



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

KEY INSIGHTS



EXECUTIVE OVERVIEW



The **Finance Act 2026 and the Economic and Financial Measures (Miscellaneous Provisions) Act 2026** (together, the “Acts”) were gazetted on 12 August 2026. They give legislative effect to a substantial part of the 2026–2027 Budget programme across taxation, global business, corporate administration, financial services, banking, immigration, technology, employment and investment.

The enacted position does not, however, reproduce every Budget announcement verbatim. Some measures were refined in the legislative process; some were accompanied by additional requirements not highlighted in the Budget; and others remain dependent on proclamation, regulations or regulatory guidance. In a few important areas, the Acts do not implement the policy initially announced.

For international structures, the principal issues include the Corporate Climate Responsibility levy, treaty-based foreign tax credits, the partial exemption regime, the Domestic Minimum Top-up Tax, management-company VAT, bank-signatory arrangements and revised rules for global business entities. For businesses operating in Mauritius, the Acts introduce or extend obligations relating to VAT, withholding tax on technology and digital services, beneficial ownership, employment policies, cyber-resilience and corporate reporting.

Note on commencement

Gazetting gives the Acts legal status, but it does not mean that every amendment became operative on 12 August 2026. Some provisions apply from the Gazette date; others have retrospective or deferred effective dates; and certain regulatory measures will commence only on proclamation, or once subsidiary rules are issued.



THE MEASURES AT A GLANCE

Theme	Main audience	Budget-to-Act position	Immediate focus
International tax	GBCs, funds and MNE groups	Important clarifications to CCR and DMTT	Model tax-credit and cash-flow outcomes
Global business	GBCs and management companies	VAT, signatory and entity-definition changes	Review structures, pricing and bank mandates
Investment and mobility	Foreign investors, founders and employers	New routes plus revised thresholds	Confirm eligibility and transitional treatment
Corporate compliance	Companies, partnerships and service providers	Expanded beneficial-ownership requirements	Collect data and update registers
Digital economy	ICT providers, advertisers and manufacturers	New tax exposure alongside incentives	Review contracts, TDS and investment plans
Banking and finance	Banks, regulated firms and fintechs	New cyber and intervention frameworks	Prepare systems and board oversight



CORPORATE CLIMATE RESPONSIBILITY LEVY: TREATY CREDITS MATTER

The 2% Corporate Climate Responsibility (“CCR”) levy remains a significant consideration for companies with substantial chargeable income. Its proceeds are earmarked for protecting and restoring Mauritius’ natural ecosystem and combating climate change. The levy reflects the broader policy that the corporate sector, as a beneficiary of Mauritius’ natural capital, should contribute to its preservation: a principle already reflected in the 2% CSR requirement introduced in 2009.

The Budget proposed quarterly payment of the levy through the Advance Payment System (“APS”) and a broad restriction on using tax credits, including foreign tax credits, against it.

The Acts preserve the APS mechanism but clarify that specified investment tax credits available to manufacturing companies and foreign tax credits arising under a Mauritius double taxation agreement may be used against the levy. The treatment therefore depends on the legal basis of the credit.

A global business company (“GBC”) relying solely on Mauritius’ unilateral foreign-tax credit rules may be able to reduce its ordinary corporate income tax, but not the CCR levy, resulting in an additional tax cost. By contrast, a treaty-based foreign tax credit may also reduce the levy, subject to the foreign tax suffered and the limitations under the applicable treaty and domestic law.

GBCs should therefore assess each income stream separately and compare the partial exemption regime with full taxation coupled with a treaty-based foreign tax credit. Companies subject to APS should also incorporate the quarterly levy payments into their cash-flow forecasts.

GBCs should not assume either that the levy invariably creates an additional 2% cost or that all foreign tax credits can be used against it. The outcome depends on the legal basis of the credit, the relevant treaty and the circumstances of each income stream.



PARTIAL EXEMPTION AND INVESTMENT-MANAGEMENT ACTIVITIES

The qualifying activities of investment advisers and asset managers under the partial exemption regime have been broadened to include the management of non-securities instruments, including loan receivables, mortgage-backed exposures and invoice-financing portfolios. This largely implements the Budget announcement.

