



Mauritius tax and regulatory changes 2026–2027

Key amendments for financial services

Our perspective

The Finance Act 2026 marks one of the most significant shifts in Mauritius' fiscal and regulatory landscape in recent years. It confirms the government's intention to accelerate fiscal consolidation, strengthen revenue collection, and further align the jurisdiction with evolving international tax and regulatory standards. Many of these measures were anticipated and, in many respects, reinforce Mauritius' credibility and long-term standing as a trusted jurisdiction for international business and investment.

What is particularly noteworthy, however, is the extent to which the Finance Act relies on revenue-raising measures and enhanced compliance obligations to achieve its objectives. The introduction of a progressive personal income tax regime with a top marginal rate of 35%; the new insurance premium tax; broader withholding tax obligations on information and communications technology ("ICT") and digital services; expanded reporting requirements; increased information-sharing mechanisms; and strengthened data collection powers collectively signal a more interventionist fiscal environment. In addition, changes to the corporate climate responsibility ("CCR") levy framework will increase the effective tax cost of certain structures investing into non-treaty jurisdictions, impacting the economics of some cross-border investment platforms.

While many of these measures are understandable in the context of fiscal sustainability and may be justified when viewed individually, their cumulative impact should not be underestimated. Taken together, they represent a gradual increase in both the cost of doing business and the administrative burden of operating within the jurisdiction. As global competition for capital intensifies, investors will assess not only tax outcomes, but also the overall ease, efficiency, and predictability of doing business.

For private equity sponsors, fund managers, and international investors, Mauritius nevertheless remains a highly relevant jurisdiction. Its robust legal framework, extensive treaty network, political stability, skilled workforce, and sophisticated ecosystem of professional service providers continue to provide a compelling platform for cross-border investment. These strengths remain firmly intact. The challenge now is ensuring that Mauritius' competitiveness evolves at the same pace as its regulatory framework.

Fiscal resilience and international credibility are essential foundations, but long-term success will ultimately depend on maintaining an environment that continues to attract capital, talent, and entrepreneurial activity. Policy predictability, administrative efficiency, and ease of doing business will therefore be just as important as revenue generation in shaping the jurisdiction's next phase of growth.

The course has been charted.
The challenge now lies in
delivering effective outcomes
that reinforce fiscal sustainability
while fostering competitiveness,
efficiency, and investor trust.



Key tax measures – Corporate tax

Qualified domestic minimum top-up tax (“QDMTT”)

Effective date: Year of assessment (“YOA”) commencing July 1, 2025, and onwards

Definition

- Excluded person – The definition of excluded person has been updated to mean an investment fund where it is an ultimate parent entity.
- Real estate investment vehicle – The definition of real estate investment vehicle has been amended to mean a real estate investment fund where it is an ultimate parent entity.
- Financial accounting net income or loss – The definition of financial accounting net income or loss has been updated to mean the net income or loss determined for a member, prior to any consolidation adjustments, made for the purpose of eliminating intra-group transactions, in preparing the consolidated financial statements of the ultimate parent entity.
- Fiscal year – The definition of fiscal year has been amended to also mean the calendar year, where the requirements of paragraph (d) of the definition “consolidated financial statements” are met.

Compliance: Effective YOA commencing July 1, 2025, and onwards

- The QDMTT return shall be filed not later than 15 months from the end of the month in which the fiscal year ends.
- Amended return – The period to file an amended QDMTT return has been extended from two to three years.

Compliance: Effective August 13, 2026 (date gazetted)

- Penalty – The penalty for late payment of any taxes due under the QDMTT return is 2.5% of the unpaid tax amount.

Note: The QDMTT regulations have also been enacted and gazetted on August 8, 2026, providing clarifications and further details to in-scope multinational enterprises (“MNEs”) for their QDMTT tax filing obligations in Mauritius.



Key tax measures – Corporate tax

CCR Levy

Effective date: August 13, 2026 (date gazetted)

Quarterly payments of CCR levy

The CCR levy is now payable through the quarterly Advance Payment System (“APS”) statements for companies required to submit such statements.

