

Bled Dry:

How tax abuse, illicit financial flows and debt affect women and girls in Africa



Chloé van Biljon
Jaco Oelofsen
Layne Hofman
Martha Hungwe



AIDC
Alternative Information
& Development Centre

CENTER for
ECONOMIC and
SOCIAL RIGHTS

**TAX JUSTICE
NETWORK**

Acknowledgements

This publication is the result of an international collaboration between the Alternative Information & Development Centre (AIDC), the Center for Economic and Social Rights (CESR), and the Tax Justice Network (TJN).

The report was written by Chloé van Biljon, Jaco Oelofsen, Layne Hofman, and Martha Hungwe (listed alphabetically). Data analysis and visualisations were supported by Matthew Amalitinga Abagna. Design and graphics were created by Zoe Parkin.

Special thanks to Liz Nelson, Bemnet Agata, Andres Knobel, Florencia Lorenzo, Maria Emilia Mamberti, Maria Ron Balsera, Marianna Leite and Auska Ovando for editing and proofreading. We are also grateful to Lucas Millán, Sergio Chaparro-Hernandez, and Cecile Clerc for making the Spanish and French versions possible.

We recognise that gender exists on a spectrum beyond traditional binary concepts. When we refer to women and girls, we do so with the intention of including women and girls in all their diversity.

December 2025

Table of Contents

Table of Contents	3
Introduction: Why tax matters for women's equality	4
The urgency: 30 years after Beijing	4
Action 3: Closing the financing gap	4
Flawed global governance and the feminisation of poverty.....	5
Background.....	7
Defining illicit financial flows.....	7
Tax-related illicit financial flows	8
Macroeconomic effects of illicit financial flows (IFFs).....	10
How does this impact women?.....	11
Case study - The lifecycle effects of tax abuse, debt, and illicit financial flows	13
Intergenerational inequalities	15
The power of tax to remedy inequalities	15
Case study - What would it look like if African countries recovered revenue lost to tax abuse?	18
Gendered impacts of illicit financial flows at a firm level.....	20
Case study - Samancor Chrome	21
Case study - Lonmin and Marikana.....	22
The “artificial unprofitability” of multinational enterprises	24
Gendered effects of financial secrecy.....	26
Comparative analysis of anti-money laundering and counter- terrorism financing legal frameworks.....	26
The Financial Action Task Force (FATF).....	27
Rwanda.....	28
Senegal.....	31
South Africa	34
Gender budgeting framework comparison	39
Critical Analysis of the Financial Action Task Force	45
Tax justice for tackling illicit financial flows and tax abuse	47
ABCs of transparency	48
Unitary taxation in the UN Framework Convention on International Tax Cooperation.....	51
Policy recommendations.....	52
International cooperation	52
Future Research.....	57
Conclusion.....	57

Introduction: Why tax matters for women's equality

The urgency: 30 years after Beijing

As we observe the **30th anniversary of the Beijing Declaration and Platform for Action in 2025**, it is clear that gender equality remains a distant goal. At the current pace of progress, it would take an alarming **123 more years** to close the global gender gap.¹

This stagnation occurs amid a global "**polycrisis**"—an era defined by democratic decline, large-scale armed conflicts, skyrocketing inequality, mounting debt, and the climate emergency.² Gender inequality is deeply embedded in economic and social structures, and each compounding crisis disproportionately harms women and girls in all their diversity. They are more likely to lose jobs, face violence, and bear an increased burden of unpaid care work, all of which severely limit their life opportunities.³

Action 3: Closing the financing gap

UN Women highlights "Closing the Financing Gap" as a crucial cross-cutting recommendation for achieving the Beijing Platform's ambition.⁴ This calls for countries to align budgets with gender equality principles, implement progressive taxation, and realign the international financial

¹ World Economic Forum, Global Gender Gap Report 2025 (2025), <https://www.weforum.org/publications/global-gender-gap-report-2025/digest/>.

² Adam Tooze, 'Welcome to the World of the Polycrisis', Global Economy, Financial Times (28 Oct. 2022), <https://www.ft.com/content/498398e7-11b1-494b-9cd3-6d669dc3de33>; David Henig and Daniel M. Knight, 'Polycrisis: Prompts for an Emerging Worldview', Anthropology Today, 39/2 (2023), 3–6, <https://doi.org/10.1111/1467-8322.12793>; Ang, 'Doing Development in the Polycrisis', UNDP (18 Dec. 2024), <https://www.undp.org/blog/doing-development-polycrisis>; Judith J. Rakowski et al., 'Characterizing the Global Polycrisis: A Systematic Review of Recent Literature', Annual Review of Environment and Resources, 50/Volume 50, 2025 (2025), 159–83, <https://doi.org/10.1146/annurev-environ-111523-102238>; Mark Elsner, Grace Atkinson, and Saadia Zahidi, Global Risks Report 2025 (World Economic Forum, 2025), <https://www.weforum.org/publications/global-risks-report-2025/>.

³ Women's Rights in Review 30 Years After Beijing (New York, 2025), <https://www.unwomen.org/en/digital-library/publications/2025/03/womens-rights-in-review-30-years-after-beijing>.

⁴ Women's Rights in Review 30 Years After Beijing.

system around human rights principles⁵ such as equity, transparency, non-discrimination, and maximum available resources.⁶

The financial need is clear: the UN estimates that an additional US\$360 billion per year is required globally to achieve gender equality by 2030.⁷ This need, however, is dwarfed by revenue lost to tax abuse and illicit financial flows. Countries are currently losing a staggering US\$492 billion in tax revenue every year due to multinational corporations and wealthy individuals using tax havens.⁸ Curbing this lost revenue would immediately create the fiscal space necessary to invest in essential gender-responsive policies.⁹ While high-income countries lose more revenue in dollar amounts, tax revenue losses affect low-income countries hardest, given their overall limited resources and greater reliance on corporate taxes as a share of their national revenue. These countries are forced to take on additional debt to make up for the lost revenue, leaving generations burdened by unsustainable interest repayments and long-term economic and social damage.¹⁰

Flawed global governance and the feminisation of poverty

Flawed global economic governance structures actively uphold and reinforce gender inequality, leading to the feminisation of poverty worldwide.¹¹

- **Poverty data:** Currently, 24.3 million more women live in extreme poverty compared to men.¹² A staggering 62.8% of the world's poorest women and girls reside in Sub-Saharan Africa.¹³ The impact

⁵ Report of the Secretary-General: Review and Appraisal of the Implementation of the Beijing Declaration and Platform for Action and the Outcomes of the Twenty-Third Special Session of the General Assembly, E/CN.6/2025/3/Rev.1 (New York, 2025), <https://docs.un.org/en/E/CN.6/2025/3/Rev.1>.

⁶ Asociación Civil por la Igualdad y la Justicia (ACIJ) et al., Principles for Human Rights in Fiscal Policy (2021), <https://www.cesr.org/principles-human-rights-fiscal-policy/>.

⁷ Women's Rights in Review 30 Years After Beijing.

⁸ Tax Justice Network, 'State of Tax Justice 2024', 2024, <https://taxjustice.net/reports/the-state-of-tax-justice-2024/>.

⁹ Report of the Secretary-General: Review and Appraisal of the Implementation of the Beijing Declaration and Platform for Action and the Outcomes of the Twenty-Third Special Session of the General Assembly.

¹⁰ Layne Hofman, The Fiscal Social Contract and the Human Rights Economy (Tax Justice Network, 2024), <https://taxjustice.net/reports/the-fiscal-social-contract-and-the-human-rights-economy/>.

¹¹ MacKenzie A. Christensen, 'Feminization of Poverty: Causes and Implications', in Gender Equality, Encyclopedia of the UN Sustainable Development Goals (Switzerland, 2021), 368–77, https://doi.org/10.1007/978-3-319-70060-1_6-1.

¹² UN Women and DESA, Progress on the Sustainable Development Goals: The Gender Snapshot 2024 (New York, 2024), <https://unstats.un.org/sdgs/gender-snapshot/2024/>.

¹³ 'Poverty Deepens for Women and Girls, According to Latest Projections', UN Women Data Hub, 1 Feb. 2022, <https://data.unwomen.org/features/poverty-deepens-women-and-girls-according-latest-projections>.

of this poverty is amplified by intersectional factors, including race, ethnicity, age, and economic status.

- **The tax conduit:** The global tax system acts as an unjust conduit, deepening inequality by siphoning resources from the Global South. Illicit Financial Flows (IFFs) from the Global South are estimated to exceed US\$1 trillion annually, with over US\$88.6 billion lost from Africa alone each year due to practices like trade mispricing and profit shifting.¹⁴ This failure to mobilize maximum available resources means states cannot provide essential, quality, and sustainable public care services. This perpetuates the enormous burden of unpaid care work on women and girls in all their diversity, work that is unrecognised, un-redistributed, and unrewarded.¹⁵ Ultimately, this economic exclusion leads to gender-unequal access to education, health services, wealth acquisition (land, real estate, financial assets), and meaningful economic participation.

¹⁴ Jaco Oelofsen, Nishal Robb, and Christine Joy Galunan, Global South Perspectives on International Tax Reform (Alternative Information & Development Centre, n.d.), <https://aidc.org.za/wp-content/uploads/2023/06/GSP-Report.pdf>.

¹⁵ Arimbi Wahono et al., Rights-Based Tax Justice: A Framework for a Progressive, Feminist, Ecologically Just, and Decolonial Approach to Taxation (WEDO, 2025), <https://www.cesr.org/a-progressive-feminist-environmental-decolonial-approach-to-taxation/>.

Background

Defining illicit financial flows

There is no singular agreed upon definition of the term illicit financial flows¹⁶. The term initially emerged in the early 2000s as a counternarrative to the prevailing idea that corruption was exclusively an issue of lower-income countries. Raymond Baker popularized the term in his 2005 book *Capitalism's Achilles Heel* where he presented ballpark estimates of the scale of illicit financial flows by category, and demonstrated that “commercial tax evasion”, primarily originating from the abusive behaviour of multinational companies, made up two-thirds of illicit financial flows while those linked to corruption only made up a few per cent's worth.¹⁷

From there, the concept of a narrow and broad definition of illicit financial flows has emerged. The narrow definition speaks only to what is explicitly illegal, while the broader definition seeks to encompass some of the most common forms of tax abuse, including the use of shell companies to hide wealth offshore, corporate profit shifting, and any other activity that involves exploiting loopholes in the law or provisions whose legality has not yet been tested in courts.¹⁸

The decision to use a broad or narrow definition of illicit financial flows, is often more of a political choice rather than a technical one, though. In the Third Session of the Intergovernmental Negotiating Committee on the UN Framework Convention on International Tax Cooperation, countries extensively discussed the need to define illicit financial flows, with the distinction of tax abuse versus tax evasion at the core of the debate. Several countries with a history of financial secrecy - including Switzerland, the Bahamas, and Singapore - called for the definition to only include explicitly illegal activity, excluding tax avoidance and abuse from the conversation entirely. However, other states, most notably India, pointed out that the United Nations has formed a statistical definition of the term that includes tax avoidance, and that in other fora “the UN and member states have broadly accepted that illicit flows can also arise from legal economic activities through aggressive tax avoidance”.

¹⁶ Alex Cobham and Petr Janský, *Estimating Illicit Financial Flows: A Critical Guide to the Data, Methodologies and Findings* (n.p., n.d.).

¹⁷ Raymond W. Baker, *Capitalism's Achilles Heel: Dirty Money and How to Renew the Free-Market System* (n.p., 2005).

¹⁸ Kasper Brandt, ‘Illicit Financial Flows and Developing Countries: A Review of Methods and Evidence’, *Journal of Economic Surveys*, 37/3 (2023), 789–820, <https://doi.org/10.1111/joes.12518>; Irene Musselli and Elisabeth Bürgi Bonanomi, ‘Illicit Financial Flows: Concepts and Definition’, *International Development Policy*, no. 12.1 (Jan. 2020), 12.1, <https://doi.org/10.4000/poldev.3296>; *Methodological Guidelines to Measure Tax and Commercial Illicit Financial Flows - Methods for Pilot Testing* (UNCTAD, 2021), https://unctad.org/system/files/non-official-document/20210917_IFFsGuidelinesForPilots_en_0.pdf.

The UN's statistical definition clearly includes both legal and illegal activities, defining illicit tax activities and aggressive tax avoidance as part of the framework.¹⁹ This aligns with the broader definition of illicit financial flows, encompassing the most important and impactful forms of illicit financial flows and allowing us to paint a more complete picture of their scale and impact. A feminist analysis of the global impact of illicit financial flows has also emerged as feminist scholars and activists began to explore the specific ways that illicit financial flows disproportionately affect women and girls in all their diversity.²⁰

Some of the most common activities that lead to illicit financial flows include tax abuse and evasion, money laundering, smuggling, and corruption. In all forms of the definition, however, illicit financial flows are deliberately hidden to obscure their true nature; they drain much needed resources from states, and they make states less responsive to their people.²¹

Tax-related illicit financial flows

Consistently, tax-related illicit financial flows are identified as representing the largest share of all illicit financial flows worldwide.²² Tax-related illicit financial flows aim to evade or underpay tax. This works by shifting money from the country where the revenue is earned, and where the corporate tax rate above 0 per cent, to a country where the tax rate is 0 per cent or very low. By doing this, corporations evade their legal obligation to pay tax on their earnings.

The loss of tax revenue to cross-border tax abuse by corporations and individuals seeking to underpay or minimise their tax payments is one of the most significant drains on public budgets, and this phenomenon

¹⁹ Enrico Bisogno et al., Conceptual Framework for the Statistical Measurement of Illicit Financial Flows (UNCTAD, and UNODC, 2020), https://www.unodc.org/documents/data-and-analysis/statistics/IFF/IFF_Conceptual_Framework_for_publication_15Oct.pdf.

²⁰ Veronica Grondona, Nicole Bidegain Ponte, and Corina Maria Rodriguez Enriquez, Illicit Financial Flows Undermining Gender Justice (n.p., 2016), <https://ri.conicet.gov.ar/handle/11336/108580>; Attiya Waris, Illicit Financial Flows: Why We Should Claim These Resources for Gender, Economic and Social Justice (AWID, 2017), <https://www.awid.org/publications/illicit-financial-flows-why-we-should-claim-these-resources-gender-economic-and-social>.

²¹ Cobham and Janský, Estimating Illicit Financial Flows: A Critical Guide to the Data, Methodologies and Findings.

²² African Union Commission and United Nations Economic Commission for Africa, *Illicit Financial Flow: Report of the High Level Panel on Illicit Financial Flows from Africa* (African Union Commission; United Nations Economic Commission for Africa, 2015), https://www.uneca.org/sites/default/files/PublicationFiles/iff_main_report_26feb_en.pdf; Office of the Special Adviser on Africa, *Tackling Illicit Financial Flows in Africa Arising from Taxation and Illegal Commercial Practices* (2022), <https://www.un.org/osaa/content/tackling-illicit-financial-flows-africa-arising-taxation-and-illegal-commercial-practices>; United Nations Interregional Crime and Justice Research Institute, *Drivers of Illicit Financial Flows* (n.d.), accessed 8 Dec. 2025, <https://unicri.org/drivers-illicit-financial-flows>; Kathy Nicolaou-Manias and Joëlle Traore, *Study on Tax-Motivated Illicit Financial Flows* (Berlin, 2024), https://capacity4dev.europa.eu/library/study-tax-motivated-illicit-financial-flows_en?refid=691.

disproportionately affects developing countries.²³ This abuse is enabled by states that maintain financial secrecy laws and lax rules on corporate reporting and taxation, depriving states of the resources needed to fulfil women's rights and promote substantive gender equality.