The extension may be relevant to credit, private-debt and alternative-finance strategies administered from Mauritius. It does not remove the need to satisfy the applicable substance, licensing and income characterisation requirements. Managers should therefore review whether their actual functions, people, expenditure and decision-making support the relief claimed.

DOMESTIC MINIMUM TOP-UP TAX AND PILLAR TWO

The Acts refine the Domestic Minimum Top-up Tax ("DMTT") framework for multinational groups that are subject to the Pillar Two minimum-tax rules, including the treatment of investment funds and real estate investment vehicles that are ultimate parent entities, consolidation adjustments for intra-group transactions, the relevant fiscal year, amended-return periods and penalties. The exemption for qualifying investment funds and real estate investment vehicles is deemed effective from 1 July 2025.

The Qualified Domestic Minimum Top-up Tax Regulations 2026 were separately gazetted on 8 August 2026. Groups to which the regime applies should now align the statutory amendments, regulations, safe-harbour analysis, group reporting calendar and Mauritius filing process rather than considering the Finance Act changes in isolation.



GLOBAL BUSINESS ENTITIES, MANAGEMENT-COMPANY VAT AND BANK MANDATES

The definition of a global business entity under the Income Tax Act 1995 is expanded to cover certain trusts, foundations and unit trust schemes. [1] The new conditions focus principally on the residence or Global Business Licence status of settlors, founders, trustees and beneficiaries, and on whether the relevant purpose is carried out outside Mauritius. Existing structures involving Mauritius-resident parties should be reviewed before the year of assessment commencing on 1 July 2027.

From 1 October 2026, qualifying management-licence services supplied to GBCs and qualifying non-resident trusts and foundations will become VAT-exempt rather than zero-rated. Although no output VAT is charged in either case, exemption may restrict the management company's recovery of input VAT. Management companies should therefore review their VAT apportionment, pricing and engagement terms, while clients should assess any resulting impact on fees.

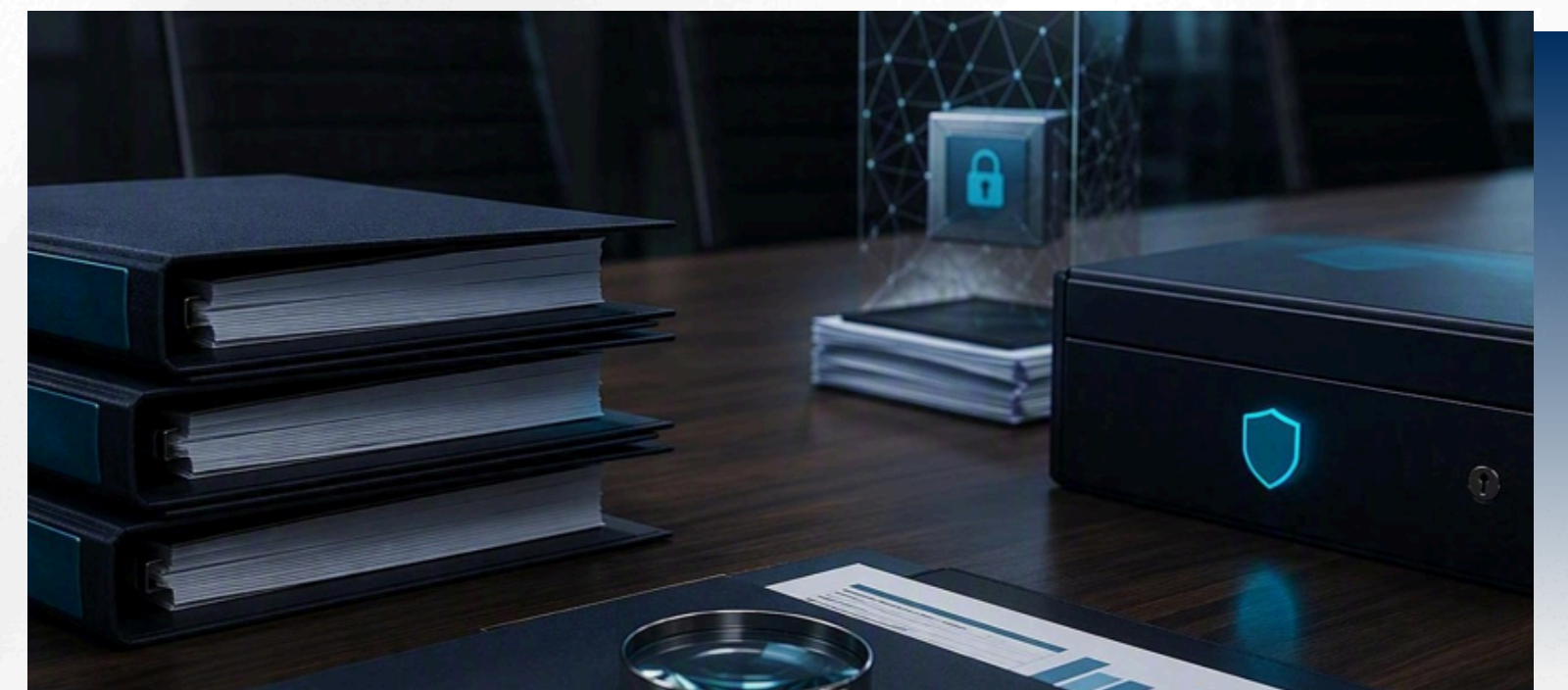
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Conversely, qualifying payment services supplied by Bank of Mauritius-licensed payment service providers to non-residents and GBCs will become zero-rated from 1 January 2027.

