KPMG

The Finance (Miscellaneous Provisions) Bill 2025 - Mauritius

Key Tax Changes

24 July 2025

Contents

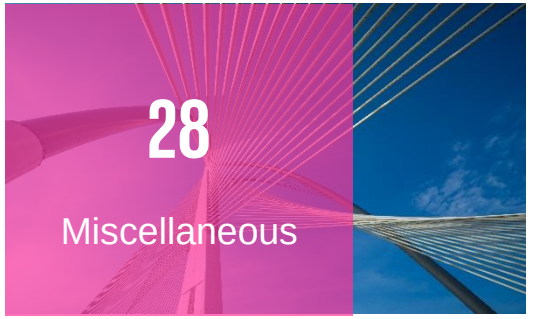












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Appendix

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Foreword (1/2)



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Dear Valued Clients,

The Finance (Miscellaneous Provisions) Bill 2025 ("the Finance Bill") has been released for consultation. It incorporates the measures announced in the recent Budget Speech on 05 June 2025. This Alert covers the key tax measures contained in the Finance Bill. These remain subject to changes during the forthcoming parliamentary debates.

The Finance Bill clarifies that only income in excess of MUR 12m will be subject to the fair share contribution of 15% for individuals. The effective tax rate may lead to a top personal income tax rate of 35%, please refer to income tax simulations in appendix 1. In addition, dividends from local companies (but not from GBC companies) remain taxable under the fair share contribution and this leads to double taxation on those recipients earning more than MUR 12m. The fair share contribution applicable to individuals is not defined as 'income tax' under the Mauritius Income Tax Act. As such, if the individual is also taxed in another country that has a tax treaty with Mauritius, it is unclear whether they will be able to claim a foreign tax credit for the contribution.

For companies, except GBC companies, whose chargeable income exceed MUR 24m, the fair share contribution ranging between 2% and 7.5% will be applicable on whole chargeable income, subject to certain conditions. While the anomaly for individuals has been addressed by applying the fair share contribution only on income exceeding MUR 12 million, a similar issue remains for companies. A company with a chargeable income of MUR 24 million is not subject to the fair share contribution, but if its chargeable income exceeds MUR 24 million, the contribution applies on the entire amount.

The Finance Bill confirms that the fair share contribution, applicable to both individuals and companies, will apply for a limited period of three years, i.e. from 01 July 2025 to 30 June 2028.

In the Budget 2025-2026, the Prime Minister announced that the Qualified Domestic Minimum Top-Up Tax (QDMTT) will be applicable on income derived as from 01 July 2025. However, the Finance Bill specifies that the QDMTT will be effective as from year of assessment commencing 01 July 2025. This means that the QDMTT will apply on all year ends post 31 December 2024. For example, a company with a financial year ending 31 March 2025 will be required to file its DMTT return within 15 months, i.e. by 30 September 2026. The QDMTT is designed to "top up" the effective tax rate of in-scope entities to the global minimum of 15%, in line with the OECD Pillar Two GloBE rules. As a result, many of Mauritius' existing tax incentives, such as the partial exemption regime, non-refundable tax credits, and tax holidays may no longer provide a competitive advantage, since they lead to an effective tax rate below the 15% threshold. Impacted entities are thus advised to carry out impact assessments immediately to avoid unexpected exposures.

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Foreword (2/2)



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For Mauritius to remain competitive, we recommend that policy makers review the suite of tax incentives with a view to designing a tax incentive framework that is both compliant with Pillar Two standards and effective in post Pillar Two environment. We also expect that the fair share contribution payable by companies will qualify for covered taxes under QDMTT.

The Finance Bill introduces a requirement for companies to prepare and maintain transfer pricing (TP) documentation in relation to their intercompany transactions. The Finance Bill does not provide detailed guidance on the scope, format, or thresholds for such documentation, but states that further details will be prescribed through regulations.