All countries are affected by cross-border tax abuse. While higher-income countries may lose more tax revenue in absolute terms, lower-income countries lose more in proportion to their current tax revenues, and the profits shifted from their borders end up in higher-income countries, often former colonial and imperial powers.²⁴ Additionally, higher-income countries are responsible for 99.3 per cent of the tax lost.²⁵ Tax abuse strips lower-income countries of their taxing rights and deprives them of revenue that is desperately needed for public investment in health, education, and infrastructure.

²³ Independent Expert on the effects of foreign debt and other related international financial obligations of States on the full enjoyment of all human rights, particularly economic, social and cultural rights, The Fiscal Social Contract and the Human Rights Economy, A/79/142 (United Nations Human Rights Council, 2024), <https://docs.un.org/A/79/142>.

²⁴ Tax Justice Network, Global Alliance for Tax Justice, and Public Services International, 'State of Tax Justice 2020', 2020, <https://taxjustice.net/reports/the-state-of-tax-justice-2020/>; Tax Justice Network, Global Alliance for Tax Justice, and Public Services International, 'State of Tax Justice 2021', 2021, <https://taxjustice.net/reports/the-state-of-tax-justice-2021/>; Tax Justice Network, 'State of Tax Justice 2023', 2023, <https://taxjustice.net/reports/the-state-of-tax-justice-2023/>; Tax Justice Network, 'State of Tax Justice 2024'.

²⁵ Tax Justice Network, 'State of Tax Justice 2024'.

Macroeconomic effects of illicit financial flows (IFFs)

Illicit financial flows are a huge problem. As stated above, they reduce the domestic revenue available to states, which curtails expenditure available for investing in public goods, meaning that fewer resources are available for sustainable development and the realisation of human rights.²⁶ Thus, the nature of Illicit financial flows also makes governments less responsive to their peoples' needs.²⁷

The OECD has held the mandate on international tax governance for several decades and was in charge of the initiative to combat illicit financial flows. In 2012, the G20 world leaders tasked the OECD with reforming the international tax system, which resulted in the Base Erosion and Profit Shifting (BEPS) Action Plan.²⁸ The Action plan was published in 2013 and began implementation in 2015 with the aim to “provide countries with domestic and international instruments that will better align rights to tax with economic activity”.²⁹

However, the OECD failed in its mandate. The Action Plan was supposed to prevent multinationals from engaging in harmful profit-shifting practices in order to underpay tax, but profit shifting has only continued to rise.³⁰ The OECD has not solved the issues of corporate taxation in our globalised economy and has been unable to address the challenges presented by big tech and the digitalised economy, as well as the movement of intangible assets. In our complex and globalised modern world, our tax systems still operate on a national level. Multinationals operate at a global level, taking advantage of their operations across multiple borders to forge the most advantageous route for themselves, and wealthy individuals use their excess resources to operate similarly, utilising complex transnational webs to place their wealth out of reach in order to pay little to no tax.³¹ The traditional notion of tax policy as a

²⁶ Stephen Hall et al., Lost Government Revenues Due to Tax Abuse – the Impact on the Determinants of Health and Mortality Rates (2020), <https://med.st-andrews.ac.uk/grade/wp-content/uploads/sites/13/2021/04/Lost-government-revenues-due-to-tax-abuses-5.4.2021-1.pdf>.

²⁷ Cobham and Janský, Estimating Illicit Financial Flows: A Critical Guide to the Data, Methodologies and Findings.

²⁸ Sol Picciotto et al., The G20 and the “Base Erosion and Profit Shifting (BEPS) Project” (Bonn, 2017), <https://www.idos-research.de/discussion-paper/article/the-g20-and-the-base-erosion-and-profit-shifting-beps-project/>.

²⁹ OECD, ‘Action Plan on Base Erosion and Profit Shifting’, OECD Publishing, 2013, <http://dx.doi.org/10.1787/9789264202719-en>.

³⁰ Tax Justice Network, ‘State of Tax Justice 2024’.

³¹ Hofman, The Fiscal Social Contract and the Human Rights Economy.

domestic matter to be settled by sovereign nations is no longer consistent with the global economic reality.³²

This failure results in ever-increasing amounts of tax revenue lost to governments that desperately need those funds for development and service provision. The most recent estimates show that the African continent loses US\$8.3 billion in tax revenue to the harmful tax practices of corporate tax abuse and offshore wealth. The loss of these revenues has a direct impact on the various ongoing global human rights failures: debt distress, poverty, the climate crisis, and health insecurity, which are built upon and exacerbated by financial systems that are programmed to benefit wealthy elites, high-income countries, and multinational corporations.³³

These figures do not include indirect losses related to “tax competition”, wherein countries reduce corporate tax rates to attract foreign investment, hoping that this will eventually lead to higher tax revenues despite a large body of evidence to the contrary. The evidence shows that this practice leads to a “race to the bottom”, meaning that governments compete for the lowest tax rates while corporations set up shop wherever they please, and continue to shift their profits to tax havens regardless. The result is lower tax revenue for all governments, and accumulating profits and wealth for corporations.

How does this impact women?

Women, in all their diversity, still suffer disproportionately when states lack adequate resources to pay for public goods and services, such as health care, education, water and sanitation systems, effective courts, and accountable police forces. The disproportionate impacts on diverse women across Africa occur in at least five ways:

- **Dwindling social services:** Inadequate budgets for social services and cuts to existing programmes affect low-income populations disproportionately, and women make up the majority of the low-income population.
- **Gender equality takes a backseat:** Budget constraints mean that institutions and programmes designed to promote gender equality and support women’s advancement often go unfunded or underfunded and constantly face the risk of spending cuts.
- **Unpaid care work:** When the state fails to provide adequate services due to budget constraints, women often fill the gaps in caregiving, education, and other family and community supports, typically without remuneration, and sometimes giving up a paid job

³² Allison Christians, ‘Sovereignty, Taxation and Social Contract’, *Minnesota Journal of International Law*, 18 (n.d.), 99, accessed 11 Apr. 2024, <https://scholarship.law.umn.edu/cgi/viewcontent.cgi?article=1244&context=mjil>.

³³ Tax Justice Network, ‘State of Tax Justice 2024’.

to take these roles on, thus subsidising the state's failures with unpaid labour. Even still, when paid, care work is unfairly remunerated and, oftentimes, precarious.

- **Regressive taxation:** In an effort to make up for revenue shortfalls, many states increase their reliance on easily administered but regressive forms of taxation, such as consumption or value-added taxes (VAT) on basic goods and services, which often disproportionately burden women.
- **Debt and austerity:** States also turn to loans from international institutions like the IMF and the World Bank. These loans come with harsh stipulations and often impose conditions like the implementation of austerity policies that further cut social spending and more deeply entrench, reinforce, and even systematise the negative impacts on women mentioned in the first four points.

Case study - The lifecycle effects of tax abuse, debt, and illicit financial flows

Illicit financial flows, tax abuse, and foreign debt can easily feel like concepts that are separate from women and girls' most pressing issues and mainstream feminist debates. However, the effects of these phenomena touch the lives of every girl or woman throughout their lifecycle and have compounded effects over their lifetime.³⁴

Taxation is a potent political tool that shapes societal outcomes by determining how wealth, income, assets, and resources are distributed.³⁵ The abuses and power imbalances of the international financial architecture uphold and entrench the systemic inequality of women and girls in a way that makes it difficult, if not impossible, to undo without reforming the entire structure. In practice, this affects girls across their entire lifecycle, perpetuating the inequalities that trap girls in poverty.

The 5Rs of tax and human rights (revenue, redistribution, repricing, representation, and reparations) outline the ways in which tax policy can be designed to remedy inequalities and strengthen and uphold human rights instead. While a politically neutral tax system upholds the disparate outcomes, a progressive and feminist taxation policy based on the 5Rs of human rights and taxation has the power to fund essential public services, redistribute wealth, raise living standards, and uplift women and girls to their full potential.

³⁴ Human Rights Implications of Debt: A Life Cycle Approach (AFRODAD TV, 2024) [5:58], <https://www.youtube.com/watch?v=Bg6jYPna9EM>.

³⁵ Andrea Larios Campos, Global Tax Governance from a Feminist Perspective (DAWN Feminist, n.d.), accessed 24 Nov. 2025, <https://www.dawnfeminist.org/feminist-macroeconomics/rethinking-tax-power>.

THE LIFECYCLE EFFECTS OF TAX ABUSE, DEBT, AND ILLICIT FINANCIAL FLOWS

INFANCY

1 In 5 infants miss basic vaccines, leading to 30 million preventable childhood illnesses.¹

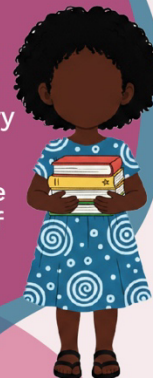
Infant girls face higher malnutrition² and the highest under-five mortality rates.³



EARLY CHILDHOOD

School costs push families to pull girls out first. 18.8 million girls are already out of primary school.⁵

From early childhood, girls take on unpaid care work instead of learning.⁶



ADOLESCENCE

Period poverty, unsafe classrooms, and poor quality education make it difficult to attend and stay in school.

34 million secondary school age girls are out of school.⁷

When girls can't stay in school, child marriage becomes a survival strategy.⁸

YOUNG ADULT

In sub-Saharan Africa, 37% of women aged 20 to 24 were married or in a union before the age of 18.⁹

Economic contraction pushes women into low-wage, insecure jobs: 90% of working women in sub-Saharan Africa engage in informal employment.¹⁰

MOTHERHOOD & ADULTHOOD

45% lack maternal care; 60% miss postnatal care, driving high maternal deaths. Low contraceptive access drives high birth rates.¹¹

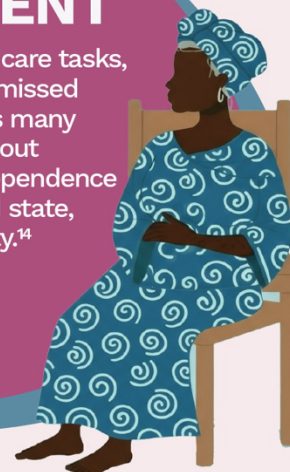
Increased care responsibilities push women into informal, unprotected work.¹²

Even in formal work, women earn & build far less wealth than men.¹³



RETIREMENT

A lifetime of unpaid care tasks, informal work, and missed opportunities leaves many elderly women without pensions, forcing dependence on the underfunded state, family, or community.¹⁴



Intergenerational inequalities

The problem with the feminisation of poverty perpetuated by debt, tax policy, and illicit financial flows is that it does not only impact one person, but it impacts whole generations throughout their lifetimes. When states don't provide, women and girls step in to fill the gaps. Women are expected to take on the role of caretaking for their families and communities, yet they are undervalued and uncompensated for their labour, perpetuating the systemic inequality that sustains wider gender inequality. As a result, social mobility may prove difficult or may elude a family or community. This feminisation of poverty is thus intra-generational and intergenerational.

The feminisation of poverty also prevents women and girls from obtaining the tools and resources needed to have autonomy over their lives and thus makes them more vulnerable to gender-based violence, including sexual violence. It means women lose bodily autonomy, leading to early marriages; face morbidity related to teenage pregnancy; and are coerced into physically unsafe work environments with sparse social protections to earn a meagre wage. When physically run down, exploited, and under-resourced, a state without the means to provide basic services leaves women with no recourse, stuck in a cycle of intersecting gender and economic inequalities.

The power of tax to remedy inequalities

Tax is our social superpower.³⁶ Tax has the power to raise revenue for states to fund necessary public services required to achieve effective gender equality. It also generates a commitment between state and citizen, thereby strengthening the accountability of governments to their people.³⁷

Effective taxation delivers the 5Rs of tax and human rights (see graphic below) and has the power to reshape our societies and economies to respond to the needs of the people and planet. Tax generates *revenue* to fund public services and can deliver *redistribution* to curb inequalities. It is a tool for *repricing* public goods and 'bads' and can provide *reparations* for past wrongs. Tax is also important in strengthening political *representation* by reinforcing the social contract between states and citizens and making governments more responsive to their citizens.

The only way for the international tax system to work fairly and effectively for all is for it to be rooted in the achievement of substantive

³⁶ Alex Cobham, *What Do We Know and What Should We Do about...?: Tax Justice* / Alex Cobham., *What Do We Know and What Should We Do About*. (London; Thousand Oaks, California.; 2024).

³⁷ Liz Nelson, *Tax Justice & Human Rights: The 4 Rs and the Realisation of Rights* (Tax Justice Network, 2021), <https://taxjustice.net/reports/tax-justice-human-rights-the-4-rs-and-the-realisation-of-rights/>.

equality within and among countries, and in sustainable development for people and planet. The moment to do so is now. Countries are currently negotiating a UN Framework Convention on International Tax Cooperation. Their mandate is “to strengthen international tax cooperation and make it fully inclusive and more effective”.³⁸ This requires countries to ground their cooperation, and the resulting convention, in the achievement of the Sustainable Development Goals and in the fulfilment of human rights, respecting the principles and actions they have already committed to in other international agreements. The most recent draft of the Framework Convention, released in October 2025, however, included only a brief mention of sustainable development, without even referring to the UN’s own Sustainable Development Goals.³⁹ It is crucial that states make explicit the link between the fair allocation of taxing rights and both the achievement of the Sustainable Development Goals, and the protection and fulfilment of human rights.

³⁸ Secretary General, Report of the Second Session of the Ad Hoc Committee to Draft Terms of Reference for a United Nations Framework Convention on International Tax Cooperation, A/79/333 (United Nations, 2024), <https://docs.un.org/A/79/333>.

³⁹ Co-Lead’s Draft Framework Convention Template (United Nations Department of Economic and Social Affairs (UNDESA), 2025), <https://financing.desa.un.org/inc/thirdsession>.

The 5 Rs of tax and the future of public services

Our tax systems are our most powerful tools for creating just societies that gives equal weight to the needs of everyone. Here's what our tax systems can deliver if we reprogramme them to work for everybody, instead of just the wealthy few:

Revenue

to fund universal public services and sustainable infrastructure



Every second, a nurse's yearly salary is lost to a tax haven. Over \$483 billion in tax is underpaid worldwide each year by corporate giants and the superrich that could be going to our public services.

Women provide 71% of unpaid dementia care hours globally. Tax can fund public caregiving systems, redistributing and reducing care burdens.



Redistribution

to curb inequality between individuals and between groups

Repricing

to limit public "bads" like carbon-intensive products and promote "goods", like sustainable local production



A lower VAT rate on public transport fares and a higher tax rate on vehicle ownership can increase use of public transportation. Higher taxes on ownership of private jets and other highly polluting transportation can discourage their use by the superrich.

Reliance of government spending on tax revenues is strongly linked to higher quality of governance and political representation.



Representation

to strengthen democratic processes and improve democratic governance

Reparation

to redress the historical legacies of colonisation and ecological damage



Reprogramming the global tax system to protect people's needs and rights can help countries fund a transition to food systems that serve people and planet.

Case study - What would it look like if African countries recovered revenue lost to tax abuse?

The Government Revenue and Development Estimations (GRADE) model uses data to demonstrate the expected effect of an increase of government revenue on some Sustainable Development Goal indicators.

The model shows that an increase in government revenue is correlated with improved progress towards the Sustainable Development Goals, and this progress can be amplified considerably with an improvement in governance. Combined with findings that increases in government revenue also lead to improved governance, this data affirms the crucial importance of curtailing illicit financial flows.⁴⁰

Additionally, an increased tax-to-GDP ratio provides a sustainable and reliable revenue base, reducing dependency on external borrowing and debt. Most governments today would need to expand their tax-to-GDP ratios by at least five percentage points to achieve the SDGs and ensure governments have sufficient revenue to address the multiple issues of the polycrisis.⁴¹

If we were to recover the US\$8.3 billion that African countries lose every year to tax abuse,⁴² the effects from 2025 to 2035 show just how much African women and girls are missing out on.

