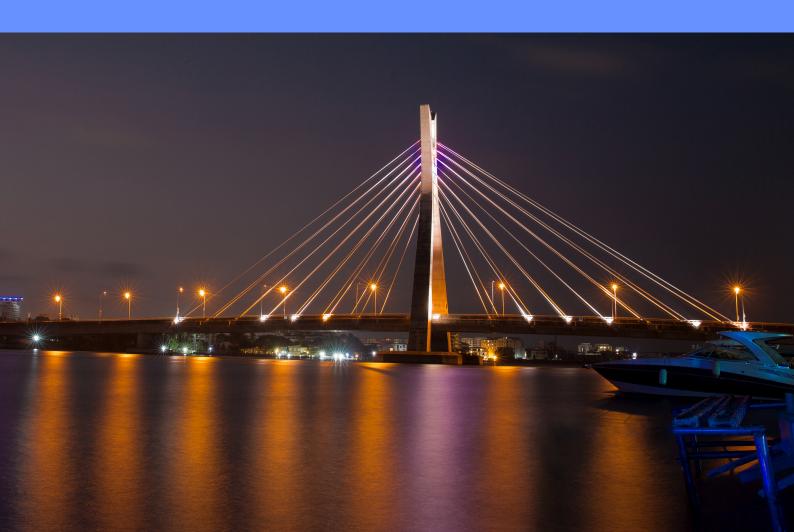


Annual Report of the Secretary-General

2024 - 2025



Dear Fellow IFA Members,

2024-2025 was memorable for the first Annual IFA Congress to ever take place in the African continent, namely the 76th IFA 2024 Cape Town Congress, in South Africa, with around 1,220 participants including accompanying persons. It also saw the second edition of a truly global IFA Travelling Lectureship Programme visiting all IFA Regions, the inauguration of the IFA Tax Directors webinar series and a steady increase of IFA's membership base across the globe.

The IFA community is stronger and more connected than ever. Many IFA Branches and IFA Regions organised successful events for their members. In the first half of 2025, the second edition of the IFA Mentoring Platform in Poland was successfully completed. The IFA Regional Conferences in Europe, Asia and Latin America visited for the first time Hungary (Budapest), Malaysia (Kuala Lumpur), and Paraguay (Asunción), respectively. The Young IFA Network (YIN) and Women of IFA Network (WIN) organised and participated in many activities and continued to grow. There are ongoing active discussions in relation to the establishment of new IFA Branches in key jurisdictions around the world. And there is more to come.

During this year key steps have been taken to continue the implementation of the new Global IFA strategy focusing on: the extension of scientific presence of Global IFA; the expansion of the reach of its activities with the view to increase its visibility as a unique and neutral platform for international tax dialogue and knowledge sharing; the strengthening of its relationship with key stakeholders and partner organisations; and the provision of continuous support and development opportunities to the IFA Branches and Regions.

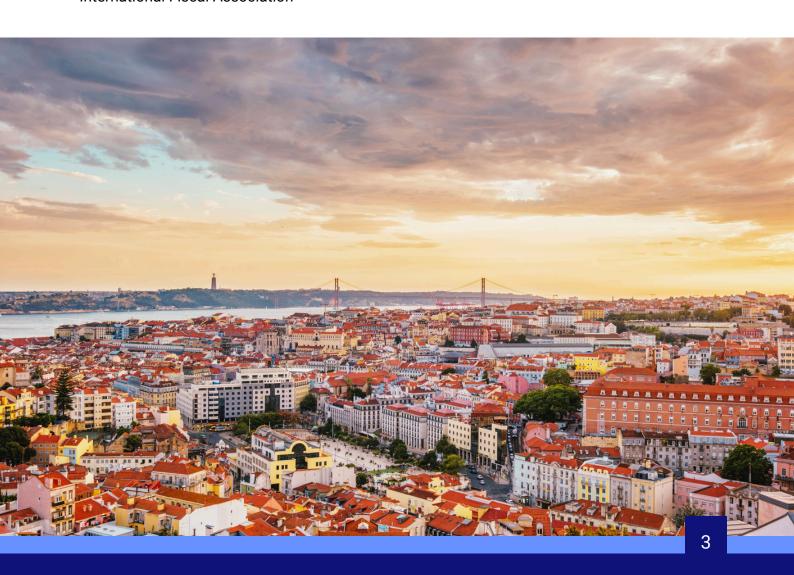
The IFA Travelling Lectureship Programme brought Global IFA close to the IFA Branches, IFA Regions and IFA members and debated one of the most topical subjects "Pillar Two and its ramifications"; the establishment of the IFA Tax Directors webinar series reflects IFA's inclusive and relevant character as a platform; and the upcoming book on "Tax Treaty Interpretation in light of the Vienna Convention on the Law of Treaties", a core topic for international tax experts, reinforces IFA's leading scientific role. At the end of 2024, the incorporation of a Special Purpose Vehicle in the Netherlands was completed. IFA events and publications B.V. will from now on facilitate all the outward facing activities of Global IFA with a special emphasis on IFA's flagship event: the Annual IFA Congress.

