

Mauritius

Rank: #15

Mauritius is responsible for 2.29% of the world's corporate tax abuse risks.

CTHI Value: 1,013 Haven Score: 81.4



How much scope for corporate tax abuse the jurisdiction's tax and financial systems allow. 0 means no scope, 100 means unrestrained scope.

Global Scale Weight: 0.66%



How much of the financial activity conducted by multinational corporations around the world is hosted by the jurisdiction.

The jurisdiction's CTHI value (Corporate Tax Haven Index value) is a measure of how intensely the jurisdiction enables multinational corporations to abuse corporate tax. The jurisdiction is ranked on the index by its CTHI value.

A jurisdiction's CTHI Value is calculated by first grading its tax and financial systems with a Haven Score out of 100 where a zero means the jurisdiction's laws allow no scope for corporate tax abuse and a 100 means they allow unrestrained scope. The jurisdiction's Haven Score is then combined with its Global Scale Weight, ie the volume of financial activity conducted in the country by multinational corporations, to calculate how much corporate financial activity the jurisdiction puts at risk of corporate tax abuse.

A higher CTHI value does not mean a jurisdiction has more aggressive tax laws, but rather that the jurisdiction's laws and its position in the global economy combine to create a greater risk of corporate tax abuse by multinational corporations.

Haven Score breakdown



81.4

LOWEST AVAILABLE CORPORATE INCOME TAX

Haven Indicator 1: LACIT ▲



100

This indicator identifies the lowest available corporate income tax rate (LACIT) for any large for-profit company that is tax resident in a country. It takes the statutory corporate income tax rate only as a starting point to analyse legal gaps and loopholes that result in lower accessible rates. The scoring of Haven Indicator 1 is computed by scaling that LACIT rate against the spillover risk reference rate of 35% (the highest available corporate income tax rate in a democracy).

ID 505 — Statutory corporate income tax rate ▲

Question: Statutory-CIT-Rate: What is the statutory CIT rate reported by the OECD (or alternatively by IBFD or KPMG)?

Answer: 15 %

Sources:

- <https://home.kpmg.com/xx/en/home/services/tax/tax-tools-and-resources/tax-rates-online/corporate-tax-rates-table.html>
- IBFD 2020d ↗
- https://stats.oecd.org/Index.aspx?DataSetCode=CTS_CIT
- KPMG 2020 ↗
- OECD Stats 2020a ↗

ID 506 — Corporate income tax rate: Correction for size of company ▲

Question: CIT-Rate-Correction-Size: What is the deviating CIT rate, if any, applicable to the largest companies in the jurisdiction?

Answer: Not applicable

ID 507 — Corporate income tax rate: Correction for sectoral exemptions ▲

Question: CIT-Rate-Correction-Sector: What is the lowest deviating CIT rate, if any, applicable to companies in jurisdictions exempting a broad range of sectors (at least four full and/or eight partial exemptions)?

Answer: 0 %

Notes:

- As of January 2019, the GBL2 (Category 2 global business license) regime in Mauritius is abolished and an "Authorised company" regime is available instead (PWC 2020a). Given that the exemptions under the new type of "authorised company" regime covers a broad range of sectors (e.g., investment, banking & insurance, and business services), we consider the zero tax rate applicable to this type of company as the lowest available in Mauritius.

Sources:

- PWC 2020a ↗
- <https://home.kpmg/us/en/home/insights/2020/09/tnf-mauritius-tax-measures-global-business-regime-reforms.html>
- <https://www.sunibelcorporateservices.mu/authorised-company-mauritius/#:~:text=of%20this%20article.,What%20is%20an%20Authorised%20Company%3F,foreign%20company%20for%20tax%20purposes.>
- <https://iqeq.com/mauritius-authorised-companies>

ID 541 — Corporate income tax rate: Correction for subnational regions ▲

Question: CIT-Rate-Correction-Regions: What is the lowest deviating CIT rate, if any, applicable in the political subdivision/subnational region with the lowest CIT rate?

Answer: Not applicable

ID 542 — Corporate income tax rate: Adjustment for retention or distribution ▲

Question: CIT-Rate-Adjustment-Retention: What is the lowest deviating CIT rate, if any, applicable to distributed or retained profits?

Answer: Not applicable

ID 543 — Corporate income tax rate: Adjustment for specific type of company ▲

Question: CIT-Rate-Adjustment-Type: What is the lowest deviating CIT rate, if any, applicable to specific types of companies?

Answer: 0 %

Notes:

- As of January 2019, the GBL2 regime in Mauritius is abolished with a grandfathering provision valid until 30 June 2021. Given that the abolishment applies in the year of the CTHI's publication, we no longer consider these types of corporations available. However, an "Authorised company" regime in Mauritius was established instead (PWC 2020a). Under the new regime, determined in the Forth Schedule of the Financial Services Act, authorised companies are not considered tax resident of Mauritius (although being incorporated under domestic law) and thus are not subject to tax in Mauritius (Id.; ieq.com). An "authorised company" may engage in any of the following activities: Investment holding, property holding, international trade, management and consultancy, IT Services, logistics, marketing, shipping and ship management; or one-off transaction using a Special Purpose Vehicle (sunibelcorporateservices.mu). (Forth Schedule of the Financial Services Act, amended 2018). Given that these companies cover a broad range of sectors and activities, we consider that the lowest CIT for Mauritius is zero.

Sources:

- PWC 2020a ↗
- <https://taxinsights.ey.com/archive/archive-news/mauritius-enacts-changes-to-tax-regime-for-corporations.aspx>
- <https://www.sunibelcorporateservices.mu/authorised-company-mauritius/#:~:text=of%20this%20article.-,What%20is%20an%20Authorised%20Company%3F,foreign%20company%20for%20tax%20purposes.>
- <https://iqeq.com/mauritius-authorised-companies>

ID 544 — Corporate income tax rate: Adjustment for territorial tax base ▲

Question: CIT-Rate-Adjustment-Territorial: What is the lowest deviating CIT rate, if any, applicable to active business income from foreign sources?

Answer: Not applicable

ID 545 — Corporate Income Tax Rate: Adjustment for tax rulings ▲

Question: CIT-Rate-Adjustment-Rulings: What is the lowest deviating CIT rate, if any, derived from documented cross-border unilateral tax rulings issued by the authorities in the jurisdiction?

Answer: Not applicable

ID 587 — Corporate tax residency scope ▲

Question: Corporate tax residency scope: Do the domestic rules for corporate tax residency include as tax resident at least all locally incorporated companies?

Answer: NO, not all locally incorporated companies are considered tax resident of the jurisdiction.