Effects of Increased Revenue on Key SDG Indicators from 2025⁴³

SDG factor	2030	2035
Electricity & fuel		
Women and girls 15-49 with increased access to clean fuels	634,018	1,459,591
Women and girls 15-49 with increased access to electricity	1,548,376	1,563,120

⁴⁰ Bernadette O'Hare and Stephen Hall, 'The Impact of Government Revenue on the Achievement of the Sustainable Development Goals and the Amplification Potential of Good Governance', *Central European Journal of Economic Modelling and Econometrics*, 14/2 (2022), 109–29, <https://doi.org/10.24425>.

⁴¹ Carolina Finette, *Stolen Futures: The Impacts of Tax Injustice on the Right to Education* (Tax Justice Network, 2024), <https://taxjustice.net/reports/stolen-futures-the-impacts-of-tax-injustice-on-the-right-to-education/>.

⁴² Tax Justice Network, 'State of Tax Justice 2024'.

⁴³ These figures were produced using revenue loss estimates from the State of Tax Justice 2024 data from the Tax Justice Network and the Government Revenue and Development Estimations (GRADE) model. Revenue was calculated as a percentage of GDP, which was then input into the GRADE model and projected over a 10-year period. We then used the results from African countries and present the sum of the results for the selected indicators relevant to gender equality for all African countries over a 5- and 10-year period.

SDG factor	2030	2035
Water & sanitation (SDG 6)		
Women and girls 15-49 with increased access to basic sanitation	913,506	2,127,540
Women and girls 15-49 with increased access to basic water	32,238	100,190
Education - teachers		
Additional lower-school teachers (number)	4,309	11,900
Additional primary-school teachers (number)	894	10,836
Additional upper-school teachers (number)	3,595	3,678
Total additional teacher (all levels)	8,798	26,414
Education - students		
Additional girls in lower secondary education	32,245	100,197
Additional girls in primary education	177,569	192,203
Additional girls in upper secondary education	22,878	24,394
Total additional girls in school (all levels)	232,692	316,794
Health & nutrition		
Children < 5 who no longer experience stunting	81,315	285,807
Maternal deaths averted	906	2,000
Under-5 five deaths averted	216	40,345

In this scenario, wherein we have curbed tax-related illicit financial flows, approximately 1.5 million women and girls would have increased access to clean fuels and electricity. Access to electricity has the potential to alleviate poverty and is associated with better health outcomes and educational attainment, especially for girls and women. Clean fuels and a transition to renewable energy sources are crucial for achieving global climate goals, which also greatly affect the lives of women and girls.⁴⁴

We would also see an additional 300,000 girls enrolled in school by the year 2035, and they would have an additional 26,000 teachers in charge of their education. This represents a crucial opportunity for girls to decide the direction of their future and reach their full potential. With increased access to basic water and sanitation, this also means a decrease in absences for menstruation and a decrease in the effort required for household tasks typically given to girls, further freeing their time for studies or other pursuits.

These effects only reflect the recovery of direct revenue losses. Indirect losses from global corporate tax abuse are estimated to be between 3-6 times larger than direct losses.⁴⁵ Recovering this revenue by curbing multinational profit shifting, for example, could result in 300 to 600 per cent more government revenue available for the improvement of Sustainable Development Goal progress.

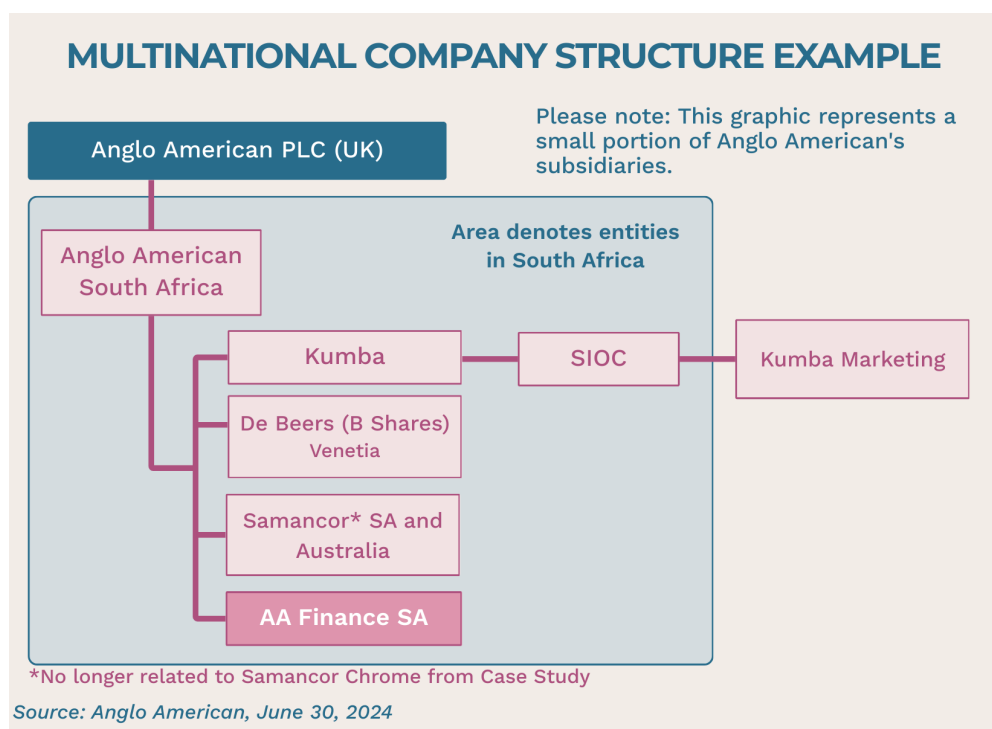
⁴⁴ Stephen G. Hall and Bernadette O'Hare, 'A Model of the Impact of Government Revenue and the Quality of Governance on Electricity and Clean Fuel Use', *Economies*, 13/6 (2025), 148, <https://doi.org/10.3390/economies13060148>.

⁴⁵ Tax Justice Network, 'State of Tax Justice 2024'.

Gendered impacts of illicit financial flows at a firm level

The impacts of tax-related illicit financial flows (TIFFs) are not only felt in terms of their effect on the tax system and national-level government revenues. Profit shifting and similar mechanisms have direct impacts at the level of an individual company as well, directly affecting workers, local communities, and others whose lives are intertwined with company operations.

The firm-level impacts of illicit financial flows are rooted in the way the international tax system works. Any multinational company, in reality, consists of a group of related companies sharing a common owner. For example, Anglo-American owns the Kumba Iron Ore mine in South Africa, but if you were to inspect the financial information of the Anglo-American headquarters in London, you would not find any mineworkers on their payroll. The mine is instead owned by a separate subsidiary company in South Africa, albeit one controlled and owned by the Anglo-American headquarters in London.



According to international tax law, each company pays tax on the income attributable to the country in which it is established. The purpose of profit shifting and other tax-related illicit financial flows is to shift the profits of one subsidiary company to another subsidiary company within the same group, exploiting the differences between countries' tax regimes. A common way in which this is done is to get a subsidiary in a low-tax country to invoice a company in a high-tax country for overvalued, or even fictional, services such as management fees or sales

commissions. From the perspective of the corporate group, this results in less tax paid overall.

This has a major impact on the source company from which profit is being shifted. This source company, usually in a high-tax country where it has a real economic presence, will be saddled with artificial costs aimed at reducing its taxable income. This reduces the capital available to that source company, which may have otherwise resulted in reinvestment, local development, improvements in working conditions, or the wages of employees.

Case study - Samancor Chrome

What happened?

In October 2019, the Association of Mineworkers and Construction Union (AMCU) filed court papers against Samancor, a South African chrome mining and smelting company and one of the largest ferrochrome producers in the world. The union, acting on the testimony and evidence of a whistleblower and former director, accused the directors of Samancor and its multinational owners of systematically shifting around 28 billion rand (approximately US\$4.8 billion at 2006 rates) in profits out of the country since 2006.⁴⁶

Samancor's multinational parent companies allegedly constructed a number of transactions designed to shift profits out of the company, including inflated sales commissions paid to a shell company in Malta, management fees to a Bahamas-based related company, and the sale of mineral-rich tailings at far below market rates.

What were the gendered impacts?

In South Africa, as in many countries, mining companies must agree to social and developmental obligations in order to secure a mining right. One of the most common mechanisms is the establishment of workers, community, women and youth trusts with some shareholding in the local mining company. Samancor had established a women's trust, called Nanka Investments, which held shares in Samancor. However, profit-shifting arrangements deprived Samancor of revenue, and its profits instead became the profits of related companies in tax havens. This meant that the local trusts, which only owned shares in Samancor and not the

⁴⁶ Miodrag Kon, 'Supporting Affidavit Submitted to the High Court of South Africa (Gauteng Division, Johannesburg) in the Matter Between Association of Mineworkers and Construction Union, Applicant, and Samancor Chrome Limited, First Respondent', n.d.

parent company, all lost out on dividends which were meant to benefit women, workers, and communities.

This demonstrates the ways in which profit shifting can act as a means for corporations to circumvent their social, environmental, and developmental commitments, by allowing them to declare that no profit has been made at the level of the local subsidiary which had agreed to these commitments, while declaring all of their profits in foreign subsidiaries with little to no real economic activity.

Case study - Lonmin and Marikana

What happened?

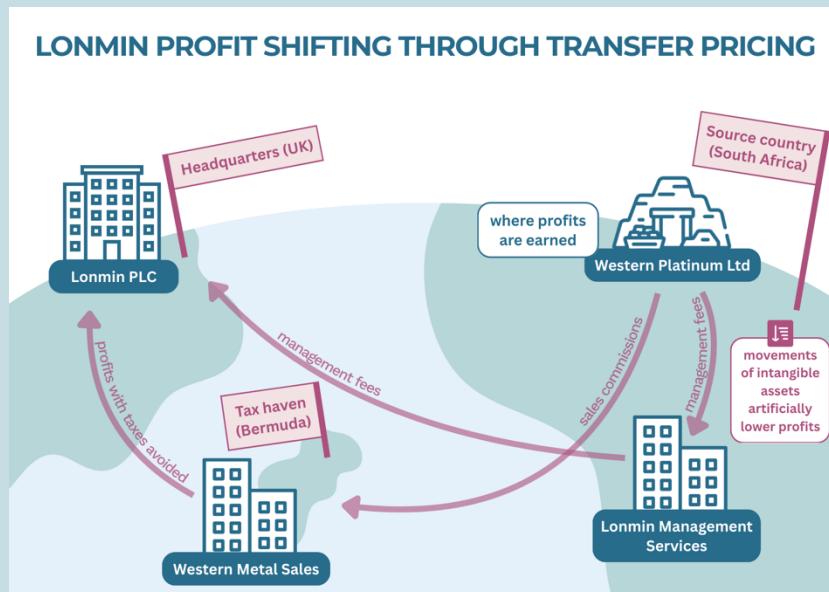
On 10 August, 2012, around 3000 miners began a wildcat strike at the Marikana platinum mine in South Africa, then owned by British multinational Lonmin. Driven by their growing frustration with low wages and the unfulfilled local development promises in the face of the massive profits extracted by Lonmin, the miners organised around their demand for a living wage of 12,500 rand (US\$1,647 in 2012), - with each mineworker responsible for between five to ten dependents.⁴⁷ Lonmin continued to insist that it did not have the money to meet these demands, and so the strike continued. Police were called in to break the strike, and ultimately opened fire, killing 34 miners. This prompted a formal multi-stakeholder investigation into the massacre and the surrounding circumstances.⁴⁸

As part of a research team supporting the investigation, Dick Forslund from the Alternative Information and Development Centre (AIDC) was asked to produce a report on the affordability of the workers' demands for Lonmin. Drawing from experience in a previous investigation on profit shifting, Forslund requested the annual financial statements (AFS) of Lonmin's subsidiaries from

⁴⁷ Ed Stoddard, 'Mine Workers Have Seen Significant Wage Growth since Marikana, but Social Burdens Undermine Gains', *Daily Maverick* (24 July 2022), <https://www.dailymaverick.co.za/article/2022-07-24-mine-workers-have-seen-significant-wage-growth-since-marikana-but-social-burdens-undermine-gains/>.

⁴⁸ Jared Sacks, 'Marikana Prequel: NUM and the Murders That Started It All', *Daily Maverick* (12 Oct. 2012), <https://www.dailymaverick.co.za/opinionista/2012-10-12-marikana-prequel-num-and-the-murders-that-started-it-all/>.

the commission and subsequently began an investigation that culminated in *The Bermuda Connection*; a report uncovering suspected profit-shifting practices at Lonmin between 1999 and 2012.⁴⁹



According to this report, Lonmin had been paying millions of dollars to related subsidiaries in Bermuda and the United Kingdom over the period preceding the strike, in the form of sales commissions and management fees. This was most likely a profit-shifting arrangement designed to underpay South African corporate tax. The report concluded that mineworkers' demands for a living wage, as well as social development obligations, could have been fulfilled if these profit-shifting arrangements were not in place.

What were the gendered impacts?

Asanda Benya, in her study of the conditions of women in Marikana, noted that women in Marikana undertook the social reproductive work that allowed Lonmin to continue paying low wages in the pursuit of profit. Women in the town were unlikely to find work and were therefore dependent on men who worked in the mines, acting as caregivers and performing household work without which “the men would not be productive workers, nor could their labour costs (wages) be so low.”⁵⁰ Women are often expected to undertake this kind of unpaid care work, which is essential to daily life but undervalued and often unrecognised, and the low wages paid by Lonmin reproduced this precarious and exploitative relationship.

⁴⁹ Dick Forslund, *The Bermuda Connection: Profit Shifting, Inequality and Unaffordability at Lonmin 1999–2012* (AIDC, 2015), <https://aidc.org.za/download/BermudaLonmin04low.pdf>.

⁵⁰ Asanda Benya, ‘The Invisible Hands: Women in Marikana’, *Review of African Political Economy*, 42/146 (2015), 545–60, <https://doi.org/10.1080/03056244.2015.1087394>.

Benya also noted the unevenness of “development”. Against a “backdrop of properly tarred and well-maintained mine roads that bring in the advanced mining equipment and take the ore out of the community”, in the community itself “there are mud roads, when it rains no car can drive in or out of Wonderkop. As a result, services are compromised.”⁵¹ Women recited the challenges this brings, including the death of an ill child who could not be reached by an ambulance. As a result of a lack of running water, women had to wake up in the early hours, risking sometimes dangerous terrain and assault in order to queue for water. In addition to upgrading the infrastructure, Lonmin had also promised to build 5,500 houses in the five years preceding the massacre but ultimately built only three show houses.⁵²

In the *Bermuda Connection* report, Forslund concludes: “Lonmin Plc chose in 2012 to continue implementing two profit- shifting arrangements – together costing the local subsidiaries well over 400 million rand (US\$48.8 million at 2012 rates) per year – instead of meeting its SLP obligations and responding adequately to demands for much higher worker incomes, both crises coming to the fore already in 2011 through a two-week strike, with Lonmin firing 9,000 workers, and ‘community unrest’.”⁵³

The “artificial unprofitability” of multinational enterprises

The cases of Samancor Chrome and Marikana and Lonmin demonstrate the consequences of the “artificial unprofitability” induced by tax-related illicit financial flows at the level of productive subsidiaries. Finally, we should add the dimension of gendered wage inequality. Alstadsæter and colleagues, in their study of Norwegian company data, finds that profit-shifting firms see an increase in the incomes of top-level employees, with a 10 per cent rise in CEO wages.⁵⁴ Of the sampled CEOs 90 per cent were men, reflecting the entrenchment of deep-rooted gender inequalities at the top end of the income distribution. These mostly male top executives employ profit- shifting and use illicit financial flows to enrich themselves. In the case of Samancor, these riches came at the expense of women’s dividend payments, while in the

⁵¹ Benya, ‘The Invisible Hands’.