The amendments also provide for transitional relief in respect of the CCR levy payable under the APS statements.

CCR liability will be reduced in the following stages:

- Between July 1, 2026, and June 30, 2027: 75%
- Between July 1, 2027 and June 30, 2028: 50%
- Between July 1, 2028 and June 30, 2029: 25%

Tax credits to be offset against CCR liability

Companies subject to the CCR levy will no longer be able to offset the tax credits against the levy other than manufacturing tax credit available under section 16A (58A) or a foreign tax credit incurred under Mauritius’ tax treaty network.

Corporate social responsibility (“CSR”) levy

Effective date: August 13, 2026 (date gazetted)

For CSR funds set up on or after January 1, 2027, a company will be allowed to spend up to 25% of its CSR fund and remit 75% to the Mauritius Revenue Authority (“MRA”), instead of 50% presently.

Present rule (current)

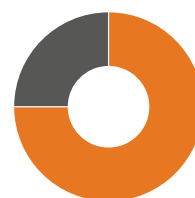
Up to **50%**
may be spent by
the company on
CSR activities



50%
must be
remitted to
the MRA

New rule
(for CSR funds set up on or after January 1, 2027)

Up to **25%**
may be spent by
the company on
CSR activities



75%
must be
remitted to
the MRA



Key tax measures – Corporate tax

Fair share contribution (“FSC”)

Effective date: YOA commencing July 1, 2027, and onwards

A company will be liable to FSC where its chargeable income exceeds MUR 24m in an accounting year. The conditions relating to the supplies exceeding MUR 24 million or compulsory VAT registration have been repealed.

FSC does not apply to global business entities (“GBE”) and exempt

bodies or companies qualifying for specific exemptions.

The definition of GBEs has been amended for trusts and

foundations. A trust or foundation will meet the definition of GBE where:

- The settlor or founder is non-resident or holds a Global Business Licence (“GBL”)
- The beneficiaries are non-residents or hold a GBL
- Its purpose is carried out outside Mauritius.

In other words, FSC will not apply to resident trusts and foundations that meet the conditions for classification as a GBE.

Exports of goods

Effective date: August 13, 2026 (date gazetted)

Exports of live animals are now excluded from the definition of “exports of goods”. Income from these exports will therefore be taxed at 15%, rather than the reduced rate of 3%, plus any applicable levies.

Expenditure incurred by hotels on cleaning, renovation, and embellishment works

Effective date: YOA commencing July 1, 2027, onwards

The 150% deduction available on qualifying expenditure incurred by hotels has been repealed.



Key tax measures – Corporate tax

Joint tertiary education with African universities

Effective date: YOA commencing July 1, 2027, onwards

The double deduction available to a registered higher education institution for qualifying expenditure incurred in providing joint tertiary education with an African university has been repealed.

ICT services

Effective date: August 13, 2026 (date gazetted)

Income from ICT services, comprising the supply of software, software licences, software applications, and software maintenance services, as well as the distance maintenance of programmes and ICT equipment supplied in Mauritius will be treated as income derived from Mauritius for income tax purposes.

In addition, payments exceeding MUR 300,000 made by any person, other than an individual, to an ICT services provider for such services (other than royalties, procurement of goods and services, and services under 111B(h)) will be subject to tax deduction at source at the rate of 1%, subject to any treaty relief.

Payments for advertising, promotional, endorsement or marketing services carried out through social media platforms, digital content or any other similar electronic means

Effective date: August 13, 2026 (date gazetted)

Payments made for advertising, promotional, endorsement or marketing services carried out through social media platforms, digital content or any other similar electronic means will attract tax deduction at source ("TDS") at the rate of 5%, subject to any treaty relief.



Key tax measures – Corporate tax

Insurance premium tax (“IPT”)

Effective date: January 1, 2027

General insurers will be required to levy IPT on premiums paid under general insurance business at the rate of 5% on the value of the premium paid. The tax will apply to all general insurance policies entered or renewed on or after January 1, 2027.

The regime excludes reinsurance contracts and insurance business restricted solely to non-Mauritian policies. General insurers will be required to submit monthly returns and remit the IPT electronically to the MRA by the end of the following month.

