purposes. Automatic Exchange of Information Implementation Report 2018.



Nigeria

Following a commitment to implement AEOI, Nigeria launched a Voluntary Assets and Income Declaration Scheme (VAIDS) in June 2017, which took effect from 1st July 2017 to 31st September 2018. The scheme yielded about 30 billion Naira (USD 82.6 million) and grew the taxpayer database from 14 million in 2016 to 19 million in 2018.



South Africa

The Special Voluntary Disclosure Programme (SVDP) set up from October 2016 to March 2017 by South Africa, prior to its first AEOI exchanges in September 2017, generated USD 283 million of additional revenues.

In total, South Africa has collected close to USD 1.5 billion from its three Voluntary Disclosure Programmes since the launch of its first VDP in 2010.



Part V.

Looking Forward

As demonstrated above, African countries are generally making progress in the field of international tax cooperation. However, as the following country progress reports show, the improvements remain uneven. Moreover, Africa is still one of the most underrepresented regions in terms of Global Forum membership with just over 50% of countries from the African continent in the Global Forum. Of course, Global Forum membership is not important on its own. What matters is the participation in the work that goes with this membership, including the technical assistance provided to members. African countries that are beginning to perform well in EOI are all Global Forum members.

African countries have not sent a sufficient number of EOI requests to their treaty partners to reap the full benefits of improvements in global tax transparency. The number of requests sent (681) does not reflect the number of EOI relationships which have substantially increased since 2014 (2 523) indicating that African countries are not using their EOI network intensively enough. One constraint in using EOI, in some countries, is the limitation of the period within which tax auditors should complete their audits. Where this is short, it may not allow EOI requests to be sent abroad as the expected time to get a response from treaty partners is up to 90 days. This is an issue that countries need to address by extending the time limit for audits where EOI is involved.

While countries with a good network of EOI partners do not use it sufficiently, others still need to broaden their EOI relationships. Only 15 African countries are Parties to the Multilateral Convention in which 127 jurisdictions currently participate, making it the largest and the most powerful agreement for EOI among tax authorities in the world.

New challenges have emerged since the Africa Initiative began and the international standards have also moved on. In particular, ensuring the availability of beneficial ownership information is now a central part of the international tax transparency and EOI Standards. This was not the case in 2014 when the Africa Initiative was conceived. Receiving beneficial ownership information would greatly strengthen African tax authorities' capacity to fight against tax evasion. However, African countries also need to be able to furnish it to other countries. Ensuring

the availability of beneficial ownership information domestically is a challenge for many of them. The Global Forum with other partners, are providing assistance to help African members address gaps in this area and are exploring solutions at country or regional level (e.g. OHADA).

AEOI is critical to stemming the tide of IFFs from Africa. As mentioned above, only five African countries are doing, or will be doing, AEOI soon. In the meantime, the amount of African wealth held offshore is proportionately much greater than that it is in developed countries, which are all implementing AEOI. If African countries are to get the full benefits of the improvements in global tax transparency that have occurred in the last five years, they must be enabled to participate in AEOI. This is a more technically challenging standard than EOIR, which has been the focus of the Africa Initiative until recently. AEOI has the potential to make a significant contribution to achieving African countries' DRM but the breadth and depth of the changes needed to achieve this requires an intensification of effort by everyone involved.



Part VI.

AFRICA IN THE GLOBAL FORUM

- 29 African countries are members of the Global Forum (+12 since 2014).
- 53% of the African countries are members - 19% of the Global Forum membership.
- AfDB, ATAF and CREDAF are observers.

TECHNICAL ASSISTANCE FIGURES IN AFRICA (2015-2018)

- 12 African countries are benefitting from an intensive mentoring programme (Induction programme):

Benin, Cabo Verde, Chad, Côte d'Ivoire, Djibouti, Egypt, Eswatini, Madagascar, Niger, Rwanda, Tanzania, Togo.

- "A la carte" assistance is provided to 15 other African countries.
- 23 training events organised in Africa attended by 1 085 officials.
- 14 technical assistance missions with ATAF

IMPLEMENTATION OF AEOI IN AFRICA

Country	Year of the first AEOI	Number of partners that each jurisdiction sent information to in 2018
Seychelles	2017	54
South Africa	2017	57
Mauritius	2018	54
Ghana	2019	-
Nigeria	2019	-
Morocco	Pilot project with France	-
Egypt	Pilot project with UK	-

Africa Tax Transpa

MEMBERS OF THE

Benin • Botswana • Burkina Faso • Cameroon • Cabo Verde • Chad • Côte d'Ivoire • Djibouti • Egypt • Eswatini • Gabon • Ghana • Kenya • Lesotho • Liberia

Testimonial Liberia

We acknowledge that the Global Forum Secretariat has been a pleasure to work with. Liberia remains impressed with the responsiveness of the Secretariat with respect to providing on time technical assistance. We admire not just the onsite visits but also the regular support received through email exchanges, telephone conversation etc. With support from the Global Forum, Liberia has made huge progress in the works of EOIR, AEOI as well as preparation for the peer review of Liberia which was launched in September 2018. We are hoping to always have such support available from the Global Forum as we join global efforts to ensure tax transparency.