⁵² Forslund, *The Bermuda Connection: Profit Shifting, Inequality and Unaffordability at Lonmin 1999-2012*.

⁵³ Forslund, *The Bermuda Connection: Profit Shifting, Inequality and Unaffordability at Lonmin 1999-2012*.

⁵⁴ Annette Alstadsæter et al., *Pennies from Haven: Wages and Profit Shifting*, CESifo Working Paper No. 9590 (Munich, 2022), <https://www.ifo.de/en/cesifo/publications/2022/working-paper/pennies-haven-wages-and-profit-shifting>.

case of Lonmin, the executives built their salary increases on the unpaid labour of the women and girls living in Marikana.

The profit-shifting arrangements of these multinational enterprises also replicate colonial models of extraction, siphoning profits and revenue from former colonies in Africa to the former colonial powers in the Global North. The current and former imperial powers have also dominated the rule setting for international tax regulations and transparency over the last century, while their former colonies suffer disproportionately from this exploitative relationship.

The UN Framework Convention on International Tax Cooperation offers an opportunity to transform the taxation of multinational corporate income. States should ensure that the Framework Convention includes its own separate article on the taxation of multinationals and should explore alternatives to the transfer pricing system. While reforming the transfer pricing system that has been in place for decades may seem like the easiest path, in the long run, multinational corporations will always find a way to exploit their operations across borders to pay as little as possible. Only a transformative and holistic approach – such as unitary taxation with formulary apportionment – can truly tackle the issue.

Gendered effects of financial secrecy

Financial secrecy can be defined as the use of complex financial mechanisms to hide assets for the purpose of underpaying tax or evading the rule of law.⁵⁵ Financial secrecy is a key driver of illicit financial flows, and efforts to combat secrecy and promote transparency are generally effective at combating and reducing illicit financial flows. The various forms of illicit financial flows – corruption, money laundering, tax abuse and evasion, among others – tend to occur together, because the same channels used for one are often used for others.⁵⁶

Anti-money laundering measures represent one way in which governments combat financial secrecy and aim to curb illicit financial flows through transparency measures. A jurisdiction with weak or ineffective anti-money laundering measures effectively issues a standing invitation to money launderers and criminals from around the world to deposit and launder the proceeds of crime and corruption through their financial system.⁵⁷

Comparative analysis of anti-money laundering and counter-terrorism financing legal frameworks

This section analyses the legal framework for anti-money laundering and countering the financing of terrorism (AML/CFT) in three African countries: South Africa, Senegal, and Rwanda. These countries were selected because they have made efforts in both strengthening their anti-money laundering and counter-terrorism financing measures and implementing gender-budgeting frameworks. These countries were deemed more illustrative than other countries which do not have the two legislative frameworks. The premise of the comparative analysis is that, should the anti-money laundering and counter-terrorism financing legislative framework lead to additional domestic resource mobilisation by successfully curbing illicit financial flows and leading to the repatriation of funds, the existence of a gender-budgeting framework would lead to using a portion of recovered revenue for gender-responsive and gender-transformative public investments. Commendably, the three countries have comprehensive laws and regulations regarding anti-money laundering and counter-terrorism financing. Their legal frameworks make provisions for the establishment of institutional infrastructure including, among others, policy

⁵⁵ 'What Is Financial Secrecy?', *Tax Justice Network* (n.d.), accessed 20 Oct. 2025, <https://taxjustice.net/faq/what-is-financial-secrecy/>.

⁵⁶ Lyla Latif, *Intensifying the Fight against Corruption and Money Laundering in Africa* (United Nations Office of the Special Adviser on Africa, 2022), <https://www.un.org/osaa/reports-and-publications/study-intensifying-fight-against-corruption-and-money-laundering-africa>.

⁵⁷ Tax Justice Network, 'FSI 2022 Methodology', 2022, <https://fsi.taxjustice.net/fsi2022/methodology.pdf>.

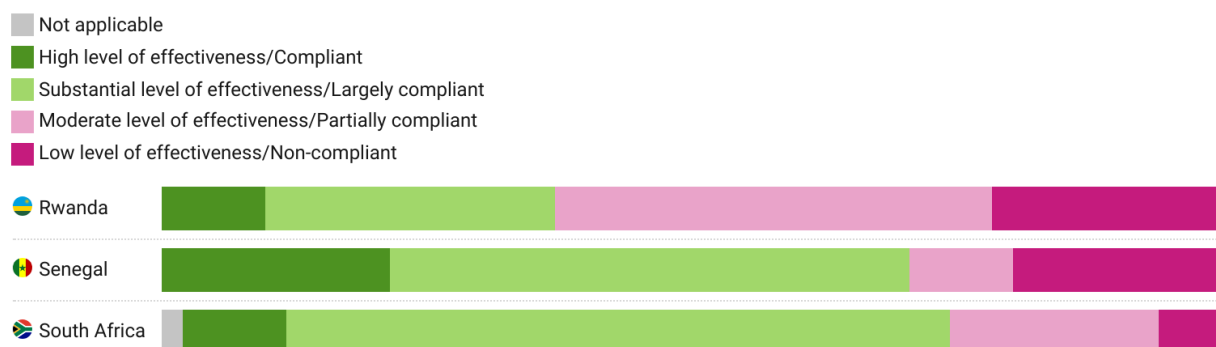
coordination bodies, government ministries, criminal justice and operational agencies, and financial-sector competent authorities that are set up for these functions. As a result, public funds are directed towards anti-money laundering and counter-terrorism financing efforts. What differs between each country's performance is the compliance levels for each of the forty recommendations specified in the Financial Action Task Force (FATF) standards. These demonstrate the strengths and weaknesses of the countries' anti-money laundering and counter-terrorism financing implementation efforts. Also revealed are the contextual challenges faced in enforcing the **Financial Action Task Force** standards.

The Financial Action Task Force (FATF)

The Financial Action Task Force is an intergovernmental organisation established in 1989 to combat money laundering and terrorist financing, and sets international standards to prevent these illegal activities, and assesses countries' compliance with these standards. The Financial Action Task Force's framework for anti-money laundering and countering the financing of terrorism aims to detect and prevent money laundering (the disguising of illicit funds); disrupt terrorist financing (the funding of violent extremism); and address proliferation financing (for example, nuclear weapons). To combat these activities, the Financial Action Task Force requires that countries pass legislation, set up institutional infrastructure including an independent Financial Intelligence Centre (FIC), resource and implement practices such as customer due diligence (CDD) and know-your-customer protocols, engage in suspicious transactions reporting (STR), provide beneficial ownership transparency, and cooperate internationally for intelligence sharing and asset recovery.

The graphic below demonstrates the level of compliance with the Financial Action Task Force's recommendations and immediate outcomes in the three countries studied, where green represents higher levels of compliance or effectiveness, and pink represents non-compliance or low levels of effectiveness.

Consolidated MER assessment ratings



Source: Financial Action Task Force • Created with Datawrapper

The Financial Action Task Force’s recommendations represent minimal financial transparency standards for a jurisdiction, but implementation of these measures is still critical for achieving a sufficient level of global financial transparency that can curb tax evasion and illicit financial flows.⁵⁸ Though sometimes criticised as regulatorily burdensome on developing countries, as well as for other reasons discussed later in this section, the Financial Action Task Force standards and its framework for anti-money laundering, countering the financing of terrorism, and countering proliferation financing help protect public revenue, strengthen governance, and reclaim stolen development finance when taken as minimum standards rather than the end goal.

Rwanda

Rwanda’s legal framework

Rwanda is a member of the Eastern and Southern Africa Anti-Money Laundering Group (ESAAMLG), a Financial Action Task Force-Style regional body. Since the 2014 Mutual Evaluation Report, Rwanda has taken reasonable steps to strengthen its institutional and legal arrangements, but despite this resource challenges prevail. Rwanda established a robust anti-money laundering policy, strategy, and legal framework, supported by strong political commitment. This was demonstrated through the elaboration of key policies and strategies, and the establishment of the coordination council responsible for the formulation, coordination, and implementation of anti-money laundering policies and strategies. Among the institutions established is a Financial Intelligence Centre (FIC), which plays a key role in overseeing anti-money laundering, countering the financing of terrorism, and countering proliferation financing activities, and in policy development and implementation. Moreover, relevant authorities — supervisory authorities and Law Enforcement Authorities (LEAs) — have incorporated anti-money laundering specific efforts into their strategies.⁵⁹ According to the 2024 Mutual Evaluation Report, Rwanda is compliant in Recommendations 9, 20, 21 30 and 32, which, respectively, concern financial institution secrecy laws; reporting of suspicious transactions; tipping-off and confidentiality; responsibilities of law enforcement and investigative authorities; and cash couriers. However, Rwanda is rated as non-compliant with Recommendation 8 for lacking effective measures to identify non-profit organisations at risk for terrorist financing abuse, and for failing to implement procedures for reporting such organisations. Along with only partial compliance in

⁵⁸ Tax Justice Network, ‘FSI 2022 Methodology’.

⁵⁹ Republic of Rwanda, ‘2024 National Money Laundering and Terrorist Financing Risk Assessment’, 2024, <https://icparwanda.com/wp-content/uploads/2025/05/2024-NRA-Report.pdf>.

twenty other recommendations, Rwanda still has major improvements to make in the understanding of money laundering and terrorist-financing risks, the investigation and prosecution of money laundering and terrorist financing, legal persons and arrangements, new technologies, targeted financial sanctions, and preventive measures in order to strengthen its anti-money laundering framework.⁶⁰

Rwanda's gender-responsive budgeting framework

Rwanda's Organic Budget Law No 12/2013, institutionalised the country's Gender Responsive Budgeting Framework (GRBF). This law enforces accountability measures for gender sensitive resource allocation across sectors, programmes and projects through Gender Budget Statements - a mandatory annex of the Budget Framework Paper submitted to both chambers of Parliament. The budget circular, which forms the basis for budget formulation and preparation, provides clear guidance for the preparation of gender budget statements, thereby facilitating the allocation of government resources aimed at improving gender equality across all key sectors of the economy. The allocation of resources in the budget proposals also provides a basis for tracking the use of such resources. Rwanda's gender-responsive budgeting framework is institutionally anchored in the Ministry of Finance (MINECOFIN); the Gender Monitoring Office; and the Ministry of Gender and Family Protection (MIGEPRO). The establishment of the Gender Monitoring Office under the Office of the Prime Minister signals strong political leadership and ownership. This creates a top-down administrative structure for monitoring and evaluating the performance of services that have an impact on gender.⁶¹ Monitoring of progress is also executed through the Gender and Financial Inclusion Thematic Reports;⁶² and the Gender Management Information System, which is used for reporting on gender-mainstreaming status. Civil society plays an oversight role and engages in advocacy calling for stronger enforcement of the gender-responsive budgeting framework.

Moreover, the Rwanda government mandated the use of a supplementary framework for assessing Gender-Responsive Public Financial Management (GRPFM), which has nine (9) indicators. These nine (9) indicators were designed to assess the processes and systems across the government's budget cycle for the promotion and

⁶⁰ *Anti-Money Laundering and Counter Terrorist Financing Measures: Rwanda*, Mutual Evaluation Report (Eastern and Southern Africa Anti-Money Laundering Group, 2024), <https://www.fatf-gafi.org/en/publications/Mutualevaluations/Mutual-evaluation-rwanda-2014.html>.

⁶¹ *Finscope 2024 Gender & Financial Inclusion Thematic Report* (Access to Finance Rwanda, 2025), <https://www.bnr.rw/documents/Rwanda-FinScope-2024-Gender-Thematic-Report3.pdf>.

⁶² *Finscope 2024 Gender & Financial Inclusion Thematic Report*.

empowerment of women's rights.⁶³ Other implementation tools include the Gender Budget Statements (GBS), the Imihigo (a performance management framework), public-sector performance contracts, and the use of sectoral gender indicators.

Rwanda reports successes, such as the fulfilment of the constitutional obligation of meeting numerical targets for women in decision-making organs, where the executive has more than 50 per cent women, while Parliament has 61 per cent women. Its legal and policy frameworks have contributed tremendously to consistent gender mainstreaming in various institutions for both men and women, girls and boys. Women have gained skills through the National Employment Programme (NEP), where they have been trained on various trades. Enrolment in schools and universities has increased for girls, compared to the previous five years. This is critical for addressing the problem of feminisation of poverty, driven by the economic marginalisation of women. The Government of Rwanda scrapped the value-added tax on sanitary pads - a significant step towards ending period poverty.

As much as there has been significant progress, the country still needs to generate and capture more gender-disaggregated data across departments to improve efficiency. Budget allocations are inconsistent year on year, and the main economic sectors critical for enhancing gendered inclusivity are under-resourced. Capacity to analyse gender gaps that exist in programmes and sub-programmes is limited, hamstringing implementation despite the legal and policy robustness of the gender-responsive budgeting framework.⁶⁴

To address these challenges, Rwanda needs to build technical capacity for the collection of gender analytical skills for gender-disaggregated data.⁶⁵ The country must enhance enforcement of the production and implementation of gender budget statements by ministries and agencies, including through gap analysis. There must be consistency in public-sector oversight by systematically mainstreaming gender-equality dimensions into accountability mechanisms used in the country. such as the Imihigo, public hearings, Umuganda, and others. Progressively increasing budget allocations to key programmes, sub-programmes, and sectors is critical.⁶⁶

⁶³ Public Expenditure and Financial Accountability (PEFA) Program, 'Supplementary Framework for Assessing Gender Responsive Public Financial Management', n.d., accessed 1 Dec. 2025, <https://www.pefa.org/gender>.

⁶⁴ John Mutamba and Cyuma Mbayiha, *Rwanda: Integrating Gender Responsive Budgeting into the Aid Effectiveness Agenda* (2008), <https://gender-financing.unwomen.org/en/resources/i/n/t/integrating-gender-responsive-budgeting-into-the-aid-effectiveness-agenda-rwanda-report>.

⁶⁵ *Report on Gender Responsive Budgeting 2019-2020: Rwanda Civil Society Analysis of Gender Budget Statements* (Rwanda Civil Society Platform (RCSP), 2019), <https://rcsprwanda.org/report-on-gender-responsive-budgeting-2019-2020/>.

⁶⁶ *Report on Gender Responsive Budgeting 2019-2020: Rwanda Civil Society Analysis of Gender Budget Statements*.

The Rwanda model shows that a gender-responsive budgeting framework can not only be institutionalised, but that gender equality can be directly linked to national development goals. Rwanda provides a replicable framework for other African countries seeking to align fiscal policy with gender equality.

Senegal

Senegal's legal framework

Senegal's approach to anti-money laundering and countering the financing of terrorism is anchored by a framework of national laws and regional directives.⁶⁷ This framework establishes the legal and operational mechanisms for preventing, detecting, and prosecuting financial crimes. The Senegalese approach prioritises the fight against corruption and the misappropriation of public funds. Senegal replaced the Court for the Repression of Illicit Enrichment (CREI) – which tried several cases involving Politically Exposed Persons (PEPs) – with the Financial Judicial Pool⁶⁸ in order to improve efficiency by expediting investigations and prosecutions and ensuring that financial crimes are addressed swiftly and effectively. The desired effect: deterrence of illicit financial flows, corruption, and the recovery of illicit financial flows.

