MAURITIUS International Financial Centre

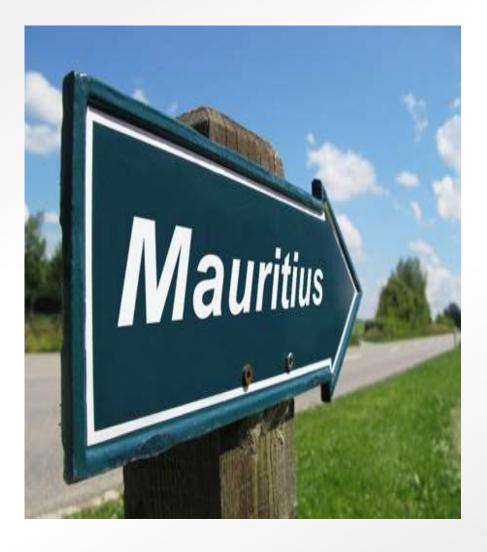


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WHY MAURITIUS?



No	Index	Global Rank	Africa Rank
1	World Bank Doing Business 2019	20 out of 190 countries	1st
2	Global Competitiveness Index 2017-2018	45 out of 137 countries	1st
3	Corruption Perceptions Index 2016 (Transparency International)	50 out of 176 countries	3rd
4	International Property Rights Index 2016	34 of 128 countries	3rd
5	Mo Ibrahim Index of African Governance 2016	-	1st
6	Economic Freedom of the World 2017 (Fraser Institute)	7 out of 159 countries	1st
7	Global Information Technology Report 2016	49 out of 139 countries	1st
8	Forbes Survey of Best Countries for Business 2017	39 out of 139 countries	1st
9	Social Progress Index 2016	40 out of 133 countries	1st
10	Global Enabling Trade Report 2016 - World Economic Forum	49 out of 139 countries	1st

WHY MAURITIUS?

Mauritius has been known as the "Star & Key" of the Indian Ocean in view of its strategic location as an important trading hub between the East and West. Mauritius has further emerged to an **International Financial Services Hub** which is increasingly being favored by professionals and investors around the world.

Mauritius, a Jurisdiction of Excellence for:

- □ its legal framework and adherence to international requirements for combating Money Laundering and Terrorist Financing;
- ☐ It has been recently categorized as an OECD compliant jurisdiction;
- ☐ its extensive network of 46 Double Taxation Avoidance Agreements (DTTA's) which allows for nil or low withholding tax rates on interest, dividends and royalties;
- □ its extensive network of 27 Investment Promotion and Protection Agreements (IPPA's) which provides for free repatriation of investment capital and returns, guarantee against expropriation, a most favored nation rule with respect to treatment of investors, and compensation for losses in case of war, armed conflict or riot and further provides arrangements for the settlement of disputes between investors and the contracting states;
- □ its membership with the major African regional originations, such as the Southern African Development Community (SADC), the Common Market for Eastern and Southern Africa (COMESA) and East African Community (EAC), which provides for preferential access to markets in the African region; and
- ☐ its political stability, social peace & unity prevailing in a multi-cultural society and its bilingual (English & French) skilled workforce.

Highlights:

- Low Corporate Tax (Between 0%, 3%, & 15%)
- Low Personal Income Tax @ 15%
- No Foreign Exchange Control;
- 100% Foreign Ownership allowed;
- No Capital Gains Tax;
- No Withholding Tax on Dividends;
- No Transfer Pricing Rules;
- No Thin Capitalization Rules;
- No Minimum Capital Requirement (Except for Financial Services activities);
- Mauritius is not a Blacklisted jurisdiction;
- Access to well established local & international Financial and Banking Institutions;
- Efficient Time Zone (GMT +4);
- Bilingual workforce of qualified professionals;
- Others.

WHY MAURITIUS?

Network of Double Taxation Avoidance Agreements (DTTA)



Network of Investment Promotion & Protection Agreements (IPPA)

Operating IPPAs					
Barbados	Belgium	Burundi			
China	Czech Republic	Finland			
France	Germany	India			
Indonesia	Madagascar	Mozambique			
Pakistan	Portugal	Republic of Korean			
Romania	Senegal	Singapore			
South Africa	Sweden	Switzerland			
Swaziland	UK and Northern Ireland	Tanzania			

IPPAs awaiting ratification				
Benin	Cameroon	Comoros		
Ghana	Guinea Republic	Mauritania		
Nepal	Republic of Congo	Rwanda		
Tchad	Zimbabwe	Kenya		
Turkey				