Darlingston Talery, Commissioner, Liberia Revenue Authority

THE SUPPORTERS OF

African Development Bank • African Tax Administration Forum • Cercle de Réflexion et d'échange des Dirigeants des Administrations Fiscales • European Union • France (Ministry of Europe and Foreign Affairs) • Norway (Agency for

Transparency Identity Map

AFRICA INITIATIVE

- Madagascar • Mauritania • Mauritius
- Morocco • Niger • Nigeria, Rwanda • Senegal • Seychelles • South Africa • Tanzania • Togo • Tunisia • Uganda

Testimonial Nigeria

When Nigerian President, Mr. Muhammadu Buhari, declared in 2016, during the Anti-Corruption Summit hosted by the former British Prime Minister, David Cameron, that Nigeria was committed to joining the Pilot initiative for Automatic Exchange of Beneficial Ownership Information, we believed the Global Forum would be of assistance to us for the implementation. We turned to them for assistance which was provided seamlessly in such technical areas like information security, regulations, policies, CRS guidelines etc. The help assisted us in the implementation of the standard; we cannot stop thanking the Global Forum.

We are so grateful to you and pray that such gestures should be extended to other jurisdictions so that there will be no escape route for tax evaders and schemers in the world.

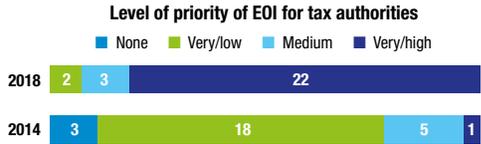
Dr. Chukwudi Ezeudeka, Head Exchange of Information, Federal Inland Revenue Service, Nigeria

THE AFRICA INITIATIVE

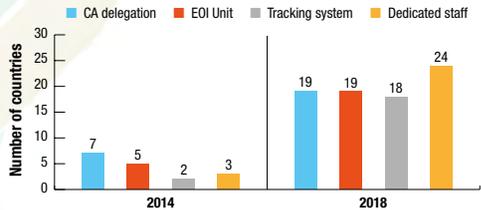
- Development Cooperation • Switzerland (State Secretariat for Economic Affairs)
- United Kingdom (Department for International Development) • West Africa Tax Administration Forum • World bank Group

FIRST RESULTS

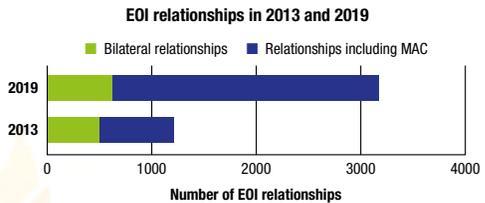
- EOI is becoming a priority for almost all African authorities. Awareness is still needed in recent African members.



- Most of the African members have set up the core elements for effective EOI. Work is ongoing with the recent African members to fill the gap.



- EOI relationships with non-African countries are rapidly increasing with more African countries joining the MAC (15 African countries are Parties to the MAC and 4 are in the process of signing the MAC).



In 2018, African members sent 192 EOI requests (38 in 2014). As a result of EOIR, 5 countries have reported the collection of over USD 22 million of additional revenue.

In addition, 2 African members have reported over USD 300 million of additional revenues gained from voluntary disclosure programmes set up prior to their first AEOI exchanges.



Part VII.

Country Progress Reports



Benin

Global Forum member since 2017
Induction Programme

Progress

- Induction programme launched
- MAC signing process started

Next steps

- Ratifying the MAC upon signature
- Setting up an EOI Unit with adequate resources
- Sending EOI requests and monitoring revenue gains
- Implementing the EOIR standard, including ensuring the availability of BO information
- Implementing AEOI



Botswana

Global Forum member since 2011
"A la carte" technical assistance

Progress

- EOI infrastructure in place (EOI unit, dedicated staff, procedures, etc.)
- Improvement in domestic tax transparency (Largely compliant rating in 2016)

Next steps

- Broadening the network of EOI partners (e.g. signing up to the MAC)
- Sending EOI requests and monitoring revenue gains
- Ensuring the availability of BO information
- Implementing AEOI



