Mauritius

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International Tax Services – Core

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A. At a glance

Corporate Income Tax Rate (%)	15 (a)
Capital Gains Tax Rate (%)	0 (a)
Branch Tax Rate (%)	15 (a)
Withholding Tax (%)	
Dividends	0
Interest	15 (b)
Royalties	10/15 (c)
Net Operating Losses (Years)	
Carryback	0
Carryforward	5

(a) See Section B.
(b) This withholding tax applies to interest paid to any person, other than a company resident in Mauritius, by a person, other than a Mauritian bank or a person authorized to carry on deposit-taking business in Mauritius. This rate may be reduced if the recipient is a tax resident of a treaty-partner country.
(c) The withholding tax rate is 10% for royalties paid to residents. For nonresidents, the rate is 15% unless the recipient is resident in a treaty country and the applicable treaty provides for a lower rate. The withholding tax rate does not apply if the payer is a corporation holding a Category 1 Global Business License under the Financial Services Act 2007 and if it pays the interest out of its foreign-source income.

B. Taxes on corporate income and gains

Corporate income tax. Companies resident in Mauritius are subject to income tax on their worldwide income. Resident companies are companies incorporated in Mauritius and companies with their central management and control in Mauritius. If a nonresident company has a branch carrying on business in Mauritius, the nonresident company is subject to tax on the income of the branch.

Rates of corporate income tax. The corporate income tax rate is 15% of the annual taxable net profits.

A requirement to establish a Corporate Social Responsibility (CSR) fund applies to companies. Companies must set up a CSR fund equal to 2% of chargeable income for the preceding year if they intend to take any of the following actions:

• Implement an approved program
• Implement an approved program under the National Empowerment Foundation
• Finance an approved Non-Government Organization

A committee has been set up for the purposes of the approval process. This committee is chaired by the Minister of Finance and Economic Empowerment. The committee provides that the CSR activities must focus on the following areas:
• Socioeconomic development
• Health
• Education and training
• Environment
• Catastrophic intervention and support

All companies must use 50% of their CSR fund to finance any one of the following four priority areas:
• Houses for the needy
• Absolute poverty and community empowerment
• Welfare of children from vulnerable groups
• Prevention of non-communicable diseases

If the contribution is less than the 2% minimum, the difference must be paid to the Mauritius Revenue Authority (MRA) when the company submits its annual tax return. Certain companies, such as Global Business Corporations set up under the Financial Services Act 2007 and companies that hold an Integrated Resort certificate referred to in the Investment Promotion (Real Estate Development Scheme) Regulations, 2007, are excluded from the purview of the CSR rules. Effective from the 2013 year of assessment, companies may spend up to 20% more than their statutory CSR obligation in any year but not more than two consecutive years and the excess CSR spending may then be offset in five equal consecutive annual installments against its future CSR liability. Subject to the approval of the CSR committee, up to 20% of the CSR liability may be carried forward to the following year.

A special levy is imposed on banks. The levy does not apply if, in the preceding year, the bank had incurred a loss or if its book profit did not exceed 5% of its operating income. For the 2009 through 2013 years of assessment, the levy equals the sum of 3.4% of book profit and 1% of operating income. For the 2014 and 2015 years of assessment, the tax base and rates remain unchanged for Segment B banking business. Segment B banking business refers to banking transactions with nonresidents and corporations that hold a Global Business License under the Financial Services Act 2007. The levy is computed at 10% of the chargeable income from other sources. For the 2016 and subsequent years of assessment, the levy will equal the sum of 1.7% of the book profit and 0.5% of operating income. For purposes of the levy, operating income is the sum of net interest income and other income before deducting any non-interest expenses.

“Telephony service providers,” defined as a provider of public fixed or mobile telecommunication networks and services, are subject to a solidarity levy for the 2009, 2010, 2011, 2012, 2013 and 2014 years of assessment. The levy equals the sum of 5% of book profit and 1.5% of turnover. The levy does not apply if, in the preceding year, the service provider incurred a loss or if its book profit did not exceed 5% of its turnover.

Tax advantages for certain companies. Freeport companies, Information and Communication Technology companies, companies engaged in offshore activities and companies engaged in spinning, weaving, dyeing or knitting may qualify for tax advantages.

Freeport companies. Freeport operators and private Freeport developers are exempt from corporate income tax on sales made to persons outside Mauritius for an indefinite time period.