Withholding tax rates under DTTA's on dividends, interests and royalties varies from 0% to a maximum of 20%

Mauritius Two Pillars

Corporate Division

GLOBAL BUSINESS COMPANY (GBC):

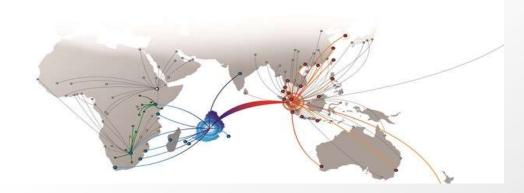
A GBC is a tax resident company in Mauritius, subject to a flat corporate tax rate of 15% but is eligible to avail itself to relief under the Partial Exemption Regime, reducing the effective rate of taxation to 3% subject to substance requirements.

A GBC is eligible to take advantage of the network of DTAA Mauritius has concluded to benefit from NIL or LOW withholding taxation rates on interest, dividends and royalties.

AUTHORIZED COMPANY

It is a tax non-resident company, majority foreign-owned and is conducting business and having their place of effective management outside of Mauritius. It therefore enjoys a 0% corporate taxation rate. It is however NOT eligible to take advantage of the benefits under the network of DTAA's.





Freeport Companies / Trading Blocks

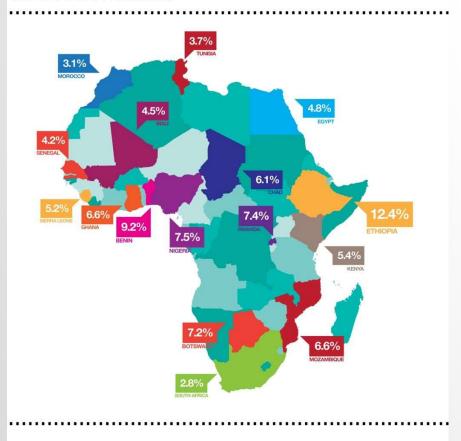
Mauritius is the leading air cargo & marine port service provider in Africa.

Mauritius provides the opportunity to Freeport Investors / Operators to set up Freeport Companies and conduct their business of imports and exports whilst enjoying low corporate tax. A Freeport operator or private Freeport developer engaged in the manufacture of goods will be liable to income tax at the rate of 3% on profits derived from the sale of goods on the local market

Mauritius is a member of the major African Regional Organizations such as the Southern African Development Community (SADC), the Common Market for Eastern Southern Africa (COMESA), and the African Growth and Opportunity Act (AGOA), which provides for free access or partial import tariff reduction between the Member States.

MAURITIUS: GATEWAY TO AFRICAN OPPORTUNITIES

African GDP Growth Rates



GATEWAY TO AFRICA

GLOBAL BUSINESS COMPANY IN MAURITIUS

African countries are fast rising, high GDP and high return on investment economies. Africa accounts for US\$ 100 billion foreign direct investment annually. With a total GDP of US\$ 2.33 trillion, a population base of 1.287 billion, abundance of natural resources and low-cost investment, the world focus of investments are now targeted in Africa.

Mauritius offers an international financial platform to international investors investing in Africa, Europe, Middle-East and Asia. With its network of Double Taxation Avoidance Agreements (DTAA), Investment Promotion & Protection Agreements (IPPA), Trade Agreements such as COMESA, SADC, AGOA and others, Mauritius positions itself as a jurisdiction of excellence and the gateway to Africa for structuring of business and investments.

In do doing, Investors availed themselves business structures with efficient & optimized taxation, security of their investments and access to world class banking & non-banking financial network.

GATEWAY TO AFRICAN OPPORTUNITIES - ILLUSTRATION OF GLOBAL BUSINESS COMPANY



CHINA

Dividend paid by Mauritian GBC to Chinese investor / shareholder is exempted from withholding tax (WHT) in Mauritius

MAURITIUS

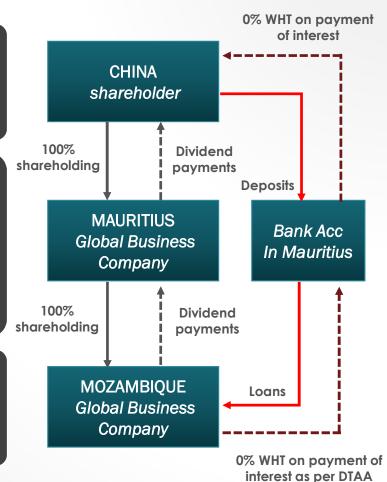
Dividend received from Mozambique is subject to 15% corporate tax in Mauritius. However, after application of foreign tax credit suffered at source, the corporate tax is reduced to NIL.