Senegal has considerably improved its anti-money laundering, counter-terrorism financing, and counter-proliferation financing legal framework by enacting laws that retain already positive aspects while addressing shortcomings. The main legislative change in Senegal since the release of fifth Follow-Up Report is the promulgation of Act 2024-08 of 14 February 2024 on the fight against money laundering, terrorist financing, and the proliferation of weapons of mass destruction, which built on the strengths of and addressed the shortcomings of Law No. 2018-03 of February 23, 2018, on combating money laundering and terrorist financing. In 2025, Senegal further tightened its legal framework by passing new laws. Bill No. 12/2025, which expands the mandate of the Office National de Lutte Contre la Corruption (OFNAC - National Office for Combating Corruption), granting it investigative powers and autonomy. Bill No. 13/2025, which reforms asset declaration law, lowering thresholds and broadening coverage to include mid-level officials and state-owned enterprises. However, it still exempts the president from declaring assets at the end of their term, in line with the Constitution. Lastly, Bill No. 15/2025, which establishes a Special Fund

⁶⁷ 'Senegal – AML & Sanctions Compliance Guide 2025', Anqa Compliance, 2025, <https://www.anqacompliance.com/senegal-aml-gabia>.

⁶⁸ Ibrahima Diallo, 'Le Pool Judiciaire Financier est Fin Prêt', Société, *SenePlus* (10 Aug. 2024), <https://www.senepius.com/societe/le-pool-judiciaire-financier-est-fin-pret>.

for Confiscated Assets, earmarked for reinvestment in public services, with potential for gender-responsive budgeting.

The Inter-Governmental Action Group against Money Laundering (GIABA) is a specialised institution of the Economic Community of West African States (ECOWAS) and a Financial Action Task Force–style regional body. According to the 2024 Follow-up Report by GIABA, Senegal is Compliant with Recommendations 2, 4, 5, 7, 9, 20, 21, 27, 31, 34, 37, which, respectively, concern national cooperation and coordination; confiscation and provisional measures; terrorist financing offences; targeted financial sanctions related to proliferation; financial institutional professional secrecy laws; suspicious transactions reporting; disclosure and confidentiality; powers of supervisory authorities; powers of law-enforcement and investigative authorities; guidance and feedback; and mutual legal assistance.

Senegal's gender-responsive budgeting framework

Senegal's 2001 Constitution recognises gender equality, and the country is a signatory to all the international human rights conventions, including the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW) and the African Charter on Human and Peoples' Rights. The National Strategy for Gender Equality and Equity (SNEEG) is the overarching policy guiding gender mainstreaming across sectors. Senegal implements performance-based budgeting that integrates gender indicators into budget planning and monitoring. Senegal distributes responsibility for gender budgeting more widely, to include units within departments or agencies.⁶⁹

Senegal's Gender-Responsive Budgeting Framework (GRBF) is institutionally anchored in the Ministry of Finance and Budget, the Ministry of Women, Family and Child Protection, and the National Gender Mechanism. The institutional framework, based on the national legal framework that promotes gender equality, facilitates implementation through the generation and monitoring of gender-disaggregated fiscal data, the compilation of gender budget statements, and budget circulars containing specific guidelines that link gender goals to programmes and performance indicators, and budget classification incorporating a gender perspective.⁷⁰ Parliamentary oversight is embedded in the framework. Senegal allows civil society to engage in participatory budgeting in some sectors and, in some cases, support implementation, in addition to playing an oversight role.

⁶⁹ *Stratégie Nationale Pour l'Egalité et l'Equité de Genre 2015* (Ministère de la Famille, de l'Entreprenariat Féminin, n.d.).

⁷⁰ UN Women, *Guide for Gender-Responsive Budgeting Facilitators: A Practical Approach* (n.d.), accessed 1 Dec. 2025, <https://africa.unwomen.org/en/digital-library/publications/2016/04/guide-bsg>.

As a result of the gender-responsive budgeting framework, evidence shows that girls' enrolment in school has increased. Women have repositioned themselves, as self-confidence, initiative, and willingness to undertake ventures have grown. The proportion of women in senior leadership roles and in the Economic, Social and Environmental Council (CESE) has increased. Efforts have been made to improve gender-disaggregated data and gender studies within the country to inform policy interventions.⁷¹

Challenges still to be tackled include weaknesses in monitoring and evaluation, which make it difficult to measure progress and identify constraints. Insufficient financial resources compromise implementation of the programmes and activities planned under the National Strategy for Gender Equality and Equity (SNEEG). Operational limitations make it difficult to achieve targets at the grassroots level, which can be resolved with stronger enforcement.⁷² Beyond the technical aspects, Senegal faces deeply entrenched gender stereotypes in society and within institutions, which perpetuate inequalities and discrimination. It, therefore, does not help that information about the National Strategy for Gender Equality and Equity is not sufficiently distributed to the general public and relevant stakeholders.⁷³

To address the challenges, the State needs to strengthen the integration of gender into development policies and plans through a cross-cutting and inclusive approach. The coordination, implementation, and monitoring and evaluation of interventions under the National Strategy for Gender Equality and Equity must be enhanced to ensure coherent and effective implementation. The capacities of public-sector staff in gender institutionalisation for the effective implementation of the National Strategy for Gender Equality and Equity need to be strengthened. More public-facing efforts must be undertaken to combat gender-based violence and cultural norms that reinforce gender inequality in society and particularly in the workplace.⁷⁴

This has led to strong gender mainstreaming across departments,⁷⁵ despite the absence of a dedicated gender law, as is the case in Rwanda.

⁷¹ Mutamba and Mbayiha, *Rwanda: Integrating Gender Responsive Budgeting into the Aid Effectiveness Agenda*.

⁷² Mutamba and Mbayiha, *Rwanda: Integrating Gender Responsive Budgeting into the Aid Effectiveness Agenda*.

⁷³ *Evaluation a Mi-Parcours De La Deuxieme Strategie Nationale Pour L'equite Et L'egalite De Genre (SNEEG 2)* (Ministère de la Famille, de l'Entreprenariat Féminin, 2023), <https://femme.gouv.sn/wp-content/uploads/2024/03/rapport-Eval-SNEEG-VF.pdf>.

⁷⁴ *Evaluation a Mi-Parcours De La Deuxieme Strategie Nationale Pour L'equite Et L'egalite De Genre (SNEEG 2)*.

⁷⁵ Diallo, 'Le Pool Judiciaire Financier est Fin Prêt'.

South Africa

South Africa's legal framework

Notable strengths of South Africa's anti-money laundering and counter-terrorism financing system are that South Africa is part of the Egmont Group, enabling secure cross-border intelligence sharing. It has a comprehensive legal framework for anti-money laundering and countering the financing of terrorism and is a direct member of the Financial Action Task Force. The country is starting to collect beneficial ownership information across several entities, and a central registry is maintained for companies and close corporations. Moreover, South Africa's public-private partnerships — for example, banks and financial-technology companies — (e.g. support compliance and enforcement).⁷⁶

However, South Africa's anti-money laundering and counter-terrorism financing system has its weaknesses and was placed on the grey list, formally known as being categorised under “Jurisdictions under Increased Monitoring”, as of February 2023 by the Financial Action Task Force.⁷⁷ This status indicates that the country is working on issues raised in the last assessment. The country has been working continuously on its anti-money laundering and counter-terrorism financing measures since then.⁷⁸ Areas of improvement for South Africa pertain to deficiencies in risk-based supervision, poor investigations and penalties for those implicated due to political interference and weak implementation of targeted financial sanctions for terrorist financing. The main domestic proceeds-generating predicate crimes are tax abuse, corruption and bribery, fraud, trafficking in illicit drugs, and environmental crimes. As a large economy and a regional financial hub for sub-Saharan Africa, South Africa has notable exposure to the threat of foreign proceeds of crime being laundered in or through the country. Sectoral risk ratings are high in the gambling, motor vehicle dealers and Krugerrand dealers, and medium to high for banks. The relatively low number of money laundering prosecutions and convictions represents the weakest aspect of the regime, with law enforcement agencies being significantly affected in the past decade by state capture. The limited number of cases also adds to the challenges in understanding risks.⁷⁹

⁷⁶ Financial Action Task Force (FATF), *Anti-Money Laundering and Counter-Terrorist Financing Measures – South Africa, 3rd Enhanced Follow-up Report* (FATF, 2024), <https://www.fatf-gafi.org/en/publications/Mutualevaluations/south-africa-fur-2024.html>.

⁷⁷ *Jurisdictions under Increased Monitoring – 24 February 2023* (Paris, 2023), <https://www.fatf-gafi.org/en/publications/High-risk-and-other-monitored-jurisdictions/Increased-monitoring-february-2023.html>.

⁷⁸ Financial Action Task Force (FATF), ‘South Africa’, n.d., accessed 4 Dec. 2025, <https://www.fatf-gafi.org/en/countries/detail/South-Africa.html>.

⁷⁹ <https://www.fatf-gafi.org/content/dam/fatf-gafi/mer/Mutual-Evaluation-Report-South-Africa.pdf>

According to the 2024 Follow-up Report of the Financial Action Task Force, South Africa is compliant with Recommendations 5, 21, 23, 30, and 31, which, respectively, concern terrorist financing offence; tipping-off and confidentiality; Designated Non-Financial Businesses and Professions (DNFBPs): other measures; responsibilities of law-enforcement and investigative authorities; and powers of law-enforcement and investigative authorities.⁸⁰

On 24 October 2025, the Financial Action Task Force removed South Africa from the grey list after having met its commitments under its action plan regarding the strategic deficiencies identified in February 2023, by: (1) demonstrating a sustained increase in outbound mutual legal- assistance requests that help facilitate money-laundering and terrorist financing (ML/TF) investigations and confiscations of a range of assets in line with its risk profile; (2) improving risk-based supervision of Designated Non-Financial Businesses and Professions (DNFBPs) and demonstrating that all supervisors apply effective and proportionate sanctions for noncompliance; (3) ensuring that competent authorities have timely access to accurate and up-to-date beneficial -ownership information on legal persons and arrangements, and applying sanctions for breaches of beneficial ownership obligations; (4) demonstrating a sustained increase in law enforcement agencies' requests for financial intelligence from the Financial Intelligence Centre (FIC) for money – laundering and terrorist-financing investigations; (5) demonstrating a sustained increase in investigations and prosecutions of serious and complex money laundering, and the full range of terrorist-financing activities in line with its risk profile; (6) enhancing the identification, seizure, and confiscation of proceeds and instrumentalities of a wider range of predicate crimes, in line with its risk profile; (7) updating its terrorist-financing risk assessment to inform the implementation of a comprehensive national strategy for countering the financing of terrorism ; and (8) ensuring the effective implementation of targeted financial sanctions and demonstrating an effective mechanism to identify individuals and entities that meet the criteria for domestic designation. South Africa is encouraged to continue working with the Financial Action Task Force and the Eastern and Southern Africa Anti-Money Laundering Group to sustain improvements in its anti-money laundering and counter-terrorism financing system.⁸¹

South Africa's gender - responsive budgeting framework

South Africa's Gender-Responsive Budgeting Framework (GRBF) was adopted in 2019 to close the gap between plans and budgets, with an

⁸⁰ Financial Action Task Force (FATF), *Anti-Money Laundering and Counter-Terrorist Financing Measures – South Africa, 3rd Enhanced Follow-up Report*.

⁸¹ *Jurisdictions under Increased Monitoring – 24 October 2025* (Paris, 2025), <https://www.fatf-gafi.org/en/publications/High-risk-and-other-monitored-jurisdictions/increased-monitoring-october-2025.html>.

overall approach of mainstreaming gender through the planning, budgeting, monitoring, evaluation, and auditing cycle.

The institutional anchors for the gender-responsive budgeting framework are the Department of Women, Youth and Persons with Disabilities and National Treasury. The roll-out of the gender-responsive budgeting framework has been slow since inception in 2019. South Africa is still at an early implementation stage. Activities implemented relate to awareness raising through roadshows in 2019, followed by roll-out in National and Provincial Departments, the development of the implementation plan, monitoring and reporting tools, advocacy and capacity building with departments, two forums held at national and provincial levels, and most recently an action plan for roll-out to local government, along with gender responsive auditing with the Auditor-General South Africa. Despite a pilot, the nationwide and cross-sectoral implementation of the gender-responsive budgeting framework across the public sector is yet to take off.

A 2021 review by the Commission on Gender Equality stated that the gender-responsive budgeting framework faced implementation challenges due to limited resources, both financial and human, required for effective implementation. There was also a lack of clarity regarding the roles and responsibilities of key ministries such as National Treasury, which is responsible for national fiscal policy formulation, and the Department of the Presidency, Monitoring and Evaluation (DPME), where the gender-responsive budgeting framework is housed under the Department of Women, Youth and Persons with Disabilities. There were unclear and ineffective communication channels regarding the specific roles and responsibilities of the departments involved in the gender-responsive budgeting framework, particularly among the core departments. In the absence of clear practice guidelines, establishing an effective mechanism for oversight and enforcement of the gender-responsive budgeting framework is impossible. As a result, the challenges identified are not due to weak conceptualisation.⁸² Challenges cited in a 2024 review by the Department of Women, Youth and Persons with Disabilities substantiate those in the 2021 Commission for Gender Equality (CGE) report, which highlighted a lack of cooperation and coordination between key national departments in the earlier years of the gender-responsive budgeting framework, limited resources, fragmented implementation, limited departmental capacity and uptake, weak accountability mechanisms, and insufficient political will and buy-in, as well as limited commitment across many state entities to embrace the gender-responsive budgeting framework. Lastly, the overhauling and uprooting of gender-blindness in government planning, budgeting, monitoring, evaluation, and auditing remains a painstakingly slow process.

⁸² Commission for Gender Equality, *Government's Gender Responsive Budgeting Framework: Commission for Gender Equality Review of Implementation Report 2021* (n.d.), <https://cge.org.za/wp-content/uploads/2021/07/CGE-Gender-Responsive-Budgeting-Framework.pdf>.

Therefore, the strength of South Africa's gender-responsive budgeting framework is yet to be truly tested in practice. The recommendations for now relate to the preliminary phases of the implementation stage. Perhaps, as in the case of Rwanda, the enactment of the framework into law would support the effective institutionalisation and implementation of gender- responsive budgeting in South Africa.

It will require political will to advance some of the reforms needed, including the enactment of the Employment Equity Amendment Bill and securing buy-in from other departments. Greater cooperation is required between the key national departments that are leading the implementation of the gender- responsive budgeting framework in South Africa. A quarterly review of government plans and budgets will ensure inclusion of indicators for women, youth, and persons with disabilities. All government departments must allocate a percentage of the national budget to programmes for women, youth, and persons with disabilities to implement the gender- responsive budgeting framework and report annually on related initiatives. Government departments are then expected to collaborate with the Auditor- General South Africa to include gender-responsive budgeting framework metrics in audits. Overall, there needs to be sufficient funding for the National Strategic Plan on Gender-Based Violence and Femicide (GBVF).

