Offshore Dependencies: The Adverse Incorporation of African Countries in Global Wealth Chains

Pritish Behuria

There is mounting pressure to combat global tax evasion and avoidance, with influential studies highlighting the vast scale (amounting to hundreds of billions of dollars a year) of tax evasion and avoidance globally.[1] Usually, the blame is placed on "tax havens," often imagined as small micro-states. It is often argued that trillions of dollars will be lost to such jurisdictions over the next decade.[2] Recent multilateral initiatives include the Organization for Economic Cooperation and Development (OECD) and G20 Multilateral Convention to Implement Tax Related Measures to Prevent Base Erosion and Profit Shifting (BEPS). BEPS has called for committing signatories to implement tax treaty measures to adhere to international tax rules. The goal of the initiatives is to target "double non-taxation," with many tax havens often using Double Taxation Avoidance Agreements (DTAAs) to entice companies to their jurisdictions, resulting in these companies barely being taxed. In 2021, nearly 140 countries signed the OECD's Global Tax Deal. The deal includes two pillars: the first aims to reallocate the residual profits of large multinationals from their home countries to jurisdictions where they generate revenue, while the second establishes a 15 percent global minimum corporate tax.[3] The United States and other industrialized countries continue to dither on their commitments resulting in delays to the implementation of both pillars.

Though a global tax deal has not formally been reached, many countries

Dr. Pritish Behuria is a Senior Lecturer/Associate Professor at The University of Manchester's Global Development Institute. He is also a British Academy Mid-Career Fellow. His research investigates the politics of economic transformation under contemporary globalization, examining the politics of state-business relations, finance, industrial policy, and energy transitions. He has conducted extensive fieldwork in Eastern and Southern Africa, as well as in India.

have used this opportunity to renegotiate bilateral tax treaties, resulting in a reorganization of global financial networks. North America and Europe are leaving themselves open to charges of hypocrisy as many jurisdictions in the Global North do not meet the standards they require from offshore havens in the Global South. Countries in the Global South have criticized the OECD for taking similar initiatives in the 1990s and early 2000s.[4] As in the rest of the world, within Africa, there are growing calls among advocacy groups to combat capital flight, yet African governments have been cognizant of the fact that they have not developed a collective position concerning adopting and enforcing international tax agreements.[5] The African Tax Administration Forum (ATAF) and Intergovernmental Group of Twenty-Four (G24) have been advocates for developing countries in international negotiations, especially when there have been concerns that multilateral tax initiatives do not accurately reflect the concerns of developing countries.[6] The African Union (AU) has begun profiling the role of illicit financial flows in depriving countries of tax revenue. ATAF has been working closely with the AU to use the global attention on international agreements to adapt BEPS requirements to African needs.[7]

Yet, within African countries, there are contradictory priorities regarding tackling tax evasion and avoidance. Since many African countries have high trade deficits and have been unable to diversify their exports to access foreign exchange, some have experimented with transforming their financial sectors into international financial centers. The main goal of these strategies is to attract foreign capital and bolster foreign exchange reserves. To achieve this, countries have opened their capital accounts, leaving them vulnerable to capital flight. Some aspiring tax havens have sought to become a home for licit and illicit finance. At different points, the Financial Action Task Force, the European Union, and the OECD have blacklisted or graylisted countries including South Africa, Mauritius, Botswana, Morocco, and Seychelles. There is little analysis of how such global initiatives reshape African financial centers, particularly in relation to the capture and departure of capital flows.

The main goal of these strategies is to attract foreign capital and bolster foreign exchange reserves.

This paper investigates how the global focus on international tax initiatives has shaped the capacity of African countries to exert more financial autonomy. Though the ire of most tax activists focuses on tax havens—mostly micro-states or islands—the countries that capture the most revenues from licit and illicit financial flows are in North America and Europe.[8] Delaware and London are synonymous with the "double standards," highlighting how offshore activities have shifted onshore.[9] There is a degree of multipolarity with the existence of regional blocs.[10] East Asian tax havens have taken advantage of China's rising economy, while Mauritius benefited significantly from the liberalization of the Indian economy in the 1990s and 2000s.[11] Yet there are signs that a global financial division of labor is being consolidated. More diversified financial centers like London and New York capture most of the financial flows. Mid-range financial centers like Singapore and Dubai have gained significance as crucial nodes within global financial networks due to their links to large and growing markets in Asia. Smaller financial centers like Mauritius are adversely incorporated as back-end offices to larger financial sectors within the global offshore network.