Information and Communication Technology companies. Information and Communication Technology (ICT) companies are classified as tax-incentive companies. If the investment certificate of an ICT company is issued before 30 September 2006 and if the ICT company is engaged in business-process outsourcing and back-office operations or in the operation of call centers or contact centers, the ICT company may elect within 60 days of the date of the issuance of its investment certificate to have two-thirds of its net income exempted from tax up to and including the income year ended 30 June 2012. This reduces the effective tax rate to 5% of taxable income. Income derived by other ICT companies from nonresidents is exempt from tax through the income year ended 30 June 2012. Income derived from residents is taxable at the incentive rate of 15%. Losses incurred during the exemption period may be carried forward to years following the expiration of the exemption period.

Companies engaging in offshore activities. Offshore business activities may be conducted through GBL1 companies or GBL2 companies. GBL2 companies must conduct their activities with nonresidents of Mauritius or GBL1 companies. Under the amendment contained in the Finance (Miscellaneous Provisions) Act 2010, GBL1 companies may conduct business within Mauritius. Under the amendment contained in the Economic and Financial Measures (Miscellaneous Provisions) Act 2012, GBL1 companies must seek the approval of the Financial Services Commission with respect to the following:

- Conduct of their business in Mauritius
- Dealings with GBL2 companies and Mauritian resident persons
- Holding of shares or other interests in Mauritian resident corporations

Mauritian residents, including GBL1 companies, are eligible for a foreign tax credit on their foreign-source income. The foreign tax credit is generally the lower of the Mauritian tax and the foreign tax. If the shareholding in the foreign company is 5% or more, an underlying tax credit can be claimed. A tax-sparing credit can also be claimed. A GBL1 company can claim a presumed foreign tax credit equal to 80% of the Mauritian tax chargeable on foreign-source income (including local-source income derived in the course of its global business) if no written evidence is produced in support of the payment of foreign tax. This reduces the effective tax rate to 3% of the chargeable income on the foreign-source income. Dividends paid to residents and nonresidents and royalties paid by GBL1 companies out of their foreign-source income to nonresidents are exempt from tax. Interest paid by GBL1 companies to nonresidents that do not have a place of business in Mauritius is exempt from tax to the extent that the interest is paid out of its foreign-source income. GBL1 companies may be considered residents of Mauritius for purposes of double tax treaties.

GBL2 companies are regulated by the Companies Act, 2001 and the Financial Services Act, 2007. To qualify as a GBL2 company, the company must be beneficially owned by nonresidents, operate exclusively outside Mauritius and meet certain other requirements. GBL2 companies are exempt from corporate income tax. Dividends paid by GBL2 companies are exempt from income tax. Interest, royalties and other payments made by GBL2 companies to nonresidents are exempt from income tax. GBL2 companies are subject to a more flexible regime than GBL1 companies, but they do not benefit from double tax treaties.

Companies engaged in qualifying activities. Companies engaged in dyeing, knitting, spinning, or weaving activities that began their operations before 30 June 2006 are exempt from income tax for a period of up to 10 income years. If a company began operations during the period of 1 July 2006 through 30 June 2008, its income is exempt from income tax up to and including the income year ending 30 June 2016. Losses incurred during the exemption period may be carried forward to years following the expiration of the exemption period.

A company that subscribes to the stated capital of a spinning company on or before 30 June 2008 for an amount of MUR60 million or more is granted a tax credit equal to 60% of the investment in share capital over a period of either four or six income years. This tax credit is also granted to a company subscribing to the stated capital of a company engaged in dyeing, knitting and weaving activities on or before 30 June 2008 for an amount of MUR10 million or more. The credit is available beginning in the income year preceding the income year in which the shares are acquired and is spread equally over the four- or six-year period. Any unused portion of the tax credit may be carried forward to subsequent income years, subject to a maximum period of five consecutive income years beginning with the income year of the investment.