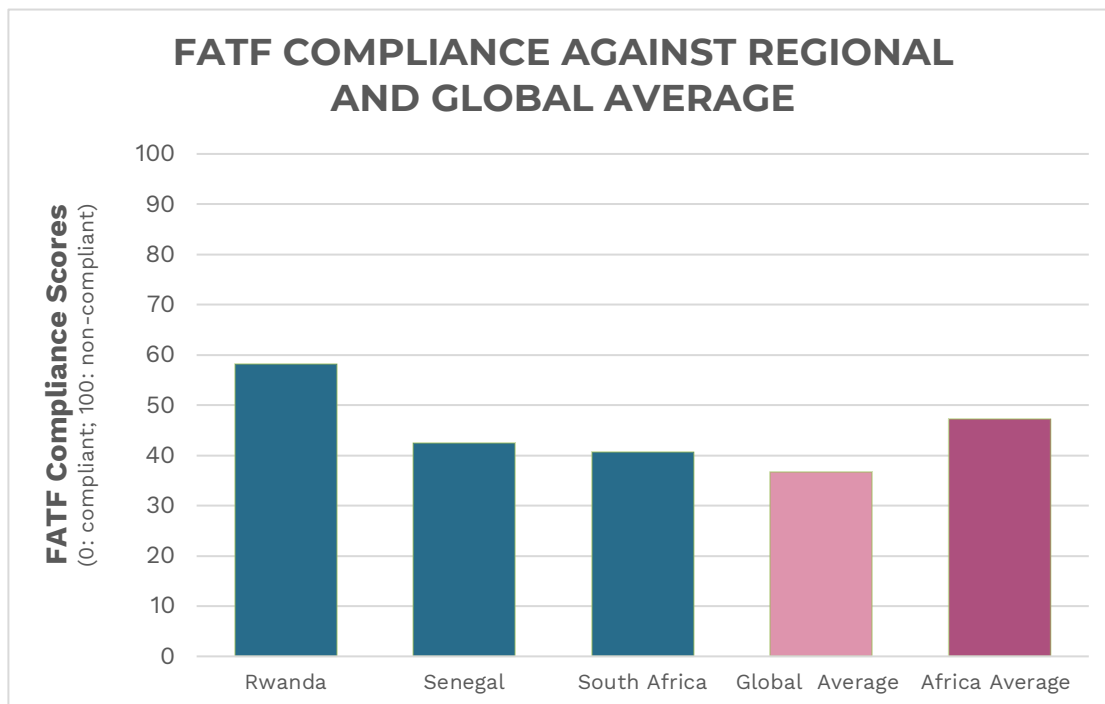
Noteworthy successes include the release of the country's first Gender Budget Statement in May 2025. In addition, a gender-sensitive Public Procurement Bill with preferential procurement provisions for women was assented to by the President in 2024.

This suggests that, even if there are gains from measures to curb illicit financial flows or from reclaiming resources lost through anti-money laundering, countering the financing of terrorism, and counter-proliferation financing systems, public spending will still be unlikely to be gender-responsive or gender-transformative without a fully functioning gender-responsive budgeting framework.

Comparative Analysis

Financial secrecy facilitates tax abuse and enables money laundering. Financial secrecy constrains and undermines the fiscal space needed for the realisation of human rights. The Financial Secrecy Index, a ranking of jurisdictions most complicit in helping individuals to hide their finances from the rule of law, includes an indicator that measures a jurisdiction's compliance with the recommendations of the Financial Action Task Force based on the latest peer reviews available. We have used the Financial Secrecy Index methodology to calculate this score based on the latest peer reviews available for Rwanda, Senegal, and South Africa. The chart below demonstrates the level of compliance with the recommendations of the Financial Action Task Force as a percentage from 0, which reflects a high level of compliance, to 100, which reflects

complete non-compliance, as well as the highest and lowest scores and the average rating for the African region.



South Africa has the best compliance rating at 40.7, followed by Senegal at 42.5. Rwanda has the lowest compliance rating among the three at 58.2, though it is noted that most of Rwanda's exposure to risk is domestic rather than international.

Gender budgeting framework comparison

	Rwanda ^{1, 2, 3, 4, 5}	Senegal ^{6, 7, 8, 9, 10}	South Africa ^{11, 12, 13, 14}
Policy document	Organic Budget Law No 12/2013	Organic Law on Finance Laws and National Strategy for Gender Equality and Equity (SNEEG)	Gender Responsive Budgeting Framework (GRBF), formerly the Framework on Gender -Responsive Planning, Budgeting, Monitoring, Evaluation and Auditing (GRPBMEAF)
Effective Year	2003	2001	2019
Legal/Policy foundation	<ul style="list-style-type: none"> - The Organic Budget Law No. 12/2013 made provisions for the set-up gender responsive planning and budgeting statement programme mandated in national and district budgets. - Integrated into public financial management reforms and Public Expenditure and Financial Accountability assessments. - Aligned with Vision 2020, the National Gender Policy, and the National Strategy for Transformation. 	<ul style="list-style-type: none"> - Anchored in the Organic Law on Finance Laws and the National Strategy for Gender Equality and Equity. - Integrated into national planning via the gender budget statement (Document Budgétaire Genre) and the National Transformational Agenda, Vision Senegal 2050. - Aligned with the Population Policy Declaration, the Poverty Reduction Strategy Paper, and the Millennium Development Goals. 	<ul style="list-style-type: none"> - National Policy Framework for Women's Empowerment and Gender Equality.
Mandate	Mixed: The Constitution and a robust legislative framework.	Mixed: The Constitution and a robust legislative framework.	Mixed: The Constitution and a robust legislative framework.
Institutional anchors	Ministry of Finance and Economic Planning (MINECOFIN); Gender Monitoring Office; Ministry of Gender and Family Protection (MIGEPRO)	<ul style="list-style-type: none"> - Ministry of Finance and Budget; Ministry of Women, Family and Child Protection - The National Gender Mechanism 	<ul style="list-style-type: none"> - Department of Women, Youth and Persons with Disabilities - National Treasury
Stated objective	To improve and promote gender equality and equitable treatment among men and women, boys and girls, through the planning and budgeting process at national and local administrative levels.	The National Strategy for Gender Equality and Equity therefore aims to contribute significantly to achieving the country's development objectives, while ensuring gender equality and equity.	Aims to ensure a sustainable, comprehensive, and multi-sectoral approach to gender mainstreaming within the country's planning, monitoring and evaluation, and public financing systems.
Implementation	<p>Yes:</p> <ul style="list-style-type: none"> - Implementation via sectoral government departments and local administrative entities such as districts, provinces, and other institutions. - Entails principles of equal access regardless of gender. - Implementations is reinforced by law. 	<p>Yes:</p> <ul style="list-style-type: none"> - Generation and monitoring of gender-disaggregated fiscal data. - Compilation of gender budget statements and budget circulars that contain specific guidelines linking gender goals to programmes and performance indicators. - Budget classification that incorporates a gender perspective, with parliamentary oversight. 	<p>Yes:</p> <ul style="list-style-type: none"> - Starting with awareness-raising through roadshows in 2019, followed by roll-out in national and provincial departments. - Development of the Implementation plan. - Development of monitoring and reporting tools. - Two forums at national and provincial levels.

		<ul style="list-style-type: none"> - Implementation by sectoral ministers and local government. - Beneficiaries are encouraged to be active participants. 	<ul style="list-style-type: none"> - One-one- one sessions with departments. - Training through the National School of Government. - National workshops. - Advocacy and capacity building. - An action plan to roll out to local government was developed. - An action plan on gender-responsive auditing with the Auditor-General South Africa.
Implementation tools	<p>Gender budget Statements (GBS)</p> <ul style="list-style-type: none"> - Imihigo performance contracts (performance management framework) - Sectoral gender indicators 	<ul style="list-style-type: none"> - Gender-sensitive templates - Sectoral gender scorecards - Project-level gender tagging - Collaboration protocols between the national gender mechanism and other partners - National gender and development information system - Monitoring and evaluation reports on the implementation of the National Strategy for Gender Equality and Equity, produced regularly by stakeholders - Annual status report submitted to the President of the Republic - Thematic briefing notes on gender issues across economic and social sectors to support advocacy for an institutional environment that promotes gender equality and integrates it into development 	<ul style="list-style-type: none"> - Gender expenditure tagging (pilot) - Gender-disaggregated data - Procurement reforms
Monitoring	<p>Yes:</p> <ul style="list-style-type: none"> - Gender and financial inclusion thematic reports - Gender management information system, which is used for reporting on gender mainstreaming status - Gender Monitoring Office evaluates the performance of gender-responsive budgeting based on nine indicators. 	<p>Yes:</p> <p>Coordination, monitoring, and evaluation carried out by the National Gender Mechanism</p>	<p>Yes:</p> <ul style="list-style-type: none"> - Six self-assessment reports drafted from 2019 to 2024 - Annual monitoring reports on the empowerment of women, youth, and persons with disabilities - International reporting through submission of annual solemn declaration reports - Reports are developed and tabled at various structures of government up to Cabinet level - Evaluation studies conducted to assess the efficiency and effectiveness of the Framework on Gender-

			responsive Planning, Budgeting, Monitoring, Evaluation and Auditing
Civil society role	Active civil society monitoring and analysis of gender budget statements, with advocacy for stronger enforcement	<ul style="list-style-type: none"> - Engage in participatory budgeting in some sectors - Civil society engaged in evaluation - Support for implementation in some cases 	Advocacy for deeper integration, with the Commission for Gender Equality and non-governmental organisations pushing for transparency and accountability
Recent innovations	Integration of gender in financial inclusion strategies as reflected in the FinScope 2024 findings	Alignment with the National Transformation Agenda, Agenda Senegal 2050, and updated gender-responsive templates for 2026–2028	Gender tagging introduced in the 2025 medium-term expenditure framework cycle, and procurement set-asides for women-owned businesses
Successes	<ul style="list-style-type: none"> - Fulfilled the constitutional obligation of achieving gender targets in decision-making bodies, with the executive comprising more than 50 percent women and parliament comprising 61 percent women - Legal and policy frameworks have contributed tremendously to the consistent gender mainstreaming in various institutions for both men and women, girls and boys. - Women have gained skills through the National Employment Programme, which provides training across multiple trades. - Enrolment in schools and universities has increased for girls compared with the previous five years - Value-added tax on sanitary pads has been removed, reducing period poverty 	<ul style="list-style-type: none"> - Girls' enrolment in school has increased - Women have gained self-confidence, initiative, and a greater willingness to undertake new ventures - The proportion of women in senior leadership roles has increased. - The proportion of women in the Economic, Social and Environmental Council has increased - Efforts have been made to improve gender-disaggregated data and gender studies to inform policy interventions 	<ul style="list-style-type: none"> - A bill on preferential procurement has been approved - South Africa's first gender budget statement was released in 2025
Challenges	<ul style="list-style-type: none"> - Limited availability of gender-disaggregated data. - Inconsistent budget allocations, with major economic sectors insufficiently gender budgeted in the gender budget statement. - Limited capacity to analyse gender gaps in programmes and subprogrammes across sectors 	<ul style="list-style-type: none"> - Need for harmonised templates and stronger enforcement - Deeply entrenched gender stereotypes in society and within institutions that perpetuate inequalities and discrimination - Information about the strategy is not sufficiently distributed to the public and relevant stakeholders - Weak monitoring and evaluation systems, making it difficult to measure progress and identify constraints - Insufficient financial resources that compromise the implementation of the programmes and activities planned under the 	<ul style="list-style-type: none"> - Lack of resources - Fragmented implementation - Limited departmental capacity and uptake - Weak accountability mechanisms - Lack of political will and buy-in, as well as limited commitment among many state entities to embrace the gender-responsive budgeting framework - Lack of cooperation and coordination between key national departments in the early years of the gender-responsive budgeting framework - The process of addressing and overturning gender-blindness in

		<p>National Strategy for Gender Equality and Equity</p> <p>- Operational limitations that make it difficult to achieve targets at the grassroots level</p>	<p>government planning, budgeting, monitoring, evaluation and auditing has been painstakingly slow</p>
Recommendations	<ul style="list-style-type: none"> - The government must provide further gender-analytical skills through capacity building of technical personnel - Consistency requires gender equality dimensions to be systematically mainstreamed in different accountability mechanisms like Imihigo, public hearings, Umuganda and others - Enforce the production and implementation of gender budget statements by ministries and agencies to address gap analysis - Progressively increase budget allocations to key programmes, subprogrammes and sectors - Build capacity for the collection and analysis of gender-disaggregated data 	<ul style="list-style-type: none"> - Strengthen the coordination and monitoring-evaluation of National Strategy for Gender Equality and Equity interventions to ensure coherent and effective implementation - Continue and strengthen the integration of gender into development policies and plans through a cross-cutting and inclusive approach - Strengthen capacities in gender institutionalisation for effective implementation of the National Strategy for Gender Equality and Equity - Strengthen measures to combat gender-based violence - Promote fairness and equality in policies and public services, including participation processes in public life - Promote equal opportunities and fight against discrimination to facilitate women's access to quality jobs 	<ul style="list-style-type: none"> - The legislation of the gender-responsive budgeting framework into law, as in other countries like Rwanda, to assist in the effective institutionalisation and implementation of gender-responsive budgeting in South Africa - It will require much more concerted efforts to assist the Department of Women, Youth and Persons with Disabilities in its efforts to implement the gender-responsive budgeting framework, and political will to push through some of the reforms required - Greater cooperation is required between the key national departments leading the implementation of the gender-responsive budgeting framework in South Africa - Quarterly reviews of government plans and budgets to ensure inclusion of indicators for women, youth and persons with disabilities - Ensure all government departments provide disaggregated data on women, youth and persons with disabilities - Developing and reviewing policies that advance and empower women, youth and persons with disabilities, such as the Employment Equity Amendment Bill - Implement an annual report specifically on initiatives for women, youth and persons with disabilities - Collaborate with the Auditor-General to include gender-responsive budgeting metrics in audits - Allocate a percentage of the national budget to programmes for women, youth and persons with disabilities - Ensure sufficient funding for the National Strategic Plan on gender-based violence and femicide

¹ Report on Gender Responsive Budgeting 2019–2020: Rwanda Civil Society Analysis of Gender Budget Statements (Rwanda Civil Society Platform (RCSP), 2019), <https://rcsprwanda.org/report-on-gender-responsive-budgeting-2019-2020/>.

-
- ² *Finscope 2024 Gender & Financial Inclusion Thematic Report* (Access to Finance Rwanda, 2025), <https://www.bnr.rw/documents/Rwanda-FinScope-2024-Gender-Thematic-Report3.pdf>.
- ³ 'Ministry of Gender and Family Promotion (MIGEPROF)', n.d., accessed 5 Dec. 2025, <https://www.migeprof.gov.rw/>.
- ⁴ Gender Monitoring Office, Republic of Rwanda, *The State of Gender Equality in Rwanda- Ensuring Gender Equality Gains from Sustainable Transformation* (Kigali, 2023), <https://africa.unwomen.org/en/digital-library/publications/2025/07/the-state-of-gender-equality-in-rwanda-ensuring-gender-equality-gains-from-sustainable-transformation>.
- ⁵ Ministry of Gender and Family Promotion (MIGEPROF), 'Revised National Gender Policy: Accelerating the Effectiveness of Gender Mainstreaming and Accountability for National Transformation', Feb. 2021, <https://migeprof.staging.risa.rw/index.php?eID=dumpFile&t=f&f=19753&token=950f76b103a1c3c084ab60920ab01dbc936a4303>.
- ⁶ UNIFEM, *Evaluation Report, UNIFEM's Work on Gender-Responsive Budgeting: Senegal* (New York, 2010), https://knowledge.unwomen.org/sites/default/files/Headquarters/Media/Publications/UNIFEM/Evaluation_GRB_Programme__Senegal_en.pdf.
- ⁷ Ministère des Finances et du Budget, République Sénégal, 'Document Budgétaire Genre 2025', Dec. 2024, https://www.finances.gouv.sn/app/uploads/www.budget.gouv._sn_document_budgetaire_genre_2025_2024-12-16_10-29.pdf.
- ⁸ Sadibou Sarr, 'Élaboration du budget 2026 – 2028 et compréhension du nouveau cadre budgétaire : le Centre de la CEDEAO pour le développement du Genre (CCDG) en retraite à Saly, république du Sénégal', *Centre de la CEDEAO pour le Développement du Genre* (14 Oct. 2025), <https://ecowasgender.org/ecowas-gender-development-centre-holds-retreat-in-senegal-on-the-2026-2028-budget-and-the-new-budgetary-framework/?lang=fr>.
- ⁹ *Stratégie Nationale Pour l'Egalité et l'Equité de Genre 2015* (Ministère de la Famille, de l'Entreprenariat Féminin, n.d.).
- ¹⁰ *Evaluation a Mi-Parcours De La Deuxieme Strategie Nationale Pour L'equite Et L'egalite De Genre (SNEEG 2)* (Ministère de la Famille, de l'Entreprenariat Féminin, 2023), <https://femme.gouv.sn/wp-content/uploads/2024/03/rapport-Eval-SNEEG-VF.pdf>.
- ¹¹ Commission for Gender Equality, *Government's Gender Responsive Budgeting Framework: Commission for Gender Equality Review of Implementation Report 2021* (n.d.), <https://cge.org.za/wp-content/uploads/2021/07/CGE-Gender-Responsive-Budgeting-Framework.pdf>.
- ¹² National Treasury Republic of South Africa, 'Gender Budget Statement', 2025, https://www.google.com/url?client=internal-element-cse&cx=018115738860957273853;j5zowsrmpli&q=https://www.treasury.gov.za/documents/National%2520Budget/2025May/review/Gender%2520Budget%2520Statement.pdf&sa=U&ved=2ahUKEwi6m8PCla6RAxVYA7kGHXKgNU4QFnoECAMQAAQ&usg=AOvVaw1ggy95V9f_AvJbSE7_n8H.
- ¹³ Department of Women, Youth and Persons with Disabilities, Republic of South Africa, 'Framework on Gender-Responsive Planning, Budgeting, Monitoring, Evaluation and Auditing', 2024, <https://dwydpd.gov.za/wp-content/uploads/2024/02/Framework-on-Gender-Responsive-Planning-Budgeting-Monitoring-Evaluation-and-Auditing.pdf>.
- ¹⁴ Dineo Mmako, Department of Women, Youth and Persons with Disabilities, Republic of South Africa, 'The Gender-Responsive Planning, Budgeting, Monitoring, Evaluation and Auditing Framework (GRPBMEAF)', July 2024.