This paper begins by describing the varied ways African countries have been incorporated into global financial geographies. Recent literature has argued how little has changed in several African countries since independence, with structural dependence persisting because of currency and monetary hierarchies.[12] To an extent, tax havens show some degree of defiance from that subordination. However, new multilateral initiatives, which target DTAAs or global minimum corporate taxes—despite not being completely implemented globally—are forcing smaller financial centers and their clients to reformulate their strategies. In effect, this is weakening African offshore sectors in comparison to emerging and diversified financial centers. The paper concludes that a new financial division of labor is currently cementing, with the offshore route now a much more constrained pathway for increasing economic autonomy.

Africa's Incorporation into Global Wealth Chains

In the 1950s and 1960s, post-independence leaders and anti-colonial scholars argued that colonial legacies contributed to financial sectors in newly independent African countries being structured to continue to benefit colonial production and extraction.[13] Colonial legacies are usually analyzed by focusing on the continued foreign ownership of domestic banks, limited prioritization of long-term developmental finance, and currency dependencies such as West Africa's CFA Franc. In settler territories such as South Africa and Kenya, deeper financial sectors developed but continued to serve the colonial settler population.[14] Even where large financial sectors developed, such as in Nigeria, those working within the dependency tradition have argued that there is little hope that liberalized financial sectors can still contribute to structural transformation, given that lending remained low for non-commodity sectors.[15] Several contemporary variants of such arguments, inspired by dependency perspectives, have taken a pessimistic view of the role of finance in promoting economic transformation in African countries. This scholarship includes the international financial subordination, subordinate financialization, and financialization literature, which all focus on African countries' constraints in using domestic financial sectors to promote economic autonomy.[16]

Yet, such generalized arguments do not account for the variation that existed at the point of independence of most African countries in terms of the composition of domestic financial sectors and the linkages of specific African financial sectors with different global financial geographies.[17] As part of structural adjustment programs in the 1980s and 1990s, most African countries liberalized financial sectors and reduced capital and exchange controls. Though there was a great deal of variation in the degree to which such policies were implemented on the continent, there was some degree of adoption nearly everywhere, except for a few exceptions, including Ethiopia and Eritrea. International Financial Institutions (IFIs)—such as the World Bank and International Monetary Fund—pressured African countries to reform their financial sectors along the lines of Shaw and McKinnon's cure to the "financial repression" hypothesis.[18] Shaw and McKinnon argued that interest rates in developing countries were too low because of interest rate controls. Instead, they proposed deregulation, which would liberate financial markets and increase interest rates, thereby motivating the domestic population to increase savings and investment. Such arguments held that central banks should relinquish any developmentalist role and instead develop narrow mandates focused on inflation-targeting.[19] This resulted in an era of increased financial crises in African countries, as shown by Nigeria's rapid liberalization and the ensuing financial crises.[20] However, in reality, there was substantial variation in the extent to which market-led reforms were adopted (e.g. exchange and capital controls were reduced). Even in the last decade, there have been significant differences among many African countries in the adoption of global banking regulation standards such as Basel I and II.[21] While Rwanda eagerly adopted most Basel banking standards, other countries like Ethiopia and Angola adopted very few.

African banking sectors have evolved along much more complex paths and with much greater variation than is usually highlighted within the literature. African financial sectors have reconfigured in different ways with three different pressures: (a) market-led IFI models; (b) developmentalist understandings of finance, with the primary goal of directing funds to strategic sectors; and (c) the influence of offshore financial centers. Dependency-inspired literature may suggest that African countries are simply victims of constraints, which are legacies of colonialism or of the market-led neoliberal paradigm. In some cases, like in Rwanda, this has led to very contradictory outcomes.[22] The Rwandan government remains heavily interventionist in using domestic financial institutions to mobilize finance for strategic investments. At the same time, the government has adopted financial sector liberalization, which has contributed to high commercial interest rates (above 20 percent) for private sector companies. Increased evidence of high interest rates shows that financial sector liberalization has led to the opposite of what Shaw and McKinnon predicted. This evidence also highlights how financial liberalization has constrained possibilities for state intervention to be used to invest in structural transformation.