The legislation also provides for penalties and interest for late filing or payment. Offences for non-compliance are as follows:

- Penalty for non-submission of the return – MUR 2000 per month up to a maximum of MUR 20,000
- Penalty for late payment of taxes – 10% of the unpaid tax
- Interest for late payment of taxes – 1% of the unpaid tax per month

Key takeaways

Effective date: January 1, 2027

Tax rate: 5% of the value of the insurance premium paid

Scope: Applies to premiums paid under general insurance business for policies entered or renewed on or after January 1, 2027

Excluded from IPT

- Reinsurance contracts
- Insurance business restricted solely to non-Mauritian policies

Filing requirement: General insurers must submit monthly IPT returns electronically to the MRA

Payment due date: By the end of the month following the month in which the tax becomes due

Penalties and interest

Late submission: Penalty: MUR 2,000 per month, up to a maximum of MUR 20,000

Late payment of tax: Penalty: 10% of the unpaid tax. Interest: 1% of the unpaid tax per month



Key tax measures – Corporate tax

Golden Visa scheme

Effective date: August 13, 2026 (date gazetted)

The Golden Visa scheme has been introduced. It is a visa issued by the Passport Officer under the Passports Act to a non-citizen on the recommendation of the Economic Development Board.

Golden Visa holders will benefit from the same tax treatment currently applicable to Premium Visa holders. Accordingly, income derived from work performed remotely from Mauritius will be deemed to be derived in Mauritius only when it is remitted to Mauritius.

In addition, expenditure incurred in Mauritius using a foreign credit or debit card will not be regarded as a remittance to Mauritius. Where funds are deposited into a Mauritian bank account, the Golden Visa holder may be liable to income tax unless a declaration is made confirming that the relevant tax has already been paid in the country of origin or residence.



Key tax measures – Personal tax

Personal income tax rate

Effective date: Year commencing July 1, 2026, and onwards

A new income bracket and income tax rate have been introduced as follows:

Income bracket	Previous regime	New regime under Finance Act 2026
First MUR 500,000	0%	0%
Next MUR 500,000	10%	10%
Next MUR 11 million	-	20%
Remainder	20%	35%

Income tax exemption

Effective date: Year commencing July 1, 2026, and onwards

A new income tax exemption has been introduced to support the development of the renewable energy sector in Mauritius. Under this measure, a qualifying non-citizen employee of a company engaged in the manufacturing of solar photovoltaic systems will benefit from a four-year income tax holiday on employment income.

For the purpose of the above, “qualifying non-citizen employee” means a non-citizen employed, wholly and exclusively, for the purpose of installation, commissioning or operation of a manufacturing plant engaged in the production of solar photovoltaic systems.



Key tax measures – Value Added Tax Act

Time of supply

Effective date: October 1, 2026

For VAT purposes, a supply is deemed to take place on the earliest of the following dates:

- at the time an invoice or a VAT invoice in respect of that supply is issued
- at the time payment for that supply is received by the supplier
- Three months from the date the supply is delivered or performed

Credit for input VAT

Effective date: August 13, 2026 (date gazetted)

The time limit to claim input VAT credits will be reduced from 36 months to 24 months from the date the input tax ought to have been taken.

Exempt supplies – Management companies

Effective date: October 1, 2026

The supply of services made by a holder of a management licence issued by the FSC to the following entities will be VAT exempt instead of zero-rated:

- corporations holding a GBL
- trusts whose settlor and the majority of the beneficiaries are non-residents
- foundations whose founder and the majority of the beneficiaries are non-residents

Zero rated items – Payment service provider licence

Effective date: October 1, 2026

Payment services provided to non-residents and global business companies by a holder of a payment service provider license issued by the Bank of Mauritius will be considered as a zero-rated.

Foreign currency remittance

Effective date: October 1, 2026

Where a hotel or tourist residence receives more than 50% of its payments in a taxable period in a foreign currency (USD, Euros, GBP, Singapore dollars, South African rands, Swiss francs etc.), it must:

- file its VAT return in accordance with the VAT Act
- pay 50% of the VAT due for that taxable period in that foreign currency

Where payments are received in more than one qualifying foreign currency, the taxpayer may choose one of those currencies in which to pay the VAT due.