Burkina Faso

Global Forum member since 2012
"A la carte" technical assistance

Progress

- EOI infrastructure in place (EOI unit, dedicated staff, procedures, etc.)
- Signatory to the MAC
- Improvement in domestic tax transparency (Largely compliant rating in 2016)

Next steps

- Ratifying the MAC
- Using the available EOI infrastructure to raise more revenue (sending out EOI requests and monitoring revenue gains)
- Ensuring the availability of BO information
- Implementing AEOI



Cameroon

Global Forum member since 2012
"A la carte" technical assistance

Progress

- EOI infrastructure in place (EOI unit, dedicated staff, procedures, etc.)
- MAC in force
- Improvement in domestic tax transparency (Largely compliant rating in 2016)

Next steps

- Using the available EOI infrastructure to raise more revenue (sending out EOI requests and monitoring revenue gains)
- Ensuring the availability of BO information
- Implementing AEOI



Cabo Verde

Global Forum member since 2018
Induction Programme

Progress

- Induction Programme launched

Next steps

- Broadening the network of EOI partners (e.g. signing up to the MAC)
- Setting up an EOI Unit with adequate resources
- Sending EOI requests and monitoring revenue gains
- Implementation of the EOIR standard, including ensuring the availability of BO information
- Implementing AEOI



Chad

Global Forum member since 2016
Induction Programme

Progress

- Induction Programme launched

Next steps Broadening the network of EOI partners (e.g. signing up to the MAC)

- Setting up an EOI Unit with adequate resources
- Sending EOI requests and monitoring revenue gains
- Implementation of the EOIR standard, including ensuring the availability of BO information
- Implementing AEOI



Cote d'Ivoire

Global Forum member since 2016
Induction Programme

Progress

- Induction programme launched
- MAC signing process started
- Setting up of the EOI unit with adequate resources in progress

Next steps

- Broadening the network of EOI partners (e.g. signing up to the MAC)
- Operationalising the EOI Unit
- Sending EOI requests and monitoring revenue gains
- Implementation of the EOIR standard, including ensuring the availability of BO information
- Implementing AEOI



Djibouti

Global Forum member since 2017
Induction Programme

Next steps

- Broadening the network of EOI partners (e.g. signing up to the MAC)
- Setting up an EOI Unit with adequate resources
- Sending EOI requests
- Implementation of the EOIR Standard, including ensuring the availability of beneficial ownership information
- Implementing AEOI



Eswatini

Global Forum member since 2018
Induction programme

Progress

- Induction programme to be launched soon

Next steps

- Broadening the network of EOI partners (e.g. signing up to the MAC)
- Setting up an EOI Unit with adequate resources
- Sending EOI requests and monitoring revenue gains
- Implementation of the EOIR standard, including ensuring the availability of BO information
- Implementing AEOL



Egypt

Global Forum member since 2016
Induction programme

Progress

- Induction programme in progress

Next steps

- Broadening the network of EOI partners (e.g. signing up to the MAC)
- Reinforcing of the EOI Unit with adequate resources and tools
- Sending EOI requests and monitoring revenue gains
- Implementation of the EOIR standard, including ensuring the availability of BO information
- Implementing AEOL



Gabon

Global Forum member since 2012
"A la carte" technical assistance

Progress

- EOI infrastructure in place (EOI unit, dedicated staff, procedures, etc.)
- Signatory to the MAC
- Improvement in domestic tax transparency (Largely compliant rating in 2016)

Next steps

- Ratifying the MAC
- Using the available EOI infrastructure to raise more revenue (sending out EOI requests and monitoring revenue gains)
- Ensuring the availability of BO information
- Implementing AEOL



Ghana

Global Forum member since 2011
"A la carte" technical assistance

Progress

- EOI infrastructure in place (EOI unit, dedicated staff, procedures, etc.)
- MAC in force
- Improvement in domestic tax transparency (Largely compliant rating in 2014)
- Implementing AEOL

Next steps

- Using the available EOI infrastructure to raise more revenue (sending out EOI requests and monitoring revenue gains)
- Ensuring the availability of BO information
- Improving the 2018 Partially compliant rating
- Starting the first AEOL exchanges in 2019 and ensuring an effective use of AEOL information received



Kenya

Global Forum member since 2010
"A la carte" technical assistance

Progress

- EOI infrastructure in place (EOI unit, dedicated staff, procedures, etc.)
- Signatory to the MAC
- Improvement in domestic tax transparency
(Largely compliant rating in 2016)

Next steps

- Ratifying the MAC
- Using the available EOI infrastructure to raise more revenue (sending out EOI requests and monitoring revenue gains)
- Ensuring the availability of BO information
- Implementing AEIO