IFIs have consistently promoted strategies such as financial sector liberalization in their lobbying for the reduction of domestic ownership of commercial banks.[23] IFIs continue to lobby against African governments using their domestic financial sectors to promote structural transformation. Yet, governments do not have to yield to all IFI demands—many governments do not. IFIs have allies in what prominent African economist Thandika Mkandawire refers to as austerity ministries, such as ministries of finance and central banks, which have been heavily funded compared to expenditure ministries, such as the ministries of industry.[24] These contradictory tensions within African states are not captured well by dependency-inspired literature or market-led mainstream economics literature, which assumes market-led reforms will lead to an equitable and efficient productive use of resources. Instead, they become clear in present-day case studies where ministries of finance and central banks have become the most ardent domestic critics of industrial policy.[25] For example, in the late 2010s, when the Ugandan government discussed banning imports of used clothing to encourage domestic textiles and garments production, government ministries were at loggerheads. The Ministry of Finance and the Central Bank, aligned with IFIs to discourage the ban while the Ministry of Trade, Industry, and Cooperatives unsuccessfully lobbied for it.

In other cases, African governments have not only tried to revive development banks and use state-owned commercial banks, but they have also used pension funds and other "functional substitutes" to fund strategic investment projects.[26] There are several national development banks (NDBs) in African countries, including South Africa, Egypt, Ethiopia, Morocco, and Rwanda, amongst others. In some cases—as is the case of South Africa—there are several development banks within one country. The results of these investments often align with the country's development strategy. For example, while South Africa's NDB has invested in industry, Rwanda's NDB has invested in services. With IFIs tending to focus their criticism on African NDBs, some governments have sought other routes to pool funds for investment in strategic projects. Rwanda's largest financial institution has been the Rwanda Social Security Board, which has invested across several sectors of the economy, often in partnership with state-owned companies.[27] East African countries have used military funds and military insurance to fund strategic investments in the economy.

There are countries that have sought to position themselves as low-tax jurisdictions to access foreign exchange, often initially to deal with unmanageable trade deficits. This has contributed to enhancing global tax evasion (where individuals and companies may send their money to low-tax jurisdictions) or tax avoidance (where companies avoid higher taxes by companies and individuals seeking to base their funds in low-tax jurisdictions, which may have DTAAs with countries where they will later invest, allowing them to take advantage of lower taxes). Establishing low-tax jurisdictions and DTAAs is a product of the agency of African governments to secure foreign exchange. Within academic literature, especially on African countries, there are few studies that investigate why offshore financial sectors were developed and the negative and productive domestic effects of that strategy.[28] Some African countries—including South Africa, Morocco, Botswana, Mauritius, Seychelles, Kenya, Rwanda, and Ghana—have attempted to establish financial sectors, with varied degrees of success. The fortunes of those that exist within constantly changing global financial geographies need to be urgently analyzed.

The New Financial Division of Labor

With IFIs applying increased pressure to reduce capital controls and liberalize financial sectors in the 1980s and 1990s, global financial sectors have become increasingly integrated. A new "global wealth chains" (GWCs) literature has recently developed to study the evolution of transacted forms of capital operating multi-jurisdictionally for wealth creation and protection.[29] Over the last decade, GWCs have become increasingly segmented, with large financial centers like New York, London, Hong Kong, and Singapore specializing in a range of financial activities such as capital markets, private equity, wealth management, hedge funds, and corporate banking. Meanwhile, other financial sectors made the decision to focus on more specialized activities. For example, Dublin was globally recognized for its expertise in fund administration and intellectual property.

Switzerland had a well-established reputation for private wealth management. Smaller financial centers have traditionally been more reliant on providing tax advantages and are less diversified. Thus, larger and more diversified financial centers are likely to concentrate benefits from a reformed global tax environment where low-tax destinations fall foul of multilateral initiatives. However, some of this will also necessarily depend on the markets on which havens depend. Smaller and mid-range tax havens are inevitably tied to the policies of larger economic markets. For example, Singapore and Hong Kong are dependent on East Asian markets and Mauritius historically depended on India. Jason Sharman argues that countries that were less reliant on the West and more reliant on Chinese wealth may be more resilient than those that are not, depending on China's evolving stance in relation to multilateral tax initiatives.[30]

