

Key highlights from the Finance (Miscellaneous Provisions) Bill 2025

Corporate tax

Qualified Domestic Minimum Top-up Tax (QDMTT)

- Introduced for members of multinational enterprise groups with annual consolidated revenue of EUR 750 million or more in at least two of the past four fiscal years
- Applies if the combined effective tax rate for all covered persons in a fiscal year is below 15%
- Further guidance from the Mauritius Revenue Authority (MRA) is expected, including details of special credits or reliefs

Effective date: 1 July 2025

Fair share contribution (FSC) – Corporates

- Companies with supplies and chargeable income exceeding MUR 24 million will be subject to:
 - 5% FSC on chargeable income
 - 2% FSC for companies taxed at 3% (e.g. exporters)
- Global business entities are exempt

Effective date: date of gazette publication

Alternative minimum tax (AMT)

- A 10% AMT on adjusted book profits (excluding capital gains/losses and local dividends) for companies operating in specified sectors
- Not applicable to global business entities
- No offset allowed via tax credits

Effective date: date of gazette publication

Corporate social responsibility (CSR)

- Companies may allocate up to 50% of CSR funds (set up post 1 January 2026) to CSR activities, up from the current 25%

Effective date: date of gazette publication

Capital expenditure on AI

- Companies with turnover not exceeding MUR 100 million can deduct capital expenditure on AI technologies, in addition to the annual allowance, up to MUR 150,000

Effective date: date of gazette publication

Transfer pricing

- Companies involved in related party transactions must maintain prescribed documentation
- Applies to direct or indirect transactions between connected persons (under common control)

Effective date: date of gazette publication

Partial exemption regime

- 80% exemption extended to income earned by virtual asset service providers, subject to licensing and compliance
- For interest income, the activity generating the income must meet substance requirements

Effective date: date of gazette publication

Special tax credit

- Companies that have paid income tax but did not claim eligible credits or reliefs may be granted a special credit, subject to conditions
- May also apply to companies subject to QDMTT tax
- Awaiting further MRA guidance

Effective date: date of gazette publication

Personal tax

Revised income tax bands (from 1 July 2025)

Chargeable income	Rate (%)
First MUR 500,000	0
Next MUR 500,000	10
Remainder	20

FSC – Individuals

- 15% contribution on leivable income exceeding MUR 12 million
- Leivable income includes local dividends, but excludes dividends from global business entities and lump sums

Effective date: year of assessment starting 1 July 2025 (for three years)

Tax administration

Registered tax agent

- Only registered tax agents may:
 - Prepare and submit tax returns
 - Represent taxpayers before the MRA, Alternative Tax Dispute Resolution (ATDR) Panel and the Assessment Review Committee (ARC) / Revenue Tribunal
- A committee will oversee agent registration

Effective date: date of gazette publication

Penalties and interest

- Late payment penalty reduced from 5% to 2.5%
- Interest reduced from 0.5% to 0.25% per month

Effective date: date of gazette publication

Assessment period

- MRA's assessment window reduced from four years to three years, except in exceptional cases

Effective date: date of gazette publication

Settlement Schemes

Tax Arrears Settlement Scheme (TASS)

- Full waiver of penalties and interest for tax arrears due as at 30 June 2025, if:
 - Registered by 30 November 2025
 - Paid in full by 31 March 2026

Effective date: date of gazette publication

Tax Dispute Settlement Scheme (TDSS)

- Full waiver of penalties and interest for cases withdrawn from the ARC, Supreme Court or Privy Council as of 5 June 2025, if application is made by 31 December 2025

Effective date: date of gazette publication

Voluntary Disclosure Settlement Scheme (VDSS)

- Full waiver of penalties and interest for voluntary declarations of:
 - Undeclared income (year of assessment 2024-2025 or earlier)
 - Taxable supplies (period ending 30 April 2025 or earlier)
- Must be made by 31 March 2026

Effective date: date of gazette publication

Value added tax (VAT)

- VAT registration threshold lowered from MUR 6 million to MUR 3 million
- Mandatory VAT registration for foreign suppliers of digital / electronic services, regardless of turnover
- VAT applies to digital / electronic services provided by foreign suppliers to Mauritius-based customers

Effective date: date of gazette publication

Key facts and figures*

People
worldwide

5900⁺

Worldwide
locations

25

Assets under
administration

\$857⁺ bn

Minimum senior
team experience

20_{yrs}

Funds under
administration

800⁺

Key contacts



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*Correct as of July 2025

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