Takeaways

Compliance with Financial Action Task Force standards for anti-money laundering, counter-terrorism financing and counter-proliferation financing indicates a jurisdiction's willingness to combat illicit financial flows and therefore protect public revenue, strengthen governance and reclaim stolen development finance. Thus, the Financial Action Task Force's recommendations, if complied with, have the potential to advance equity and system transformation through investment in the care economy, especially if the jurisdiction has incorporated an element of gender-responsive budgeting as well. Sustainable gender-responsive or transformative impact is possible if the recovered revenues from illicit financial flows are ring-fenced for programmes such as essential care infrastructure and public services that improve maternal health and access to contraceptives, access to water and sanitation and affordable electricity, and for the reduction of reliance on indirect and regressive taxes that disproportionately impact women.

Rwanda appears to have the most integrated system due to legislation and institutionalisation of both anti-money laundering and counter-terrorism financing and the gender-responsive budgeting framework. Moreover, the country is consistently improving its anti-money laundering and counter-terrorism financing mechanisms. Should resources gained from curbing illicit financial flows be ring-fenced, Rwanda would be in the best position to deliver gender-responsive and transformative change. The most striking feature about Senegal's anti-money laundering and counter-terrorism financing system is the criminalisation of politically exposed persons involved in corruption and illicit financial flows. South Africa's strengths are its membership in the Egmont Group, which enables secure cross-border intelligence sharing to improve prospects for recouping illicit financial flows, coupled with public-private partnerships that support compliance and enforcement.

All three countries would benefit significantly from integrating gender-disaggregated data into anti-money laundering and counter-terrorism financing protocols and corruption risk assessments to enhance gender-sensitivity and take into account the negative gendered impact of illicit financial flows, and to help identify sectors where women are most vulnerable to financial crime and tax abuse. This way, identification and implementation of remedial measures would be possible.

The three countries would also benefit from peer-to-peer learning in order to improve their anti-money laundering and counter-terrorism financing measures and implementation both within their borders and across them.

Finally, the Financial Action Task Force standards should set a target for a minimum level of financial controls – not the maximum. Additional transparency and public-disclosures measures, as well as measures specifically targeting corporate base erosion and profit shifting that fall beyond the scope of anti-money laundering and counter-terrorism financing, such as capital controls or macroeconomic and investment

policy, should also form part of an integrated approach to combatting illicit financial flows and corporate profit shifting.

Critical Analysis of the Financial Action Task Force

The Financial Action Task Force framework is critiqued for many reasons, including that it primarily focuses on crimes related to corruption, trafficking, and other forms of narrowly defined illicit financial flows while largely excluding commercial and tax-related illicit financial flows.

This has largely been the case in South Africa, with the Inter-Agency Working Group (IAWG) tasked with combatting illicit financial flows having a broad mandate, of which tax-related illicit financial flows are only one part. This is problematic; while there is a great deal of overlap, the issue of corporate cross-border tax abuse has specific characteristics and interactions with economic policymaking that fall beyond the mandate of a working group focused on the more criminal elements of illicit financial flows. This limits the efficacy of efforts by South Africa (or any other country, for that matter).

This necessitates further scrutiny of the Financial Action Task Force by the state and independent parties, including civil society organisations, even in areas deemed compliant by the task force. This is especially important because the Financial Action Task Force lacks legitimacy due to the absence of a legal convention that outlines its mandate and the extent of its powers. The task force also lacks transparency in how it operates. Therefore, for countries that are not direct members of the Financial Action Task Force, or those that believe they are negatively affected by its standards, this lack of operational transparency and governance is especially problematic.⁸³ Some countries bear unintended impacts of greylisting, such as reduced investment confidence, which negatively affects capital flows.⁸⁴ All the while, the Financial Action Task Force incurs limited accountability for the impact of its decision-making and ratings. Moreover, it is argued that the task force is inconsistent in the application of its standards. Further, developing countries are overly burdened by the demands of the task force because these standards are costly

⁸³ Tom Keatinge, Stephen Reimer, and Isabella Chase, 'Good Intentions: The FATF Faces Its Own Unintended Consequences', *Royal United Services Institute* (5 Aug. 2021), <https://www.rusi.orghttps://www.rusi.org>.

⁸⁴ Mizuho Kida, and Simon Paetzold, *The Impact of Gray-Listing on Capital Flows: An Analysis Using Machine Learning*, no. 2021/153, IMF Working Papers (International Monetary Fund (IMF), 2021), <https://www.imf.org/en/publications/wp/issues/2021/05/27/the-impact-of-gray-listing-on-capital-flows-an-analysis-using-machine-learning-50289>.

and countries are pressured to implement reforms rapidly.⁸⁵ At the same time, the Financial Action Task Force does not provide financial support to countries for the implementation of its standards.

⁸⁵ Sizwe Dlamini, 'The Consequences of FATF Grey Listing for SA: A Call to Action', *Sunday Tribune* (Durban) (8 Dec. 2024), <https://www.msn.com/en-za/money/financial-regulation/the-consequences-of-fatf-grey-listing-for-sa-a-call-to-action/ar-AA1vtcQv>.

Tax justice for tackling illicit financial flows and tax abuse

Tax justice seeks to establish an equitable system for how taxes are imposed and collected by governments and addresses disparities and inequalities arising from both domestic and international fiscal policies.⁸⁶ Effective states rely on taxation. The state must collect revenue to provide public goods and services, vital infrastructure, and the fundamental institutions that underpin quality governance.⁸⁷ The objective of tax justice is substantive gender equality – within and between countries – and social justice through fair and just taxation.⁸⁸

Currently, no state has achieved tax justice. There is no country free from tax abuse, no society that enjoys the kind of progressive and fair tax system necessary for a just and sustainable world in which the human rights of all are guaranteed.⁸⁹ We need to reprogramme our tax systems to work for all.

Tax justice necessitates that states collect revenue in a manner that is fair and just, and that redistributes the revenue in a way that promotes substantive equality and respects and fulfils human rights obligations. The way that tax is collected matters, and progressive taxation is essential for redistributive purposes. While a regressive tax system results in lower income taxpayers paying a disproportionate share of tax, a progressive system ensures that the burden of taxation is more evenly distributed by applying higher tax rates to those with higher income or more accumulated wealth.⁹⁰ Regressive taxes such as sales tax and excise taxes shift the tax burden onto consumers, which means that they disproportionately impact women as well.⁹¹

For decades, corporations and lobbyists have pressured governments into using tax as a tool for prioritising the desires of the wealthiest members of society to the detriment of human rights, sustainable

⁸⁶ Carolina Finette, *Stolen Futures: The Impacts of Tax Injustice on the Right to Education* (Tax Justice Network, 2024), <https://taxjustice.net/reports/stolen-futures-the-impacts-of-tax-injustice-on-the-right-to-education/>.

⁸⁷ Pete Coleman, 'Pinstripe Outlaws', in *The Greatest Invention: Tax and the Campaign for a Just Society* (United Kingdom, 2015), 33–7.

⁸⁸ 'What Is Tax Justice?', *Tax Justice Network* (n.d.), accessed 22 Oct. 2025, <https://taxjustice.net/faq/what-is-tax-justice/>.

⁸⁹ Layne Hofman, *The Fiscal Social Contract and the Human Rights Economy* (Tax Justice Network, 2024), <https://taxjustice.net/reports/the-fiscal-social-contract-and-the-human-rights-economy/>.

⁹⁰ *Introduction*, Progressive Taxation Briefings (ActionAid, 2018), <https://actionaid.org/publications/2018/progressive-taxation-briefings>.

⁹¹ 'Framing Feminist Taxation': *Making Taxes Work for Women* (Global Alliance for Tax Justice, 2021), <https://globaltaxjustice.org/news/framing-feminist-taxation-making-taxes-work-for-women/>.

development, and substantial equality.⁹² However, human rights provide a framework to raise and allocate resources fairly, remedy inequalities, support people—⁹³ participatory development and rebalance power in our economies. Fiscal policy needs to be grounded in the human rights principles and obligations that countries are already bound to by international law.⁹⁴

Advocates for tax justice have developed several policy priorities and conceptual frameworks crucial for the fight against illicit financial flows and tax abuse and the achievement of tax justice.

ABCs of transparency

As the foundational policies for promoting tax justice, the ABCs are fundamental in combatting illicit financial flows and the negative effects they have on women and girls.

Automatic exchange of information (AEOI)

Automatic exchange of information is a data-sharing process designed to expose corporations and individuals whenever they hide money to appear less wealthy to their governments and underpay tax. Wealthy individuals use banking secrecy to hide their assets from the authorities and the rule of law, shirking their responsibilities to the government and their fellow citizens. In fact, the majority of offshore wealth is still hidden from tax authorities: a staggering USD11 trillion.⁹⁵

The Common Reporting Standard (CRS) is the OECD’s multilateral instrument for automatic exchange of information about financial accounts. Since 2017, over 100 jurisdictions have been participating, sending and receiving financial account data on an automatic basis. There is some evidence that automatic exchange of information is effective in curbing offshore wealth, but the mechanism is flawed.⁹⁶ While more than 100 jurisdictions actively participate in the scheme,

⁹² Telita Snyckers et al., ‘Why the World Needs UN Leadership on Global Tax Policy’, *Tax Justice Network* (24 July 2023), <https://taxjustice.net/2023/07/25/why-the-world-needs-un-leadership-on-global-tax-policy/>.

⁹³ Amnesty International et al., ‘A Human Rights Economy: What Is It and Why Do We Need It’, Mar. 2025, https://cesr.org/sites/default/files/2025/HRE_briefing_mar12.pdf.

⁹⁴ Committee on Economic, Social and Cultural Rights, ‘Tax Policy and the International Covenant on Economic, Social and Cultural Rights’, 17 Mar. 2025, <https://www.ohchr.org/en/statements-and-speeches/2025/02/ec1220251-committee-adopts-statement-tax-policy-and-international>; Asociación Civil por la Igualdad y la Justicia (ACIJ) et al., *Principles for Human Rights in Fiscal Policy* (2021), <https://www.cesr.org/principles-human-rights-fiscal-policy/>.

⁹⁵ Tax Justice Network, ‘State of Tax Justice 2024’, 2024, <https://taxjustice.net/reports/the-state-of-tax-justice-2024/>.

⁹⁶ Mark Bou Mansour, ‘Did We Really End Offshore Tax Evasion?’, *Tax Justice Network* (20 Nov. 2024), <https://taxjustice.net/2024/11/20/did-we-really-end-offshore-tax-evasion/>.

lower-income countries receive little or no information.⁹⁷ As of 2023, only seven out of 54 African countries are able to engage in automatic exchange.⁹⁸ The alternative, bilateral information-exchange requests, can be slow, costly, and politically sensitive, especially when it comes to a nation from the Global South requesting information from a more powerful country in the Global North. Central to the goal of realising rights is addressing unequal power imbalances, making it more difficult for illicit financial flows to move between countries undetected. The largest financial centre, the United States, continues not to cooperate with the OECD Common Reporting Standard scheme, thereby facilitating significant revenue losses for those countries that need it most.

Beneficial ownership (BO) transparency

Beneficial ownership refers to publicly accessible registers of the beneficial owners of companies, trusts, foundations, and partnerships, ensuring that the real person, made of flesh and blood, who truly owns, controls or benefits from a legal vehicle is known. In recent years, major data leaks – from Lux Leaks to the Panama Papers, Luanda Leaks, the Malta Files, the Paradise Papers, the Pandora Papers, and most recently, Swazi Secrets – have revealed how politicians, public officials, and high-net-worth individuals abuse complex financial structures to underpay tax and have shattered the public’s already waning trust in the authorities and institutions that are supposed to protect their interests. Transparent and complete beneficial ownership registries can prevent the abuse of complex legal structures to hide wealth and assets and make it possible to hold tax abusers accountable.

As of January 2023, 23 of 54 African jurisdictions have a law or regulation requiring the declaration or registration of beneficial owners with a government authority for at least one type of legal vehicle, mostly for companies. While more countries have committed to registering beneficial owners in specific sectors such as extractives or government contracts, there is still much room for improvement on beneficial ownership transparency in the region.⁹⁹

⁹⁷ GRADE et al., *Submission Human Rights Council Universal Periodic Review (Fourth Cycle) United Kingdom of Great Britain & Northern Ireland* (2022), <https://medicine.st-andrews.ac.uk/grade/wp-content/uploads/sites/39/2022/12/Submission-to-Human-Rights-Council-Universal-Periodic-Review-Fourth-Cycle-UK-NI.pdf>.

⁹⁸ *Tax Transparency in Africa 2024: Africa Initiative Progress Report* (Global Forum, 2024), <https://web-archives.oecd.org/tax/transparency/documents/tax-transparency-in-africa-2024.pdf>.

⁹⁹ Rachel Etter-Phoya et al., *The State of Play of Beneficial Ownership Registration in Africa 2022* (Tax Justice Network and Tax Justice Network Africa, 2023), <https://taxjustice.net/reports/the-state-of-play-of-beneficial-ownership-registration-in-africa-2022/>.

Global Asset Registry (GAR)

The Global Asset Registry is a proposal to combine national beneficial ownership registries into a central registry and to include the owners of high-value assets such as properties, artworks, or aircraft, for example. This registry, often referred to as the GAR for short, would be the basis for enforcing wealth taxes as well as enabling a fully informed political discourse about wealth inequality and the wealth and poverty levels that we are willing to tolerate, either at the national level or globally.

Public country by country reporting (pCBCR)

Public country-by-country reporting is an accounting practice designed to expose a multinational corporation whenever it shifts its profits into tax havens to underpay tax by declaring its tax and profit paid by country. Country-by-country reporting is the best and most effective way to combat profit shifting, where companies shift profits into tax havens to pay less tax than they should. In fact, worldwide countries could have saved US\$475 billion in revenues lost to corporate tax abuse if public country by country reporting had been in effect from 2016 to 2021.¹⁰⁰ The level of transparency that can be afforded by public disclosure of country-by-country data shifts power away from corporate and elite interests and towards the general population, which is crucial for an effective fiscal social contract.