Notes:

- A company in Mauritius is resident if incorporated or if it has its central management and control, in Mauritius. However, a company incorporated in Mauritius will be treated as a nonresident if it is centrally managed and controlled from outside Mauritius (Deloitte 2020a; IBFD 2020d: 1.2.1.). Furthermore, the new regime applicable to "Authorised Companies" specifically considers that such locally incorporated companies are not considered tax-residents in Mauritius (see note for ID 526 - Haven Indicator 5).

Sources:

- IBFD 2020d ↗
- Deloitte 2020a ↗

LOPHOLES AND GAPS

Haven Indicator 2: Foreign Investment Income ▲

100

This indicator assesses whether a country includes worldwide capital income in its corporate income tax base and if its domestic law grants unilateral tax credits for foreign tax paid on certain foreign capital income.

ID 555 — Double taxation relief, dividends, related parties ▲

Question: *Legal Person, Resident, Related Party: Dividends

Answer: Exemption.

Notes:

- As of January 2019, the GBL2 regime is abolished and an "Authorised company" regime is available instead (PWC 2020a). Under the new regime, authorised companies are not considered tax resident of Mauritius, although being incorporated under domestic law. (Id.) (EY 2018) An "authorised company" may not engage in any of the following activities: "Financial services, Carrying out the business of holding or managing or otherwise dealing with a collective investment fund or scheme as a professional functionary, Providing of registered office facilities, nominee services, directorship services, secretarial services or other services for corporations, Providing trusteeship services by way of business" (Forth Schedule of the Financial Services Act, amended 2018). We consider that these activities cover the following sectors: "investment", "banking & insurance", "business services" (with regards to "professional and technical services", the exception covers only certain activities related to the financial sector, other activities such as legal and technical services are in principle allowed). Thus, we consider that all economic sectors other than "investment", "banking & insurance", and "business services" are fully exempt under the "authorised company" regime. It is worth noting that the sectors that are not covered under this regime are otherwise fully exempt (IBFD 2020d; 1.2., 6.1.1.).

Sources:

- IBFD 2020d. ↗
- PWC 2020a ↗
- <https://taxsummaries.pwc.com/mauritius/corporate/tax-credits-and-incentives>
- EY 2018 ↗

ID 554 — Double taxation relief, royalties ▲

Question: Legal Person, Resident: Royalties

Answer: Exemption.

Notes:

- Specific legal entities are tax exempt (IBFD 2020d: 1.2.) (see notes under [ID525-538]). Although this jurisdiction has a patent box (see ID 515), we disregard such regime from this indicator because it is compliant with OECD nexus constraints (for more details, please refer to Haven Indicator 7 methodology).

Sources:

- IBFD 2020d ↗

ID 553 — Double taxation relief, interest ▲

Question: *Legal Person, Resident: Interest

Answer: Exemption.

Notes:

- As of January 2019, the GBL2 regime is abolished and an "Authorised company" regime is available instead. (PWC 2020a) Under the new regime, authorised companies are not considered tax resident of Mauritius, although being incorporated under domestic law (Id.)(EY 2018). An "authorised company" may not engage in any of the following activities: "Financial services, Carrying out the business of holding or managing or otherwise dealing with a collective investment fund or scheme as a professional functionary, Providing of registered office facilities, nominee services, directorship services, secretarial services or other services for corporations, Providing trusteeship services by way of business" (Forth Schedule of the Financial Services Act, amended 2018). We consider that these activities cover the following sectors: "investment", "banking & insurance", "business services" (with regards to "professional and technical services", the exception covers only certain activities related to the financial sector, other activities such as legal and technical services are in principle allowed). Thus, we consider that all economic sectors other than "investment", "banking & insurance", and "business services" are fully exempt under the "authorised company" regime. It is worth noting that the sectors that are not covered under this regime are otherwise fully exempt (IBFD 2020d; 1.2., 6.1.1.).

Sources:

- IBFD 2020d ↗
- PWC 2020a ↗
- EY 2018 ↗

ID 552 — Double taxation relief, dividends, independent parties ▲

Question: *Legal Person, Resident, Independent Party: Dividends

Answer: Exemption.

Notes:

- As of January 2019, the GBL2 regime is abolished and an "Authorised company" regime is available instead (PWC 2020a). Under the new regime, authorised companies are not considered tax resident of Mauritius, although being incorporated under domestic law. (Id.)(EY 2018) An "authorised company" may not engage in any of the following activities: "Financial services, Carrying out the business of holding or managing or otherwise dealing with a collective investment fund or scheme as a professional functionary, Providing of registered office facilities, nominee services, directorship services, secretarial services or other services for corporations, Providing trusteeship services by way of business" (Forth Schedule of the Financial Services Act, amended 2018). We consider that these activities cover the following sectors: "investment", "banking & insurance", "business services" (with regards to "professional and technical services", the exception covers only certain activities related to the financial sector, other activities such as legal and technical services are in principle allowed). Thus, we consider that all economic sectors other than "investment", "banking & insurance", and "business services" are fully exempt under the "authorised company" regime. It is worth noting that the sectors that are not covered under this regime are otherwise fully exempt (IBFD 2020d: 1.2., 6.1.1.).

Sources:

- IBFD 2020d ↗
- PWC 2020a ↗
- EY 2018 ↗

Haven Indicator 3: Loss Utilisation ▲

50

This indicator measures whether a jurisdiction provides loss carry backward and/or unrestricted loss carry forward for ordinary and trading losses. Capital losses fall outside the scope of this indicator.

ID 509 — Loss carry backward ▲

Question: Loss Carry Backward: Does the jurisdiction allow loss carry backward?

Answer: No

Notes:

- In Mauritius, loss carry-backward is not allowed (Deloitte 2020a).

Sources:

- <https://www2.deloitte.com/content/dam/Deloitte/global/Documents/Tax/dttl-tax-mauritiushighlights-2020.pdf?nc=1>
- Deloitte 2020a ↗

ID 510 — Loss carry forward ▲

Question: Loss Carry Forward: Does the jurisdiction restrict loss carry forward independent of change of ownership?

Answer: No, unrestricted loss carry forward is available.

Notes:

- In Mauritius, loss carry forward is available for subsequent 5 years in general. But, losses arising from annual allowance on capital expenditure and from research and development may be carried forward indefinitely. There is no annual ceiling (IBFD 2020d: 1.5.1.).

Sources:

- IBFD 2020d ↗

This indicator measures the extent to which a jurisdiction taxes corporate capital gains arising from the disposal of domestic and/or foreign securities (i.e. shares and bonds). As such, it assesses the lowest available tax levied on corporate capital gains, applicable for large for-profit corporations which are tax resident in the jurisdiction, irrespective of whether the capital gains are taxed as part of corporate income tax or as part of another type of tax, such as wealth tax or an independent capital gains tax.