All this was made possible with the dedicated and thoughtful leadership of President Prof. Guglielmo Maisto.

I am excited to welcome everyone to the first Annual IFA Congress patronized by Global IFA, the 77th IFA 2025 Lisbon Congress, in Portugal; an Annual IFA Congress that truly reflects the core of IFA: bringing together more than 2,000 professionals from all constituencies; scientific content of topical, practical and relevant nature; an opportunity for international organisations to meet and express their views; and a platform embracing change, with a first-ever tax technology hub at the Congress' exhibition hall. Global IFA is grateful to the IFA Branch in Portugal for their excellent and seamless collaboration, under the leadership of Rogério Fernandes Ferreira, in this endeavour. I also wish to wholeheartedly thank our General Secretariat and my Head of Secretariat, Alexia Kardachaki, for their dedication and enthusiasm that made it all possible.

This Annual Report gives a brief overview of the IFA activities and the most important events in 2024-2025.

Jean-Blaise EckertSecretary-General International Fiscal Association





2024-2025 was the year that many of the initiatives that had already started in the previous years became a structural element of Global IFA's activities: the second edition of the Travelling Lectureship Programme and the IFA Mentoring Platform. In addition, new activities were introduced: the IFA Tax Directors Webinar Series and the Tax Directors Lunch Dialogue, the latter forming part of the Annual IFA Congress, starting as of the IFA 2025 Lisbon Congress.

Travelling Lectureship Programme

The second edition of Global IFA's Travelling Lectureship Programme was held from February to July 2025 at various locations in all five IFA Regions. In particular, Global IFA visited 12 locations and held lectures on the topic "Pillar Two and its ramifications", leading up to the IFA 2025 Lisbon Congress, with a dedicated Lunch Dialogue that will debate the key take-aways and conclusions from the Travelling Lectureship Programme. The lectures were a great success with more than 1,400 registrations received worldwide. They emphasised IFA's role as a platform for knowledge exchange and debate; connected tax practitioners with tax directors, government officials and policy makers; and Global IFA with its members; and increased the visibility of the IFA 2025 Lisbon Congress, as well as IFA in general in particular through press coverage. Global IFA would like to thank all the IFA Branches participating, for their tremendous support, as well as the lecturers and speakers for sharing their insights and expertise. A new edition of the Travelling Lectureship Programme will be launched in 2026.

Tax Treaty Interpretation Book

As part of its increased focus on tax certainty in the international dimension, the Global IFA book on "Tax Treaty Interpretation in light of the Vienna Convention on the Law of Treaties" is expected to be launched in the coming months. This book will revisit the fundamental principles of interpretation of tax treaty law and will provide guidance in order to facilitate and strengthen the consistency of tax treaty practice with the principles laid down in the Vienna Convention on the Law of Treaties. The book will be published by IFA's sister organisation, the IBFD. Global IFA wishes to express its gratitude to all authors and editors for their contribution to this project.

Tax Directors Webinar Series

The first webinar from the newly introduced Tax Directors Webinar Series took place in May 2025. It was a tremendous success with more than 1,100 registrations and with many key issues emerging from the discussion. The webinar gave the stage to Tax Directors of large multinationals from different industries to discuss key international tax issues of concern that are of particular importance in their daily work.

