AUGUST 2026

KEY MEASURES OF THE MAURITIUS FINANCE ACT 2026 AND THE ECONOMIC AND FINANCIAL MEASURES (MISCELLANEOUS PROVISIONS) ACT 2026

This memorandum summarises selected measures from the Finance Act 2026 and the Economic and Financial Measures (Miscellaneous Provisions) Act 2026, published in the Government Gazette on 13 August 2026, that are deemed to be relevant to the Mauritius global business industry.

The effective date of the measures is expected to be the date of publication, unless otherwise referenced in this memorandum.

This memorandum is a high-level client briefing and does not constitute legal, tax, accounting or regulatory advice.

AT A GLANCE

AREA	KEY DEVELOPMENT	PRIMARY RELEVANCE
GLOBAL BUSINESS	Wider Global Business Entity definition under Fair Share Contribution obligations; new GBL bank-signatory requirement	GBLs, trusts, foundations and funds
MANAGEMENT COMPANIES	Specified management services become VAT-exempt rather than zero-rated	Management companies
FSC SUPERVISION	Conservatorship regime and wider enforcement reach	FSC licensees and boards
PRIVATE WEALTH	New Private Wealth Management Licence and Golden Visa	Family office and private clients
BENEFICIAL OWNERSHIP	New partnership register and additional date-of-birth data	Corporate and fiduciary administration
TAX	Fair Share Contribution updates impacting individuals and certain corporations, QDMTT refinements, tighter CCR credits, ICT taxation and TDS	International groups and operating entities
FUNDS	PCC to VCC conversion and intra-VCC service options	Funds and administrators
DIGITAL ASSETS	Wider solicitation restrictions and licensing requirements	VASPs, promoters and platforms

KEY TAX MEASURES

Fair Share Contribution (FrSC)

Measure

> From the year of assessment commencing 1 July 2027, the definition of "global business entity" under the Income Tax Act 1996 will include:

- > qualifying foundations with founders and beneficiaries being non-resident or holding a Global Business Licence (GBL) and which purpose is carried out outside of Mauritius.
- > qualifying trusts with settlors and beneficiaries being non-resident or holding a GBL, and purpose trusts whose purpose is carried out outside Mauritius.
- > a trustee of a unit trust scheme who is non-resident or holds a GBL.

> The applicability of FrSC with respect to income derived by an individual is no longer be limited to the income years commencing 1 July 2025, 1 July 2026 and 1 July 2027 only.

> Under the Value Added Tax Act (VAT Act), a company with supplies exceeding Rs 24 million was required to register under the said Act and be liable to FrSC if its chargeable income exceeded Rs 24 million. The requirement for the company liable to FrSC to be registered under the VAT Act is removed.

Impact

> The FrSC threshold and leviable income exclude dividends or distributions made by a global business entity. Hence, dividends or distributions made by trusts and foundations other than those falling under the definition of global business entity shall be included for the purpose of determining FrSC liability.

> Companies (other than global business entities) with chargeable income exceeding Rs 24 million are liable to pay FrSC.

> Individuals shall be subject to FrSC for income years beyond the income year commencing 1 July 2027.

Suggested Actions

Companies (including limited partnerships, variable capital companies, protected cell companies) as well as trusts and foundations not falling under the scope of global business entity, and individuals with leviable annual income exceeding Rs 12 million (other than from dividends and distributions from global business entities) shall assess the impact of the FrSC.

Qualified Domestic Minimum Top-up Tax (QDMTT)

Measure

> Excluded persons shall include an investment fund and a real estate investment vehicle where the entity is the Ultimate Parent Entity (UPE).

> The computation shall cater for consolidation adjustments eliminating intragroup transactions, and the fiscal-year definition are refined.

> The return deadline is clarified as no later than 15 months from the end of the month in which the fiscal year ends; returns may be amended within three years instead of two.

> The non-payment penalty is reduced from 5% to 2.5% of the unpaid tax, from the gazetted date.

The effective date in relation to the measures above shall be as from year of assessment commencing on 1 July 2025.