Lesotho

Global Forum member since 2013
"A la carte" technical assistance

Progress

- EOI infrastructure in place (EOI unit, dedicated staff, procedures, etc.)
- Improvement in domestic tax transparency
(Largely compliant rating in 2016)

Next steps

- Using the available EOI infrastructure to raise more revenue (sending out EOI requests and monitoring revenue gains)
- Broadening the network of EOI partners (e.g. signing up to the MAC)
- Ensuring the availability of BO information
- Implementing AEIO



Madagascar

Global Forum member since 2018
Induction Programme

Progress

- Induction programme in progress
- MAC signing process started

Next steps

- Broadening the network of EOI partners (e.g. signing up to the MAC)
- Setting up an EOI Unit with adequate resources
- Sending EOI requests and monitoring revenue gains
- Implementation of the EOIR standard, including ensuring the availability of BO information
- Implementing AEIO



Mauritania

Global Forum member since 2012
"A la carte" technical assistance

Progress

- EOI infrastructure in place (EOI unit, dedicated staff, procedures, etc.)
- Signatory to the MAC
- Improvement in domestic tax transparency
(Largely compliant rating in 2016)

Next steps

- Ratifying the MAC
- Using the available EOI infrastructure to raise more revenue (sending out EOI requests and monitoring revenue gains)
- Ensuring the availability of BO information
- Implementing AEIO



Liberia

Global Forum member since 2012
"A la carte" technical assistance

Progress

- EOI infrastructure in place (EOI unit, dedicated staff, procedures, etc.)
- Signatory to the MAC
- Improvement in domestic tax transparency (Legal framework found in line with the EOIR standard in 2016)

Next steps

- Using the available EOI infrastructure to raise more revenue (sending out EOI requests and monitoring revenue gains)
- Ratifying the MAC
- Ensuring the availability of BO information
- Implementing AEOI



Mauritius

Global Forum member since 2009
"A la carte" technical assistance

Progress

- EOI infrastructure in place (EOI unit, dedicated staff, procedures, etc.)
- Broad network of EOI partners (MAC in force)
- Improvement in domestic tax transparency (Largely compliant rating in 2014, Compliant rating in 2017)
- First AEOI exchanges completed in 2018

Next steps

- Using the available EOI infrastructure to raise more revenue (sending out EOI requests and monitoring of revenue gains)
- Ensuring an effective use of information received in AEOI



Morocco

Global Forum member since 2011
"A la carte" technical assistance

Progress

- Broad network of EOI partners and Signatory to the MAC
- EOI infrastructure in place (EOI unit, dedicated staff, procedures, etc.)
- Improvement in domestic tax transparency (Largely compliant rating in 2016)
- AEOI implementation pilot project ongoing with France

Next steps

- Ratifying the MAC
- Using the available EOI infrastructure to raise more revenue (sending out EOI requests and monitoring of revenue gains)
- Ensuring the availability of BO information
- Implementing AEOI



Niger

Global Forum member since 2015
Induction Programme

Next steps

- Launch of the induction programme
- Broadening the network of EOI partners (e.g. signing up to the MAC)
- Setting up an EOI Unit with adequate resources
- Sending out EOI requests and monitor revenue gains
- Implementation of the EOIR Standard, including ensuring the availability of BO information
- Implementing AEOI

Nigeria

Global Forum member since 2011
"A la carte" technical assistance

Progress

- EOI infrastructure in place (EOI unit, dedicated staff, procedures, etc.)
- Broad network of EOI partners (MAC in force)
- Improvement in domestic tax transparency (Largely compliant rating in 2016)
- Implementing AEOI

Next steps

- Using the available EOI infrastructure to raise more revenue (sending out EOI requests and monitoring revenue gains)
- Ensuring the availability of BO information
- Starting the first AEOI exchanges in 2019 and ensuring an effective use of AEOI information received

Rwanda

Global Forum member since 2017
Induction Programme

Progress

- Induction Programme in progress
- MAC signing process started

Next steps

- Broadening the network of EOI partners (e.g. signing up to the MAC)
- Setting up an EOI Unit with adequate resources
- Sending EOI requests and monitoring revenue gains
- Implementation of the EOIR standard, including ensuring the availability BO information
- Implementing AEOI

Seychelles

Global Forum member since 2009
"A la carte" technical assistance

Progress

- EOI infrastructure in place (EOI unit, dedicated staff, procedures, etc.)
- Improvement in domestic tax transparency (Largely compliant rating in 2016)
- Broad network of EOI partners (MAC in force)
- First AEOI exchanges completed in 2017

Next steps

- Using the available EOI infrastructure to raise more revenue (sending out EOI requests and monitoring revenue gains)
- Ensuring the availability of BO information
- Ensuring an effective use of information received in AEOI