The Acts also give statutory effect to the requirement that GBC bank accounts be operated through signatory arrangements complying with FSC guidelines. GBCs and management companies should review their bank mandates and internal controls against the authorised-signatory requirements and any applicable transitional period.



CAPTIVE INSURANCE, PRIVATE WEALTH AND FUND STRUCTURES

Captive insurers licensed before 19 June 2026 may benefit from an additional exemption period of up to five years. Relevant insurers should verify the licence date and calculate the remaining exemption period.

The new Private Wealth Management Licence is intended to support the development of Mauritius as a wealth-management and family-office centre, but the precise permitted activities will depend on FSC Rules and approval.

Protected Cell Companies may convert into or operate as Variable Capital Companies ("VCC") while preserving legal continuity and VCCs may, with FSC approval, enter into contractual arrangements with or provide ancillary services to their sub-funds, provided those services are not themselves licensable activities.

These provisions should be considered when reviewing existing fund platforms and new product structures.



GOLDEN VISA AND PERMANENT RESIDENCE

The Budget announced a two-year Golden Visa for investors committing at least USD 1 million in designated high-value sectors, with a pathway to permanent residence. The enacted framework requires the investment to be made within 12 months of issuance in a business activity. Acquisition of residential property under an EDB property scheme does not satisfy that USD 1 million investment requirement.

The Acts extend certain tax provisions applicable to Premium Visa holders to Golden Visa holders. However, holding a Golden Visa does not, by itself, determine Mauritius tax residence. Residence, source and remittance questions must therefore be analysed separately. In addition, some qualifying conditions and implementation details remain to be prescribed.

For potential applicants, the key distinction is between acquiring a right to reside and establishing the legal and tax structure for the underlying investment. Investors should settle the business activity, funding route, investment timetable, ownership structure and tax-residence position before applying.

REVISED OCCUPATION-PERMIT FRAMEWORK

The investor occupation-permit route now uses an initial investment threshold of USD 100,000, with turnover requirements of MUR 5 million from year three and MUR 8 million from year five for renewal. The professional category generally requires a minimum monthly basic salary of MUR 50,000, while the ProPass and ExpertPass categories have been discontinued. Transitional treatment applies to certain existing professional permit holders on their first renewal.

For self-employed applicants, the revised framework is directed to the services sector and introduces turnover thresholds from year three and on renewal. A new technical category supports contractual workers or technical personnel under approved government-to-government arrangements, subject to its own salary, accommodation and duration requirements. The Family Occupation Permit has been discontinued.