ID 513 — Domestic securities capital gains taxation ▲

Question: Domestic Securities Capital Gains Taxation: What is the lowest available capital gains tax rate arising from disposal of domestic securities applicable for large "for profit" companies which are tax resident in the jurisdiction?

Answer: 0 %

Notes:

- There is no tax on domestic capital gains in Mauritius nor is there tax levied on foreign capital gains (IBFD 2020d: 1.4.).

Sources:

- IBFD 2020d ↗

ID 514 — Foreign securities capital gains taxation ▲

Question: Foreign Securities Capital Gains Taxation: What is the lowest available capital gains tax rate arising from disposal of foreign securities applicable for large "for profit" companies which are tax resident in the jurisdiction?

Answer: 0 %

Notes:

- See note above.

Sources:

- IBFD 2020d ↗

This indicator measures the availability of broad exemptions from corporate income tax (CIT). It covers exemptions applicable to companies engaged in specific activities or sectors.

ID 524 — Real estate investment sector tax exemption (passive) ▲

Question: Real Estate Investment (passive): Are there any (partial) tax exemptions applicable to collective investment companies investing in real estate?

Answer: Full: Yes, there are full tax exemptions.

Notes:

- In order to ascertain whether CIT exemption apply for real estate investment activities, we must determine whether a company or limited liability entity (not a partnership or trust) can be awarded an income exemption. In Mauritius, a collective investment scheme may be constituted as a company limited by shares (The Securities (Collective Investment Schemes and Closed-end Funds) Regulations 2008, as amended 2013: reg. 5(1)). While regular "collective investment schemes" are not allowed to purchase real estate (ibid.: reg.65(c)), "specialised investment schemes" can invest in real estate (ibid.: reg. 77(1)). Under the Income Tax Act, a "REIT" is a collective investment scheme authorised as a REIT (Real Estate Investment Trust) by the Financial Services Commission (Income Tax Act of 1995, as amended 2020: Section 2). Finally, pursuant to section 49C of the same act, "no REIT shall be liable to income tax" (ibid.: 49C). Thus, we consider that limited liability legal entities engaged in real estate investment activities may be fully exempt from corporate income tax.

Sources:

- IBFD 2020d; PWC 2020a; Deloitte 2020a ↗
- <https://www.fscmauritius.org/en/being-licensed/licensed-activities/securities>
- https://www.fscmauritius.org/media/2169/securities__collective_investment_schemes_and_closed-end_funds__regulations_2008.pdf
- <https://www.mra.mu/download/ITAConsolidated.pdf>

ID 525 — Financial investment sector tax exemption (passive) ▲

Question: Other Investment (passive): Are there any (partial) tax exemptions applicable to collective investment companies investing in assets other than real estate?

Answer: Full: Yes, there are full tax exemptions.

Notes:

- Equity funds and special purpose funds are considered tax-exempt entities in Mauritius. (IBFD 2020d : 1.2.) In addition, qualifying interests (on debentures, bonds and sukuk), dividends (domestic dividends), and capital gains (upon the sale of units, securities and debt obligations) are fully exempt from tax (IBFD 2020d: 1.3.2.).
- Otherwise, foreign income derived by "CIS, Closed End Funds, CIS manager, CIS administrator, investment adviser or asset manager licensed or approved by the FSC" is 80% tax exempt (PWC 2020a). According to IBFD, such income is tax exempt (IBFD 2020d: 1.3.2.). In any case, it appears that the partial exemption is subject to a minimum expenditure requirement, that is proportional with the company's level of activity (IBFD 2020d: 7.1.). Thus, we disregard this partial exemptions for the purposes of this indicator.

Sources:

- IBFD 2020d; PWC 2020a; Deloitte 2020a ↗
- <https://taxsummaries.pwc.com/mauritius/corporate/tax-credits-and-incentives>

ID 526 — Extractive sector tax exemption ▲

Question: Extractives (active): Are there any (partial) tax exemptions applicable to companies active in the extractives sector (oil, gas, mining)?

Answer: Full: Yes, there are full tax exemptions.

Notes:

- As of January 2019, the GBL2 regime is abolished and an "Authorised company" regime is available instead. (PWC 2020a) Under the new regime, authorised companies are not considered tax resident of Mauritius, although being incorporated under domestic law. (Id.) (EY 2018) An "authorised company" may not engage in any of the following activities: "Banking; Financial services; Holding, managing, or otherwise dealing with a collective investment fund or scheme as a professional functionary; Providing registered office facilities, nominee services, directorship

services, secretarial services, or other services for corporations; Providing trusteeship services by way of business." (Forth Schedule of the Financial Services Act, amended 2020). We consider that these activities are within the following sectors: "investment", "IT services", "banking & insurance", "business services" and "professional and technical services". However, certain activities within the "banking & insurance" sector (such as insurance and reinsurance activities) are not excluded from the "authorised company" regime. Similarly, activities within the "professional and technical services" sector (such as legal, medical and other advisory services) are not excluded from the exemption regime. The same is the case for "IT services", while services such as server hosting and website maintenance may be excluded from the regime (because they are considered "other services for corporations" (Forth Schedule of the Financial Services Act, amended 2020), others activities within the sector can be subject to the regime (such as online gaming and cybersecurity). Thus, while certain activities within the "IT services", "banking & insurance" sector and the "professional & technical services" sector may be excluded from the "authorised company" regime, other activities in these sectors may be fully exempt. Thus, we consider that all economic sectors other than "investment" and "business services" are fully exempt under the "authorised company" regime. It is worth noting that the sectors that are not covered under this regime are otherwise fully exempt (see notes under [ID525] and [ID536]).

Sources:

- IBFD 2020d; PWC 2020a; Deloitte 2020a ↗
- <https://taxsummaries.pwc.com/mauritius/corporate/corporate-residence>
- <https://www.fscmauritius.org/media/84940/financial-services-act-2007.pdf>
- <https://taxsummaries.pwc.com/mauritius/corporate/tax-credits-and-incentives>

ID 527 — Agriculture and farming sector tax exemption ▲

Question: Agriculture and farming (active): Are there any (partial) tax exemptions applicable to companies active in the agricultural and farming sector?

Answer: Full: Yes, there are full tax exemptions.

Notes:

- We consider that all economic sectors other than "investment" and "business services" are fully exempt under the "Authorised company" regime. (see note under [ID526])

Sources:

- IBFD 2020d; PWC 2020a; Deloitte 2020a ↗

ID 528 — Manufacturing sector tax exemption ▲

Question: Manufacturing (active): Are there any (partial) tax exemptions applicable to companies active in the manufacturing sector?

Answer: Full: Yes, there are full tax exemptions.