• foundations whose founder and the majority of the beneficiaries are non-residents



Key tax measures – Value Added Tax Act

VAT on digital services or electronic services

Effective date: October 1, 2026

- A foreign supplier will not be required to compulsorily register for VAT purposes if their annual turnover of taxable supplies is less than MUR 3m per annum or they make taxable supplies exclusively to a VAT registered person, in which case, the VAT reverse charge mechanism will apply

Effective date: August 13, 2026 (date gazetted)

- A foreign supplier of digital or electronic services will not be required to appoint a tax representative for the submission of return and remittance of VAT and services
- Digital or electronic services will exclude electronic books
- Digital or electronic services will include commission, fee, or other consideration receivable by operators of an online marketplace

“Online marketplace” means:

- (a) A digital platform connecting or facilitating electronic transactions and interactions, whether directly or indirectly, between sellers and buyers for the supply of goods
- (b) A website, web-based portal or gateway, applications store, digital distribution platform or any other similar platform, excluding platforms that solely processes electronic payments.

Failure to issue fiscal invoices

Effective date: October 1, 2026

- Businesses that are required to issue fiscal invoices must do so in accordance with the VAT Act. Failure to issue fiscal invoices may result in a penalty of MUR 5,000 per day, subject to a maximum of MUR 1 million over a 12-month period
- The penalty is payable within 28 days from the date the claim is issued

Failure to use the e-invoicing system

Effective date: October 1, 2026

- Businesses required to use the e-invoicing system must ensure that all invoices are issued through the prescribed platform. Failure to comply may constitute an offence and, upon conviction, may result in a fine of up to MUR 500,000 and/or imprisonment of up to 24 months



Key tax measures – Others

Compliance agreement

Effective date: August 13, 2026 (date gazetted)

- The MRA and a taxpayer may enter into a compliance agreement to settle a tax matter before the MRA issues an assessment, claim, or objection decision
- The agreement will set out the matters agreed between the parties, including any tax, penalties, surcharges and interest payable, as well as the payment terms. Once signed, the agreement is generally final and binding on both the taxpayer and the MRA
- The taxpayer will waive the right to object to or appeal against the matters covered by the agreement. However, the MRA may still issue an additional assessment or claim if new material information comes to light or if it is later discovered that the taxpayer failed to disclose relevant information

Registered tax agents

Effective date: August 13, 2026 (date gazetted)

- The requirement for registered tax agents was introduced through the Finance Act 2025 and takes effect from January 1, 2027
- The eligibility criteria have been expanded to include individuals who can demonstrate to the committee that they have at least three years of relevant experience as a tax agent, or who otherwise meet the prescribed terms and conditions

Director's liability

Effective date: August 13, 2026 (date gazetted)

- A “principal officer” is defined as the executive director or any other person who exercises, is entitled to exercise, controls or is entitled to control the powers of the board of directors
- Every secretary, manager or other principal officer of a company, société or other body of persons shall be deemed liable for a company's unpaid income tax



Key legal and regulatory updates

This alert provides an overview of the key amendments in the Economic and Financial Measures (Miscellaneous Provisions) Act 2026 gazetted on August 13, 2026.

Companies Act 2001

Effective date: August 13, 2026 (date gazetted)

- Section 34(3)(b): Amended to extend the validity period of the notice of reservation of name from two months to six months, after the date stated in the notice
- Section 91(3A)(a)(iii): New subsection (DA) introduced – Companies will be required to record and file the date of birth of beneficial owners (“BOs”) and ultimate beneficial owners (“UBOs”) on their BO register. Deadline for existing companies to comply: June 30, 2027
- Section 121: The requirements under section 121 to appoint a debenture holders’ representative will no longer apply to GBCs and Authorised Companies (“ACs”) issuing debentures exclusively outside Mauritius to non-residents where no invitation is made in Mauritius
- New section 167A(8): Failure by a company to register as a company service provider where it provides the services that a company service provider normally provides will now constitute an offence punishable by a fine of up to MUR 200,000
- Section 221: Content of the annual report – Companies (other than GBCs and ACs) will now be required, where applicable, to include a sustainability report as referred to under the Financial Reporting Act
- Section 306: Amended to recognise not only a certificate of registration, but also “other equivalent official document evidencing registration”, for the purpose of the Registrar of Companies deregistering a Mauritian company which is being redomiciled in a foreign jurisdiction



