BRIS GROUP

MAURITIUS

AUTHORISED COMPANY (AC)

CLIENT GUIDE 2026

Non-resident international company, taxation, records and annual compliance

Professional company formation and ongoing corporate administration

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Mauritius Authorised Company (AC) at a Glance

A Mauritius **Authorised Company (AC)** is a company incorporated under the **Companies Act 2001** and authorised under **section 71A of the Financial Services Act 2007**. It is intended for a company whose ownership is principally foreign, whose business is conducted principally outside Mauritius and whose **central management and control is outside Mauritius**. It is therefore fundamentally different from a Mauritius Global Business Corporation (GBC), which is designed as a Mauritius-resident structure.

Topic	Current legal / practical position
Foreign ownership	Section 71A applies where the majority of shares, voting rights or legal/beneficial interest is held or controlled by a person who is not a citizen of Mauritius.
Business location	The company must propose to conduct, or conduct, business **principally outside Mauritius** or with categories of persons permitted by FSC Rules.
Management/control	The company's **central management and control must be outside Mauritius**.
Tax residence	Under section 73A of the Income Tax Act, a Mauritius-incorporated company is treated as **non-resident** where it is centrally managed and controlled outside Mauritius; this is the normal AC position.
Director	The Companies Act special provisions permit at least one director who need not be ordinarily resident in Mauritius; a corporate director may also be appointed.
Registered agent/office	The AC is administered through a Mauritius management company/registered agent and must maintain a registered office in Mauritius.
Tax	A non-resident AC is generally taxable in Mauritius only on income derived from or accruing in Mauritius. Genuine foreign-source income can therefore produce **0% Mauritius income tax**.
Treaty status	Because an AC is non-resident in Mauritius, it is generally **not entitled to Mauritius tax-residence treaty benefits** in the manner of a resident GBC.

Key Benefits for International Clients

- Designed expressly by section 71A for foreign-owned companies conducting business principally outside Mauritius.
- Central management and control is intentionally maintained outside Mauritius.
- Potential **0% Mauritius income tax on genuine foreign-source income** because the AC is treated as non-resident where central management and control is outside Mauritius.
- One director can be sufficient and the director need not be Mauritius-resident.
- Corporate directors are permitted by the special Companies Act provisions applicable to Authorised Companies.
- No requirement to establish the level of Mauritius substance normally expected of a resident Global Business Corporation because the AC's management/control must be outside Mauritius.
- Internationally regulated structure administered through a Mauritius licensed management company/registered agent.
- Accounting records may be maintained outside Mauritius, provided statutory access/location requirements are satisfied.
- Lower FSC annual authorisation fee than the Global Business Licence regime.

The 0% Mauritius Tax Position - Correct Legal Basis

0% can be the correct Mauritius tax result for a genuine Authorised Company

The Mauritius Revenue Authority confirms that under **section 73A of the Income Tax Act**, a company incorporated in Mauritius is treated as **non-resident** if it is centrally managed and controlled outside Mauritius. MRA specifically notes that this generally applies to Authorised Companies. A non-resident is subject to Mauritius income tax on income derived from or accruing in Mauritius. Therefore, where the AC earns only genuine foreign-source income and has no Mauritius-source taxable income, the practical Mauritius corporate income-tax result can be **0%**.

This is not an automatic exemption based solely on the words 'Authorised Company'. The company must actually maintain its central management and control outside Mauritius and the source of each material income stream must be reviewed.

When 0% Mauritius Tax Is NOT Available

- The company derives income from or accruing in Mauritius.
- Central management and control is in fact exercised in Mauritius, contrary to the AC conditions.
- The company carries on activities in Mauritius beyond those compatible with its authorised status.
- A payment or transaction is specifically subject to Mauritius withholding or other domestic tax rules.
- The company changes its status or operational facts so that it no longer qualifies as non-resident.
- Tax arises in the country where the company is actually managed, where its owners are resident or where its business is carried on.

Formation / Authorisation Requirements

Topic	Current legal / practical position
Companies Act incorporation	The entity is incorporated as a Mauritius company under the Companies Act 2001.
FSC authorisation	An application for Authorised Company status is made under section 71A of the Financial Services Act.
Application channel	The application must be made to the FSC **through a licensed management company**.
Ownership	Majority foreign ownership/control as required by section 71A.

Topic	Current legal / practical position
Central management/control	Must be outside Mauritius and remain so while the AC status is maintained.
Business	Must be principally outside Mauritius and must not conduct activities prohibited/restricted for ACs under the Financial Services Act/FSC Rules.
Registered agent	The Mauritius management company acts as the registered agent and maintains the required statutory records/services.
Registered office	Mauritius registered office at the management company/registered agent address.
KYC/UBO	Full beneficial-owner, controller, director and source-of-funds/wealth information is required under Mauritius AML/CFT rules.