Capital gains derived from sales of shares in Mozambique Company are taxable in Mauritius therefore rendering the rate at NIL instead of 32% in Mozambique.



MOZAMBIQUE

Dividend payment is subject to 8% withholding tax (WHT) in Mozambique under the DTAA between Mauritius & Mozambique instead of 20%.



REAL ESTATE INVESTMENT IN MAURITIUS

REAL ESTATE SCHEMES

The past few decades revealed Mauritius as one of the most sought destinations by foreign investors worldwide. Besides Mauritius being benchmarked as a paradise island, a strategic geographical location at the cross-roads of Africa and Asia, an efficient time zone (GMT +4), legendary hospitality of its people, a low-tax system, a politically stable country, the Govt. has opened its economy to foreign investors and expatriates to work, live & retire in Mauritius. New real estate schemes and are constantly being promoted by the Economic Development Board (EDB) of Mauritius aiming to harmonize and make Mauritius a global living community. Foreign migration have increased significantly over the years resulting in high demand for real estate.

Real Estate in Mauritius has become a luxury and niche market for foreigners. There are a series of property schemes allowing foreigners to buy a real estate property in Mauritius: the Integrated Resort Scheme (IRS), the Real Estate Scheme (RES) and most recently, the Property Development Scheme (PDS) which continues to attract more and more foreigners to work, live or retire in Mauritius.

With the rise of a professional and skillful population amongst the youngsters of Mauritius, there is a substantial demand for housing schemes for local Mauritian nationals. The schemes in demand are apartments, duplex and commercial spaces for office, shops & others.





EXPATS: WORK & LIVE IN MAURITIUS

Mauritius offers Occupational (Work & Live) Permit (OP) to foreigners under 3 categories, namely: Investor, Professional and Self-Employed. A Residence Permit is also available to foreign nationals of at least 50 years old if they wish to retire in Mauritius. Foreign nationals also gets an RP if they acquire real estate schemes in Mauritius. The governing statutory body for expatriate's OP in Mauritius is the Economic Development Board.



Main requirements (amongst others):

	Category	Details
	INVESTOR	An initial transfer of USD 100,000 in his company in Mauritius and the turnover of the company should be at least MUR 2 million the first year and a cumulative turnover of MUR 10 million for the subsequent 2 years.
	PROFESSIONAL	An expat employed by a company incorporated in Mauritius to deliver professional services earning a monthly basic salary exceeding MUR 60,000 (MUR 30,000 for professionals in the Information Communication Technology sector).
	SELF-EMPLOYED	An expat engaged in his/her own business offering professional services. He/she must make an initial transfer of USD 35,000 to his/her bank account in Mauritius and the business activity should generate an annual income exceeding MUR 600,000 in the first 2 years and MUR 1.2 million in the third year.

Mauritius: Types of Special Purpose Vehicles



BUSINESS STRUCTURING CAN TAKE THE FORM OF A:

- Domestic Company
- ☐ Global Business Company
- Authorised Company
- ☐ Trust
- Foundation
- Global Fund
- □ Protected Cell Company
- Limited Partnership

All of the above types of Special Purpose Vehicle (SPV) can be used either to conduct business onshore (Except for the Authorised Company) or offshore.

MAURITIUS: BANKING NETWORK



- ABC Banking Corporation Ltd
- AfrAsia Bank Limited
- Bank of Baroda
- Bank of China (Mauritius) Limited
- Bank One Limited
- Banque Centrale Populaire (BCP)) Ltd
- Banyan Tree Bank Limited
- Barclays Bank Mauritius Limited

- Deutsche Bank (Mauritius) Ltd
- MauBank Ltd
- □ SBI (Mauritius) Limited
- □ SBM Bank (Mauritius) Ltd
- Standard Bank (Mauritius) Limited
- Standard Chartered Bank (Mauritius) Limited
- HSBC Mauritius Ltd
- The Mauritius Commercial Bank Limited
- Warwyck Private Bank Ltd