Notes:

- We consider that all economic sectors other than "investment" and "business services" are fully exempt under the "Authorised company" regime. (see note under [ID526])

Sources:

- IBFD 2020d; PWC 2020a; Deloitte 2020a ↗

ID 529 — Construction sector tax exemption ▲

Question: Construction (active): Are there any (partial) tax exemptions applicable to companies active in the construction sector?

Answer: Full: Yes, there are full tax exemptions.

Notes:

- We consider that all economic sectors other than "investment" and "business services" are fully exempt under the "Authorised company" regime. (see note under [ID526])

Sources:

- IBFD 2020d; PWC 2020a; Deloitte 2020a ↗

ID 530 — Infrastructure sector tax exemption ▲

Question: Infrastructures (active): Are there any (partial) tax exemptions applicable to companies active in the infrastructures sector?

Answer: Full: Yes, there are full tax exemptions.

Notes:

- We consider that all economic sectors other than "investment" and "business services" are fully exempt under the "Authorised company" regime. (see note under [ID526])

Sources:

- IBFD 2020d; PWC 2020a; Deloitte 2020a ↗

ID 531 — Transportation and storage sector tax exemption ▲

Question: Transportation and storage (active): Are there any (partial) tax exemptions applicable to companies active in the transportation and storage sector?

Answer: Full: Yes, there are full tax exemptions.

Notes:

- We consider that all economic sectors other than "investment" and "business services" are fully exempt under the "Authorised company" regime. (see note under [ID526])
- Otherwise, income derived from deep-sea international trade by a company operating Mauritius-registered ships is exempt from tax. (IBFD 2020d : 1.3.2.) Because this exemption potentially covers shipping activities, as well as distribution/wholesale linked to "deep-sea international trade"; we consider that full CIT exemptions are available in the "transporation & storage" sector, as well as in the "distribution & wholesale" sector.

Sources:

- IBFD 2020d; PWC 2020a; Deloitte 2020a ↗

ID 532 — Distribution sector tax exemption ▲

Question: Distribution (active): Are there any (partial) tax exemptions applicable to companies active in the distribution sector?

Answer: Full: Yes, there are full tax exemptions.

Notes:

- We consider that all economic sectors other than "investment" and "business services" are fully exempt under the "Authorised company" regime. (see note under [ID526])
- Otherwise, income derived from deep-sea international trade by a company operating Mauritius-registered ships is exempt from tax. (IBFD 2020d : 1.3.2.) Because this exemption potentially covers shipping activities, as well as distribution/wholesale linked to "deep-sea international trade"; we consider that full CIT exemptions are available in the "transportation & storage" sector, as well as in the "distribution & wholesale" sector.
- Finally, IBFD informs that companies conducting export of goods activities are taxed at a rate of 3% on "chargeable income" derived from exports (IBFD 2020d: 1.6.1.). We consider this exemption as a partial exemption for activities within the "distribution & wholesale" sector.

Sources:

- IBFD 2020d; PWC 2020a; Deloitte 2020a ↗

ID 533 — Accommodation, food and recreation sector tax exemption ▲

Question: Accommodation, food and recreation (active): Are there any (partial) tax exemptions applicable to companies active in the accommodation, food and recreation sector?

Answer: Full: Yes, there are full tax exemptions.

Notes:

- We consider that all economic sectors other than "investment" and "business services" are fully exempt under the "Authorised company" regime. (see note under [ID526])

Sources:

- IBFD 2020d; PWC 2020a; Deloitte 2020a ↗

ID 534 — Information and telecom sector tax exemption ▲

Question: Information and telecom (active): Are there any (partial) tax exemptions applicable to companies active in the information and telecom sector?

Answer: Full: Yes, there are full tax exemptions.

Notes:

- We consider that all economic sectors other than "investment" and "business services" are fully exempt under the "Authorised company" regime. (see note under [ID526])

Sources:

- IBFD 2020d; PWC 2020a; Deloitte 2020a ↗

ID 535 — IT services sector tax exemption ▲

Question: IT services (active): Are there any (partial) tax exemptions applicable to companies active in the IT services sector?

Answer: Full: Yes, there are full tax exemptions.

Notes:

- We consider that all economic sectors other than "investment" and "business services" are fully exempt under the "Authorised company" regime. (see note under [ID526])

Sources:

- IBFD 2020d; PWC 2020a; Deloitte 2020a ↗

ID 536 — Banking and insurance sector tax exemption ▲

Question: Banking and insurance (active): Are there any (partial) tax exemptions applicable to companies active in the banking and insurance sector?

Answer: Full: Yes, there are full tax exemptions.

Notes:

- We consider that all economic sectors other than "investment" and "business services" are fully exempt under the "authorised company" regime. (see note under [ID526]) As mentioned above, insurance and reinsurance activities are in principle allowed, and thus foreign income of Mauritius incorporated companies may be fully tax exempt.
- According to IBFD, as from July 2020, banks are taxed on "chargeable income" at a rate from 5% to 15% (IBFD 2020d: 1.6.1.).Otherwise, banks are taxed under an alternative regime, which may be considered a "surcharge". From 1 January 2019, banks are taxed at a rate of 5.5% (under MUR 1.2 bn) or 4.5% (over MUR 1.2 bn), assessed on "leviable income" (which includes net interest income and income derived from banking transactions with resident persons) (IBFD 2020d: 3.2.). Further, no tax is levied if in the preceding year "the book profit of the bank did not exceed 5% of its operating income." (Art.50H(4)(b) of the Income Tax Act, as amended 2020) (IBFD 2020d: 3.2.) (PWC 2020a) Thus, although the alternative regime does not always result in taxation, we consider that banking activities are partially exempt.

Sources:

- IBFD 2020d; PWC 2020a; Deloitte 2020a ↗

ID 537 — Professional and technical services sector tax exemption ▲

Question: Professional and technical services (active): Are there any (partial) tax exemptions applicable to companies active in the professional and technical services sector?

Answer: Full: Yes, there are full tax exemptions.

Notes:

- We consider that all economic sectors other than "investment" and "business services" are fully exempt under the "Authorised company" regime. (see note under [ID526])

Sources:

- IBFD 2020d; PWC 2020a; Deloitte 2020a ↗

ID 538 — Business services sector tax exemption ▲

Question: Business services (active): Are there any (partial) tax exemptions applicable to companies active in the business services sector?

Answer: Full: Yes, there are full tax exemptions.

Notes:

- Foreign income derived from leasing ship and aircraft is tax-exempt. (IBFD 2020d : 1.2.3.; PWC 2020a) Indeed, "owners of foreign vessels registered in Mauritius are exempt from income tax on income derived from the operation of such vessels, including any income derived from the chartering of such vessels." (PWC 2018a) Furthermore, income derived by companies engaged in ship and aircraft leasing is exempted at 80% (IBFD 2020d : 1.3.2.). Otherwise, an exemption for foreign interest income derived by a company in the ship and aircraft leasing business is exempt subject to minimum expenditure requirements that are proportionate to the level of activities (IBFD 2020d: 1.7). The exemption related to interests is disregarded because it does not relate to active business income. Yet, because companies engaged in ship and aircraft charters (leasing) are fully exempt, we consider that Mauritius offers a full tax exemption in relation to the "business services" sector.