Activities an AC Should Not Conduct

Section 71A provides that, unless otherwise permitted by FSC Rules, an Authorised Company may not conduct the activities specified in the Fourth Schedule to the Financial Services Act. Regulated financial-services activities require the appropriate Mauritius licence and may require a different corporate/regulatory structure.

AC vs GBC

An Authorised Company is normally suitable where the business and management are genuinely outside Mauritius and Mauritius treaty residence is not required. A **Global Business Corporation** is the more appropriate route where the client needs a Mauritius-resident company, treaty access and Mauritius substance/management.

Share Capital

The AC is incorporated under the Companies Act and can use the share structures permitted by that Act and its constitution. For an ordinary private AC there is no universal high statutory paid-up capital comparable with certain regulated structures. The capital should be appropriate to the activity, bank requirements and commercial profile.

Shares, shareholder rights and the consideration paid/owing should be properly reflected in the company's constitution, share register and accounting records.

Documents Required from the Client

- Certified passport or acceptable government-issued identification for each shareholder, director, controller and ultimate beneficial owner.
- Recent certified proof of residential address.
- For corporate shareholders/directors: incorporation, constitutional, management and full ownership-chain documentation.
- Three proposed company names and a detailed description of the international business.
- Countries where central management and control will actually be exercised.
- Countries of customers, suppliers and business operations.
- Proposed shareholding percentages, directors and signing arrangements.
- Source-of-funds and, where appropriate, source-of-wealth evidence.
- Expected turnover, currencies, banking, counterparties and transaction profile.
- Tax-residence information relevant to CRS/FATCA classification and the AC's non-resident position.

Formation Process & Documents Received

1. Structure/tax-residence review **2.** KYC/AML approval **3.** Mauritius incorporation **4.** FSC AC authorisation **5.** Corporate organisation **6.** Tax/CRS and annual-compliance setup

Typical corporate file: Certificate of Incorporation; Constitution; FSC Authorised Company evidence/authorisation; shareholder/director resolutions; share certificate(s); register of members; register of directors/officers; registered-agent/registered-office records and tax/CRS documentation as applicable.

FSC and Government Fees - 2026

Topic	Current legal / practical position
FSC processing fee	Current 2026 FSC codified list: **USD 600** for an Authorised Company application.
FSC fixed annual fee	Current 2026 FSC fixed annual fee: **USD 1,400**.
Registrar annual fee	The Companies Registry separately levies an annual registration fee for an Authorised Company. The most recent published CBRD schedule shows **USD 100** when paid by the due date; the live 2026 amount should be reconfirmed before renewal.
Registered agent	Management company / registered-agent professional fees are separate from government/FSC fees.
BRIS Group fees	BRIS Group professional formation and annual administration fees are quoted separately.

Government and FSC fee schedules can change. BRIS Group will reconfirm the live statutory amounts when issuing the client's quotation and before each annual renewal.

Accounting Records

The special Companies Act provisions for Authorised Companies require full and proper accounting/corporate records. Records include minutes/resolutions, books, accounts, receipts, invoices, vouchers, contracts and agreements sufficient to reflect the financial position of the company, together with share and charge registers.

Topic	Current legal / practical position
Record standard	Records must provide a full and proper record of transactions and other acts and reflect the company's financial position.
Language	Records must be in English or French, or an English/French translation must be made available within the statutory period.
Retention	Accounting/corporate records must be kept for at least **7 years** after completion of the transactions to which they relate.
Location	Records may be at the registered office or another location selected by directors.
Registered-agent notice	If kept elsewhere, the registered agent must be notified of the full address.
FSC audit filing	Section 30 of the Financial Services Act expressly states that the general FSC audited-financial-statement filing requirement in that section **does not apply to an Authorised Company**.

Financial Statements & Tax Filing

An AC should maintain annual financial information/accounts sufficient to comply with the Companies Act, its registered agent's requirements and Mauritius tax administration. The absence of the section 30 FSC audited-financial-statement filing requirement does **not** mean that the company may operate without accounts.

Tax filing depends on the company's Mauritius-source position

Because an AC is normally treated as non-resident, its Mauritius tax exposure centres on income derived from or accruing in Mauritius. The registered agent/accountant should review each year whether a Mauritius income-tax return, local-income disclosure or other MRA filing is required. MRA's current procedures for Authorised Companies expressly recognise the distinction between their non-resident status and any **local income** they may derive.

Annual Return / Registrar Compliance

An Authorised Company remains a company incorporated under the Companies Act and is subject to the applicable Corporate and Business Registration Department filing and annual-registration requirements. The management company/registered agent should determine the exact annual-return/financial-summary filing required for the company's status, turnover and current Companies Act rules.