Impact

In-scope multinational groups may need to adjust entity classification, consolidation data, return governance and filing calendars.

Suggested Actions

Confirm the scope analysis, UPE status, data sources, filing responsibility and timetable with tax advisers.

Corporate Social Responsibility (CSR) Contributions

Measure
Entities subject to CSR Levy shall be required to remit 75% of the contributions to Mauritius Revenue Authority, for CSR Fund set-up on or after 1 January 2027.

Impact
The contribution of 50% with respect to CSR Fund set-up on or after 1 January 2027 increases to 75%.

Suggested Actions
Entities subject to the CSR contribution should take into consideration the increase.

Corporate Climate Responsibility Levy

Measure
> The levy moves into the quarterly Advance Payment System (APS), with 25% of the amount of the levy payable together with the APS Statement for the first 3 quarters and the remaining amount (full levy amount net of the amount already paid) payable in the last quarter.

> Tax credits will generally no longer offset the levy, except investment tax credit and foreign tax credit available under a tax treaty.

Impact
Affected companies will be required to pay the levy under their APS, with reduced capacity to offset the levy with tax credits.

Suggested Actions
Model the cash-flow and effective-tax impact, verify the legal basis for foreign-tax credits and update APS processes.

ICT, Software and Digital-Service Taxation

Measure
> Non-resident suppliers of specified software, licences, applications, maintenance and remote ICT maintenance deriving income from Mauritius, may be subject to Mauritian income tax deducted at source (TDS).

> A 1% TDS applies to qualifying company payments over Rs 300,000 to ICT service providers, subject to stated exclusions.

> A 5% TDS will apply to qualifying digital advertising, promotional, endorsement and marketing service payments.

> Digital VAT rules will be adjusted, including reverse charge where a foreign supplier makes taxable supplies exclusively to VAT-registered persons.

Impact
Cross-border technology and online-marketing expenditure may create new income tax, withholding and VAT obligations.

Suggested Actions
Review vendor masters, contracts, residence, payment thresholds, withholding processes and reverse-charge controls.

Personal Tax and Internationally Mobile Clients

Measure

- > From 1 July 2026, the proposed taxation bands for individuals shall be: first Rs 500,000 at 0%; next Rs 500,000 at 10%; next Rs 11 million at 20%; remainder at 35%.
- > Golden Visa holders will have specified remittance-based treatment for foreign employment income, foreign-card spending and declared funds deposited in Mauritius.

Impact

The revised top rate and remittance rules may affect investors and employees being tax resident in Mauritius (including officers).

Suggested Actions

Obtain tailored personal tax advice before making changes to your residence status, remittance arrangements, banking relationships or investment structures.

VAT Treatment for Holders of Management Licence

Measure

- > From 1 October 2026, services by a holder of management licence (Management Company) to a holder of a GBL, specified trusts with non-resident settlors and beneficiaries, and specified foundations with non-resident founders and beneficiaries will be exempt rather than zero-rated.
- > The input-tax claim period will reduce from 36 to 24 months.

Impact

Although output VAT will not be charged on affected services, the change may restrict input VAT recovery and create irrecoverable VAT cost for holders of a management licence.

Suggested Actions

Management Companies should assess the impact of the partial-exemption on historical input-tax claims, contracts, billing codes, VAT mappings and finance-system changes ahead of 1 October 2026.

MEASURES AFFECTING GLOBAL BUSINESS STRUCTURES

GBL Bank Signatory Arrangements

Measure

Holders of GBLs are required at all times to operate bank accounts under signatory arrangements made in accordance with guidelines of the Financial Services Commission (FSC), which must include at least one officer of the Management Company.

The FSC's guidelines to management companies from the FSC was already updated to include the requirement since June 2026. GBLs are to ensure that bank mandates, signing authority and payment workflows are aligned.

Impact

Mandates of bank accounts maintained by GBLs will be required to be updated to comply with the guidelines.

Suggested Actions

Assess bank accounts mandates, signatories, delegated authorities and approval workflows against the guidelines.