Sources:

- IBFD 2020d; PWC 2020a; Deloitte 2020a ↗
- <https://taxsummaries.pwc.com/mauritius/corporate/tax-credits-and-incentives>

Haven Indicator 6: Economic Zones and Tax Holidays ▲

75

This indicator measures whether and to what extent time-bound or geographically confined tax incentives are available in a country. It measures if these incentives offer partial or full exemptions from corporate income tax (CIT) and/or capital gains tax (CGT). This includes temporary tax holidays and special tax incentives (temporary or permanent) given to companies located in designated economic zones.

ID 540 — Tax holidays, non-economic zones, full exemption ▲

Question: NonEZ-Temporary-Full: How many temporary (tax holidays) and full tax exemptions are offered to companies established anywhere in the jurisdiction (except in economic zones or non-autonomous regions)?

Answer: 2

Notes:

- Although Deloitte (2020a) considers that "[t]here are no tax incentives", we confirm the availability of wide-ranging incentives with other sources (IBFD 2020d; PWC 2020a).
- (1). The following companies may be exempt for a period of 5 years: (i) Companies holding a Global Treasury Activities License (IBFD 2020d: 1.3.2.); (ii) Companies holding an Investment Banking License issued after September 2016 (ibid.).
- (2). The following activities are exempt from income tax for a period of 8 years: (i) income derived by a Global Headquarters Administration License after September 2016 (IBFD 2020d: 1.3.2.); (ii) Fishing income derived by an industrial fishing company incorporated after September 2016 (ibid.); (iii) "Income derived from the exploitation and use of deep ocean water for air conditioning installations, facilities, and services" (PWC 2020a; confirmed by IBFD 2020d: 1.3.2.); (iv) income of a company incorporated after July 2017 that conducts innovation-driven activities for intellectual property assets (ibid.); (v) income of companies set up after June 2017 that manufacture pharmaceutical products, medical devices and other high tech products (ibid.); (vi) income of a company in the business of manufacturing automotive parts, subject to registration with the Economic Development board (ibid.).
- [Disregarded] Small enterprises are fully exempt for a period of 4 years (IBFD 2020d: 1.3.2.). However, because a small or medium are companies with a turnover of less than 50 million rupees (aprox. 574 000€), and we exclude companies with annual turnover of less than 10M€ from assessment in this Index, we disregard this incentive for the purposes of this indicator.

Sources:

- IBFD 2020d; PWC 2020a; Deloitte 2020a ↗
- <http://www.ilo.org/dyn/natlex/docs/ELECTRONIC/82663/90714/F1619164235/MUS82663.pdf>
- <https://www2.deloitte.com/content/dam/Deloitte/global/Documents/Tax/dttl-tax-mauritiushighlights-2020.pdf?nc=1>

ID 539 — Tax holidays, non-economic zones, partial exemption ▲

Question: NonEZ-Temporary-Partial: How many temporary (tax holidays) and partial tax exemptions are offered to companies established anywhere in the jurisdiction (except in economic zones or non-autonomous regions)?

Answer: 0

Sources:

- IBFD 2020d; PWC 2020a; Deloitte 2020a ↗

ID 504 — Permanent, economic zones, full exemption ▲

Question: EZ-Permanent-Full: How many permanent and full tax exemptions are offered by the jurisdiction to companies established in economic zones or non-autonomous regions?

Answer: 0

Notes:

- [Disregarded] According to IBFD (2020d: 1.6.1.), the full CIT exemption for companies engaged in freeport activities will no longer be available after June 2021 (confirmed by PWC 2020a). Because this tax exemption regime is abolished in the year of publication of the present index (2021), we disregard this incentive for the purposes of this indicator.

Sources:

- IBFD 2020d; PWC 2020a; Deloitte 2020a ↗
- <https://taxsummaries.pwc.com/mauritius/corporate/tax-credits-and-incentives>

ID 503 — Permanent, economic zones, partial exemption ▲

Question: EZ-Permanent-Partial: How many permanent and partial tax exemptions are offered by the jurisdiction to companies established in economic zones or non-autonomous regions?

Answer: 0

Sources:

- IBFD 2020d; PWC 2020a; Deloitte 2020a ↗

ID 502 — Tax holidays, economic zones, full exemption ▲

Question: EZ-Temporary-Full: How many temporary (tax holidays) and full tax exemptions are offered by the jurisdiction to companies established in economic zones or non-autonomous regions?

Answer: 1

Notes:

- Income from development or project financing activities in collaboration with the Mauritius Africa Fund in relation to developing infrastructures in Special Economic Zones is fully exempt for 5 years after the year in which the company starts activities (IBFD 2020d: 1.3.2.). We consider this exemption as a full, temporary, exemption available to companies operating in economic zones.

Sources:

- IBFD 2020d; PWC 2020a; Deloitte 2020a ↗

ID 501 — Tax holidays, economic zones, partial exemption ▲

Question: EZ-Temporary-Partial: How many temporary (tax holidays) and partial tax exemptions are offered by the jurisdiction to companies established in economic zones or non-autonomous regions?

Answer: 0

Sources:

- IBFD 2020d; PWC 2020a; Deloitte 2020a ↗

Haven Indicator 7: Patent Boxes ▲

100

This indicator measures whether a jurisdiction offers preferential tax treatment for income related to intellectual property rights (e.g. patent boxes) and whether the Organisation for Economic Co-operation and Development (OECD) nexus approach constraints are applicable to the patent box.

ID 515 — Patent box ▲

Question: Patent Box: Does the jurisdiction offer preferential tax treatment for income related to intellectual property?

Answer: Yes, an exemption or a lower CIT for IP-income is available without OECD nexus constraints.

Notes:

- Even though the OECD or IBFD may consider that the jurisdiction doesn't have an IP tax regime in this country or that the IP tax regime in this country is compliant with nexus approach, the exemption of foreign royalties from the corporate tax base (see Haven Indicator 2, ID 554) is functionally equivalent to a patent box and thus is considered for the purpose of this indicator to amount to a patent box which is non-compliant with the modified nexus approach.
- For contextual purposes, but without any impact on the country's assessment, here is the description of the patent box regime in isolation of Haven Indicator 2: According to the OECD's latest peer review report, Mauritius' IP regimes of companies holding a category named Global business license 1 and Global business license 2 were abolished with a grandfathering provision, whereas the 'Innovation box' was amended (with no grandfathering provision) and was assessed by the OECD as not harmful and compliant with the nexus approach (OECD HTP 2020).