As announced in the Budget, foreign suppliers of digital or electronic services to recipients in Mauritius will be required to register for VAT in Mauritius and charge VAT on such services. The Finance Bill sets out a list of services to which this requirement will apply. However, the Finance Bill also provides that where the recipient in Mauritius is VAT-registered and accounts for VAT under the reverse charge mechanism, the foreign supplier should not apply VAT. This creates administrative complexity, as the foreign supplier must now verify the VAT registration status of each Mauritian client before determining whether VAT should be charged on the service. To simplify the process, policy makers could have considered the approach adopted in Kenya, where the foreign supplier charges VAT to all its clients, and the local recipient does not apply the reverse charge, thus ensuring consistency and ease of administration.

The new registration duty and land transfer tax rates of 10% applicable to non-citizens on the purchase and sale of properties under EDB property schemes and other approved schemes will now take effect as from 1 July 2026, rather than upon publication of the Finance Act 2025. We note that the previously proposed land transfer tax for non-citizens, being the higher of 10% of the property value or 30% of the profit on resale, has not been implemented through the Finance Bill.

The Tax Arrears Settlement Scheme (TASS) has been extended and caters for full waiver of penalty and interest on taxes due as at 30 June 2025 and application must be made before 30 November 2025. It is confirmed that MRA assessments can cover only the last 3 and 2 years for income tax and VAT respectively.

I hope you find this tax alert informative. Feel free to contact the KPMG team for any queries you may have.

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Business Tax

Business tax

Key measures	Effective Date
Qualified Domestic Minimum Top-up Tax (QDMTT) – QDMTT is applicable where a Mauritius entity is included in the consolidated financial statements of a Multinational Enterprise (MNE) whose annual turnover exceeds EUR 750 m in at least two of the four fiscal years immediately preceding the fiscal year in which the QDMTT is leviable. – Where the jurisdictional effective tax rate (ETR) of the group in Mauritius falls below 15%, the QDMTT will apply to bring the Mauritius ETR up to 15%. The QDMTT is calculated after reducing the group's payroll costs and tangible assets located in Mauritius. – Excluded entities from QDMTT shall include investment fund, real estate investment vehicle, insurance investment entity and other entities as may be prescribed. – While the Finance Bill sets out the key applicability criteria and effective date, further details, including the formula for computing QDMTT, the definition of covered persons, and other administrative requirements, will be clarified through subsequent regulations. – Impacted groups are required to notify the MRA of the designated person (resident in Mauritius) responsible for filing the QDMTT return, within six months from the end of the fiscal year. Where the year-end of the consolidated financial statements of the ultimate parent entity is 31 March 2025, the Mauritius entity will need to notify the MRA by 30 September 2025. – QDMTT is payable in QDMTT return which needs to be filed 15 months from end of accounting period of the ultimate parent entity of the MNE. – Failure to file the QDMTT return and pay the tax will result in a penalty of 5% of unpaid tax and 0.25% interest per month or part of a month until the return is submitted.	YOA commencing 1 July 2025

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Business tax

Key measures	Effective Date
Fair Share Contribution (FSC) – Introduction of FSC for companies having; - annual chargeable income of more than MUR 24m; and - supplies exceeding MUR 24m in an accounting year or required to be registered under the VAT Act. – FSC will not be applicable to: - Global Business Licence companies - Exempt companies and companies availing of tax holidays – The FSC rate applicable on chargeable income: - Banks – 5% plus an additional 2.5% of its chargeable income arising from transactions with residents (other than GBCs) - Export companies – 2% - Domestic companies (other than export companies and banks) - 5% – FSC payable by Banks and Telecommunication company shall be reduced such that the total tax liability (income tax + CSR + CCR + FSC + applicable Levy) is capped at 35% of chargeable income. – Applicable in respect of income derived from 01 July 2025 to 30 June 2028 – FSC cannot be offset against any tax credit – Payable in VAT returns on a quarterly basis	Gazette date