Next to providing a platform for exchange of knowledge and thoughts, the webinar paved the way towards the Tax Directors' Lunch Dialogue that will take place during the Annual IFA Congress, starting as of the IFA 2025 Lisbon Congress, where the most prominent issues identified during the webinar will be debated between Tax Directors and their key stakeholders.

IFA Branches and Regions

At the time of writing this report, a Branch is being established in Saudi Arabia, Romania and Ivory Coast. Interest for establishment of new IFA Branches has been expressed in other countries as well. Membership of IFA now stands at more than 13.700 members (per end of August 2025) from 118 different jurisdictions.

Various activities were organised by our IFA Branches and Regions.
An overview of these activities is also available at https://www.ifa.nl/calendar.

Regional IFA Conferences

The 5th IFA European Region Conference took place in Budapest in March 2025. The IFA Branch in Hungary and Global IFA welcomed approximately 200 participants to discuss Tax Competition in Europe in 2025. In April 2025, the 8th IFA Asia Pacific Region Conference took place in Kuala Lumpur, Malaysia. This year's Conference presented an exciting programme that delved into recent major developments with a profound impact in the region and worldwide. In May 2025, the 15th IFA Latin American Region Conference was held in Asunción, Paraguay. The Conference had two main subjects: exchange of information and investment structures in Latin America, as well as a number of topical seminars and brought together tax professionals from Latin America and beyond.

IFA Mentoring Platform

Under the auspices of Global IFA, the IFA Mentoring Platform was pioneered in 2024 by IFA and YIN Poland. The IFA Mentoring Platform is an innovative initiative aimed at fostering collaboration and supporting the development of tax law professionals within IFA and YIN. It connects experienced IFA mentors with advancing YIN mentees, through the structured yearlong mentoring programme, offering essential guidance and support to help them achieve their professional goals. The second edition of the programme in Poland was concluded in the first half of 2025. Given the success of the programme, more IFA Branches were invited by Global IFA to join it and it is expected that the roll out to other IFA Branches will start in the months ahead.





The journey of IFA: the IFA Congresses

IFA 2024 Cape Town Congress – the first IFA Congress on the African continent



THE INTERNATIONAL FISCAL ASSOCIATION

LISBON, PORTUGAL, 5 - 9 OCTOBER 2025

On 27-31 October 2024, the IFA Branch in South Africa hosted the 76th Annual IFA Congress. Approximately 1,220 participants travelled to Cape Town and enjoyed a truly memorable Congress. Next to the scientific programme, including the IFA signature sessions, IFA/OECD, IFA/EU and Recent Developments, two Lunch Dialogues were organised, including on UN tax developments. The participants had the opportunity to enjoy the incredible culture and nature of South Africa through a series of social events, including a magical concert at the botanical gardens of Kirstenbosch and a lively South African experience closing dinner.

Global IFA thanks the IFA Branch in South Africa and, in particular, Prof. Jennifer Roeleveld and Prof. Johann Hattingh for the excellent organisation of IFA's flagship event, as well as all speakers, sponsors and exhibitors for their contribution.

IFA 2025 Lisbon Congress – Welcome to Portugal!

Lisbon will once again host an IFA Congress, almost 60 years after the first IFA Annual Congress held in Portugal. The IFA 2025 Lisbon Congress will take place on 5-9 October 2025 and will have two exciting Main Topics: "Residence of legal entities for corporate income tax purposes" and the "Improper use of tax treaties from the source state perspective". Next to the IFA signature sessions, there will be stimulating discussions on key areas of focus for tax professionals, as well as three Lunch Dialogues, including the concluding dialogue of the second edition of the Travelling Lectureship Programme and the Tax Directors Dialogue, bringing together tax directors and government officials on the subject of tax dispute prevention and resolution. The IFA Branch in Portugal is looking forward to share with the Congress participants the Portuguese traditions and unique culture through a variety of social events that will allow them to connect and share memorable moments. Do not forget to visit the first-ever Tax Technology Hub at the Exhibition area of the Congress venue and speak to our esteemed sponsors and exhibitors.