Innovative start-up applicants face new progress-reporting and development milestones, including demonstration that the project has reached minimum viable product stage by the end of the fifth year. Employers, founders and existing permit holders should therefore review not only entry eligibility but also the evidence needed for renewal.

TRAVEL AUTHORISATION, STUDENTS AND FAMILY PERMITS

The Immigration Act framework now provides for a digital travel authorisation to be obtained electronically before travel, subject to the prescribed fee and any exemptions. The operational start will depend on implementation measures. Employers and travel coordinators should monitor official guidance before changing travel procedures.

A new student employment permit creates a formal authorisation regime for employing foreign students. The legislation adds enforcement provisions and a transitional period for existing arrangements. Employers should not treat the Budget announcement allowing additional holiday work as a self-executing permission. The permit regime and commencement requirements must be checked.

Residence permits may be issued digitally, by card or on paper. Eligibility linked to a non-citizen spouse is also extended to dependent children and parents from 1 October 2026.



AI CITY INVESTORS

The AI City Scheme, introduced in the Acts, includes facilitated occupation, work and residence permits, while the AI Founder route requires an investment of at least USD 1 million. These mobility benefits form part of the broader AI City framework considered in section 4 below. Applicants should assess the investment, immigration and tax consequences separately, as participation in the scheme does not by itself determine Mauritius tax residence.

BENEFICIAL-OWNERSHIP RECORDS

Companies, limited liability partnerships, limited partnerships and foundations must include the date of birth of beneficial owners and ultimate beneficial owners in their records and filings. Existing entities generally have until 30 June 2027 to provide the additional information.

Partnerships, including sociétés civiles and sociétés commerciales, are brought within a dedicated beneficial ownership register framework. Prescribed information must be maintained and changes filed within the statutory period. Existing partnerships have until 31 March 2027 to comply.

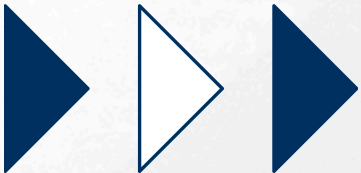
The deadlines appear generous but collecting verified information across layered or family-owned structures may take time. Companies, partnerships, management companies and company service providers should update onboarding forms, registers, verification procedures and filing calendars well in advance.

CORPORATE ADMINISTRATION AND CROSS-BORDER FINANCE

The period for reserving the name of a company, limited liability partnership or limited partnership is extended from two to six months, providing additional flexibility for restructurings and new investments.

The Budget suggested a broad acceptance of foreign registry extracts and electronic confirmations. The enacted amendment is narrower; it concerns evidence that a company has registered in another jurisdiction when it is being removed from the Mauritius register. It should not be presented as a general statutory rule requiring acceptance of foreign documents for every corporate process.

A GBC or Authorised Company issuing debentures exclusively outside Mauritius to non-residents, without an invitation being made in Mauritius, is exempted from appointing a debenture holders' representative. This may simplify qualifying offshore issuances, but the transaction should be checked carefully against each statutory condition.



SUSTAINABILITY REPORTING AND SERVICE PROVIDERS

The Financial Reporting Council may recognise, adopt or recommend sustainability reporting standards, including IFRS Sustainability Disclosure Standards. Regulations may introduce mandatory reporting on a sectoral or phased basis, with transitional relief and enforcement arrangements. Entities likely to be brought within scope should begin a readiness assessment, including governance, data ownership, controls and assurance capability, while monitoring the regulations.

The small-partnership turnover threshold is increased from MUR 50 million to MUR 100 million for limited partnerships and limited liability partnerships. Company service providers that fail to comply with the applicable registration requirements may face a fine of up to MUR 200,000.



AI CITY SCHEME

The Acts establish an AI City Scheme under the Economic Development Board (“EDB”) framework. Certificate holders may benefit from prescribed fiscal and non-fiscal incentives, facilitated occupation, work and residence permits, and prescribed rights relating to immovable property. An AI Founder route is also available for an investment of at least USD 1 million.