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Business tax

Key measures	Effective Date
Alternative Minimum Tax ("AMT") – Introduction of AMT to following sectors - Hotel - Insurance - Real estate - Telecommunication - Financial intermediation – AMT is not applicable to: - Global Business entities - Exempt companies and companies availing of tax holidays – AMT cannot be offset against any tax credit – AMT computation - Companies other than life insurance companies - where tax payable, after availing all deductions, is less than 10% of adjusted book profits, the tax payable will be 10% of adjusted book profits	YOA commencing 1 July 2026

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Business tax

Key measures	Effective Date
Alternative Minimum Tax ("AMT") (cont.) – AMT computation – life insurance companies - where the tax payable, after availing all deductions, is less than 10% of adjusted book profits, the tax payable will be 10% of adjusted book profits; or - Higher of normal tax payable or 10% of relevant profit whichever is higher. *tax payable - chargeable income x applicable tax rate* *normal tax payable for life insurance companies - tax payable on net income as provided in Income Tax Regulations* *book profits - accounting profits adjusted for capital gains/losses and dividends from resident companies* *relevant profit - profit attributable to shareholders adjusted for any capital gain/loss attributable to shareholders where such amount has been accounted to the income statement of that company in that income year*	YOA commencing 1 July 2026

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Business tax

Key measures	Effective Date
Arm's length principle – A company which engages in a transaction between connected persons shall prepare and maintain documentation in such a manner as may be prescribed – The following have been defined: • **Connected persons**: Where one company controls the business or income earning activity of the other, in Mauritius or from Mauritius • **Transaction**: Any transaction or series of transactions, carried out directly or indirectly, between connected persons; and includes cross-border transactions	Gazette date
Corporate Social Responsibility (CSR) Fund set up on or after 1 January 2026 – 50% to be remitted to MRA in income tax returns – Remaining 50% to be spent by company as per MRA approved framework	Gazette Date
Tax incentives – Special tax credit - a credit or relief may be granted to companies subject to conditions that will be prescribed – Investment tax credit of 5% over 3 years for small businesses (annual turnover not exceeding MUR 10m), on cost of acquisition of new equipment of up to MUR 500,000 (excluding motor vehicles) incurred during the period 1 July 2025 to 30 June 2030. Unutilised tax credit may be carried forward for 5 income years	YOA commencing 1 July 2025 Gazette date

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Business tax

Key measures	Effective Date
Tax incentives (cont.)	
– Tax deductions on expenditure in investment in AI technologies and right of use of AI technologies up to MUR 150,000, to companies having annual turnover not exceeding MUR 100m	YOA commencing 1 July 2025
– For project financed to the extent of at least 50% from foreign state grants or donor institutions and approved by the Ministry of Finance, the company implementing the project will benefit from corporate income tax exemption	Gazette date
– The 4-year income tax holiday granted to SME converting from sole trader or partnership to a company will not be granted for the following activities; - information and communication technologies - professional services - financial services - tourism, or - training services	YOA commencing 1 July 2026

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Business tax

Key measures	Effective Date
Tax incentives (cont.) The following available tax incentives will henceforth be restricted to SMEs with annual turnover not exceeding MUR 100m: – Double deduction on; - cost of setting up a crèche or Child Day Care Centre for its employees - acquisition of patents and franchises and costs to comply with international quality standards - acquisition of specialised software and systems - financing, sponsorship, marketing or distribution costs of a film – Triple deduction of donation, capped at MUR 1m, to a charitable institution or NGO involved in specified activities. – Double deduction on emoluments and training costs paid in respect of an employee in Rodrigues and emoluments paid to female employee under the Prime à l'Emploi Scheme.	YOA commencing 1 July 2026 Income year commencing 1 July 2025
– Tax exemption on gains on sale of gold, silver or platinum held for a continuous period of at least 6 months, will not be available to Banks	YOA commencing 1 July 2026