Senegal

Global Forum member since 2012
"A la carte" technical assistance

Progress

- EOI infrastructure in place (EOI unit, dedicated staff, procedures, etc.)
- Broad network of EOI partners (MAC in force)
- Sending of EOI requests
- Improvement in domestic tax transparency (Largely compliant rating in 2016)

Next steps

- Using the available EOI infrastructure to raise more revenue (sending out more EOI requests and monitoring revenue gains)
- Ensuring the availability of BO information
- Implementing AEOI



South Africa

Global Forum member since 2009
"A la carte" technical assistance

Progress

- EOI infrastructure in place (EOI unit, dedicated staff, procedures, etc.)
- Broad network of EOI partners (MAC in force)
- Improvement in domestic tax transparency (Compliant rating in 2013)
- Good experience in sending EOI requests and raising additional revenue
- First AEOI exchanges completed in 2017.

Next steps

- Expanding the EOI programme (using the available EOI infrastructure to raise more revenue - sending out more EOI requests and monitoring revenue gains)
- Ensuring the availability of BO information
- Ensuring an effective use of information received in AEOI



Tanzania

Global Forum member since 2015
Induction Programme

Progress

- Induction programme in progress

Next steps

- Broadening the network of EOI partners (e.g. signing up to the MAC)
- Setting up an EOI Unit with adequate resources
- Sending EOI requests and monitoring revenue gains
- Implementation of the EOIR standard, including ensuring the availability of BO information
- Implementing AEOI



Togo

Global Forum member since 2016
Induction Programme

Progress

- Induction programme in progress
- MAC signing process started
- Setting up of the EOI unit in progress

Next steps

- Ratifying the MAC upon signature
- Operationalising the EOI Unit with adequate resources
- Sending EOI requests and monitoring revenue gains
- Implementation of the EOIR standard, including ensuring the availability of BO information
- Implementing AEOI



Tunisia

Global Forum member since 2012
"A la carte" technical assistance

Progress

- EOI infrastructure in place (EOI unit, dedicated staff, procedures, etc.)
- Broad network of EOI partners (MAC in force)
- Sending EOI requests
- Improvement in domestic tax transparency (Legal framework found in line with the EOIR standard in 2016)
- Implementation of mechanisms to ensure availability of BO information

Next steps

- Using the available EOI infrastructure to raise more revenue (sending out more and quality EOI requests and monitoring revenue gains)
- Implementing AEOI



Uganda

Global Forum member since 2012

"A la carte" technical assistance

Progress

- EOI infrastructure in place (EOI unit, dedicated staff, procedures, etc.)
- Broad network of EOI partners (MAC in force)
- Improvement in domestic tax transparency (Largely compliant rating in 2016)
- Good experience in sending EOI requests and raising additional revenue

Next steps

- Expanding the EOI programme (using the available EOI infrastructure to raise more revenue - sending out more EOI requests and monitoring revenue gains)
- Ensuring the availability of BO information
- Implementing AEOI



Part VIII.

Annex A.

The Yaoundé Declaration

YAOUNDÉ DECLARATION

A call for action to tackle illicit financial flows through international tax cooperation

We, signatories of this joint declaration gathered in Yaoundé, Cameroon on 15 November 2017, for the Tenth Plenary meeting of the Global Forum on Transparency and Exchange of Information for Tax Purposes (the Global Forum);

Recalling the commitment of the Addis Ababa Action Agenda to redouble efforts to substantially reduce illicit financial flows by 2030, with a view to eventually eliminating them, including by combating tax evasion through strengthened national regulation and by scaling up international tax cooperation, including to support access to beneficial ownership information for competent authorities and progressively advance towards automatic exchange of tax information among tax authorities as appropriate.

Acknowledging that the report from the African Union and United Nations Economic Commission for Africa's High Level Panel on Illicit Financial Flows from Africa has focused attention on the scale of the issue of illicit financial flows in Africa, which includes tax evasion and other criminal activities, and its negative impact on Africa's development and governance agenda while also identifying ways in which to tackle it, in particular by increasing cooperation and exchange of information to improve domestic resource mobilisation.

Emphasizing the unprecedented efforts made by the international community to improve tax transparency and exchange of information which are a prerequisite for effectively tackling international tax evasion and addressing gaps and mismatches in tax rules that allow for artificial profit shifting.

Recalling the universal Sustainable Development Goals of the United Nations, and in particular the domestic resource mobilisation objective, as well as the African Union principles in this area.

Affirming that sustainable development and good governance are among the seven African aspirations of the African Union Agenda 2063.

Having deliberated on the theme “Fighting illicit financial flows through international tax cooperation: A Call for Action in Africa”.