The Scheme may provide an attractive platform for technology businesses, founders and investors, but much of its practical scope will depend on regulations and the detailed EDB framework. Prospective applicants should therefore avoid building financial models around incentives that have not yet been prescribed.



INVESTMENT INCENTIVES FOR MANUFACTURERS

The investment tax credit available to manufacturing companies for qualifying expenditure is extended to expenditure on artificial-intelligence solutions and patents. The credit is 15% per year over three years - 45% in total - and the qualifying investment period is extended to 30 June 2029. Unrelieved credit may be carried forward subject to the statutory rules.

Manufacturers considering automation, predictive maintenance, process optimisation or proprietary technology should identify qualifying expenditure at procurement stage, maintain the necessary evidence and model the interaction with the CCR levy.



NON-RESIDENT ICT PROVIDERS AND WITHHOLDING TAX

Non-resident companies supplying software, licences, applications, maintenance services or remote maintenance of programs and ICT equipment may now fall expressly within the Mauritius income-tax net for relevant services supplied in Mauritius.

Payments exceeding MUR 300,000 for qualifying ICT services are subject to 1% tax deduction at source ("TDS"), while payments for advertising, promotion, endorsement or marketing supplied through social-media platforms, digital content or similar electronic means attract 5% TDS. Treaty rates and the statutory carve-outs for amounts treated as royalties, procurement or services already subject to another TDS category must be considered.

Local businesses should update vendor onboarding, contract gross-up clauses, accounts-payable coding and tax-remittance procedures. Foreign providers should review whether their Mauritius facing contracts create local tax exposure and whether treaty relief is available.

VAT, ONLINE MARKETPLACES AND E-BOOKS

The Acts refine the VAT framework for digital and electronic services and define an online marketplace. A foreign supplier whose Mauritius customers are all VAT-registered may not be required to register locally under the revised framework and the former requirement to appoint a tax representative has been removed. Marketplace operators and foreign suppliers should nevertheless test their customer base and supplies against the detailed rules.

Electronic books are zero-rated rather than exempt, an improvement on the Budget wording because zero-rating generally preserves input-VAT recovery. Commissions and fees receivable by qualifying online-marketplace operators are treated under the enacted VAT rules from the relevant commencement date.

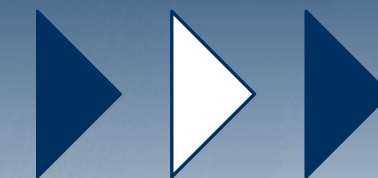


DIGITAL GAMING AND MEASURES STILL OUTSTANDING

The legislation adds certification requirements for digital games and platforms by accredited independent gaming laboratories, complementing monitoring and server-connectivity measures. Operators should examine technical certification, systems access and licensing requirements before launch or renewal.

Not every digital-finance announcement has yet been enacted. In particular, the Budget's proposed comprehensive framework for stablecoins and tokenisation of real-world assets is not created by the Acts. The legislation does, however, prohibit unlicensed persons from soliciting or targeting investors in Mauritius for virtual-asset transactions or initial token offerings. Businesses should distinguish that investor-protection measure from the broader framework still to come.





CYBER THREAT INTELLIGENCE SHARING PLATFORM

A significant measure not expressly announced in the Budget is the statutory requirement for the Bank of Mauritius to establish a Cyber Threat Intelligence Sharing Platform. The Bank may require banks, financial institutions and other specified institutions to participate on terms it determines.

Affected institutions should prepare for secure intelligence exchange, incident classification, escalation, data protection, confidentiality and board oversight. The operational requirements and implementation timetable should be monitored through Bank of Mauritius communications.



CENTRAL-BANK AND BANKING CHANGES

The Government may, after consultation with the Governor, transfer funds or property to increase the paid-up capital of the Bank of Mauritius. The Bank's authority to hold or deal in securities is extended to instruments with maturities of up to 30 years, supporting the longer-dated Government securities announced in the Budget.