2025 is an exciting year for Global IFA, as the IFA 2025 Lisbon Congress marks the start of the new organisational model of the Annual IFA Congress. Global IFA has taken on the main part of the organisation and carries the financial and overall responsibility for the Annual IFA Congress. Organisation is made in close cooperation with the Hosting IFA Branch. In that context, Global IFA established key relationships with important stakeholders, including a Core Professional Congress Organiser and sponsors, and the General Secretariat will continue its work in this area in the years ahead.

7

Future Annual IFA Congresses

The journey of IFA continues. The dates and locations of the next Annual IFA Congresses are:



18-22 October 2026 IFA 2026 Melbourne Congress



19-23 September 2027 **IFA 2027 Stockholm Congress**



24-28 September 2028 IFA 2028 Montreal Congress



2029 dates to be announced IFA 2029 Singapore Congress





IFA's young community is thriving as an increasing number of IFA Branches have become interested in YIN. 57 IFA Branches have YIN Representatives that promote and coordinate the YIN activities in their Branches. The YIN Community is present on LinkedIn and Instagram. It has grown into a robust network developing activities in a growing number of IFA Branches and is chaired by Ignacio Gepp (Chile). The YIN Committee gets the full support of Global IFA in its actions to make IFA even stronger in the future. More information on the activities of YIN can be found in their annual report.



Women of IFA Network

In recent years, the female membership of IFA has grown to more than 3,500 female members across the globe; it is an evident welcome sign of the increasing awareness of the significance of professional women in international taxation. WIN has been established as a Special Committee to represent and connect the many professional women working in international tax. WIN is on LinkedIn. Facebook Instagram. The WIN Committee includes representatives from all IFA Regions and is chaired by Ana Claudia Utumi (Brazil). Also, most IFA Branches have appointed a WIN representative. More information on the activities of WIN can be found in their annual report.

Publications and Communication

IFA Cahiers Online

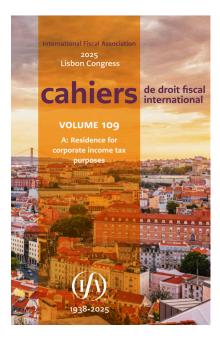
As of 2023 onwards, the Cahiers are fully digital. This is a big step towards sustainability!

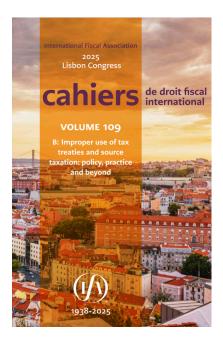
The "Online Cahiers" are published on the IFA website in August, and are only accessible to IFA Members. The Cahiers with all their reports (general reports, special reports and the Branch reports) are available from 1980 onwards. The database is user-friendly and it is possible to search for a specific Cahier via a large set of predefined keywords. IFA members can also go directly to a specific year and select Cahier A or Cahier B, followed by the selection of Branch reports.

2025 IFA Cahiers

The 2025 IFA Cahiers were published on the IFA website in August 2025. They cover the following Main Subjects to be discussed at the IFA 2025 Lisbon Congress:

- Volume 109A of the Cahiers 2025 discusses "Residence of legal entities for corporate income purposes" and includes a general report by Prof. Dr. João Félix Pinto Nogueira (Portugal), and an EU report written by Dr. Adam Zalasiński. It includes 49 Branch reports.
- Volume 109B covers "Improper use of tax treaties and source taxation: policy, practice and beyond" and includes a general report by Prof. Dr. Jinyan Li (Canada) and Prof. Dr. Eivind Furuseth (Norway), and an EU report by Dr. Ivan Lazarov. Volume 109B includes 43 Branch reports.





Website, IFA App and social media

The IFA website is a major source of information about IFA, its activities and the IFA Branches and IFA Regions.

It also includes a multisite platform for IFA Branches and IFA Regions. IFA Branches can choose to use the multisite for their own website, benefitting from uniform branding and exchanging information and activities with other IFA Branches. In 2022 the first IFA Branches developed their websites through the multisite platform, and in 2023 and 2024 more Branches are using the platform. In 2023 a Branch Officers' toolkit was developed and published on the secured part of the IFA website. This toolkit assists IFA Branches with setting up their IFA Branch, their administration and the organisation of their activities.