Manufacturing companies or companies producing specified goods or products can claim a tax credit on the total capital expenditure incurred on the acquisition of new plant and machinery (excluding motor cars) exceeding MUR100 million during the period of 1 January 2014 through 31 December 2018. The annual tax credit equals 5% of the cost of the plant and machinery. The credit is subtracted from the income tax liability in the year of acquisition and the two subsequent income years. Any unrelieved tax credit with respect to an income year may be carried forward to the following income year. The carryforward applies to a maximum of five consecutive income years following the income year in which the capital expenditure is incurred. The tax credit applies to the acquisition of the following goods or products:
- Computers
- Electrical equipment
- Film
- Furniture
- Jewelry and bijouterie

- Medical and dental instruments, devices and supplies
- Pharmaceuticals or medicinal chemicals
- Ships and boats
- Textile
- Wearing apparel

Alternative minimum tax. The alternative minimum tax (AMT) applies if a company either declares a dividend or distributes any shares instead of dividends and if the tax payable is less than 7.5% of the book profit. The AMT equals the lower of 7.5% of the book profit or 10% of the sum of any dividends declared and amounts distributed instead of dividends. The tax payable by the company is the higher of the AMT or the tax payable under the normal rules.

For purposes of the AMT calculation, capital gains (losses) or revaluation of fixed assets, dividends received from companies resident in Mauritius and trading profits (losses) from the sale or revaluation of securities are excluded in the computation of the book profit. In addition, a foreign tax credit is not subtracted in computing the tax payable.

The AMT does not apply to companies that are exempt from tax and GBL1 companies.

For the 2013 and 2014 income years, manufacturing companies and companies operating hotels are outside the scope of AMT.

Capital gains. Capital gains are not subject to income tax. The Finance (Miscellaneous Provisions) Act 2010 (FMPA 2010) introduced a capital gains tax regime for transactions in immovable properties or interests in immovable properties; however, it was repealed by the Finance (Miscellaneous Provisions) Act 2011, effective from 5 November 2011.

Withholding taxes. Withholding taxes apply to certain payments. The tax withheld at source is an interim tax payment that may or may not be the final tax liability. Amounts deducted are credited to the final tax liability of the taxpayer for the relevant tax year.

The following are the withholding tax rates.

Payment	Rate (%)
Interest	15 (a)
Royalties	10/15 (b)
Rent for buildings	5
Payments to contractors and subcontractors	0.75
Payments to architects, attorneys, barristers, engineers, land surveyors, legal consultants, medical service providers, project managers in the construction industry, property valuers, quantity surveyors and solicitors	3
Payments made by a ministry, government department, local authority, statutory body or the Rodrigues Regional Assembly on contracts, other than payments to contractor and subcontractors and payments to service providers specified in the preceding entry above	
For the procurement of goods and services under a single contract, if the payment exceeds MUR300,000	1

Payment	Rate (%)
For the procurement of goods under a contract, if the payment exceeds MUR100,000	1
For the procurement of services under a contract, if the payment exceeds MUR30,000	3
Payments made to the owner of immovable property or agent, other than a hotel, unless the payments are made to a body of persons specified in Part I of the Second Schedule or a person exempt from income tax as a result of any other enactment, by a tour operator or travel agent, other than an individual, an Integrated Resort Scheme (IRS) or Real Estate Development Scheme (RES) company or a provider of property management services designated by an IRS or RES company, under the Investment (Real Estate Development) Regulations 2007, or any other agent, other than an individual, carrying on the business of providing services with respect to the leasing of properties	5
Payments made to nonresidents for services rendered in Mauritius	10

(a) This withholding tax applies to interest paid by any person, other than by a bank or nonbank deposit-taking institution under the Banking Act, to any person, other than a company resident in Mauritius.

(b) This withholding tax is imposed on residents and nonresidents. The withholding tax rate is 10% for residents and 15% for nonresidents. For a recipient of royalties that is resident in a treaty country, the treaty rate applies if it is lower than 15%. The treaty rate does not apply if the payer is a GBL1 company.

If a recipient of a payment proves to the Director-General of the MRA that the recipient is not liable for tax, the Director-General may, by written notice to the payer, direct that no tax be withheld from the payment to the recipient.

Administration. The income year is 1 January to 31 December of the year preceding the year of assessment. Companies may choose a financial year-end other than 31 December for tax purposes. The income year-end was previously 30 June.

Companies are required to file their tax returns within six months after their year-end. If the year-end of a company is 30 June and if the company does not have any tax payable, the tax return can be submitted by 15 January of the following year.