Sources:

- IBFD 2020d ↗
- EU Code of Conduct 2018 ↗
- OECD HTP 2020 ↗

Haven Indicator 8: Fictional Interest Deduction ▲

0

This indicator measures whether a jurisdiction offers fictional interest deduction to lower the corporate income tax. Because the deduction is given even though no actual interest was paid, the interest deduction is referred to as "fictional" or "nominal". Fictional interest deduction allows a company with a capital structure with high equity (i.e. mostly financed by issuing shares instead of borrowing money) to deduct a certain sum of fictitious financial costs from its tax base.

ID 516 — Fictional interest deduction ▲

Question: Fictional Interest Deduction: Does the jurisdiction offer a scheme that allows deducting from the corporate income tax base a notional return on equity?

Answer: No

Sources:

- IBFD 2020d ↗
- EU Code of Conduct 2019 ↗

TRANSPARENCY

Haven Indicator 9: Public Company Accounts ▲

100

This indicator considers whether a country requires all available types of company with limited liability (except for small companies) to keep accounts according to the international standard and to file their accounts with a government authority and to make them accessible online for free or at a low cost.

ID 188 — Compliance with international standard on keeping accounting records ▲

Question: *Is there an obligation to keep accounting data?

Answer: Yes

Notes:

- The Global Forum wrote that "Obligations to maintain accounting records, including underlying documentation, in accordance with the international standard are in place in Mauritius for all relevant entities and arrangements." (GF 2017: 63).

Sources:

- GF 2017: 63-64 ↗
- http://documents.ocra.com/jurisdiction/Mauritius%20and%20the%20Seychelles/mauritius_ac_information.pdf
- s.193 of Companies Act ↗
- <http://companies.govmu.org/English/Legislation/Documents/amended%20acts290819/Companies%20Act%202001%20amended%20up%20to%2001.aspx#:~:text=The%20Companies%20Act%202001%20was,invest%20in%20and%20from%20Mauritius.>

ID 189 — Submission of annual accounts to a government authority ▲

Question: *Are annual accounts submitted to a public authority?

Answer: Yes, there is an obligation to submit annual accounts for all types of companies.

Notes:

- According to section 215 of the updated Companies Act 2001: "[...] every company, other than a small private company, shall ensure that, within 28 days after the financial statements of the company [...] are filed with the Registrar for registration with the annual return required to be registered under section 223, a financial summary.[...]" According to the Global Forum, it was not clear if companies with Global Business Licence have to file financial statements: "With the exception of any company with a Global Business License, companies incorporated under the Companies Act must submit such financial statements to the Registrar as part of their annual report (s. 221 CA)" (GF 2017: 66). However, the Financial Services Commission approves that Global Business license 1 and 2 types of companies are abolished (OECD HTP 2019: 22).

Sources:

- GF 2017: 66; GF 2013: 60-61 ↗
- <http://www.ocra.com/jurisdictions/mauritius01.asp>
- <https://www.fscmauritius.org/media/1352/fact-sheet-on-global-business-fsc-final-22-march-2013.pdf>
- <http://companyformation7.com/MauritiusFAQ.pdf>
- <https://dhw-international.com/wp-content/uploads/2012/12/Doing-Business-Guide-Mauritius-1st-edition.pdf>
- <https://www2.deloitte.com/content/dam/Deloitte/global/Documents/Tax/dttl-tax-mauritiushighlights-2020.pdf?nc=1>
- Section 215, Companies Act ↗
- <http://companies.govmu.org/English/Legislation/Documents/amended%20acts290819/Companies%20Act%202001%20amended%20up%20to%2001.aspx#:~:text=The%20Companies%20Act%202001%20was,invest%20in%20and%20from%20Mauritius.>

ID 201 — Online availability of annual accounts / financial statements ▲

Question: *Are annual accounts available on a public online record (up to 10 €/US\$/GBP)?

Answer: No, company accounts are not always online (up to 10 €/US\$).

Notes:

- Mauritius' Companies and Business Registration Integrated System (CBRIS) is free of charge, it requires no user registration. While freely available information is supposed to include financial statements, only in 3 out of more than 10 random checks included financial statements.

Sources:

- <https://companies.govmu.org:4343/MNSOnlineSearch/>
- http://documents.ocra.com/jurisdiction/Mauritius%20and%20the%20Seychelles/mauritius_ac_information.pdf

Haven Indicator 10: Public Country By Country Reporting (CBCR) ▲

100

This indicator measures whether the companies listed on the stock exchanges or involved in certain sectors (eg extractives) or incorporated in a given jurisdiction are required to publish publicly worldwide financial reporting data on a country-by-country reporting basis.

ID 318 — Public country-by-country reporting standard ▲

Question: *CBCR: Are companies listed on the national stock exchange or incorporated in the jurisdiction required to comply with a worldwide country-by-country reporting standard?

Answer: No public country-by-country reporting at all.

Sources:

- Email communication with PWYP International, 19.02.2019 & 05.08.2019 ↗
- Meinzer & Trautvetter 2018 ↗
- Freymeyer 2019 ↗
- Email communication with Eurodad, 09.09.2020 ↗

Haven Indicator 11: Robust Local Filing of Country By Country Reporting (CBCR) ▲

100

This indicator assesses whether a jurisdiction, going beyond the OECD standard, ensures its own access to the country-by-country reports of any relevant foreign multinational enterprises with domestic operations. Access is ensured if the jurisdiction requires country-by-country reports to be filed locally by the local subsidiary or branch of a foreign multinational enterprise whenever the jurisdiction does not obtain these reports through the automatic exchange of information for whatever reason.

ID 419 — Robust local filing of country-by-country reporting ▲

Question: *CBCR: Is there a local filing requirement of a global country-by-country reporting file (according to OECD's BEPS Action 13) by large corporate groups (with a worldwide turnover higher than 750 million Euro) and local subsidiaries of foreign groups?

Answer: OECD Legislation: Secondary mechanism is subject to restrictions imposed by OECD model legislation; or no secondary mechanism at all (only the domestic ultimate parent entity has to file the CbCR)

Notes:

- "Mauritius does not apply or plan to introduce local filing" (OECD CBCR 2019: 337-338). This was confirmed in 2020 (OECD CBCR 2020: 263).

Sources:

- OECD CBCR 2019 ↗
- OECD CBCR 2020 ↗

This indicator measures whether and to what extent a country publishes online unilateral cross-border tax rulings; and for countries with extractive industries, whether extractive industries contracts are published.

ID 363 — Tax rulings availability ▲

Question: *Tax Rulings: Are unilateral cross-border tax rulings (e.g. advance tax rulings, advance tax decisions) available in laws or regulation, or in administrative practice?