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Business tax

Key measures	Effective Date
80% Partial Exemption Regime (PER) – Extended to income derived by Virtual Asset Service Providers engaged in exchange, transfer, safekeeping and administration of virtual assets subject to meeting the prescribed substance requirements – On dividends will not be available to banks – On interest income shall be granted provided the relevant activity of the company, generating the interest income, satisfies the conditions relating to substance requirements	YOA commencing 1 July 2026 Gazette Date Gazette Date
Tax Deducted at Source (TDS) – Payments to non-resident entertainers or sportspersons performing in Mauritius will be subject to 10% TDS irrespective of the level of turnover	YOA commencing 1 July 2026
Charitable institutions – Revocation of the charitable status of an institution by the MRA where the institution no longer meets the objects of a charitable institution or its approval was obtained by fraud or misrepresentation. If no representations are made to the ARC within 21 days of notification, the institution will be subject to tax as from the revocation date	Gazette Date

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Personal Tax



Personal Tax

Key measures	Effective Date
Introduction of Fair Share Contribution (FSC) on high-income earners	Income Year commencing 1 July 2025

Criteria	Details
Application	Every individual with **FSC income threshold** exceeding MUR 12m per year
Rate	15% on **leviable income** exceeding MUR 12m
Due date	Upon submission of the income tax return
Effective period	01 July 2025 to 30 June 2028

	FSC income threshold	Leviable income
Sum of :		
- Income base	Net income of the individual	Chargeable income of the individual
- Dividends from resident companies and co-operative societies	Included	Included
- Share of dividends from sociétés or successions (if fully distributed)	Included	Included
- Dividends/ distributions from global business entities	Excluded	Excluded
- Lump sums (pension commutation, gratuity, death/injury compensation)	Excluded	Excluded

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Personal Tax

<table>
<tr><th>Key measures</th><th>Effective Date</th></tr>
<tr><td>

Introduction of new tax rates and bands

Chargeable Income	Tax Rate
First MUR 500,000	0%
Next MUR 500,000	10%
Remainder	20%

Please refer to Appendix 1 for income tax simulations.

</td><td>Income Year commencing 1 July 2025</td></tr>
<tr><td>

Personal deductions and reliefs

- The following personal deductions and reliefs have been removed:
  - Deduction of wage paid to a household employee
  - Relief for adoption of animals
  - Angel investor allowance

</td><td>Income Year commencing 1 July 2025</td></tr>
</table>

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Personal Tax

Key measures	Effective Date
Reductions in penalties and interest	Gazette date

Penalty and Interest	Previous Rate	Revised Rate
Penalty for late payment of tax by individuals	5%	2.5%
Penalty for late payment of tax by individuals not in business	2%	1%
Interest on unpaid tax per month or part of month during which the tax remains unpaid	0.5%	0.25%

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Value Added Tax

Value Added Tax

Key measures	Effective Date
VAT on digital or electronic services – A foreign supplier of digital or electronic services to recipients in Mauritius is required to register for VAT in Mauritius and charge VAT irrespective of its turnover of taxable supplies. – Foreign supplier means any person who: - has no permanent establishment in Mauritius or has his place of abode outside Mauritius; and - supplies, in the course of his business, digital or electronic services to a person in Mauritius. – Digital or electronic service means services supplied by: - a foreign supplier over the internet or an electronic network which is reliant on the internet; or - a foreign supplier and is dependent on information technology for its supply. – Digitally or electronically supplied services consist of supplies of images or texts, music, films, television shows, applications, software and website supply, amongst others. – Foreign supplier receiving payment in foreign currency to submit VAT return and pay tax in that currency. Where payment is received in more than one currency, VAT return to be made in currency of choice among the currencies. – Requirement to appoint a tax representative in Mauritius where the annual taxable supplies of a foreign supplier exceed, or are likely to exceed, MUR 3 million.	1 January 2026

