

Invest Into Africa

Through Mauritius

Choosing the right fund domicile is very important for a fund manager and the determining factors include ability to access targeted investors, location of investments and reputation of the jurisdiction.

While Mauritius has forged a strong reputation as a premier International Financial Centre for Africa-focused fund domiciliation, there may be instances where a fund manager will prefer to select another jurisdiction due to their investor base. In the latter case, interposing a Mauritius Special Purpose Vehicle ('SPV') between the fund and the African investments offers several benefits to the fund manager.

Features of the Mauritius' IFC facilitating cross-border investment into Africa



Tried and tested investment hub



Bilingual (English and French) and skilled workforce



Ease of doing business



Transparent and innovative hybrid legislative framework



No exchange control and free movement of capital



No minimum capital requirements



state-of-the-art infrastructure and excellent means of communication



100% foreign ownership



Range of facilities: banking, insurance, corporate services, funds, legal services, and accounting

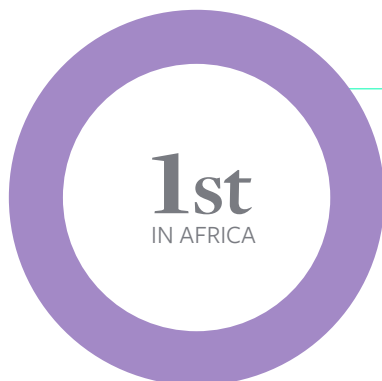


Politically stable and jurisdictionally neutral setting



Secure and efficient platform that helps to mitigate risks and lower costs

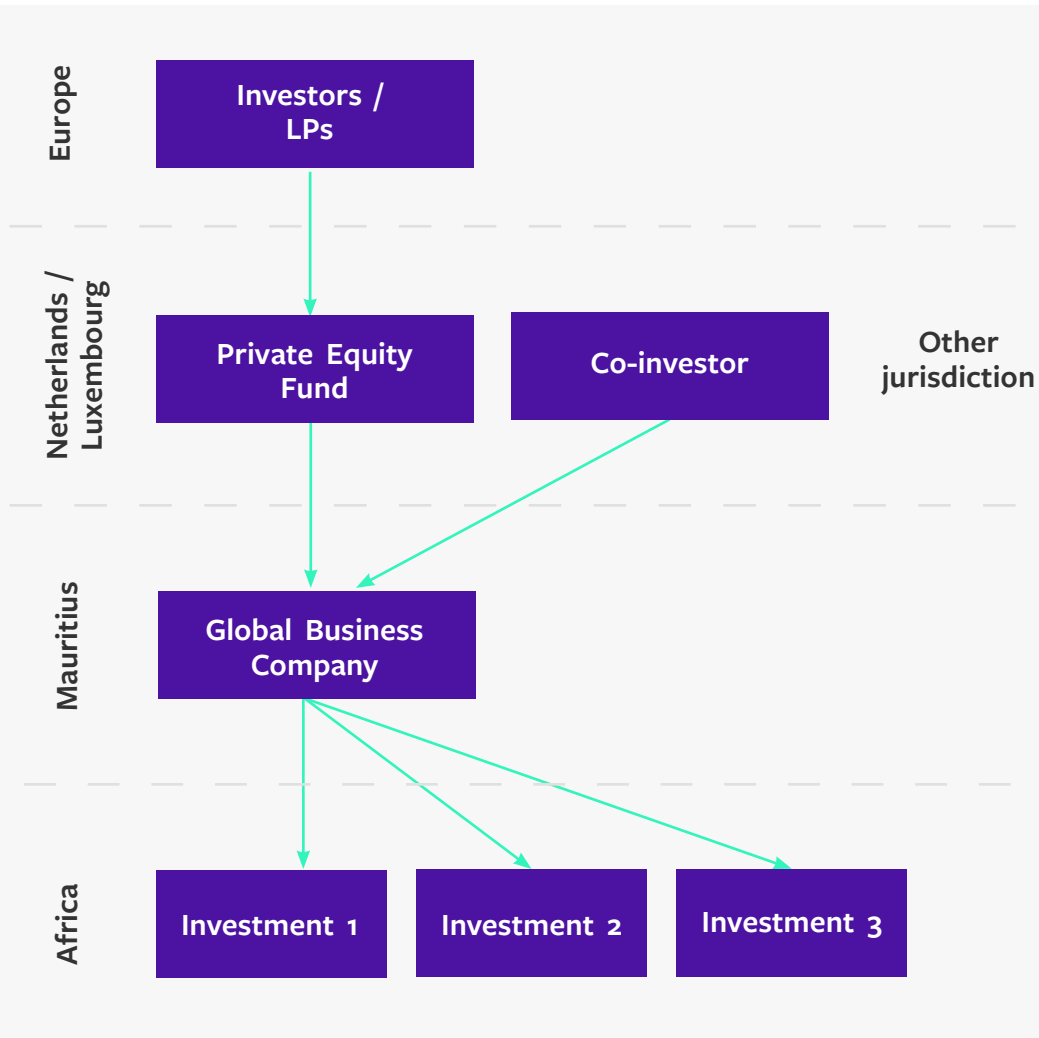
International accolades where Mauritius is ranked 1st in Africa



