

Protection Cell Company(PCC)

PCCs in Mauritius are governed by the Protected Cell Companies Act 1999 and are mainly used for asset holding, structured finance business, collective investment schemes and closed-end funds, insurance business and external pension schemes. A PCC is a corporate structure in which a single legal entity consists of a core linked to separate cells.

A PCC simplifies administration, reduces costs of operation, and provides security for international investment structuring. The main objectives of a PCC are the segregation of business risks and to protect individual cell's assets and liabilities from the threat of contamination by the failure of another cell.

Key features of Mauritius Protection Cell Company (PCC):

Cells can be created with different strategies, subject to the overall objective of the PCC

- A PCC is liable to Mauritius income tax at the rate of 15% which may be reduced to 3% after application of the partial exemption regime of 80% to certain categories of income such as trading.
- A PCC is qualified as a Mauritian tax resident entity and thus can avail benefit under the "45 Double Tax Treaties" network aim at reducing or eliminating the burden of double taxation between two countries when they engage in trade.

Each cell has separate assets and liabilities and is independent of one another including the core

- There are no limits on the number of cells that can be created
- There's no minimum capital requirement imposed for the PCC or the cell(s), except in specific cases such as insurance business
- Each cell can apply for a separate Tax Deduction and Collection Account Number (TAN) and Permanent Account Number (PAN). Each cell can have its own FPI account and can apply for its own Tax Residency Certificate (TRC)
- A PCC can pay dividend on a cellular basis only by reference to the profits made by each individual cell. There is no withholding tax on dividends, capital gains and interest.

The PCC can opt to have a single financial statement with all the cells consolidated or separate financial statements for each of its cells.

- A PCC is required to submit annual audited accounts to the Financial Services Commission ("FSC"). Tax returns need also be filed accompanied by statement of accounts signed by directors.



How to set up PCC in Mauritius?

- A PCC is structured through a Global Business License (GBL) entity
- Applications for PCCs should be accompanied by a detailed business plan
- A PCC must always have a qualified company secretary, 2 resident directors and have its registered office in Mauritius.

How can Think Thrust Help?



Required documents for incorporation of an offshore company:

Individuals:

*The following documents are required for each individual Beneficial Owner(s), Director(s), Shareholder(s) and Authorised Bank Signatory(ies)

- Certified copy of Passport
- Original/certified copy of proof of address, for example recent utility bill (dated less than 3 months)
- Original reference letter issued from a reputed bank where the individual has a private bank account. The letter is to state the date of account opening [more than 2 years] and that account has been maintained in a satisfactory manner
- Curriculum Vitae/ Professional profile
- Proof of funds – A statement of account of the company should suffice



Corporates:

- Certified copy of Certificate of Incorporation
- Certified copy of Memorandum and Articles of Association / Constitution
- Certified copy of Register of Members
- Certified copy of Register of Directors
- Latest annual audited financial statements (two periods)
- Certificate of Incumbency and Good Standing or equivalent (less than 6 months old)
- Duly signed Board Resolution approving participation, appointment as director or/and mandating the representative of the Corporate shareholder/ director
- KYC documents on any 2 directors of the corporate entity [please refer to the above list of documents for individuals
- KYC documents on all the individual beneficial owners of the corporate entity [please refer to the above list of documents for individuals
- KYC documents on all the corporate shareholders of the corporate entity [please refer to the above list of documents for Corporates. (if applicable)

Certified True Copy – Certifier Requirements

The documents must be “Certified as a true copy” either handwritten or by way of a seal, including:

- The certifier’s name, address, and position or capacity together with contact details including his /her telephone number
- Signature of the certifier
- Date of certification