Any tax payable in accordance with the annual return must be paid at the time of filing the return. The Advance Payment System (APS) requires companies to pay tax on a quarterly basis. For purposes of the APS, companies can either use the taxable profits of the preceding tax year or the results of the relevant quarter. A company with annual turnover of MUR4 million or less is not required to pay tax under the APS. The APS requirement also does not apply if the company did not have any chargeable income in the preceding year

If a payment is late or an incorrect return is filed, a penalty of 5% of the tax payable is imposed. Interest at a rate of 1% for each month or part of a month the tax remains unpaid also applies. In addition, a penalty of MUR2,000 is imposed for each month or part of a month that the annual tax return is late. The penalty is limited to a maximum amount of MUR20,000.

After the MRA issues a notice of assessment, the taxpayer may object to the assessment. For an objection to be valid, 30% of the total tax claimed must be paid to the MRA. If the MRA is satisfied that the taxpayer cannot pay the 30% tax, a bank guarantee may be provided.

Dividends. Dividends paid to residents and nonresidents are exempt from tax.

Foreign tax relief. Residents of Mauritius may claim a foreign tax credit (FTC), regardless of whether they may claim other tax credits. The FTC equals the lower of the Mauritian tax liability and the amount of the foreign taxes. In computing the FTC, all foreign-source income may be pooled. An underlying FTC is also available if the residents, including individuals and trusts, own directly or indirectly at least 5% of the share capital of the foreign company. The underlying FTC is extended to all previous tiers. The FTC takes into account any tax sparing credits granted to the payer of the dividends.

C. Determination of trading income

General. Taxable income of resident companies and foreign branches comprises gross income less cost of goods sold and expenses incurred exclusively in the production of income, unless specifically excluded by law. Income and expenses are determined in accordance with generally accepted accounting principles.

Inventories. Inventories may be valued according to accounting standards. However, the income tax rules provide that the last-in, first-out (LIFO) method of valuation may not be used.

Provisions. No provisions are allowed for tax purposes.

Tax depreciation. No deduction is allowed for book depreciation of non-current assets, but statutory depreciation (capital allowances) is granted. Mauritian law provides for investment allowances and annual allowances. However, the investment allowance and the additional investment allowances have been repealed and are now available only in limited cases under transitional rules.

Under the transitional rules, a company whose application has been approved under the Investment Promotion Act, or whose proposed activity has been approved under any other enactment, may elect by irrevocable notice in writing to the Director-General to claim annual allowances for capital expenditure incurred on or before 30 June 2009 at the rates prevailing on 30 June 2006. Manufacturing companies may claim additional investment allowances on state-of-the-art technological equipment for acquisitions made in the years ended 30 June 2007 and 30 June 2008. ICT companies may claim additional investment allowances on computer equipment and plant and machinery for acquisitions made on or before 30 June 2008.

The following investment allowances are provided.

Allowance	Rate (%)
Investment allowance on certain new assets, including industrial buildings, office equipment, plant and machinery, and buses with a seating capacity of at least 30	25
Additional investment allowance for a manufacturing company that has incurred capital expenditure on the acquisition of state-of-the-art technological equipment in the year ended 30 June 2008	10
Additional investment allowance for an ICT company that incurs capital expenditure on the acquisition of new plant and machinery or computer software	25

The following are the rates of annual allowances computed using the declining-balance method.

Asset	Rate (%)
Hotels	30
Plant and machinery	35
Heavy equipment (such as agricultural tractors or excavators)	35
Computers and high precision equipment	50
Motor vehicles	25
Setting up of golf courses	15

The following are the rates of annual allowances computed using the straight-line method.

Asset	Rate (%)
Commercial premises	5
Industrial premises excluding hotels	5
Any item of a capital nature not listed above that is subject to depreciation under the normal accounting principles	5
Plant and machinery costing MUR30,000 or less	100
Aircraft and aircraft simulators leased by aircraft leasing companies	100

The following are the rates of annual allowances for capital expenditure incurred during the 2013 and 2014 income years.

Asset	Rate (%)
Industrial premises dedicated to manufacturing	30
Plant and machinery costing MUR50,000 or less	100
Electronic and high-precision equipment	50
Plant and machinery acquired by a manufacturing company	50
Green technology equipment	50
Landscaping and other earthworks for embellishment purposes	50
Scientific research	50
Renovation-works expenditure by hotels, restaurants and retail outlets	33

Except for the annual allowance rates on industrial premises, the above rates will be applied on a straight-line basis.