This filing is separate from the FSC annual authorisation fee and from any MRA tax filing.

CRS / FATCA

An AC's non-resident tax treatment does not remove international information-reporting obligations. The MRA has specifically addressed Authorised Companies under the Common Reporting Standard. If the AC is itself a Financial Institution for CRS purposes, residence/reporting analysis follows the CRS rules and may look to incorporation, central management/effective management and financial supervision.

Banks and other financial institutions will also classify the entity and its controlling persons for CRS/FATCA purposes according to the relevant entity type and tax residences.

Annual Compliance Checklist

- ■ Maintain FSC Authorised Company status and pay the FSC annual fee.
- ■ Maintain the Mauritius licensed management company / registered agent and registered office.
- ■ Pay the Registrar's annual registration fee.
- ■ Maintain central management and control outside Mauritius.
- ■ Ensure the company's business remains principally outside Mauritius and within permitted AC activities.
- ■ Maintain at least one eligible director and current shareholder/member records.
- ■ Keep full accounting/corporate records and supporting documents for at least seven years.
- ■ Notify the registered agent of the location of records kept outside the registered office.
- ■ Complete applicable Companies Registry annual filings.
- ■ Review MRA income-tax filing/local-income position annually.
- ■ Maintain and update UBO/controller/KYC information.
- ■ Review CRS/FATCA classification and reporting.
- ■ Maintain any foreign-country tax, licensing, accounting and substance compliance where the business is actually managed/carried on.

Why Mauritius AC Can Be Attractive

Topic	Current legal / practical position
Non-resident structure	Designed in law for central management/control outside Mauritius.
Foreign business	Designed for business principally outside Mauritius.
Potential 0% Mauritius tax	Foreign-source income can result in no Mauritius income tax where the AC remains non-resident and has no Mauritius-source taxable income.
Foreign ownership	Majority foreign ownership/control is a statutory feature of the regime.

Topic	Current legal / practical position
Flexible directors	No general Mauritius-resident director requirement; corporate directors are permitted by the special Companies Act provisions.
Regulated administration	Formation/administration through a Mauritius FSC-licensed management company.
Lower FSC fee	2026 FSC annual AC fee is USD 1,400 compared with USD 2,600 for the Global Business Licence.
Clear distinction	Useful alternative where the client does not need Mauritius treaty residence or GBC substance.

How BRIS Group Supports You

Structure review - Assess whether an Authorised Company or a resident Global Business Corporation is more appropriate.

Formation - Coordinate Mauritius incorporation and FSC Authorised Company application through a licensed management company.

Registered agent - Coordinate Mauritius registered-agent and registered-office services.

KYC / UBO - Coordinate shareholder, director, controller, UBO and source-of-funds/wealth due diligence.

Tax-residence review - Coordinate annual confirmation of central management/control and Mauritius/non-Mauritius tax position.

Accounting - Coordinate accounting records, financial statements/management accounts and MRA support where required.

Annual compliance - Coordinate FSC fee, Registrar fee/filings, corporate changes and good-standing maintenance.

Documents - Arrange Mauritius Registry/FSC certificates, certified copies, apostille/legalisation and other corporate documents where available.

Professional Fees & Quotations

Tailored quotation

This brochure is an informational guide to Mauritius Authorised Company formation and maintenance and is not a fee quotation. BRIS Group professional fees, Mauritius management-company/registered-agent/registered-office fees, FSC and Registrar government fees, accounting/tax/CRS work, certified documents, apostille/legalisation and optional services are quoted separately. Clients may request a tailored quotation based on ownership, management location, business activity and annual transaction volume.

Important Legal Notes & Official Sources

This brochure is a general commercial guide and does not constitute Mauritius or foreign legal, tax, accounting, CRS/FATCA, regulatory or investment advice. **The Mauritius AC 0% result is not a blanket statutory tax exemption:** it arises because an AC must have central management and control outside Mauritius and is normally treated as a **non-resident company**, taxable in Mauritius on Mauritius-source income rather than genuine foreign-source income.

Primary official/legal sources reviewed: Financial Services Act 2007, section 71A; Companies Act 2001 and the special provisions applicable to Authorised Companies; Income Tax Act 1995 / MRA guidance on section 73A and non-resident companies; FSC Global Business/Authorised Company guidance; FSC 2026 Codified List of licences and fees; MRA CRS and Authorised Company guidance; Corporate and Business Registration Department company/annual-fee information.

Information reviewed: August 2026. FSC fees, Registrar fees, permitted activities, annual filings, tax treatment and CRS requirements will be reconfirmed before formation and each annual renewal.

PREPARED BY BRIS GROUP

Mauritius Authorised Company (AC) - Client Guide 2026

Professional incorporation and corporate administration for international clients.