- Ease of doing business
- Global innovation
- Mo Ibrahim foundation of African governance
- Tax competitiveness
- Regulatory quality
- International property rights
- Governance efficiency
- Economic complexity

Structure

The below structure shows how a fund manager targeting European investors can establish its fund in a European country, for example, Netherlands or Luxembourg and access African investments through Mauritius by incorporating a Global Business Company as its SPV. This type of structure also allows co-investors to enter at the SPV level which makes any potential exit easier at a later stage.



Types of activities

Type of activities	Any activity, provided however, that the ultimate purpose of the company is to make an investment or provide a product or a service principally outside Mauritius.
Standard requirements	A GBC shall, at all times: <ul style="list-style-type: none"> ● carry out its core income generating activities, in or from Mauritius, as required under the Income Tax Act ● be managed and controlled from Mauritius; and ● be administered by a management company
Central management and control	A GBC shall be managed and controlled from Mauritius, if it: <ul style="list-style-type: none"> ● has at least 2 directors, resident in Mauritius, of sufficient calibre to exercise independence of mind and judgement; ● maintains, at all times, its principal bank account in Mauritius; ● keeps and maintains, at all times, its accounting records at its registered office in Mauritius; ● prepares its statutory financial statements and causes such financial statements to be audited in Mauritius; and ● provides for meetings of directors to include at least 2 directors from Mauritius
Time to establish	5 to 10 business days for a GBC (without any activity licence) and 4 to 5 weeks for an investment fund or a GBC that will conduct financial business activity, subject to all the documents and information required by the Financial Services Commission ("FSC") have been provided.

Tax regime

- Corporate tax rate of 15%
- Vast treaty network with African countries
- Partial exemption regime of 80% available on dividends and interest, amongst others
- No capital gains tax in Mauritius
- No withholding tax on dividend payments
- No withholding tax on interest paid by a GBL to non-residents out of its foreign source income
- Foreign tax credits available in Mauritius for foreign tax suffered on foreign income

How can IQ-EQ help?

IQ-EQ takes into consideration various factors before recommending a legal structure to a client. These include inter alia, the residency of the investor, the destination of the investment, the intended purpose of the transaction and its duration, the nature of income expected from the transaction and volume involved and risk associated with the transaction.

Key facts and figures*

Years of experience and pioneer in the Financial Services industry	Employees	Assets under administration	Client entities	SSAE 18 / ISAE 3402 accredited and
30	700⁺	\$150bn	2,100⁺	ISO 27001 certified

Key contacts in Mauritius



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Our locations worldwide

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British Virgin Islands
Cayman Island
Curaçao
USA (Austin, Bedford NH, Chicago, Dallas, Fort Worth, Houston, New York, Rapid City SD, San Francisco & West Palm Beach)

MIDDLE EAST

United Arab Emirates

EUROPE

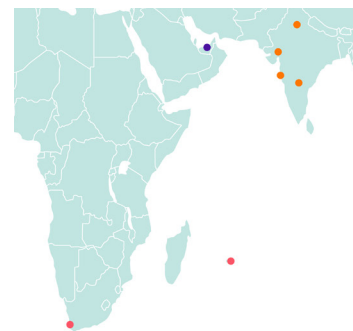
Belgium
Cyprus
France
Guernsey
Ireland
Isle of Man
Jersey
Luxembourg
Switzerland
The Netherlands
UK

AFRICA

Mauritius
South Africa

ASIA

Mainland China
Hong Kong
India
Japan
Philippines
Singapore



*Correct as of July 2023

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