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Value Added Tax

Key measures	Effective Date
Digital or electronic services (cont.) – VAT return to be submitted electronically and payment of tax by foreign suppliers within 20 days after the end of each taxable period. A list of taxable supplies made to persons in Mauritius to be submitted with the VAT return. – No credit for input tax to be claimed by suppliers of digital or electronic services.	1 January 2026
VAT registration – Threshold for compulsory registration reduced from MUR 6m to MUR 3m. – Compulsory registration for holder of Pleasure Craft Licence issued by Tourism Authority in respect of pleasure craft of more than 12 metres used for commercial purposes.	Gazette date
Special Levy on Banks – Currently, banks are subject to a VAT special levy calculated at 5.5% of their leviable income from transactions with residents, other than Global Business Companies. The levy is capped to 1.5 times of the levy payable in year of assessment 2017/18. The cap of 1.5 times will be removed.	Accounting period starting on or after 1 July 2025
Credit for input tax – No input VAT shall be allowed as credit for parking fees, unless the vehicle is used for business purposes or is designed to carry at least 10 people including the driver.	Gazette date

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Tax Administration



Tax Administration

Key measures	Effective Date
Reduction in the time limit to raise tax assessments – Income Tax - Currently, the Director-General shall not, in a year of assessment, make an assessment in respect of a period beyond 3 years of assessment preceding the year of assessment. - It is being proposed to reduce the 3-year limit to 2 years. – Value Added Tax - Currently, an assessment shall not be made in respect of a period beyond 4 years immediately following the last day of the taxable period in which a return or a statement is submitted. - It is being proposed to reduce the 4-year limit to 2 years.	Gazette date
Payment of tax to the MRA in foreign currency – Companies deriving more than 50% of their gross income in a specified foreign currency will be required to convert and pay any tax due in the same foreign currency, using the exchange rate applicable on the date of payment of tax. – Where the companies derive more than 50% of their gross income in a combination of foreign currencies, payment of tax will be made in one of those foreign currencies, at the option of the companies.	01 October 2025

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Tax Administration

Key measures	Effective Date
Payment of tax to the MRA in foreign currency (cont.) – Where the company is a bank, it shall pay in Mauritius currency the proportion of tax arising from transactions with residents other than from a global business entity. – The Minister may make amendments through regulations to exclude certain category of companies and reduce the amount of tax to be paid in foreign currency.	01 October 2025
Tax Amnesty Schemes *Extension of the Tax Arrears Settlement Scheme (TASS)* – Taxpayers applying to the Director-General under TASS on or before **30 November 2025** will benefit from a full waiver of penalties and interest on tax arrears due as at 30 June 2025 under the Income Tax Act, the Value Added Tax Act, and the Gambling Regulatory Authority Act, provided the arrears are paid in full on or before **31 March 2026.**	Gazette date
Extension of the Arrears Payment Scheme – The Scheme under the Registrar-General's Department provides for a full waiver of penalties and interest under Land (Duties and Taxes) Act on duty and taxes due as at 31 May 2025, provided the debt is settled in full on or before **31 March 2026**. – The taxpayer must withdraw or formally undertake to withdraw any objection, representation, or appeal relating to the payment of the duty and taxes.	Gazette date

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Tax Administration

Key measures	Effective Date
Tax Amnesty Schemes (cont.) *Introduction of Voluntary Disclosure Settlement Scheme (VDSS)* – For Income Tax, the Scheme applies to non-declaration or under-declaration of income for the Year of Assessment 2024/25 and prior years. – For VAT, it applies to non-declaration or under-declaration of taxable supplies for the taxable period ended 30 April 2025 and prior periods. – Taxpayers will benefit from 100% waiver of penalties and interest, provided the tax is paid in full on or before **31 March 2026**. – This also applies to assessments issued after 5 June 2025 where objections, representations, or appeals are still pending as at 31 March 2026. – Any tax not paid in full on or before by 31 March 2026 will carry interest.	Gazette date