To qualify as capital expenditure on green technology, it must be incurred on the following:

- Renewable energy
- Energy-efficient equipment or noise-control devices
- Water-efficient plant and machinery and rainwater harvesting equipment and systems
- Pollution-control equipment or devices, including wastewater recycling equipment
- Effective chemical hazard control devices
- Desalination plant
- Composting equipment
- Equipment for shredding, sorting and compacting plastic and paper for recycling

Any unused annual allowances that arise as a result of the above increased rates can be carried forward indefinitely. Expenditure on passenger cars will not be eligible for increased annual allowances.

Capital allowances are subject to recapture on the sale of an asset to the extent the sales price exceeds the tax value after depreciation. Amounts recaptured are included in ordinary income and are subject to tax at the normal tax rate. To the extent that the sales price is lower than the depreciated value, an additional allowance is granted.

Under an amendment contained in the Finance (Miscellaneous Provisions) Act 2010, the total annual allowances on a motor car cannot exceed MUR3 million. The MUR3 million cap does not apply to persons engaged in the business of tour operator or car rental.

Relief for losses. Losses can be offset against future corporate income in the following five income years. Losses attributable to annual allowances claimed with respect to assets acquired on or after 1 July 2006 can be carried forward indefinitely. Losses may not be carried back.

If a company takes over a company engaged in manufacturing activities or if two or more companies engaged in manufacturing activities merge into one company, any unrelieved losses of the acquired company or merging companies may be transferred to the acquirer or to the company resulting from the merger in the income year of the takeover or merger, subject to certain conditions relating to the safeguarding of employment that may be established by the Minister of Finance. The loss transferred is withdrawn if, within three years from the date of the takeover or merger, more than 50% of the employees are made redundant.

D. Other significant taxes

The following table summarizes other significant taxes.

Nature of tax	Rate (%)
Value-added tax	15
National pension fund, a statutory savings plan for employees' old-age retirement; monthly contribution imposed on gross salary; paid by	
Employer, limited to MUR888	6
Employee, limited to MUR444	3

Nature of tax	Rate (%)
Land transfer tax; payable by transferor based on the value of the immovable property transferred; also applies to transfers of shares that result in a change in control of a company that owns immovable property	5
Tax on transfer of leasehold rights in state land; based on the open market value of the leasehold rights; payable equally by the transferor and the transferee	20
Registration duty; payable on the registration of certain transactions, such as the sale of land; based on the value of the property transferred; payable by the transferee; certain transactions are not subject to the duty	5

E. Miscellaneous matters

Foreign-exchange controls. The Exchange Control Act was suspended in 1993. Consequently, approval of the Bank of Mauritius is no longer required for transactions involving foreign exchange.

Anti-avoidance legislation. Anti-avoidance provisions apply to interest on debentures issued by reference to shares, excessive remuneration to shareholders or directors, benefits to shareholders, excessive management expenses, leases with inadequate rent, rights over income retained and other transactions designed to avoid tax liability. Certain of these items are discussed below.

Interest on debentures issued by reference to shares. If a company issues debentures in the proportion of shares held by each shareholder, the interest on the debentures is treated as a dividend and is therefore not an allowable deduction for the company. The 2004 Finance Act provides that such interest on the debentures is not treated as a dividend for the shareholder.

Benefits to shareholders. If a benefit of any nature, whether in money or money's worth, is granted by a company to a shareholder or a party related to the shareholder, the value of the benefit is deemed to be a taxable benefit in the hands of the shareholder or the related party.

Rights over income retained. If a person transfers property or any right to income to a related party and retains or obtains power to enjoy income from the property or the right, the income is deemed to be derived by the transferor.

F. Treaty withholding tax rates

Under Mauritian domestic law, dividends paid to residents and nonresidents and royalties paid by GBL1 companies (see Section B) to nonresidents are exempt from tax. Interest payments are exempt from tax if they are paid by Mauritian banks to nonresidents or if they are paid by GBL1 companies to nonresidents that do not have a place of business in Mauritius. The following table lists the tax rates for dividends, interest and royalties under the tax treaties entered into by Mauritius. However, Mauritian domestic law prevails if it exempts the payments from tax.