Reaffirm the important role of the Global Forum in bringing about transparency in tax matters and in assisting developing countries in the implementation of the Standards of exchange of information in tax matters (EOI) and the use of the EOI instruments in their domestic resource mobilisation strategy.

Note that while progress has been made in Africa, many countries still do not fully benefit from the new transparent tax environment: only 27 African countries are participating in exchange of information on request (EOIR), only five African countries are committed to automatic exchange of financial accounts information (AEOI), and a large number of African countries continue to have a small EOI network, gaps in their domestic legislation and administrative capacity constraints that hamper efforts to tackle international tax evasion.

Encourage all African countries and the Regional Economic Communities to strengthen their efforts in the fight against international tax evasion through tax cooperation and transparency and work towards more regional coordination;

Resolve to lead by example in using the powerful EOI infrastructure which has now emerged to counter international tax evasion and to support domestic resource mobilisation;

Endorse the renewal for three years (2018-2020) of the Africa Initiative launched in 2014 by the Global Forum with the support of the African Tax Administration Forum and the Centre de Rencontre et d’Etudes des Dirigeants des Administrations Fiscales and the World Bank Group.

Welcome the continuous support of the French Republic, the United Kingdom of Great Britain and Northern Ireland and the Swiss Confederation to the Africa

Initiative and Call upon other international bodies to support the efforts of African countries in building their capacities.

Consider that tackling illicit financial flows in Africa through improved tax cooperation and transparency would be enhanced if carried out at the continental level under the auspices of the African Union with the support of all development partners and international and regional organisations.

Undertake an initiative by the African Union to begin a high level discussion on tax cooperation and illicit financial flows and their link to domestic resource mobilisation.

Encourage African countries with the support of the Global Forum Secretariat to explore with the African Union, United Nations Economic Commission for Africa, Regional Economic Communities and the African Development Bank a collaboration aimed at boosting African countries' efforts towards implementing the international EOI Standards and using EOI tools to improve their domestic resource mobilisation;

Request the Global Forum Secretariat to report back to the Africa Initiative Taskforce on the outcome of the above proposal within 6 months.

Made in Yaoundé, Cameroon, on 15 November 2017
In two originals in English and in French

LIST OF SIGNATORIES (as of 21 September 2018)

	Country	Representative	Date
1	Cameroon	H.E. Alamine Ousmane Mey, Minister of Finance	15/11/2017
2	Liberia	H.E. Adolphus Forkpa, Deputy Minister of Finance and Development Planning	15/11/2017
3	Uganda	H.E. Haruna Kasolo Kyeyune, Minister of State, Minister of Finance, Planning and Economic Development	15/11/2017
4	Benin	Mr. Servais Adjovi, Chief of Staff, Representing the Minister of Economy and Finance	15/11/2017
5	Togo	H.E. Sani Yaya, Minister of Economy and Finance	19/01/2018
6	Ghana	H.E. KEN OFORI – ATTA, Minister of Finance	22/02/2018
7	Seychelles	H.E. Peter Larose, Minister of Finance, Trade and Economic Planning	22/02/2018
8	Chad	H. E. Dr Abdoulaye Sabre Fadoul, Minister of Finance and Budget	26/03/2018
9	Madagascar	H.E. Andriambololona Vonintsalama, Minister of Finance and Budget	04/04/2018
10	Niger	H. E. Massoudou Hassoumi, Minister of Finance	09/04/2018
11	Gabon	H. E. Régis Immongault, Minister of Economy, Prospective and Sustainable Development Planning	10/04/2018
12	Burkina Faso	H. E. Edith Clémence YAKA, Minister Delegate to the Minister of Economy, Finance and Development	13/04/2018
13	Congo	H. E. Calixte NGANONGO, Minister of Finance and Budget	13/04/2018
14	Guinea Bissau	H.E. João Alage Mamadu FADIA, Minister of Economy and Finance	13/04/2018
15	Mali	H.E. Bakary Bocar MAIGA, Ambassador of Mali in Congo, Representing the Minister of Economy and Finance	13/04/2018
16	Senegal	H.E. Amadou BA, Minister of Finance and Planning	17/04/2018
17	Mauritius	H.E. Pravind Kumar Jugnauth, Prime Minister	28/05/2018
18	Mauritania	H.E. Mohamed OULD KEMBOU, Minister Delegate at the Ministry of Economy and Finance, with special responsibility for Budget	04/06/2018
19	Comoros	H.E. Said Ali Said CHAYHANE, Minister of Finance and Budget	05/06/2018
20	Côte d'Ivoire	H.E. Moussa SANOGO, Secretary of State to the Prime Minister, in charge of Budget and State Portfolio	21/06/2018
21	Lesotho	H.E. Moeketsi MAJORO, Minister of Finance	19/07/2018
22	Nigeria	H.E. Kemi ADEOSUN, Minister of Finance	06/08/2018
23	South Africa	H.E. NHLANHLA M NENE, Minister of Finance	19/09/2018

Annex B.