Answer: Yes

Notes:

- Mauritius can issue unilateral cross-border tax rulings. According to the OECD, these include "(i) preferential regimes; (ii) cross-border unilateral APAs and any other cross-border unilateral tax rulings (such as an advance tax ruling) covering transfer pricing or the application of transfer pricing principles; and (iii) permanent establishment rulings" (OECD UTR 2019: 284).

Sources:

- OECD UTR 2018: 313 ↗
- IBFD 2020d ↗
- Section 159 of the Income Tax Act ↗
- OECD UTR 2019: 284 ↗

ID 421 — Tax rulings disclosure ▲

Question: *Tax Rulings: Are all unilateral crossborder tax rulings (e.g. advance tax rulings, advance tax decisions) published online for free, either anonymised or not?

Answer: MINIMAL (ANONYMISED AND NOT FULL TEXT): All unilateral crossborder tax rulings are published online, but in a reduced version and without the name of the taxpayer concerned.

Notes:

- According to the OECD, "Rulings are issued by the Mauritius Revenue Authority ("MRA")" (OECD UTR 2018: 313) and "Mauritius publishes taxpayer specific rulings in redacted form" (OECD UTR 2019: 283). A reduced version of the ruling is indeed available online (mra.mu).

Sources:

- OECD UTR 2018: 313 ↗
- <https://www.mra.mu/index.php/media1/rulings/income-tax-rulings?highlight=WYJpbmNvbWUiLCInaW5jb21Iiwiw5jb21IjylsInRheCIsInJ1bGluZ3MiLCJpbmNvbWUgdGF4Iiwiw5jb21IIHRheCBydWxpbdzliwidC>
- OECD UTR 2019: 283 ↗

ID 561 — Mining contracts disclosure in law ▲

Question: *Mining contracts in law: Are all extractive industries mining contracts required by law to be disclosed?

Answer: Not Applicable

Sources:

- Contract Disclosure Policy and Practice Tracker, Natural Resource Governance Institute 28.07.2020 ↗
- <https://docs.google.com/spreadsheets/d/1FXEeD43jw6VYHV8yS-8KJ5-rR5l0XtKxVQZBWzr-ohY/edit#gid=4>

ID 562 — Mining contracts disclosure in practice ▲

Question: *Mining contracts in practice: Are all extractive industries mining contracts published online in practice?

Answer: Not applicable

Sources:

- Contract Disclosure Policy and Practice Tracker, Natural Resource Governance Institute 28.07.2020 ↗
- <https://docs.google.com/spreadsheets/d/1FXEeD43jw6VYHV8yS-8KJ5-rR5l0XtKxVQZBWzr-ohY/edit#gid=41>

ID 563 — Petroleum contracts disclosure in law ▲

Question: *Petroleum contracts in law: Are all extractive industries petroleum contracts required by law to be disclosed?

Answer: Not Applicable

Sources:

- Contract Disclosure Policy and Practice Tracker, Natural Resource Governance Institute 28.07.2020 ↗
- <https://docs.google.com/spreadsheets/d/1FXEeD43jw6VYHV8yS-8KJ5-rR5l0XtKxVQZBWzr-ohY/edit#gid=0>

ID 564 — Petroleum contracts disclosure in practice ▲

Question: *Petroleum contracts in practice: Are all extractive industries petroleum contracts published online in practice?

Answer: Not applicable

Sources:

- Contract Disclosure Policy and Practice Tracker, Natural Resource Governance Institute 28.07.2020 ↗
- <https://docs.google.com/spreadsheets/d/1FXEeD43jw6VYHV8yS-8KJ5-rR5l0XtKxVQZBWzr-ohY/edit#gid=9>

This indicator assesses two components of mandatory reporting to tackle tax avoidance schemes: (i) the reporting of tax avoidance schemes, in which we assess whether a country requires both taxpayers and tax advisers to report tax avoidance schemes they have used; and (ii) the reporting of uncertain tax positions, in which we assess whether a country requires taxpayers and tax advisers to report uncertain tax positions for which reserves have been created in annual corporate accounts.

ID 403 — Taxpayers' mandatory reporting of tax avoidance schemes ▲

Question: *Taxpayers reporting schemes: Are taxpayers required to report at least annually on certain tax avoidance schemes they have used?

Answer: No.

Sources:

- IBFD 2020d ↗

ID 404 — Tax advisers' mandatory reporting of tax avoidance schemes ▲

Question: *Tax advisers reporting schemes: Are tax advisers (who help companies and individuals to prepare tax returns) required to report at least annually on certain tax avoidance schemes they have sold/marketed (if applicable)?

Answer: No.

Sources:

- IBFD 2020d ↗

ID 405 — Taxpayers' mandatory reporting of uncertain tax positions ▲

Question: *Taxpayers reporting uncertain tax positions: Are taxpayers required to report at least annually on details of uncertain tax positions for which reserves have been created in the annual accounts?

Answer: No.

Sources:

- IBFD 2020d ↗

ID 406 — Tax advisers' mandatory reporting of uncertain tax positions ▲

Question: *Tax advisers reporting uncertain tax positions: Are tax advisers required to report at least annually on details of uncertain tax positions for which reserves have been created in the annual accounts of the companies they advised?

Answer: No.

Sources:

- IBFD 2020d ↗

Haven Indicator 14: Tax Court Transparency ▲

100

This indicator assesses the openness of a jurisdiction's judicial system in tax matters by analysing the public online availability of verdicts, judgements, and sentences.

ID 409 — Criminal tax courts' publication of decisions ▲

Question: *Is the full text of judgements / verdicts issued by criminal tax courts published online for free, or for a cost of up to 10 €/US\$/GBP??

Answer: No, full text of verdicts is not always online (up to 10€/US\$/GBP)?

Notes:

- Judgments delivered by the courts of Mauritius are publicly available for consultation online on the website of the Supreme Court of Mauritius (supremecourt.govmu.org). However, tax litigation cases are generally handled at the Assessment Review Committee (ARC) (which is akin to a tax appeal tribunal) established by the Mauritius Revenue Authority Act No. 33 of 2004 (Section 18) and operates under the Ministry of Finance. Although the Mauritius Revenue Authority keeps a summary online of all the tax rulings in a redacted format, it was not possible to find full decisions of the ARC online.

Sources:

- <http://www.mra.mu/index.php/media-centre/rulings/income-tax-rulings>
- https://supremecourt.govmu.org/_Layouts/CLIS.DMS/Judgment/JudgementList.aspx

ID 410 — Civil tax courts' publication of decisions ▲

Question: *Is the full text of judgements / verdicts issued by civil tax courts published online for free, or for a cost of up to 10 €/US\$/GBP?

Answer: No, full text of verdicts is not always online (up to 10€/US\$/GBP)?

