



## **Your trusted Corporate Service Provider**

We are experienced independent providers of bespoke tailor-made structures for the specific needs of our Private and Corporate Clients world-wide.

## Who are we

We are an independent privately owned company incorporated in the Republic of Mauritius in 2000 and Licensed by the Financial Services Commission to provide bespoke company and trust formation and administration services including other approved financial services.

## Our Mission

To put Clients at the heart of what we do and to do it well.

## Our Virtue

- Integrity
- Reliability
- Quality

 **Trustlink**  
Corporate & Trust Services

# Meet the Management



**Rajiv G. REEMUL**

CEO, Founder

Mr Reemul has extensive experience in the financial industry. He started his career in the international tax department of a renowned UK Law firm and subsequently as a regulator of the offshore sector of Mauritius. He has been instrumental in introducing new legislations for the sector and particularly for the development of the investment fund and captive insurance industry in Mauritius. He specialises in providing tailor made investment structure to both private and corporate clients.



**Theyvarajen . PONAMBALUM**

Non-Executive Director

Mr. Ponambalum is an Attorney-At-Law with 23 years of standing before the Supreme Court of Mauritius. He acts as Legal Consultant for various reputed local as well as international firms. He is also a member of the Law Reforms Commission since 1998 and has been the Chairman of the Mauritius Law Society on 3 occasions during last decade. Mr. Ponambalum specialises on corporate matters and regulatory issues.



**Kalim CHEDEE**

Director

Mr Chedee is an active CEO /director with experience, leading large companies subject to regulatory oversight. His service as a board member in a variety of industries (Pharmaceutical property development) brings additional perspectives to our board. He holds a PHD in Pharmaceutical Sciences.



**Ricardo CAILLOU**

Director

Mr Caillou has more than 10 years experience in the Offshore sector. He has extensive experience in corporate and transactional law with emphasis on representing privately held businesses with regard to business formation, structuring and organization and contract negotiations. He is also responsible for the supervision of the compliance and administration of investment funds and heads Trustlink Compliance Department.



**Ikhlass JOOMUN**

Director

Mr Joomun has more than 10 years experience in accounting ,corporate organization, financial reporting(IFRS), budgeting, tax issues and assisting clients with the ongoing administration of business entities. He is a Fellow Member of the Association of Chartered Certified Accountants (ACCA, CIMA). He is a member of MIPA and MIOD).

## Corporate Clients

- SPV Formation & Administration
- Company secretarial services
- Registered Office & Office Space
- Accounting / bookkeeping
- Bank Account Opening
- Mergers & Acquisitions
- Stock exchange listings
- Regulatory / Tax reporting
- Payroll Services

## Private Clients

- Succession & Estate planning
- Fiduciary Services
- Family office setup
- Trust formation & Administration
- Foundations setup
- Wealth consolidation
- Asset Protection and reporting
- Relocation services
- Philanthropy

## Investors services

- Fund setup & administration
- Depository Service
- Listing agent
- Registrar & transfer agent
- Cash & treasury management
- Risk management / reporting
- Corporate Finance & Treasury
- FATCA/CRS & FIU reporting
- Captive Insurance Services

## Expatriate Services

- Assistance with occupational permit
- Accommodation
- Concierge Services
- Redomiciliation
- Bank introduction
- Insurance services
- Retirement planning
- Property Services

## Legal Services

- Drafting & reviewing of documents
- Legalisation/notorization/apostille
- AML/CFT Compliance & Governance
- Ship/Yacht/Aircraft registration
- AML CFT training
- Intellectual Property Registration

## e-Commerce Services

- Payment intermediaries License
- Crypto Services / EMI License
- Acquisition of Visa/Master Cards
- Bank & Merchant Account opening
- SPV setup for Merchants
- Accounting Services for Global Merchants

# Our Expertise



# Company Formation and Administration Services

The companies we administer for our clients are used for many purposes: portfolio investment, trading, property investment, Intellectual property (patent, royalty and copyright holding), ship and aircraft ownership and financing, asset-based lending, and long-term project financing, e-commerce, headquarters holding