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Tax Administration

Key measures	Effective Date
Tax Amnesty Schemes (cont.) *Introduction of Tax Dispute Settlement Scheme (TDSS)* – Where tax, penalty and interest are due under an assessment in respect of which proceedings were pending before the Assessment Review Committee, the Supreme Court or the Judicial Committee of the Privy Council as at 05 June 2025, the taxpayer will benefit from 100% waiver of penalties and interest, provided that: - the taxpayer withdraws the legal proceedings before the date of application; - an electronic application is submitted to the Director-General on or before **31 December 2025**; and - the outstanding tax is paid in full on or before **31 March 2026** – No refund shall be made under this Scheme in respect of any tax, penalty or interest already paid.	Gazette date

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Tax Administration

Key measures	Effective Date
Registration of tax agents – No person shall be able to submit tax return or represent a tax payer before the MRA or Tax Tribunal unless that person is a registered tax agent. – In the case of an individual, a tax agent shall meet the three conditions below: a) A citizen of Mauritius; and b) A member of the Mauritius Institute of Professional Accountants (MIPA) or a law practitioner; and c (i) A person with at least 3 years of experience in accounting or tax, who has been employed by someone who is either a MIPA member or a registered tax agent; or c (ii) A person holding a degree in the field of taxation, accountancy, economics, business management or any other related field – In the case of a company, it must be registered with MIPA, and the person the company nominates must meet the same conditions required for an individual. – Any other tax agent will be required to make an application with the MRA.	Date to be fixed by Proclamation

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Tax Administration

Key measures	Effective Date
Penalty and interest — The maximum penalties and interest charged cannot exceed 100% of the tax due, except for the following penalties - Failure to join electronic system for PAYE system - Late submission of Statement of Income for Current Payment System - Late submission for Tax on Winnings - Late submission of return of income - Failure to submit return of income by companies electronically - Loss over claimed by a person	01 July 2025
— 50% reduction of penalties and interest on unpaid taxes under: - Advance Payment System - Current Payment System - Return of income by individuals - Return of income by companies - Return in respect of a trust or a resident société - Assessments by Director-General - Pay As You Earn Return by employer - Reduction of penalty from 5% to 2.5% on loss over claimed	01 July 2025

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Miscellaneous

Property Taxes

Key measures	Effective Date
Registration Duty and Land Transfer Taxes for non-citizens – The rate of Land Transfer Tax (LTT) payable by the seller will be increased from 5% to 10% on the sale of residential property to non-citizens under the EDB Property scheme or other approved schemes – The rate of Registration Duty payable by a non-citizen will be increased from 5% to 10% on the purchase of residential property under the EDB Property scheme or other approved schemes	1 July 2026
Smart City Scheme (SCS) *Removal of the following tax incentives:* – Land Transfer Tax and Registration Duty on the transfer of land to a Smart City Company for the development of a Smart City project – Land conversion tax in respect of land earmarked for other than residential development purposes – Exemption from income tax for 8 succeeding years from the date of issue of SCS certificate – Accelerated annual allowance at 50% in respect of certain specified capital expenditure incurred (this incentive will continue to apply for smart city companies issued with a SCS certificate prior to 5 June 2025) – Exemption from customs duty on imports of dutiable goods to be used in infrastructure works and construction of buildings – Full recovery and repayment of input VAT paid on buildings and capital goods	Gazette date

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Property Taxes

Key measures	Effective Date
Smart City Scheme (SCS) (cont.) *Tax incentives available to SCS certificate holders will be as follows:* – Smart city companies and smart city developers will be deemed to be VAT registered so they can fully recover VAT paid on buildings and infrastructure until the period ending 30 June 2027 – Ability to claim VAT refund on buildings, capital goods and construction of public roads in respect of a project relating to construction of a public transport station/terminal for a period not exceeding 8 years from the issue of the SCS certificate – Ability to claim VAT refund for construction of public roads or roads eventually available for general public use – Exemption from Customs duty on imports of dutiable goods, other than certain types of furniture, to be used in infrastructure works for the construction of a public transport station/terminal – Exemption from income tax on income derived in respect of a project relating to the construction of a public terminal/station for 8 succeeding years following the issue of the SCS certificate as long as the income is from an activity pertaining to the development and sale, rental or management of immovable property other than an activity in respect of supply of goods and services	Gazette date
Smart City Fee – Introduction of a smart city fee payable by a smart city company or smart city developer upon issue of an SCS certificate. The SCS will be based on the land and usage similar to the Morcellement fee.	Gazette date