Within Africa, Mauritius remains the most well-known and low-tax jurisdiction. It is a gateway for investment into Africa, as well as a capital flight away from other countries. However, its offshore sector heavily depends on its DTAA with India.[31] Seychelles, too, had become a prominent tax haven but its fortunes have faded recently.[32] Seychelles was unable to keep up with global tax regulations while its competitors—including Mauritius, for a period—gradually became more attractive to potential investors. There have been many failed attempts at establishing tax havens including in Liberia, Kenya, Gambia, Nigeria, Ghana, as well as some ongoing attempts in Cape Verde, Botswana, and Rwanda. Clearly, the vast amount of foreign exchange that offshore sectors can provide is a substantial incentive for many African countries, with most countries simultaneously facing large trade deficits and a shortage of foreign exchange. Such structural imbalances are a feature of late development since most former colonies were dependent on primary commodities at independence. Despite the continued allure of becoming a tax haven, recent initiatives by the OECD hint at further consolidation of offshore profits within more diversified financial centers in the Global North at the cost of smaller specialized financial centers like Mauritius.

Since the global financial crisis of 2007 and 2008, the international rules that allow tax avoidance by multinational corporations have captured political attention in the United States and Europe.[33] Multilateral initiatives have resulted in the adoption of an automatic exchange of information as a new global standard against tax evasion: the OECD's Common Reporting Standard and the OECD's Multilateral Convention to implement tax-related measures to prevent base erosion and profit shifting. The Multilateral Instrument (MLI) commits signatories to implement a series of tax treaty measures to update international tax rules—primarily to reduce possibilities of "double non-taxation" where entities use DTAAs to not be taxed at all, and to counter treaty abuse. The MLI has provided an opportunity for several countries to renegotiate existing DTAAs. Most renegotiations have taken place with smaller tax havens. For example, India has renegotiated its DTAA with Mauritius, partly also to set up its own low-tax jurisdiction within its border in Gujarat.[34]

These changes in global tax governance have motivated DTAA partners to renegotiate the terms of their agreements with many low-tax jurisdictions—including Mauritius. The Indian government responded to BEPS by immediately seeking to renegotiate its DTAA with Mauritius.[35] This is crucial because scholars have argued that newer low-tax jurisdictions are more likely to grow if they are closely linked to specific larger markets.[36] For example, Hong Kong and Singapore benefit from their close links to China and other East Asian countries. Mauritius was heavily reliant on its DTAA with India. In 2016, the Indian government negotiated for the capital gains exemption that Mauritian entities held to be removed, following a grandfathering period, which lasted until 2020. This has had a dramatic effect on the Mauritian offshore sector. Mauritius lost a large tax advantage through the removal of an 80 percent tax credit.[37] India's Foreign Direct Investment (FDI) statistics show a massive decrease in investments from Mauritius. From 2020–2021, Mauritius dropped to third—after Singapore and the United States—as a FDI base into India, with inflows falling nearly 32 percent to $5.6 billion compared to $8.2 billion in 2019–2020. In March 2024, the India-Mauritius DTAA was amended again to comply with the OECD's measures. As part of the changes, firms do not qualify for tax benefits if the principal purpose of their transaction is deemed to have been to avoid tax. Foreign firms have recently bought some of Mauritius' largest offshore management companies, hinting that Mauritius' future as an offshore center is likely to be as a back office to a more diversified financial center.[38]

One of the major implications of the new multilateral rules is likely to be that governments may bring their own low-tax jurisdictions within their own countries. Just as the United States has low-tax jurisdictions with a state like Delaware, India has sought to move entities to the Gujarat International Finance Tec-City (GIFT City). GIFT City is already home to 23 multinational banks and 35 financial technology (fintech) entities, and is among the top ten emerging financial centers, as rated by the Global Financial Centres Index. While foreign currency transactions are closely monitored and controlled in India, GIFT is intended to be a "gateway for cross-border flows."[39] Eight international banks have been established in GIFT City. India's National Stock

Exchange and Singapore's Stock Exchange have established special derivatives trading facilities. This signals the Indian government's closer links with Singapore's financial center. Indeed, Mauritius has already begun to lose out, with countries beginning to revise their arrangements with better-placed financial centers ahead of any OECD agreements being formally implemented globally. Singapore was better-placed because of how diversified its financial activities were, while Mauritius heavily depended on fund management.