Statement of outcome of the 5th Africa Initiative meeting (July 2018, Accra, Ghana)

On 25-26 July 2018, 63 delegates from 21 African countries (Benin, Burkina Faso, Cameroon, Côte d'Ivoire, Gabon, Ghana, Kenya, Liberia, Madagascar, Mali, Mauritania, Mauritius, Morocco, Nigeria, Republic of Tanzania, Rwanda, Senegal, Seychelles, South Africa, Togo and Uganda), the African Tax Administration Forum (ATAF), the West African Tax Administration Forum (WATAF), the African Union Commission (AU Commission), the United Nations Economic Commission for Africa (UNECA) and the French Ministry of Europe and Foreign Affairs came together in Accra, Ghana, for the 5th meeting of the Africa Initiative.

The Africa Initiative was launched for a period of three years (2015-2017) by the Global Forum at its plenary meeting in Berlin in 2014 along with its African members and the ATAF, the Cercle de Réflexion et d'Échange des Dirigeants des Administrations fiscales (CREDAF), the OECD, the World Bank Group, the French Ministry of Europe and Foreign Affairs and the United Kingdom's Department for International Development. It was renewed for a further period of three years (2018-2020) at the Global Forum plenary meeting in Yaoundé in November 2017.

Emphasising the scale of the illicit financial flows issue in Africa as illustrated in the report from the AU and UNECA's High Level Panel on Illicit Financial Flows from Africa (High Level Panel), Delegates discussed the African tax transparency agenda in detail. They stressed that the High Level Panel's recommendations to tackle illicit financial flows from Africa and improve domestic resource mobilisation include increasing tax transparency and exchange of information (EOI). In this context, they recognised that the implementation of the international standards would address a number of the High Level Panel's recommendations.

They commended the African Union for advancing the transparency agenda in Africa and highlighting the importance of beneficial ownership register, automatic exchange of information (AEOI) and the abolishment of bank secrecy at their 31st African Union Summit in Nouakchott, Mauritania.

Delegates welcomed the growing support for the Yaoundé Declaration which was initially signed by four African Countries during the 4th Africa Initiative meeting and is now adhered to by 21 African Countries (Annex 1). All African countries were encouraged to sign on to this Declaration.

Delegates shared information on their progress towards the specific targets they have committed to, including expanding their EOI networks, making more EOI requests, ensuring availability of beneficial ownership information and taking steps to participate in AEOI. They also discussed the challenges faced by African countries in implementing the international tax transparency standards and shared experiences in addressing them.

To raise public and political awareness and inform decisions at national, regional or continental level, Delegates agreed that the progress they achieve in improving tax transparency in Africa should be reflected in an annual report of the Africa Initiative to be approved by the Africa Initiative. This will include progress made by countries in meeting individual country targets.

Delegates commended the broadening of the Africa Initiative and welcomed the first participation of the AU Commission, the UNECA, the WATAF and one non-Global Forum member (Mali). They welcomed the work on beneficial ownership, which is now underway with the Organisation pour l'Harmonisation en Afrique du Droit des Affaires (OHADA), and requested that similar regional projects in Africa be explored to support the African tax transparency and domestic resource mobilisation agenda. They called for the strengthening of the collaboration between the Africa Initiative framework and other key organisations in Africa to enhance domestic revenue mobilisation through improved transparency and exchange of information.

Acknowledging that the Africa Initiative framework provides for concrete steps and targets in the implementation of international tax transparency standards, as well as technical assistance programmes aimed at building capacity in coordination with key organisations in Africa, the Global Forum Secretariat was mandated

to explore with the UNECA and the AU Commission putting in place a process to jointly ensure that progress made by African countries in implementing the common objectives of fighting tax evasion and illicit financial flows through the implementation of the international tax transparency standards is monitored and measured.

Delegates finally agreed that the statements of outcomes of the Africa Initiative should be made public.

Annex C.

Statement of outcome of the 6th Africa Initiative meeting (February – March 2019, Rwanda)

On 28 February – 1st March 2019, 68 delegates from 22 African countries and 11 Africa Initiative partners came together in Kigali, Rwanda, for the 6th meeting of the Africa Initiative (see annex 1).