Other Structural Measures

Measure

> A holder of a GBL or an Authorised Company issuing debentures exclusively outside Mauritius to non-residents, without invitation in Mauritius, does not require a debenture holders' representative.

> For continuation into Mauritius, a foreign company may use a certificate of registration or equivalent official evidence.

> The Limited Partnership (non-GBL) audit-exemption threshold and Limited Liability Partnership financial-statement threshold has been increased from Rs 50 million to Rs 100 million; name reservation will increase from two to six months.

Impact

The changes may simplify selected international financing, continuation and partnership administration arrangements.

Suggested Actions

Update transaction, continuation, annual-compliance and entity-formation checklists following enactment.

MEASURES AFFECTING HOLDERS OF LICENSEES FROM THE FINANCIAL SERVICES COMMISSION

Conservatorship Framework

Measure

> The FSC may appoint a conservator where capital is impaired or threatened, practices are detrimental to clients, directors knowingly permit contraventions, requirements are not or are unlikely to be met, or contraventions are likely.

> A conservator may take charge of the business, preserve and recover assets, and overrule or suspend board powers.

Impact

Boards and senior management face a stronger early-intervention framework where capital, client interests or compliance are at risk.

Suggested Actions

Review capital monitoring, client-asset protection, breach escalation, board reporting, compliance monitoring and recovery readiness for impacted entities.

Private Wealth Management Licence

Measure

Effective 1 September 2026, a new Private Wealth Management Licence will be introduced under the Financial Services Act.

Impact

The Private Wealth Management Licence will be subject to the approval of the Commission and conduct activities as may be specified by FSC Rules and is expected to increase competitivity of the jurisdiction with broader choice for investors and managers.

Suggested Actions

Further details are awaited regarding the FSC licensing requirements and FSC Rules.

Other FSC and Fintech Measures

Measure

> Effective, 1 September 2026, a National Fintech Governance Committee will coordinate and oversee fintech strategy.

> The prohibition on false or misleading statements to the FSC will extend to information concerning a valid or past licence.

Impact

Current and former licensees may face wider regulatory exposure concerning information supplied to the FSC.

Suggested Actions

Retain robust licence records and regulatory submissions.

GOVERNANCE, AML/CFT AND BENEFICIAL OWNERSHIP

Minimum Periodic Review Frequencies

Measure

> The Registrar of Companies shall maintain a beneficial ownership register for every partnership.

> Limited partnerships must also maintain a beneficial ownership register, including adequate, accurate and current information, records of identification steps along with written declarations from beneficial owners or ultimate beneficial owners.

> Information must be filed with the Registrar of Companies on registration and within 14 days of a change.

> Existing limited partnerships must comply by 31 March 2027.

Impact

Partnerships will have new identification, declaration, filing and remediation obligations.

Suggested Actions

Review records and put in place or update beneficial ownership register.

Date of Birth in Beneficial Ownership Registers

Measure

> The beneficial ownership registers of companies, foundations, limited liability partnerships and limited partnerships will also include the date of birth of the beneficial owner or ultimate beneficial owner.

> Existing entities have until 30 June 2027 to comply.

Impact

Existing statutory records and personal-data processing arrangements may require remediation.

Suggested Actions

Identify missing dates of birth, update registers and plan filings by the applicable deadline.

AML/CFT and Financial-Crime Information

Measure

> Financial institutions subject to the AML/CFT regime imposed by FIAMLA has been clarified to exclude the third-party administrators.

> Banks have expanded disclosure duties concerning Financial Crimes Commission and United Nations sanctions requirements.

Impact

Financial institutions may face stronger information-sharing and enforcement expectations. Reliance on third-party administrator are be limited, with demarcation regarding responsibilities clarified.

Suggested Actions

Review controls and procedures for any impact.

Sustainability Reporting

Measure

> Sustainability reporting standards include International Sustainability Standards Board (ISSB) standards as adopted or recognised by the Financial Reporting Council.

> Future regulations may impose sector-specific mandatory reporting, differentiated timelines, transitional relief and enforcement. Company annual reports will include sustainability reporting where applicable.