Mauritius' offshore growth has contributed significantly to sustaining its position as one of the richest countries in Africa. As a result, many countries (including Ghana and Rwanda) continue to discuss the possibility of mimicking Mauritius' offshore strategy. However, this paper has shown how recent international tax agreements have contributed to constraining possibilities for emerging low-tax jurisdictions to achieve sufficient success. Though rarely acknowledged within the academic literature, offshore growth has been a path to secure more economic autonomy for late-developing countries, especially as IFIs have sought to constrain possibilities for the state to use domestic financial sectors to promote structural transformation. Yet, as lobbying for new international tax agreements continues, there is likely to be significant consolidation of profits within the higher-value segments of the GWC, especially for more diversified financial centers. For incipient and existing smaller and specialized low-tax jurisdictions, this is likely to lock them into dependency on more diversified financial centers.

Offshore growth has been a path to secure more economic autonomy for late-developing countries

Conclusion

Tax activists are increasingly frustrated with the apparent lost momentum around the global tax deal, in the wake of the optimism that came when Joe Biden became President of the United States in 2021. President Biden led a global tax deal, which 130 countries signed onto in 2021. The Biden administration even hired several high-profile tax law specialists to join the U.S. Department of the Treasury in 2021.[40] It is common to imagine the main culprits of capital flight and lost incomes through tax avoidance and evasion as small micro-states that have established low-tax jurisdictions or tax havens. However, many of these tax havens were largely either directly established by European countries or have later developed based on advice from European and North American lawyers and banks. Still, contrary to how tax havens are presented, there is a substantial degree of hypocrisy with financial centers like Delaware or London remaining at the apex of the offshore system, consolidating most of the profits. Micro-states, which operate as tax havens, regularly criticize OECD countries for practicing a "do as I say, not as I do" selective morality, arguing that they are made scapegoats because they are smaller and more vulnerable.[41]

In the last two years, there has been a substantial loss of momentum in global tax deals. Many countries have taken this opportunity to revise bilateral tax arrangements through renegotiating existing DTAAs. Such initiatives have favored established and diversified financial centers at the cost of specialized, smaller, low-tax jurisdictions, as well as incipient ones. There are signs of a financial division of labor being consolidated, with larger diversified centers set to consolidate their control, with fewer opportunities for newer entrants into GWCs. This article has argued that Mauritius, in particular, is being adversely incorporated into GWCs, as a back office for larger, diversified financial centers. Thus, though rarely acknowledged, the announcement of global tax deals has created an environment for the reorganization and increased consolidation of global offshore wealth.

How does this affect African countries? Nearly all African countries have been victims of capital flight, especially since they have been pressured to reduce capital and exchange controls since the 1970s. Some African countries, like Mauritius, successfully positioned their financial sectors to benefit from increased global financial integration. However, now, even that pathway to gain access to foreign exchange has been further constrained. It is extremely difficult to increase capital controls after decades of reducing it. There are very rare cases of reversals in such policies. So, countries may still see an opportunity for accessing offshore wealth by signing DTAAs with strategic partners. However, given the control exercised within global wealth chains by diversified financial centers, any access to offshore wealth will depend on their links to larger and more diversified centers such as Singapore or Dubai.

This may seem like a positive story in the fight against global illicit wealth, but a closer analysis would show that there is very little reason to think there will be a reduction in global illicit wealth. It is likely to simply be a case that those who seek to evade or avoid taxes will do so in better-resourced or better-diversified tax havens. Yet, this barely affects the continued subordinate position of African countries within the global political economy. Most African countries remain in dire need of foreign exchange, with unmanageable trade deficits and some countries suffering spiraling debts after the Covid-19 pandemic. As calls grow for reinvesting in industrial policy and structural transformation, there is less attention to how domestic finance may be mobilized for structural transformation.[43] All we know now is that the tax haven route to sustaining growth, made popular by Mauritius' success, is just one more route that has been cut off to achieve catch-up development.

Notes

1. Gabriel Zucman, *The Hidden Wealth of Nations: The Scourge of Tax Havens* (Chicago: University of Chicago Press, 2015); Annette Alstadsaeter, Niels Johannesen, and Gabriel Zucman, "Who Owns the Wealth in Tax Havens? Macro Evidence and Implications for Global Inequality," *Journal of Public Economics* 162 (2018): 89–100.

2. Tax Justice Network, *The State of Tax Justice 2023*, (Buckinghamshire, United Kingdom: Tax Justice Network, 2023).

3. "The OECD Global Tax Deal still hangs in the balance," *Economist Intelligence Unit (EIU)*, March 1, 2024, https://www.eiu.com/n/the-oecd-global-tax-deal-still-hangs-in-the-balance/.