Key legal and regulatory updates

Financial Services Act 2007

Effective date: September 1, 2026

- Establishment of the National Fintech Governance Committee (“NFGC”): Sections 13A and 13B under the new Part IIIA provide for the establishment and composition of the NFGC as a central coordination and oversight body for the implementation of fintech strategies in Mauritius
- Section 19(1) amended: Extension of the Financial Services Commission’s (“FSC”) enforcement powers to former licensees. A licensee who has submitted false or misleading information to the FSC will not be able to avoid regulatory action solely by surrendering its licence.
- Section 26A(2)(g) amended: The register of trusts that the FSC keeps will no longer need to record “particulars of the assets of the trust.” As such, the qualified trustee will no longer have to provide this information to the FSC.
- Section 31 amended: The FSC has been empowered to take action against any person, whether licensed or unlicensed, who issues misleading advertisements or promotional material relating to financial services business
- New sections 48A, 48B, and 48C introduced: These provide for the appointment, duties, and powers including term of office and remuneration of a conservator
- The FSC may appoint a conservator where it has reasonable grounds to believe that a licensee is facing financial difficulties, has breached regulatory or anti-money laundering/combating the financing of terrorism (“AML/CFT”) requirements, has acted in a manner that may prejudice the interests of its clients or creditors, or is likely to fail to comply with its legal or licensing obligations

The role of the conservator will be to take charge of the business of the licensee and exercise all powers necessary to preserve, protect, and recover any of the assets of the licensee and may also reorganise or rehabilitate a licensee under the authority of the FSC

- New subsection 71(3)(b)(vi) added as an additional condition to the central management and control test: A GBL holder shall, at all times, additionally ensure that their bank accounts are operated under a bank signatory arrangement made in accordance with guidelines issued by the commission
- In line with the new section 79B, the FSC will be empowered to issue a Private Wealth Management Licence: FSC rules are expected to be issued on the regulation and supervision of this activity



Key legal and regulatory updates

Workers' Rights Act 2019

Menstrual leave

Effective date: August 13, 2026 (date gazetted)

- New section 46 A – To provide for one day of menstrual leave on full pay every month to every female worker.

The definition of “menstrual leave” is as follows:

“menstrual leave” refers to leave granted to a female worker who is temporarily unable to perform work due to severe menstruation-related symptoms or disorders.

Maternity and paternity leave

Effective date: January 1, 2027

- Section 52 amended to increase maternity leave to 26 weeks on full pay and provide for an additional (optional) 26 weeks maternity leave on half pay on giving birth or adoption of a child of less than 12 months.
- Section 53: Increase of paternity leave from 4 to 6 weeks.

Financial Intelligence and Anti-Money Laundering Act 2002

Effective date: August 13, 2026 (date gazetted)

- Section 18(3) is amended to clarify that where there is non-compliance, the FSC may exercise its disciplinary powers under the Financial Services Act 2007 (FSA 07) to impose an administrative sanction on a financial institution that is under its supervision
- The Fifth Schedule, entitled “Holders of Licences, and Categories of Licensees, that are Excluded” has been amended to include third-party administrators as a category that does not fall under the definition of financial institution and hence, is not required to put in place an AML/CFT programme

Variable Capital Companies Act 2022

Effective date: September 1, 2026

- Section 3 is amended to clarify that a protected cell company (“PCC”) may also be converted into a variable capital company (“VCC”)
- New section 5(1A): To allow a VCC, subject to FSC approval, to enter into contractual obligations with its sub-funds and provide ancillary services to its sub-fund, provided the activity does not require a separate license under applicable legislation. This will allow a VCC to provide non-regulated services to its sub-funds