The Africa Initiative was launched for a period of three years by the OECD hosted Global Forum in 2014 along with its African members and development partners (see annex 2). The Initiative aims to ensure that African countries can realise the full potential of progress made by the global community in implementing tax transparency and in international tax cooperation. With encouraging first results, its mandate was renewed for a further period of three years (2018-2020) in Yaoundé in November 2017. Countries participating in the Africa Initiative have committed to meeting specific and measurable targets in implementing and using the international tax transparency standards.

The delegates welcomed the attendance and support of the Economic Community of West African States (ECOWAS), the Central Africa Monetary and Economic Community (CEMAC), the East Africa Community (EAC), the Organisation for the harmonisation of business law in Africa (Organisation pour l'Harmonisation en Afrique du Droit des Affaires – OHADA) and the European Union for the first time at an Africa Initiative meeting.

Emphasising the increasing political focus on tackling illicit financial flows (IFFs) from Africa, delegates discussed how to convert political attention into tangible deliverables. They acknowledged that enhanced tax transparency is an important part of the solution to fighting tax evasion which in turn is a major component of IFFs. They expressed the urgency of delivering on the tax transparency agenda in Africa recognising that it fits into a broader development agenda by generating positive spillovers going beyond the exchange of information (EOI). They asked the Global

Forum Secretariat to continue its discussions with the United Nations Economic Commission for Africa, African Union, the Regional Economic Communities and the African Development Bank and stressed that the efforts of the supporters of the Africa Initiative should be as coordinated as possible.

During this 6th meeting, delegates approved the first progress report on tax transparency in Africa (“Tax transparency in Africa; 2018 Africa Initiative Progress Report”). This is the first of an annual series of reports which will measure the progress African countries are making in improving tax transparency and the impact of these improvements. They commended the progress that a number of African countries have made and welcomed the fact that African countries have started converting information exchange into tax revenues. For example, South Africa has reported having collected additional revenues of USD 225 million from its Voluntary Disclosure Programme launched as a prelude to its first automatic exchanges of financial accounts information in 2017. Nigeria collected USD 82.6 million from a similar programme. Tunisia and Togo have collected over USD one million each in 2018 as a consequence of EOI while Uganda has collected around USD 14 million from its EOI programme. Nevertheless, a number of countries still need to put more efforts to achieve the targets that they committed to. Delegates agreed to publish the report and to transmit it to the African Union, and look forward to seeing further progress in the 2019 report.

Delegates shared information on some of their recent successes and initiatives to build on and supplement effective EOI, in particular voluntary disclosure programmes, beneficial ownership regimes, implementation of automatic exchange of information and high net worth individual programmes. There was consensus on the importance of political support. With political support, tax authorities in developing countries can pursue the use of transparency and EOI as a revenue-raising tool and get on with the task of implementing the international standards.

Recognising that availability of beneficial ownership is critical to the fight against tax evasion and other IFFs, delegates discussed ways to implement this aspects of the international tax transparency standards, including working at regional levels such as CEMAC, EAC, ECOWAS and OHADA. Amending legal framework to that end remains a challenge as it cuts across other domains such as company or anti-money laundering laws. Delegates welcomed the development of the Global Forum and Inter-American Development Bank toolkit on beneficial ownership

implementation which is intended to support policy implementation discussion in developing countries and technical assistance activities.

One of the African Initiative targets is to increase the number of African countries implementing AEOI on a specific timeline. Concerned that as implementation proceeds around the world there is a risk that Africa is left behind: there are currently only five African countries committed to implement AEOI on a specific timeframe. Delegates discussed the main challenges that they faced, including the more demanding confidentiality requirements where AEOI is concerned. They also discussed some opportunities that are now emerging to make implementation of the standard easier for developing countries.

Finally, delegates thanked Ms. Monica Bhatia, the outgoing Head of the Global Forum Secretariat for her commitment and leadership in promoting the Africa Initiative. They wished her well in her future career.

Members of the Africa Initiative

Benin • Botswana • Burkina Faso • Cameroon • Cabo Verde • Chad • Côte d'Ivoire • Djibouti • Egypt • Eswatini • Gabon • Ghana • Kenya • Lesotho • Liberia • Madagascar • Mauritania • Mauritius • Morocco • Niger • Nigeria • Rwanda • Senegal • Seychelles • South Africa • Tanzania • Togo • Tunisia • Uganda

The supporters of the Africa Initiative

African Development Bank • African Tax Administration Forum • Cercle de Réflexion et d'échange des Dirigeants des Administrations Fiscales • European Union • France (Ministry of Europe and Foreign Affairs) • Norway (Agency for Development Cooperation) • Switzerland (State Secretariat for Economic Affairs) • United Kingdom (Department for International Development) • West Africa Tax Administration Forum • World Bank Group

For more information

**Global Forum on Transparency and Exchange
of Information for Tax Purposes**

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