4. Bill Maurer, "Re-Regulating Offshore Finance?," *Geography Compass* 2, no. 1 (2008): 155–75.

5. Leonce Ndikumana and James Boyce, eds., *On the Trail of Capital Flight from Africa: The Takers and the Enablers,* (Oxford: Oxford University Press, 2022).

6. Martin Hearson, Joy W. Ndubai, and Tovony Randriamanalina, "The Appropriateness of International Tax Norms to Developing Country Contexts," *Financial Accountability Transparency & Integrity*, July 20, 2020.

7. Annet Wanyana Oguttu, "Tax Erosion and Profit Shifting in Africa–Part 1: Africa's Response to the OECD BEPS Action Plan" (working paper, International Centre for Tax and Development, 2016), https://www.ictd.ac/publication/tax-base-erosion-and-profit-shifting-in-africa-part-1-africa-s-response-to-the-oecd-beps-action-plan/.

8. Nicholas Shaxson, *Treasure Islands: Tax Havens and the Men who Stole the World* (London: Bodley Head, 2011); Lukas P. Hakelberg, *The Hypocritical Hegemon: How the United States Shapes Global Rules against Tax Evasion and Avoidance* (Ithaca, NY: Cornell University Press, 2020).

9. Jason Sharman, "Canaries in the Coal Mine: Tax Havens, the Decline of the West and the Rise of the Rest," *New Political Economy* 17, no. 4 (2012): 493–513.

10. Daniel Haberly and Dariusz Wojcik, "Regional Blocks and Imperial Legacies: Mapping the Global Offshore FDI Network," *Economic Geography* 91, no. 3 (2015): 251–80.

11. Jason Sharman, "Canaries in the Coal Mine: Tax Havens, the Decline of the West and the Rise of the Rest," *New Political Economy* 17, no. 4 (2012): 493–513; Pritish Behuria, "The Political Economy of a Tax Haven: The Case of Mauritius," *Review of International Political Economy* 30, no. 2 (2023): 772–800.

12. Ingrid Harvold Kvangraven, Kai Koddenbrock, and Ndongo Samba Sylla, "Financial Subordination and Uneven Financialization in 21st Century Africa," *Community Development Journal* 56, no. 1 (2021): 119–40.

13. Kwame Nkrumah, *Neocolonialism: The Last Stage of Imperialism* (New York: Thomas Nelson & Sons, 1965); Samir Amin, "Accumulation on a World Scale: A Critique of the Theory of Underdevelopment," *New York: Monthly Review*, January, 1974.

14. Nick Bernards, *A Critical History of Poverty Finance: Colonial Roots and Neoliberal Failures* (London: Pluto, 2022).

15. Florence Dafe et al., "Local Currency Bond Markets in Africa: Resilience and Subordination," *Development and Change* 54, no. 5 (2023): 1031–64.

16. Ilias Alami et al., "International Financial Subordination: A Critical Research Agenda," *Review of International Political Economy* 30, no. 4 (2023): 1360–1386.

17. Catherine Boone, "State, Capital, and The Politics of Banking Reform in Sub-Saharan Africa," *Comparative Politics* 37, no. 4 (2005): 401–20; Vanessa Ogle, "'Funk Money': The End of Empires, The Expansion of Tax Havens, and Decolonisation as an Economic and Financial Event," *Past & Present* 249, no. 1 (2020): 213–49.

18. Edward S. Shaw, *Financial Deepening in Economic Development*, (New York: Oxford University Press, 1973); Ronald McKinnon, *Money and Capital in Economic Development* (Washington, DC: The Brookings Institution, 1973).

19. Gerald Epstein, "Developmental central banking: Winning the future by updating a page from the past," *Review of Keynesian Economics* 1, no. 3 (2013): 273–87.

20. Thandika Mkandawire, "The political economy of financial reform," *Journal of International Development* 11, no. 3 (1999): 321–42; Peter Lewis and Howard Stein, "Shifting fortunes: The political economy of financial liberalization in Nigeria," *World Development* 25, no. 1 (1997): 5–22.

21. Emily Jones, ed., *The Political Economy of Bank Regulation in Developing Countries: Risk and Reputation*, (Oxford: Oxford University Press, 2020).

22. Pritish Behuria, "Learning from Role Models in Rwanda: Incoherent Emulation in the Construction of a Neoliberal Developmental State," *New Political Economy* 23, no. 4 (2018): 422–40.