Notes:

- Judgments delivered by the courts of Mauritius are publicly available for consultation online on the website of the Supreme Court of Mauritius (supremecourt.govmu.org). However, tax litigation cases are generally handled at the Assessment Review Committee (ARC) (which is akin to a tax appeal tribunal) established by the Mauritius Revenue Authority Act No. 33 of 2004 (Section 18) and operates under the Ministry of Finance. Although the Mauritius Revenue Authority keeps a summary online of all the tax rulings in a redacted format, it was not possible to find full decisions of the ARC online.

Sources:

- <http://www.mra.mu/index.php/media-centre/rulings/income-tax-rulings>
- https://supremecourt.govmu.org/_Layouts/CLIS.DMS/Judgment/JudgementList.aspx

ANTI-AVOIDANCE

Haven Indicator 15: Deduction Limitation of Interest Payments ▲

100

This indicator assesses a country's limitations on the deduction of interest expenses from the corporate income tax base. It focuses on limits placed on interest paid to non-resident group affiliates ("intra-group interest payments"), including by means of a fixed ratio rule.

ID 517 — Outbound intra-group interest deduction limitation ▲

Question: Outbound intra-group interest deduction limitation: Does the jurisdiction restrict or disallow deducting from the corporate income tax base interest paid to non-resident group affiliates?

Answer: NO: No deduction limitation for intra-group interest payments.

Notes:

- There is no deduction limitations rules for intra-group interest payments including transfer pricing rules in Mauritius (IBFD 2020d: 7.3).

Sources:

- IBFD 2020d ↗

ID 518 — Group ratio rule (as part of fixed ratio interest deduction limitation) ▲

Question: Group ratio rule: Does the jurisdiction apply a group ratio rule opt-in alongside fixed ratio limitations on interest deduction?

Answer: Not applicable

Notes:

- Since there are no fixed-ratio rules in force in Mauritius (IBFD 2020d: 7.3), a group ratio or a worldwide debt-to-equity ratio carve-out is not applicable.

Sources:

- IBFD 2020d ↗

ID 519 — Financial undertaking exclusion (as part of fixed ratio interest deduction limitation) ▲

Question: Financial undertaking exclusion: Does the jurisdiction apply a financial undertaking exclusion alongside fixed ratio limitations on interest deduction?

Answer: Not applicable

Notes:

- Since there are no fixed-ratio rules in force Mauritius (IBFD 2020d: 7.3), a financial undertaking exclusion is not applicable.

Sources:

- IBFD 2020d ↗

Haven Indicator 16: Deduction Limitation of Royalty Payments ▲

100

This indicator measures whether or to what extent a jurisdiction disallows or restricts the deduction of royalties paid to non-resident group affiliates ("intra-group royalty payments") from the corporate income tax base.

ID 520 — Outbound intra-group royalty deduction limitation ▲

Question: Outbound intra-group royalty deduction limitation: Does the jurisdiction restrict or disallow deducting from the corporate income tax base royalties paid to non-resident group affiliates?

Answer: NO: No deduction limitation for intra-group royalty payments.

Notes:

- In Mauritius, there is no deduction limitation rules for intra-group royalty payments including transfer pricing rules (IBFD 2020d: 1.3.3.1; 7.2).

Sources:

- IBFD 2020d ↗

Haven Indicator 17: Deduction Limitation of Service Payments ▲

100

This indicator measures whether or to what extent a jurisdiction restricts or disallows the deduction of intra-group services payments (management fees, technical fees, consulting services fees) paid to non-resident group affiliates from the corporate income tax base.

ID 521 — Outbound intra-group services deduction limitation ▲

Question: Outbound intra-group services deduction limitation: Does the jurisdiction restrict or disallow deducting from the corporate income tax base payments for management, technical, legal or accounting services paid to non-resident group affiliates?

Answer: No, there is no deduction restriction beyond transfer pricing rules, the arm's length principle or other generic rules.

Notes:

- There is no deduction limitation for intra-group service payments including transfer pricing rules in Mauritius (IBFD 2020d: 1.3.3.1; 7.2).

Sources:

- IBFD 2020d ↗

Haven Indicator 18: Withholding Taxes on Dividend Payments ▲

100

This indicator measures the extent to which a jurisdiction levies withholding taxes on outbound dividends. It assesses the lowest available unilateral withholding tax rate on outbound dividend payments.

ID 508 — Dividend-related party payment ▲

Question: Dividend-Related Party Payment: What is the (lowest) applicable unilateral cross-border withholding tax rate for outgoing dividend payments to a related party?

Answer: 0 %

Notes:

- Mauritius does not levy withholding tax on dividends paid to resident and non-residents companies (IBFD 2020d: 6.3.1).

Sources:

- IBFD 2020d ↗

Haven Indicator 19: Controlled Foreign Company Rules ▲

75

This indicator assesses whether countries apply robust non-transactional controlled foreign company (CFC) rules. CFC rules are a type of specific anti-avoidance rules that target particular taxpayers or transactions. Like other types of specific anti-avoidance rules, CFC rules are more effective than general anti-avoidance rules in capturing the specific type of tax avoidance on which they focus.

ID 522 — Controlled Foreign Company (CFC) rules ▲

Question: CFC-Rules: Does the jurisdiction apply robust non-transactional CFC rules?

Answer: NO, TRANSACTIONAL: While there are CFC rules, these are only transactional type of rules which allow attribution of profit to the CFC according to the arm's length principle, e.g. OECD Transfer Pricing Guidelines.

Notes:

- Mauritius has introduced transactional CFC rules that have been effective since 1 July 2020 (IBFD 2020d: 7.4).

Sources:

- IBFD 2020d ↗

DOUBLE TAX TREATY AGGRESSIVENESS

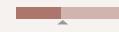
Haven Indicator 20: Treaty Aggressiveness ▲

This indicator analyses the aggressiveness of a jurisdiction in their double tax agreements with other countries, as revealed by the withholding tax rates that apply to the payment of dividends, interests and royalties.

ID 571 — Aggregate tax treaty aggressiveness ▲

Question: Aggregate-Aggressiveness: What is the scaled value of all negative differentials between the assessed jurisdiction's treaty withholding rates on all three payment types (dividend, interest and royalty) and those of its treaty partner jurisdiction.

Answer: 40.3672383132703



40

Global Scale Weight breakdown



0.66%

Inward foreign direct investment (US\$)

\$ 330,077,788,619

Outward foreign direct investment (US\$)

\$ 295,676,817,149

Sum of inward and outward foreign direct investment (US\$)

\$ 625,754,605,768

Global total of sum of inward and outward foreign direct investment (US\$)

\$ 94,690,323,833,261

Global scale weight (share of jurisdiction's inward and outward foreign direct investment on the global total)

0.661%