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Tourist fee

Key measures	Effective Date
Tourist fee – A Tourist Fee of EUR 3 per night will be applicable to tourists staying in registered tourist accommodations: - Domaines; - Guesthouses; - Hotels; and - Tourist residences. – Accommodation managers will be responsible to collect the fee and submit it electronically to the MRA through a prescribed return containing the following relevant details: - Number of tourists (distinguishing those under 12 years old); - The number of other residents; - Amount of tourist fees payable and collected; and - Any other particulars as may be required. – Late remittance to the MRA will result in a 10% penalty along with interest of 1% per month (or part thereof). – Failure to submit the return or submission of a false return may lead to a fine not exceeding MUR 500,000 or imprisonment.	01 October 2025

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Immigration Rules – Occupation Permit (OP)

Key measures	Effective Date
Professional OP – The basic monthly salary threshold (currently MUR 22,500) is being revised as follows: – Professional Pass (“ProPass”) - Monthly basic salary of a least MUR 50,000 – Expert Pass - Monthly basic salary of a least MUR 250,000 - The holder of an professional OP may invest in businesses but cannot be majority shareholders or draw a salary if not employed there	Gazette date/Fixed by proclamation
Investor OP – The conditions to obtain investor OP will be amended as follows: - Option 1: Initial investment of USD 50,000 with minimum turnover MUR 1.5 million from year 1 with progressive growth to reach a total MUR 20 million by year 5 - Option 2: Initial investment of USD 100,000 with minimum turnover MUR 1 million from year 1 with progressive growth to reach a total MUR 15 million by year 5 - Bank statement & written undertaking to transfer funds within 60 days remain the same - To renew and maintain eligibility: minimum annual turnover of MUR 5 million from year 6 onward	Gazette date/Fixed by proclamation

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Immigration Rules – Occupation Permit (OP)

Key measures	Effective Date
Self-employed OP *The conditions to obtain self-employed OP will be amended as follows:* – Initial investment required increased from USD 35,000 to USD 50,000 – Submission of at least 3 letters of intent including 2 from potential local clients – Minimum business income of MUR 750,000 from year 1 with progressive growth to reach a total MUR 6 million by year 5 – Bank statement & written undertaking to transfer funds within 60 days remain the same – For renewal, a minimum business income of MUR 1.5 million from year 6 onward	Gazette date/Fixed by proclamation
Dependent Child of OP holders – It has been clarified that a dependent child as defined under the Immigration Act shall be below the age of 24. Hence, children below 24 of holders of occupation permit shall generally be eligible for resident permit in Mauritius.	Gazette date/Fixed by proclamation

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Regulatory

Key measures	Effective Date
Resident directors for GBC – Clarification will be made that holders of Global Business Licence must, **at all times**, have at least two resident directors.	Gazette date
Annual report requirements for Public Interest Entities (PIE) – Every PIE must now prepare an annual report within 6 months of the balance sheet date. – Previously, private (PIE) companies could be dispensed from this requirement through a shareholder's resolution.	Gazette date
Beneficial ownership declarations – Companies, Partnerships, and Foundations must keep a written declaration from each beneficial owner or ultimate beneficial owner confirming their status and, must ensure that any change in such status is promptly notified by the beneficial owner to the entity. Existing entities have until 30 June 2026 to comply.	Gazette date