23. Howard Stein, "Financial Liberalisation, Institutional Transformation and Credit Allocation in Developing Countries: The World Bank and the Internationalisation of Banking," *Cambridge Journal of Economics* 34, no. 2 (2010): 257–73.

24. Thandika Mkandawire, "The Spread of Economic Doctrines and Policymaking in Postcolonial Africa," *African Studies Review* 57, no. (2014): 171–98.

25. Pritish Behuria, "The Political Economy of Reviving Industrial Policy in Uganda," *Oxford Development Studies* 49, no. 4 (2021): 368–85.

26. Alexander Gerschenkron, *Economic Backwardness in Historical Perspective* (Cambridge, MA: Harvard University Press, 1962); Pritish Behuria, "The Political Economy of Central Bank Effectiveness: The Case of National Bank of Rwanda," (working paper, ESID, 2020), 151.

27. Pritish Behuria, "Examining Effectiveness and Learning in Rwandan Policymaking: The Varied Outcomes of Learning from Productive Sector Policies," *Journal of International Development* 30, no. 6 (2018): 1023–43.

28. Ricardo Soares de Oliveira, "Researching Africa and the Offshore World," *Journal of Modern African Studies* 60, no. 3 (2022): 265–96; Pritish Behuria, "The Political Economy of a Tax Haven: The Case of Mauritius," *Review of International Political Economy* 30, no. 2 (2023): 772–800.

29. Leonard Seabrooke and Duncan Wigan, "Global Wealth Chains in the International Political Economy," *Review of International Political Economy* 21, no. 1 (2014): 257–63.

30. Jason Sharman, "Chinese Capital Flows and Offshore Financial Centers," *The Pacific Review* 25, no. 3 (2012): 315–37.

31. Pritish Behuria, "The Political Economy of a Tax Haven."

32. Justin Robertson, "Global Networks on the way up and the way down: Lessons from the Rise and Fall of the Seychelles an Offshore Centre," *Global Networks* 21, no. 4 (2021): 631–52.

33. Martin Hearson, *Imposing Standards: The North-South Dimension to Global Tax Politics* (Ithaca, NY: Cornell University Press, 2022).

34. Pritish Behuria, "From a Miracle Boom to Niche Dependence: How the India DTAA Shapes Future Offshore Growth in Mauritius," in C. Oya, R. Ramtohul and V. Tandrayen-Ragoobur, eds. *The Oxford Handbook of the Mauritian Economy*. Oxford: Oxford University Press, 2025).

35. Justin Robertson, "Global Networks on the way up and the way down: Lessons from the Rise and Fall of the Seychelles an Offshore Centre," *Global Networks* 21, no. 4 (2021): 631–52.

36. Jason Sharman, "Canaries in the Coal Mine: Tax Havens, the Decline of the West and the Rise of the Rest," *New Political Economy* 17, no. 4 (2012): 493–513.

37. Pritish Behuria, "The Political Economy of a Tax Haven: The Case of Mauritius."

38. Ibid.

39. Chloe Cornish, "India's gift to offshore financial centres starts to get off the ground," *Financial Times,* August 5, 2022.

40. Jonas Heering, Loriana Crasnic, and Abraham Newman, "When Digital Taxes Come Due: National Digital Taxes and the Negotiation of the OECD Inclusive Framework," *New Political Economy*, 1–16.

41. Jason Sharman, *Havens in a Storm: The Struggle for Global Tax Regulation* (Ithaca, NY: Cornell University Press, 2006).

42. Arkebe Oqubay, *Made in Africa: Industrial Policy in Ethiopia* (Oxford: Oxford University Press, 2015); Lindsay Whitfield et al., *The Politics of African Industrial Policy: A Comparative Perspective* (New York: Cambridge University Press, 2015); Christopher Cramer, John Sender, and Arkebe Oqubay, *African Economic Development: Evidence, Theory and Policy* (Oxford: Oxford University Press).

43. Arkebe Oqubay, *Made in Africa: Industrial Policy in Ethiopia* (Oxford: Oxford University Press, 2015); Lindsay Whitfield et al., *The Politics of African Industrial Policy: A Comparative Perspective* (New York: Cambridge University Press, 2015); Christopher Cramer, John Sender, and Arkebe Oqubay, *African Economic Development: Evidence, Theory and Policy* (Oxford: Oxford University Press).