Key legal and regulatory updates

Virtual Asset and Initial Token Offering Services Act 2021

Effective date: August 13, 2026 (date gazetted)

- A new section 34A prohibits any person from soliciting, targeting or engaging investors in Mauritius in relation to virtual asset transactions or initial token offerings ("ITO"), unless the person is duly licensed as a virtual asset service provider ("VASP") or registered as an ITO issuer under the Act

Limited Liability Partnerships Act 2016

Effective date: August 13, 2026 (date gazetted)

- Section 19(3): Amended to extend the period during which a reserved Limited Liability Partnership ("LLP") name remains available for registration from two months to six months
- Section 40(1): Increase of the turnover threshold from MUR 50 million to MUR 100 million. LLPs with a turnover below the threshold may file a financial summary, while LLPs meeting or exceeding the threshold must file financial statements
- LLPs will be required to include date of birth of BO and UBO in their beneficial ownership register. Existing LLPs must comply by June 30, 2027

Limited Partnerships Act 2011

Effective date: August 13, 2026 (date gazetted)

- Section 16(3)(b): Extension of the period of availability for a reserved Limited Partnership ("LP") name from two months to six months
- Section 39(6A): LPs will be required to include the dates of birth of BOs and UBOs in their UBO registers
- Section 46(2)(a): Amended to increase the turnover threshold to qualify as a small LP from MUR 50 million to MUR 100 million. Applies only to LPs not holding a GBL

Foundations Act 2012

Effective date: August 13, 2026 (date gazetted)

- Section 36(1A): Foundations will be required to include the dates of birth of BOs and UBOs in their UBO registers and file this information with the Registrar of Companies ("ROC"). Existing foundations must comply by June 30, 2027.



Key legal and regulatory updates

Economic Development Board Act amended

Effective date: August 13, 2026 (date gazetted)

- A new sub-part AAA – Introduction of AI City Scheme to attract investment in AI, digital technologies, advanced computing and innovation-driven businesses. A holder of an AI City Scheme Certificate may benefit from tax incentives, regulatory facilitation, and expedited permits

Impact: Many details remain subject to future regulations and Economic Development Board (“EDB”) guidelines.

- A new Golden Visa framework is introduced for non-citizens upon recommendation of the EDB. The investor must invest at least US\$ 1 million in qualifying business activities to benefit under the Act
- The First Schedule is amended to allow an AI Founder investing at least US\$ 1 million under the AI City Scheme to qualify for the relevant residency benefits
- The legislation states that projects must involve “such activity as may be prescribed”
- Part I – Criteria for Occupation Permit of the First Schedule of the Economic Development Board Act has been replaced by a new Part I*

*Save and except for the new Item 6 of the above Part I Criteria for Occupation Permit titled “Technical category under Government-to-Government framework”, the amendment shall come into operation on a date to be fixed by proclamation.

Financial Reporting Act

Effective date: August 13, 2026 (date gazetted)

- New section 73A added to empower the FRC to acknowledge, adopt or recommend for adoption, sustainability reporting standards, including climate related disclosure standards. Public interest entities (“PIEs”) may need to comply with sustainability reporting standards

Bank of Mauritius Act amended

Effective date: August 13, 2026 (date gazetted)

- New section 6(1)(rb) empowers the bank to establish a Cyber Threat Intelligence Sharing Platform, require participation by financial institutions and such other institutions as it may determine, and impose terms and conditions.

Comment: The measure is intended to build up the capacity of the financial services sector to respond to and counter cyber threats. More details are expected on the project prior to its implementation.



Key legal and regulatory updates

Business Registration Act amended

Effective date: August 13, 2026 (date gazetted)

- Business registration certificates may be displayed “in any format”

Display in digital format would be acceptable.

Public Holidays Act

Effective date: August 13, 2026 (date gazetted)

- Section 3(3) has been amended to provide that where any public holiday specified in the second column of the Third Schedule of the Public Holidays Act falls on a Sunday; the following day shall be observed as public holiday
- A Third Schedule is inserted in the Public Holidays Act to provide for the official list of holidays





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We shall await further details once the Finance (Miscellaneous Provisions) Act 2026 is enacted.