Impact

Entities brought into scope may need new governance, data, controls and assurance arrangements.

Suggested Actions

Identify present ESG data and reporting ownership and monitor regulations defining the entities and implementation timetable.

VCC, VIRTUAL ASSET AND VISA

Variable Capital Companies

Measure

> A protected cell company may convert into a variable capital company (VCC).

> With prior FSC approval, a VCC may contract with or provide ancillary services to its sub-funds provided no other licences are required for such services.

Impact

Fund structures gain additional conversion and intra-VCC operating options.

Suggested Actions

Evaluate tax, regulatory, creditor-protection opportunities for existing PCCs to be converted into VCC and review any plans for ancillary services to be provided by existing VCCs to their sub-funds.

Virtual Asset Solicitation and Reporting

Measure

> Unless appropriately licensed or registered, a person may not solicit, target or engage an investor in Mauritius for virtual-asset transactions or an initial token offering.

> The definition of soliciting and communication are far reaching.

Impact

Increased regulations regarding virtual-asset transactions and initial token offering.

Suggested Actions

Those engaged in virtual-asset transactions or an initial token offering to ensure compliance with licensing and registration requirements.

PRIVATE CLIENT, IMMIGRATION AND EMPLOYMENT MEASURES

Golden Visa and Occupation Permits (OP)

Measure

> A Golden Visa shall be available for a qualifying non-citizen investment of at least USD 1 million in a business activity, excluding specified residential-property acquisitions.

> The Investor OP will require USD 100,000 initial investment, to be transferred to his bank account in Mauritius within 60 days of the permit being issued. The conditions include a minimum turnover of Rs 5 million as from third year of registration of his business and a minimum of Rs 8 million as from the fifth year of registration, for renewal.

> The Professional OP minimum monthly basic salary increases to Rs 50,000 across sectors. Revised rules also apply to innovative start-ups, technical personnel and self-employed applicants.

> The Family OP category will be abolished.

Impact

Investors, executives, employers and private clients may need to reassess eligibility, renewal planning and mobility structures.

Suggested Actions

Each affected person should review visa and permit criteria.

Employment Measures

Measure

> One day of menstrual leave per month on full pay is introduced.

> Maternity leave on full pay increases from 16 to 26 weeks, with an option for up to another 26 weeks at half pay; qualifying adoption leave will also expand.

> Paternity leave increases from four to six consecutive weeks.

Impact

Resource and cost implications to Mauritius employers.

Suggested Actions

Update leave policies, payroll and HR systems, manager guidance and confidentiality controls.

TAX ADMINISTRATION AND DISPUTE MEASURES

Compliance Agreements

Measure

> The Mauritius Revenue Authority (MRA) and a taxpayer may enter a written agreement to resolve liabilities before an assessment, claim or notice of determination.

> The agreement may cover tax, penalties, surcharges, interest and payment terms. The taxpayer waives objection and appeal rights for covered matters.

Impact

A taxpayer may achieve early resolution but gives up important challenge rights.

Suggested Actions

Obtain specialist advice and document the legal, factual and commercial basis before entering an agreement.

Director Liability and Enforcement

Measure

> Liability for unpaid income tax restricted to “Principal officer”, which includes an executive director or another person exercising or controlling board powers.

> MRA information and inspection offences and penalties are strengthened.

Impact

The narrower liability provision provides greater certainty to officers holding a non-executive role, while information-production and inspection risks increase.

Suggested Actions

Review officer responsibilities, records, inspection-response authority and escalation procedures. The amendment does not remove other statutory duties.

IMPORTANT NOTES AND LIMITATIONS

> This memorandum is a high-level summary and is not a substitute for enacted legislation, regulations, FSC guidelines, MRA practice or professional advice.

> Readers should obtain advice based on their circumstances and that of the impacted corporations before implementing tax, legal, regulatory, employment, immigration or operational changes.

HOW WE CAN ASSIST

For more information, please contact your usual Trident Trust representative or our office at mauritius@tridenttrust.com.