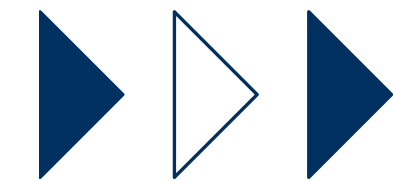
The qualification threshold for chairing the Banking Services Review Panel is raised to a retired judge or barrister of at least 15 years' standing. Banking confidentiality is also expressly subject to disclosure requirements under the Financial Crimes Commission Act, the United Nations sanctions framework and the Public Inquiries Act 2025. Banks should update disclosure protocols and escalation procedures accordingly.

CONSERVATORSHIP AND FINTECH GOVERNANCE

The Financial Services Commission receives a detailed conservatorship framework for licensees experiencing financial, governance or operational difficulties. A conservator may assume control of the business and records, overrule or suspend the board, suspend certain repayments, deal with contracts and pursue or defend proceedings. Because the framework can materially displace ordinary governance, FSC licensees should treat capital adequacy, regulatory compliance and board oversight as part of their restructuring and contingency planning.

A National Fintech Governance Committee will coordinate fintech priorities, implementation plans, cross-agency alignment, standards and public-private collaboration. Some elements of the financial-services framework, including conservatorship, fintech governance and private wealth licensing, depend on proclamation or supporting rules and should be monitored accordingly.





FAIR SHARE CONTRIBUTION, VAT AND INSURANCE

For companies, liability to the Fair Share Contribution is now determined by chargeable income exceeding MUR 24 million. The former turnover-based criterion for that contribution is removed. This is a change to the Fair Share Contribution threshold, not to the corporate income-tax rate, which remains 15%. Businesses close to the threshold should revisit forecasts, group charges and year-end tax provisioning before the 1 January 2027 commencement.

The VAT time-of-supply rules are also tightened. Where neither an invoice nor payment has triggered the tax point, VAT may become due three months after goods are delivered or services performed. Suppliers with delayed certification or billing cycles should align operational records, invoicing and VAT reporting so that tax is not omitted merely because an invoice remains outstanding.

General insurance business carried on in Mauritius becomes subject to a 5% insurance premium tax, with exclusions including reinsurance and insurance business restricted solely to non-Mauritian policies. Insurers should update products, invoicing, returns and systems; policyholders should review whether the new charge affects pricing and renewals.

Taxpayers considering an appeal to the Revenue Tribunal should also note the required payment of 5% of the amount determined or MUR 5 million, whichever is lower.

EMPLOYMENT CHANGES

From 1 January 2027, the Workers' Rights Act reforms materially expand employee entitlements. Maternity leave increases to 26 weeks on full pay, followed, at the worker's option, by up to a further 26 weeks on half pay. Paternity leave increases from four to six consecutive weeks.

Female workers are also entitled to one day of paid menstrual leave per month under the enacted framework.

These changes require more than amendments to staff handbooks. Employers should review contracts and policies, payroll and leave systems, workforce planning, replacement arrangements, confidentiality around health information and safeguards against discriminatory decision-making. Budgeting for longer absences should begin before the January 2027 commencement date.

WHERE THE ENACTED POSITION DIFFERS FROM THE BUDGET

Measure	Budget position	Enacted position / significance
CCR levy	Broad restriction on unused tax credits	Specified manufacturing credits and treaty-based foreign tax credits preserved; material for cross-border structures
Golden Visa	USD 1 million investment and tax incentives	Business investment must be made within 12 months; EDB residential-property purchase does not satisfy the investment test; further conditions remain to be prescribed
State land / Pas Géométriques	Restriction on sales to non-citizens announced	The restriction itself is not in the Acts; an additional 10% duty on specified transfers was enacted
Foreign registration documents	General acceptance of extracts and electronic confirmations suggested	Enacted wording is narrower and relates to evidence of registration following migration out of Mauritius
Cyber-threat platform	Not specifically announced	Mandatory statutory platform and participation power introduced
Stablecoins and tokenisation	Comprehensive framework announced	No comprehensive framework enacted; unlicensed investor solicitation is prohibited
E-books	VAT exemption announced	Zero-rating enacted, generally preserving input-VAT recovery



TEN ACTIONS FOR BUSINESSES AND INVESTORS

01 Map the Acts across the group.

Identify the entities, licences, contracts, employees and investment projects affected by each measure.