NEW FISCAL INCENTIVES IN MAURITIUS

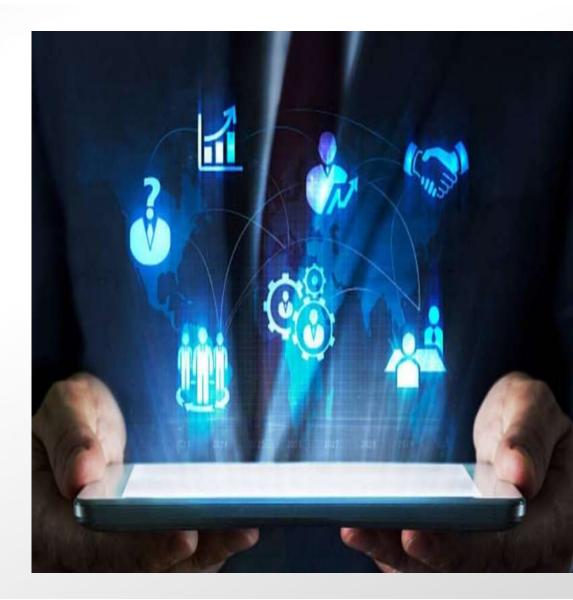
BUDGET 2019-2020

EXISTING FISCAL MEASURES:

- 1. A tax holiday of 8 years for companies holding a "Global Administration License" issued by the FSC.
- 2. A tax holiday of 5 years for the following companies:
 - · A Treasury Management Centre issued by the FSC;
 - Asset and Fund Managers licensed by the FSC and managing a minimum of USD 25 million in Mauritius;
 - Foreign Ultra High Net Worth Individuals investing a minimum of USD 25 million in Mauritius;
 - International Law Firms issued with a Global Legal Advisory Services License:
 - Investment Banks issued with an "Investment Banking and Corporate Advisory License.

NEW FISCAL MEASURES:

- A newly set-up company involved in innovation-driven activities benefits from a tax holiday of 8 years on income derived from its intellectual property assets developed in Mauritius;
- A 5 year tax holiday will be introduced for a company setting up an ecommerce platform;
- A 5 year tax holiday will be granted to a Peer-to-Peer lending operator;
- A 4 year tax holiday granted on income derived from bunkering of low sulphur heavy fuel oil



NEW FINANCIAL MEASURES IN MAURITIUS

BUDGET 2019-2020

NEW FINANCIAL MEASURES:

- New framework for fund administration and fund management;
- FSC entering into an agreement with the Gujarat International Finance Tec-City to recognize Mauritian licensed funds and management companies as qualified to operate in the Gujarat jurisdiction;
- New rules and an attractive tax regime to promote the development of Real Estate Investment Trusts;
- · An 'umbrella licence' for wealth management activities;
- A scheme for headquartering of 'e-commerce' activities;
- A framework for Green Finance in line with the 'Marrakech Pledge' a continental coalition of African Capital Markets Regulators and Exchanges committed to foster green financing on the continent;
- A new trading platform at the Stock Exchange of Mauritius to allow medium sized profitable enterprises that do not qualify for listing on the official and DEM markets to raise capital and trade their shares;
- Introduction of a Business Facilitation Bill which will amend 26 pieces of legislation. These amendments will, among others expedite the start of businesses, eliminate unnecessary licences & permits, expedite clearances at the port & airport and align with international best practices regarding protection of minority investors and sharing of information;
- Establishment of a regime for Robotics and AI enabled financial advisory services;
- New licence for Fintech Service providers and encouraging self-regulation for Fintech activities;

- Upgrade the Regulatory Sandbox Licensing framework for Fintech activities to be led by the Economic Development Board in consultation with the UN Office on Drugs and Crime;
- · Crowd-funding will become a new licensable activity;
- FSC will Introduce e-signatures and e-licences on a pilot basis; and
- Setting up of a scheme for the head quartering of e-commerce activities



BIZCORP EXPERTS LTD: SERVICE OFFERINGS



BizCorp Experts Ltd is a duly registered company in Mauritius providing corporate fiduciary, business development and management services to its valued clients for their business advice, set up and administration.

It provides the following services:

- Business advice & benchmarking;
- Drafting of business plan;
- Business / Company set up';
- Accounting and bookkeeping;
- Bank account opening;
- Company Secretary;
- Directorship;
- Administration:
- ❖ Tax computation;
- *Registered office address & Business desks;
- Application for trade license &other permits;
- ❖ Application for work & residence permits in Mauritius for expatriates;
- Assistance for acquisition of properties in Mauritius;
- Performance management;
- Strategic planning & forecasts;
- HR management;
- Payroll computation;
- Investment / Debt structuring; and
- Others.

OUR PARTNERS: BRANDING & MARKETING MANAGEMENT

BRANDING & MARKETING MANAGEMENT

Our team monitors periodically and provide bespoke services for your brand & marketing management. Amongst others, the team will undertake the creation of your corporate identity (corporate logo, business cards, letterheads, flyers, etc..), website, email box, domain, e-branding, e-marketing, publication and communication.











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