Recipient's country of residence	Dividends %	Interest %	Royalties %
Bangladesh	10	15	15
Barbados	5	5	5
Belgium	5 (i)	0/10	0
Botswana	5 (j)	12	12.5
China	5	10 (f)	10
Croatia	0	0	0
Cyprus	0	0	0
France	5 (a)	15 (f)	15 (g)
Germany	5 (r)	0	10
India	5 (a)	15 (f)	15
Italy	5 (b)	15 (f)	15
Kuwait	0	0	10
Lesotho	10	10	10
Luxembourg	5 (a)	0	0
Madagascar	5 (h)	10	5
Malaysia	5 (a)	15 (f)	15
Monaco	0	0	0
Mozambique	8/10/15	8 (f)	5
Namibia	5/10	10 (f)	5
Nepal	5/10/15 (o)	10/15 (p)	15
Oman	0	0	0
Pakistan	10	10	12.5
Qatar	0	0	5
Russian Federation (l)	5 (k)	0	0
Rwanda	0	0	0
Senegal	0	0	0
Seychelles	0	0	0
Singapore	0	0	0
South Africa	5 (a)	0	0
Sri Lanka	10 (a)	10	10
Swaziland	7.5	5	7.5
Sweden	0 (i)	0	0
Thailand	10	10/15	5/15
Tunisia	0	2.5	2.5
Uganda	10	10	10
United Arab Emirates	0	0	0
United Kingdom	10 (c)	15 (f)	15 (d)
Zambia	5 (q)	10	5
Zimbabwe	10 (e)	10 (f)	15
Non-treaty countries	0	0/15 (m)	0/15 (n)

(a) Applicable if the recipient has a direct shareholding of at least 10% of the capital of the Mauritian company; otherwise, the rate is 15%.

(b) Applicable if the recipient has a direct shareholding of at least 25% of the capital of the Mauritian company; otherwise, the rate is 15%.

(c) Applicable if the recipient has a direct or indirect shareholding of at least 10% of the capital of the Mauritian company; otherwise, the rate is 15%.

(d) The reduced rate applies only if the royalties are subject to tax in the United Kingdom.

(e) Applicable if the recipient controls directly or indirectly 25% of the voting power of the Mauritian company; otherwise, the rate is 20%.

(f) The rate is 0% if the interest is paid to a bank resident in the treaty country (subject to additional conditions) and, under the France treaty, if the loan is made or guaranteed by the Banque Française du Commerce Extérieur.

(g) The rate is 0% for literary, artistic or scientific copyright royalties and for royalties for the use of motion picture films or works recorded for broadcasting or television.

(h) Applicable if the recipient is the beneficial owner of the dividends and if the payer of the dividends is a venture capital company; otherwise, the rate is 10%.
(i) Applicable if the recipient is a company that holds at least 10% of the voting power of the company paying the dividends. Otherwise, the rate is 15% if the shareholder is the beneficial owner of the dividend income. The limitations-of-benefits clause of the tax treaty should be considered.
(j) Applicable if the recipient has a direct or indirect shareholding of at least 25% of the capital of the Mauritian company; otherwise, the rate is 10%.
(k) Applicable if the recipient has invested at least USD500,000 in the authorized capital of the payer of the dividends; otherwise, the rate is 10%.
(l) This treaty has been signed, but it has not yet been ratified.
(m) Interest paid by GBL1 companies to nonresidents or by Mauritian banks to nonresidents is exempt. Interest paid by other resident companies to nonresidents is taxed at a rate of 15%.
(n) Royalties paid by GBL1 companies to nonresidents are exempt from tax. Royalties paid by other companies to nonresident companies are subject to tax at a rate of 15%.
(o) The 5% rate applies if the recipient of the dividends holds directly at least 15% of the capital of the payer. The 10% rate applies if the recipient of the dividends holds directly at least 10%, but less than 15%, of the capital of the payer. The 15% rate applies to other dividends.
(p) The 10% rate applies if the recipient of the interest is a financial institution or an insurance company. The 15% rate applies to other interest payments.
(q) The 5% rate applies if the recipient is a company that owns at least 25% of the share capital of the paying company. Otherwise, the rate is 15%.
(r) The 5% rate applies if the recipient is a company with a shareholding of at least 10%. Otherwise, the rate is 15%.

A tax treaty with Ghana awaits signature. Mauritius is negotiating tax treaties with Algeria, Burkina Faso, Canada, the Czech Republic, Greece, the Hong Kong Special Administrative Region, Iran, Malawi, Montenegro, Morocco, Portugal, St. Kitts and Nevis, Saudi Arabia, Tanzania, Vietnam and Yemen.