02 Model CCR outcomes by income stream.

Separate treaty-based credits, unilateral credits and partial-exemption income, and reflect APS cash flows.

03 Complete the DMTT readiness exercise.

Align the Act, the 2026 Regulations, safe-harbour analysis and group filing calendar.

04 Review management-company and payment-service VAT.

Assess input-VAT recovery, pricing, engagement terms and the different commencement dates.

05 Check GBC bank mandates.

Confirm that signatory arrangements and internal controls comply with FSC requirements.

06 Prepare beneficial-ownership data.

Update forms, registers and filing processes before the March and June 2027 deadlines.

07 Update technology contracts and payables.

Address TDS, treaty relief, gross-up clauses and non-resident-provider exposure.

08 Review immigration and investor plans.

Confirm the applicable permit category, investment route, renewal metrics and prescribed conditions.

09 Update employment policies and budgets.

Implement the January 2027 leave changes in contracts, policies, payroll and resource planning.

10 Track measures awaiting implementation.

Monitor proclamations, FSC and Bank of Mauritius rules, EDB conditions and the outstanding digital-asset framework.

SELECTED EFFECTIVE DATES



DATE / TRIGGER	SELECTED MEASURES
8 AUGUST 2026	Qualified Domestic Minimum Top-up Tax Regulations gazetted.
12 AUGUST 2026	Acts gazetted; numerous provisions commence on Gazette date, subject to the wording of each amendment.
1 SEPTEMBER 2026	Selected VCC and protected-cell-company changes.
1 OCTOBER 2026	Management-company VAT exemption; selected digital-services and residence-permit changes.
1 JANUARY 2027	Selected corporate-tax, payment-service VAT, tax-agent and employment changes.

DATE / TRIGGER	SELECTED MEASURES
31 MARCH 2027	Transitional deadline for existing partnerships' beneficial-ownership registers.
30 JUNE 2027	Deadline for specified existing entities to provide additional beneficial-ownership information.
1 JULY 2027 YOA	Revised global-business-entity definition and selected abolished incentives.
30 JUNE 2029	End of extended qualifying period for manufacturing investment credit on qualifying AI solutions, patents and plant and machinery.
PROCLAMATION/ RULES	Conservatorship, fintech governance, private wealth management and other measures where commencement or operation depends on further instruments.

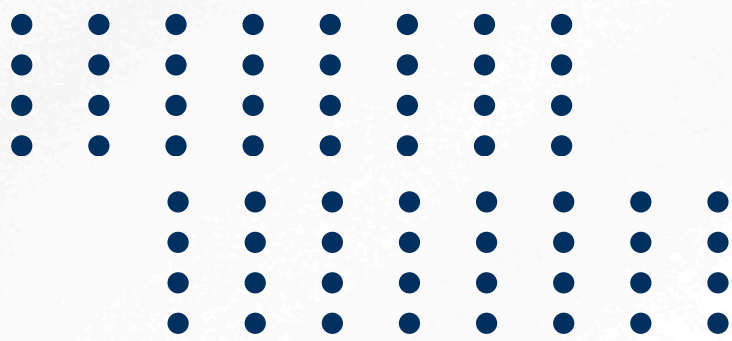
CONCLUSION

The Acts contain both opportunities and new operational burdens. For international businesses, the key is to understand how tax credits, substance, management-company services and regulatory requirements interact across the structure. For businesses operating in Mauritius, the immediate task is implementation: updating systems, contracts, registers, policies and governance before the relevant dates.

A measure-by-measure reading is therefore only the starting point. Each organisation should determine which changes apply to it, when they take effect and whether additional regulations or regulatory guidance are still required.

Companies should also budget for the full CCR levy cost from July 2029 onward, when the phased reductions have tapered off.

This publication is intended as a general guide and does not constitute legal or tax advice. Specific advice should be obtained in relation to individual circumstances.





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