

Mauritius – GBL1 Company

Global Business License 1 (GBL1) Company

Mauritius provides a well established company infrastructure with tax advantages and access to Double Taxation Agreements.

Significant features:

- Company may be limited by share or guarantee (or by both);
- Open bank accounts in local and foreign currencies;
- Tax Residency Certificate (TRC) allows the company to claim double taxation relief under the various treaties signed by Mauritius;
- Audited accounts filed 6 months after year end;

The Purpose of a GBL1 Company

A GBL1 can carry out any business activity such as investment holding, asset management, credit finance, custodian services (non-CIS), distribution of financial products, factoring, leasing, occupational pension schemes, pension fund administration, pension scheme management, retirement benefits schemes, superannuation funds, registrar and transfer agencies, treasury management and such other financial business activities as may be specified by the Financial Services Commission (FSC), the non-banking financial activities regulator.

Mobility

- A foreign company may transfer its seat to Mauritius and continue as a GBL1.
- A GBL1 may transfer its statutory seat to another jurisdiction.
- A GBL1 may be converted into a GBL2.

Taxation of a GBL1

A GBL1 is resident in Mauritius and is taxable on its income at a rate of 15%. It is however automatically entitled to a tax credit of 80% of the Mauritius tax. The company may also claim a credit for foreign taxes paid on foreign sourced income resulting in a tax rate possibly even lower than 3%.

No capital gains tax and no withholding tax on payment of dividends, interests or royalties, no stamp duties and no inheritance tax are imposed in Mauritius.

A GBL1 wishing to benefit from the tax relief under the Double Taxation Agreements requires a Tax Residence Certificate (TRC), which is issued by the Commissioner of Income Tax in Mauritius. To be tax resident, the company must demonstrate that the 'effective management and control' is in Mauritius.

Treaties

Mauritius is a member of the Common Market for Eastern and Southern Africa (COMESA) and Southern African Development Community (SADC), a member of the commonwealth and is associated to the European Union as ACP member state. Mauritius has an extensive network of Double Taxation Avoidance Treaties (DTAs).



35 treaties are currently in force (as March 2010):

Africa:

Botswana
Lesotho
Madagascar
Mozambique
Namibia
Rwanda
Senegal
Seychelles
South Africa
Swaziland
Tunisia
Uganda
Zimbabwe

Europe:

Belgium
Croatia
Cyprus
France
Germany
Italy
Luxembourg
Sweden
United Kingdom
North America:
Barbados

Asia:

People's Republic of China
India
Malaysia
Nepal
Pakistan
Singapore
Sri Lanka
Thailand
Middle East:
Kuwait
Oman
United Arab Emirates
State of Qatar

Requirements

- A GBL1 requires a minimum of one Director who must be a natural person. For treaty access, a minimum of two local Directors are required and board meetings must be held in Mauritius.
- Must at all times have a registered office in Mauritius.
- Accounting records and statutory documents including register of members, debenture holders, and officers must be kept there. It is recommended that a Register of Charges and Register of Interests be kept.
- Must at all times have a qualified company secretary (corporate or individual) who is resident in Mauritius.
- Only a licensed and qualified Management Company such as Turnstone Corporate (Mauritius) Limited can provide registered office and act as secretary.
- A GBL1 need not make annual returns, but must file audited profit & loss account and balance sheet annually with the Financial Services Commission, within 6 months of the financial year-end.
- The accounts must be prepared in accordance with internationally accepted accounting standards. Tax returns must also be filed with Income Tax Authorities.

For further information please contact our expert team at marketing@turnstone-group.com

www.turnstone-group.com

This document does not provide a legal opinion and Turnstone does not guarantee the information contained in this document.
Professional advice should be obtained for the incorporation of such company.

Turnstone Corporate (Mauritius) Limited is licensed by the Mauritius Financial Services Commission as a Global Management Company. Turnstone (Europe) Limited is licensed by the Isle of Man Financial Supervision Commission as a Corporate and Trust Service Provider. Turnstone Corporate (Seychelles) Limited is licensed by the Seychelles International Business Authority as an International Corporate Service Providers. Turnstone Trustees (New Zealand) Limited is registered as a corporate trustee in New Zealand.
Turnstone Corporate Trustee (S.A.) (Pty) Ltd is registered as a corporate trustee in South Africa.