Next to the website, the IFA App has become a traditional feature during the Annual IFA Congresses, which is highly appreciated by the participants. Since 2024 the IFA App also includes live captions and simultaneous audio translation will be added as of the IFA 2025 Lisbon Congress.

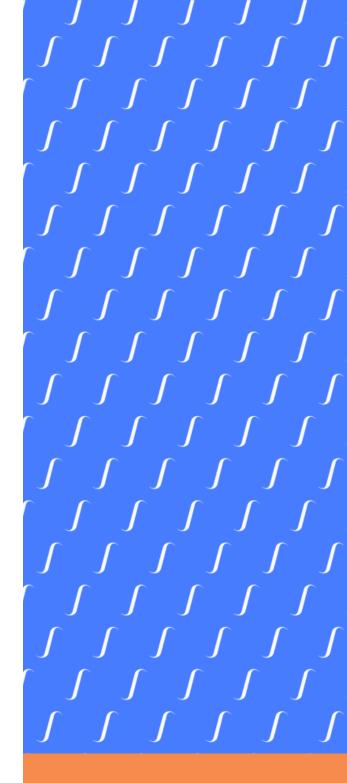
Regularly members are kept informed through the IFA newsletters and LinkedIn posts on publications, activities and the Annual IFA Congress. In addition, specifically for the IFA 2025 Lisbon Congress, a WhatsApp group was set up to provide real-time access to fresh news and updates on the IFA 2025 Lisbon Congress.

IFA and Social Media



The IFA LinkedIn Community has grown to more than 24,000 followers and has become an intrinsic part of IFA. Next to the Global IFA LinkedIn community, various IFA Branches and IFA Regions have established their own LinkedIn groups. To stay up to date on activities and events, members can stay connected by becoming part of the IFA community:

https://www.linkedin.com/company/international-fiscal-association







Global IFA General Secretariat

A new strategy calls for a strong team. Global IFA welcomed Alexia Kardachaki who joined the General Secretariat in June 2024 and became the Head of the Secretariat on 1 September 2024. Since then, the General Secretariat has been strengthened with more focused and technical profiles, and the team currently comprises (from left to right in the picture):

- Anita Burggraaf, Finance and Membership Administration Coordinator
- Ezgi Arik, Scientific Researcher
- Tamara Kerrebijn, Assistant Head of Secretariat
- Alexia Kardachaki, Head of the Secretariat
- · Mary Darbyshire, Administrative Assistant
- Olena Skachkova, PR, Communications & Marketing Officer

The General Secretariat implements the strategy of Global IFA, manages all day-to-day operational matters and is the linking pin between Global IFA, IFA Branches, IFA Regions and the IFA members. It can be contacted via the general email address <u>info@ifa.nl</u>.

Closing Remarks

2024-2025 marked the first year of complete implementation of Global IFA's new strategy. A strategy that is built on the solid foundations of the very essence of IFA: connectivity, neutrality and solid technical focus, while embracing the future: technology, mobility, innovation.

In a continuously fracturing world, IFA has stayed true to its mission to provide a space for inclusive and solid exchange and to promote unity and collaboration. The IFA Branches and IFA Regions play a pivotal role in this respect and are the back-bone of our Association. We are most grateful for the dedication and enthusiasm of so many members who spend part of their precious time to contribute to IFA: they are making and keeping IFA the unique, neutral and independent platform for the study, research and dialogue on international taxation.

As the global landscape is shifting and new trends and players emerge, international taxation does not stand still either. Traditional tax notions are being challenged, the limits of existing tax concepts are being tested and new initiatives are being proposed and explored at local, regional and global levels. These continuing developments will provide IFA with ample opportunity to fulfil its mission, grow stronger in all regions across the globe, and build key partnerships for the future.

I am stepping down from my role as Secretary-General, which I have held for the past 9 years, with great confidence in the future of IFA. It has been an honour and privilege to serve this unique organisation and its members, navigate challenges and pursue opportunities, and contribute to its mission in the best way I could.

I look forward to our Annual IFA Congress and hope to see you all in Lisbon at 5-9 October 2025.

August 2025

Jean-Blaise Eckert

Secretary-General International Fiscal Association