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Appendix



Appendix: Income Tax simulation

Example 1 - Monthly basic salary of MUR 100,000

Year of Assessment	2025/2026	2024/2025
Income year	1 July 2025 to 30 June 2026	1 July 2024 to 30 June 2025
	MUR	MUR
Annual salary	1,300,000	1,300,000
Annual travelling allowance	240,000	240,000
Total gross income [A]	1,540,000	1,540,000
Less: Exempt income	(240,000)	(240,000)
Total net taxable income	1,300,000	1,300,000
Less: Deduction for one dependent	(110,000)	(110,000)
Chargeable income	1,190,000	1,190,000
Income Tax	88,000	76,800
Contribution Sociale Généralisée	39,000	39,000
Total income tax and contribution payable by employee [B]	127,000	115,800
Effective tax rate [B] / [A]	8.25%	7.52%
Disposable income [A] – [B]	1,413,000	1,424,200
Increase / (Decrease) in disposable income	(11,200)	

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Appendix: Income Tax simulation (cont.)

Example 2 – High income earner (earning emoluments exceeding MUR 12m per annum)

Year of Assessment	2025/2026	2024/2025
Income year	1 July 2025 to 30 June 2026	1 July 2024 to 30 June 2025
	MUR	MUR
Emoluments including bonuses	26,000,000	26,000,000
Annual petrol allowance	1,500,000	1,500,000
Dividend income from resident company	500,000	500,000
Rental Income	900,000	900,000
Total gross income [A]	28,900,000	28,900,000
Less: Exempt income		
- Petrol allowance [Capped at MUR 20,000 per month]	(240,000)	(240,000)
- Dividend income from resident company	(500,000)	(500,000)
Total net taxable income	28,160,000	28,160,000
Less: Deduction for two dependents	(190,000)	(190,000)
Chargeable income	27,970,000	27,970,000

Example 2

Year of Assessment	2025/2026	2024/2025
Income year	1 July 2025 to 30 June 2026	1 July 2024 to 30 June 2025
	MUR	MUR
Income Tax	5,444,000	5,388,800
Fair Share Contribution (FSC) Liability	2,470,500	Not Applicable
Contribution Sociale Généralisée	195,000	195,000
Total income tax, FSC and contribution payable by employee [B]	8,109,500	5,583,800
Effective tax rate [B] / [A]	28%	19.32%
Disposable income [A] – [B]	20,790,500	23,316,200
Increase / (Decrease) in disposable income	(2,525,700)	

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Glossary of terms

Definition	Term
Alternative Minimum Tax	AMT
Corporate Climate Responsibility	CCR
Corporate Social Responsibility	CSR
Economic Development Board	EDB
Effective Tax Rate	ETR
Euro	EUR
Fair Share Contribution	FSC
Financial Services Commission	The Commission
Foreign Tax Credit	FTC
Global Anti-Base Erosion	GloBE
Land Transfer Tax	LTT
Mauritius Institute of Professional Accountants	MIPA
Mauritius Revenue Authority	MRA
Mauritius Rupee	MUR
Multinational Enterprise	MNE

Definition	Term
Non-Governmental Organisation	NGO
Occupation Permit	OP
Organisation for Economic Co-operation and Development	OECD
Partial Exemption Regime	PER
Pay As You Earn	PAYE
Qualified Domestic Minimum Top-up Tax	QDMTT
Registration Duty	RD
Residence Permit	RP
Tax Arrears Settlement Scheme	TASS
Tax Deducted at Source	TDS
The Finance (Miscellaneous Provisions) Bill 2025	The Finance Bill
United States Dollar	USD
Value Added Tax	VAT
Voluntary Disclosure Settlement Scheme	VDSS
Year of Assessment	YOA

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Disclaimer

The above information has been extracted from The Finance (Miscellaneous Provisions) Bill 2025. The Finance (Miscellaneous Provisions) Bill 2025 has been released for consultation on 21 July 2025 and may be amended significantly before enactment. The content of this summary is intended to provide a general guide to the subject matter and should not be regarded as a basis for ascertaining liability to tax or determining investment strategy in specific circumstances. In such cases, specialist advice should be taken.

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