Unitary taxation with formulary apportionment

Unitary taxation with formulary apportionment is a way of taxing multinational corporations as a single unit based on where they carry out real economic activity rather than where they formally declare their profits. The goal is to ensure taxes are paid in the jurisdictions where economic activity is generated: specifically, where employees, markets and tangible assets are located. Multinational corporations currently take advantage of their operations across multiple borders to declare their profits in the most advantageous country, maximizing profit for themselves at the expense of both governments and citizens. The traditional notion of tax policy as a domestic matter to be settled by sovereign nations within their own borders is not consistent with the global economic reality.

The cases of Lonmin and Samancor demonstrate the perils of allowing multinational companies to operate as legally separate entities while strategising as a unified front to maximize profits at any cost. Unitary taxation with formulary apportionment has the potential to shift the

¹⁰⁰ Tax Justice Network, *The State of Tax Justice 2025* (2025), <https://taxjustice.net/reports/the-state-of-tax-justice-2025/>.

balance of power away from multinational corporations, tax havens, and resident countries, where headquarters tend to be located.

Unitary taxation in the UN Framework Convention on International Tax Cooperation

United Nations member states are currently negotiating a historic reform of the international financial architecture, which offers a once-in-a-generation opportunity to reprogramme international taxation rules more fairly and to distribute taxing rights among countries in an equitable way.

The first three rounds of negotiations have revolved around possible adjustments to the existing transfer pricing system rather than the structural transformations that can actually combat the injustices of the current system. However, these short-term measures must be supplemented with a long-term vision that seeks to replace the outdated transfer pricing system altogether. Embracing unitary taxation and formulary apportionment will create a simpler, fairer, and more inclusive system that allocates taxing rights based on where economic activity occurs, addressing the root problems of current international tax rules rather than reforming nexus rules that tax abusers will simply find new and creative ways to avoid.

It is therefore essential that a long-term roadmap towards a unitary tax system guides the reform of international corporate taxation, recognising and putting in place the building blocks necessary for such a system to succeed on a pragmatic level without compromising on the ultimate objective of replacing the transfer pricing system with a progressive and workable alternative.

Policy recommendations

Tax justice is essential for gender justice. There are multiple spheres where policy changes need to be made to truly bring about tax justice.

International cooperation

International collaboration is necessary to end the race to the bottom; one country cannot do it alone. Fortunately, the tides are beginning to turn on international cooperation to reform the international financial architecture and international tax rules. We urge all countries to engage in these processes and to recommend and endorse ambitious reforms that can bring about actual structural change that can improve the lives of all citizens, especially women and girls in all their diversity.

Transform international tax through the UN Framework Convention on International Tax Cooperation

The United Nations Framework Convention on International Tax Cooperation (UNFCITC) represents a once-in-a-lifetime opportunity to reform the international financial architecture in a way that effectively taxes multinationals and high-net-worth individuals, curbs illicit financial flows, and ends an era of profits and tax revenues draining freely from the African continent. This process and its resulting agreement will set the rules for intergovernmental negotiations both now and well into the future. We strongly urge states to:

- Advocate for a robust UN Framework Convention on International Tax Cooperation with clear, actionable commitments and an objective of achieving a fair allocation of taxing rights from the start.
- Advance a UN Framework Convention committed to the effective taxation of multinational enterprises and high-net-worth individuals, grounded in the ABCs of tax transparency and a path to unitary taxation with formulary apportionment.
- Ensure the inclusion of binding language on human rights, and specifically gender equality, in the text of the Convention and its protocols, as well as gender-specific mechanisms such as data and statistics disaggregated by sex and impact analyses in monitoring and evaluation procedures.

End the era of debt

Debt is debilitating African economies and perpetuating harmful colonial mechanisms of extraction from the African continent to the former and current colonial powers. As a result, it is essential to:

- Cancel illegitimate and unsustainable debts.
- Establish a UN Debt Convention to democratise debt governance and move away from lender-dominated institutions.
- End overly burdensome austerity requirements for developing countries to prevent disproportionate harm to women and girls.

South-South solidarity

South-South solidarity is critical for a cohesive and coherent movement by states and civil society against unjust global tax systems and the financial architecture that holds the global economy together. One avenue available to the South is a rights-based approach by which the South pushes back against international financial institutions' macroeconomic policies on the grounds of the human rights violations that arise from the policies, such as austerity and the way it deepens both economic and gender inequality.

- A global tax system that combats illicit financial flows must also address the way these flows contribute to states' inability to fulfil their human rights obligations and how they deepen gender inequality. The South should demand that the UN Framework Convention on International Tax Cooperation be just and unravel the underlying inequity and undue extraction from the Global South through Global North-centric tax rules.
- Sovereign debt, some of which is odious and colonial in origin, leads to prioritisation of debt payments over essential care infrastructure and services. The South should come together to demand debt cancellation.

Though the Global South is heterogeneous and there is need for intra-regional solidarity under regional intergovernmental bodies and economic blocs (depending on their progressiveness), there is also a need for inter-regional solidarity – South-South cooperation on international tax matters, given the shared colonial history and ongoing neocolonial exploitation. It may be necessary for regional intergovernmental bodies and economic blocs may to receive capacitation and coordinated lobbying for a change in approach and priorities.

G20 and other international institutions

The G20 is instrumental, if not central, to the way the global financial architecture functions. The G20, through the G20 Common Framework, works with the International Monetary Fund to determine debt rules. It is also involved in the formation of the Organisation for Economic Co-operation and Development and G20 Inclusive Framework, through which many global tax rules are drafted. The G20 is therefore at the helm of many important global decisions.

The G20 states indicate they will work together to stabilise the international tax system and enhance domestic resource mobilisation in the G20 South Africa Summit Leaders' Declaration, but their commitment to "continue engaging constructively regarding Pillar Two global minimum taxes..." is insufficient. The commitment in the Leaders' Declaration to significantly increase investment and social protection in the care economy is welcomed. However, this must be backed by a just and transformative global and national tax system that enables Global South countries to mobilise the resources required for care-economy investment.

- It is critical for the G20 to support a robust United Nations Framework Convention on International Tax Cooperation that seeks to reform global tax rules so that they are equitable and benefit all.
- The G20, together with the International Monetary Fund and the World Bank, must end recommendations of austerity measures for African countries and lift austerity requirements for existing loans.
- Ensure policy coherence so that taxation aligns with human rights and equality principles.
- Initiate global discussions on wealth taxation to address growing inequalities.
- Commit to strengthening progressive taxation at the national level to ensure that tax systems are fair and redistributive.

Emphatically, multilateralism is essential for achieving fair global tax systems. States must therefore continue sustained advocacy for this goal across all fora, including the United Nations (for example, the Office of the High Commissioner for Human Rights, the World Trade Organization and the UN Framework Convention on Climate Change), international financial institutions, the G7, G77, ASEAN, the African Union, MERCOSUR and the European Union, among others.

National provisions

Strengthening tax enforcement and transparency

Key efforts must focus on bolstering the capacity of revenue services and increasing transparency:

- **Fund enforcement:** Provide additional and targeted funding to revenue services to enhance their ability to audit and prosecute large corporations and high net worth individuals. This effort should be supported by a legal review process grounded in domestic resource mobilisation principles.
- **Improve interagency coordination:** Expand interagency efforts across relevant state departments to combat illicit financial flows. This coordination must be broadened to explicitly cover commercial illicit financial flows and base erosion and profit

shifting, prioritising these areas for the sake of revenue mobilisation.

- **Establish monitoring metrics: Implement** a robust methodology for monitoring and tracking illicit financial flows, particularly commercial illicit financial flows and base erosion and profit shifting, in alignment with UN Sustainable Development Goal 16.4.1 on reducing illicit financial flows. This establishes a high-level target to evaluate the performance of interagency efforts.
- **Increase financial transparency:** Push for stronger transparency provisions regarding tax, corporate financial information, and ownership data. The current balance is too heavily weighted toward privacy, which is unjustifiable given Africa's extreme inequality and urgent revenue needs. This must include ensuring centralised public access to beneficial ownership information.
- **Advocate for global reform:** Prioritise diplomatic efforts to transform the international corporate tax system through processes such as the United Nations Framework Convention on International Tax Cooperation. Domestic efforts should align with this diplomatic push, particularly in reforming the transfer pricing system.

Implementing a Tax Haven Defence Act

African states must adopt specific measures against jurisdictions known to facilitate corporate tax abuse through low tax rates, aggressive incentives, or lack of transparency.

- **Establish a domestic list:** Create a transparent process for determining and maintaining a domestic list of tax havens, updated annually as part of tax law amendments.
- **Defensive measures:** A Tax Haven Defence Act would allow African states to selectively deny tax relief to haven-based firms without imposing blanket changes. These targeted measures could include:
 - **Denying deductions:** Certain expenses arising from transactions with haven-based companies could be non-deductible from the taxable income of African companies.
 - **Higher Withholding Taxes:** Applying higher withholding tax rates on dividends, interest, royalties, and services related to haven-directed transactions.
 - **Excluding participation exemption:** Ensuring the participation exemption (a deduction for corporate income) does not apply to haven-based firms.
 - **Increased reporting:** Imposing additional reporting requirements for transactions involving haven-based firms.

Reforming international tax agreements and investment policy

The current network of agreements and the prevailing investment strategy must be critically reviewed to prevent tax base erosion.

- **Review double tax agreements (DTAs):** Many existing double tax agreements are highly problematic, often reducing statutory withholding tax rates to as low as 0%–5%, particularly with tax haven jurisdictions. African states must review and renegotiate these problematic treaties. At a minimum, no treaty should entirely exempt transactions from withholding taxes, nor should any treaty with a known conduit country or tax haven reduce tax rates below the statutory rate.
- **Reconsider investment hub strategy (race to the bottom):** The pressure to implement policies to position some African countries as “investment hubs” (for example, relaxed capital controls, generous provisions in double tax agreements, and tax exemptions such as a headquarters company regime) often undermines tax base protection. These measures risk attracting capital inflows related to treaty shopping rather than stable, long-term investment, and can turn African states into conduit countries for global tax abuse. If the goal of increasing investment attractiveness is pursued, it should not rely on tax incentives and legal exemptions. Instead, states should prioritise non-fiscal measures such as providing quality infrastructure, ensuring a skilled workforce, and facilitating local linkages to attract stable, productive foreign direct investment.

Future Research

The issues of tax and gender justice are complex and form only two dimensions of a wider, multi-layered ecosystem that varies across contexts. Therefore, contextual nuances need to be read into the analysis and recommendations. For instance, the impact of debt, austerity and illicit financial flows on Small Island Developing States (SIDS), may be similar in some respects but differ markedly from those faced by Sub-Saharan African or Latin American countries, despite their shared classification as Global South states. These dissimilarities are important to note for effective and context-specific advocacy. As noted, this was an Afrocentric study. Other intersections were not explored, such as the tax-debt-gender-climate nexus or trade-tax-gender nexus in Africa. This is not to negate their importance, as their analysis is vital for global economic governance reform that is genuinely gender transformative. They were simply outside the scope of this study.

Conclusion

This paper argues that tax justice is not only adjacent to, but fundamentally inseparable from, the pursuit of gender justice. We have put forward multiple areas where policy changes can contribute to the advancement of tax and gender justice.

It is our hope that this analysis serves not only as a diagnosis but also as a practical tool, equipping organisations with concrete alternatives to the current status quo around which they can organise and build.

Annex 1: Lifecycle graphic citations

- ¹ “Immunization | WHO | Regional Office for Africa.” December 5, 2025. <https://www.afro.who.int/health-topics/immunization>.
- ² Bain, Luchuo Engelbert, Paschal Kum Awah, Ngia Geraldine, et al. “Malnutrition in Sub – Saharan Africa: Burden, Causes and Prospects.” *The Pan African Medical Journal* 15 (August 2013): 120. <https://doi.org/10.11604/pamj.2013.15.120.2535>.
- ³ UNICEF, United Nations, World Bank, and World Health Organization. *Levels and Trends in Child Mortality - Report 2023*. Text/HTML. United Nations Inter-agency Group for Child Mortality Estimation (UNIGME), 2024. <https://documents.worldbank.org/en/publication/documents-reports/documentdetail/099606103132489570>.
- ⁵ David Archer and Ashina Mtsumi. *Transforming Education Financing in Africa: A Strategic Agenda for the African Union Year of Education*. 2024. <https://actionaid.org/publications/2024/over-18-million-girls-missing-school-africa-continent-loses-usd29-billion>.
- ⁶ Kit Catterson, Belen Garcia Gavilance, Keya Khandaker, and Adriana Marin Peroza. *Out of Time: The Gendered Care Divide and Its Impact on Girls*. Plan International, 2024. <https://plan-international.org/publications/out-of-time/>.
- ⁷ Uraidah Hassani. “A Critical Moment to Prioritize Girls’ Secondary Education in Sub-Saharan Africa.” *World Bank Blogs*, April 19, 2024. <https://blogs.worldbank.org/en/nasiliza/critical-moment-to-prioritize-girls-secondary-education-in-sub-saharan-africa-afe-0424>.
- ⁸ Child Marriage Coordinating Unit of the Ministry of Gender, Children and Social Protection (Republic of Ghana). “National Strategic Framework on Ending Child Marriage in Ghana 2017–2026.” November 2016. <https://www.unicef.org/ghana/media/1001/file/National%20Strategic%20Framework%20on%20Ending%20Child%20Marriage.pdf>.
- ⁹ UN Women. *Turning Promises into Action: Gender Equality in the 2030 Agenda for Sustainable Development*. 2025. <https://www.unwomen.org/en/digital-library/publications/2018/2/gender-equality-in-the-2030-agenda-for-sustainable-development-2018>.
- ¹⁰ International Labour Organization. *The Impact of Care Responsibilities on Women’s Labour Force Participation*. 2024. <https://www.ilo.org/publications/impact-care-responsibilities-women%25s-labour-force-participation>.
- ¹¹ Bain, Luchuo Engelbert, Richard Gyan Aboagye, Robert Kokou Dowou, Eugene Justine Kongnyuy, Peter Memiah, and Hubert Amu. “Prevalence and Determinants of Maternal Healthcare Utilisation among Young Women in Sub-Saharan Africa: Cross-Sectional Analyses of Demographic and Health Survey Data.” *BMC Public Health* 22, no. 1 (2022): 647. <https://doi.org/10.1186/s12889-022-13037-8>.
- ¹² Olu-Owolabi, Fadeke Esther, Emmanuel Amoo, Oni Samuel, Adeola Oyeyemi, and Gbadebo Adejumo. “Female-Dominated Informal Labour Sector and Family (in) Stability: The Interface between Reproduction and Production.” *Cogent Arts & Humanities* 7, no. 1 (2020): 1788878. <https://doi.org/10.1080/23311983.2020.1788878>.
- ¹³ Casale, Daniela, and Adeola Oyenubi. “Measuring the Gender Wealth Gap in South Africa Using Individual-level Data.” *South African Journal of Economics* 92, no. 1 (2024): 80–92. <https://ideas.repec.org/a/bla/sajeco/v92y2024i1p80-92.html>.
- ¹⁴ Kate Horstead, Sofia Mohamed, and Andrew Kavala. *Older Women: The Hidden Workforce - Access to Economic Justice*. Age International, 2021. <https://www.ageinternational.org.uk/policy-research/publications/older-women-the-hidden-workforce/>; Moore, Elena, and Gabrielle Kelly. “Struggles over Elder Care in South Africa.” *Development Southern Africa* 41, no. 6 (2024): 1062–77. <https://doi.org/10.1080/0376835X.2024.2374823>.