## Our services include:

### Company incorporation / Formation and Administration Services

- Incorporation and set-up of GBC and Authorized Company (zero tax), Specialized license vehicle (SPV).
- Drafting & reviewing of company constitutive documents
- Registered office services / Directorships / Officers
- Liaising with regulatory bodies for permission & Licenses
- Compliance and reporting services (Statutory & Tax)
- Human resources and office support / Virtual office
- Legal documentation review / apostille notarization
- Maintenance of statutory / Beneficial ownership records
- Bank Account opening & provision of Authorized Signatories
- Accounting / Payroll services / Annual Financial Statements
- Invoicing / Purchasing services
- Assistance with Cross-border Structuring & Tax planning
- IPO structuring and Market Listings
- Compliance with the Economic Substance test

### Company Secretarial Services & reporting:

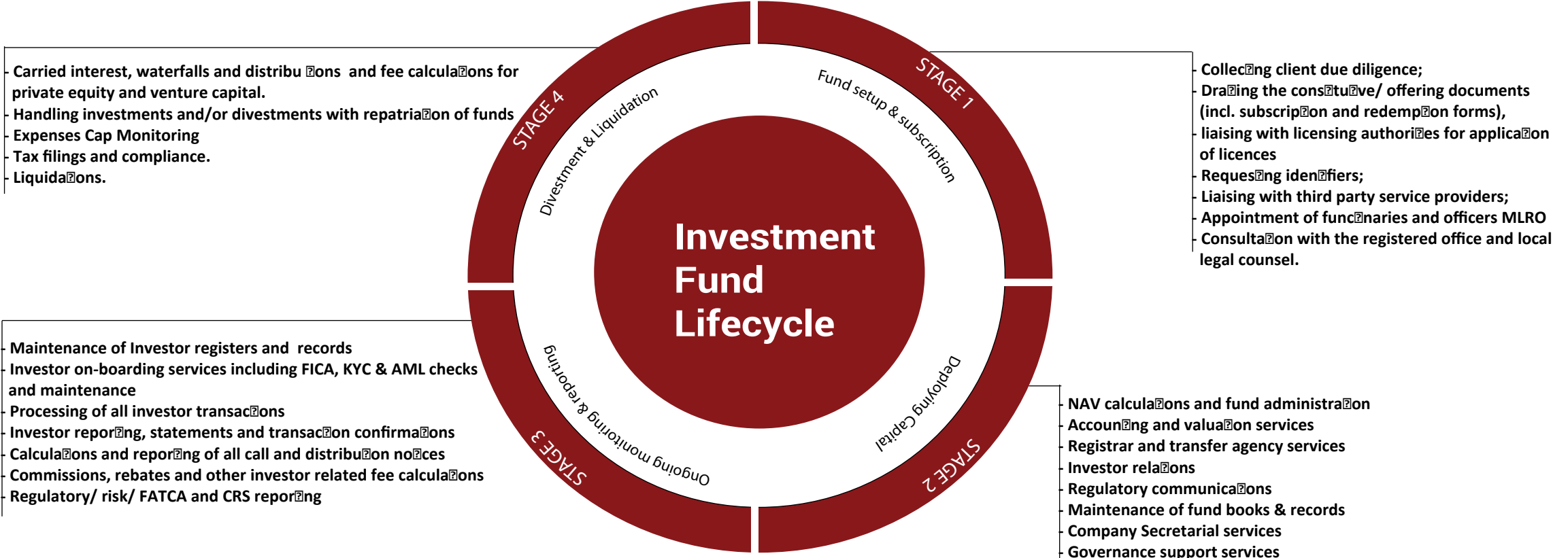
- Structuring the share capital
- Maintenance of statutory records
- Minutes approving annual accounts
- Appointment and resignation of officers
- Dividend minutes & shareholder register
- Filing of standard forms at the Registrar of Companies
- Providing information to statutory authorities
- Filing the Annual Return and Accounts
- Managing the register of directors and shareholders
- Attending Board and AGM meetings
- Tax, regulatory & compliance related reporting

### Liquidation, Dissolution and cessation:

- Dealing with the liquidation process
- Handling de-registration and withdrawal of licences
- Applying for dormant status of companies
- Advising on the closing down of companies / branches and attending to related matters

# Investment Fund Services

FUNDS TYPES (OPEN/ CLOSED ENDED)	STRUCTURES	ASSET CLASSES
GLOBAL CIS	Companies	Equities
PROFESSIONAL CIS	Protected Cell companies	Fixed Income
SPECIALISED CIS	Unit trust /Trust	Hedge Fund
EXPERT FUND (PROFESSIONAL)	Limited Partnership	Private Equity
	Umbrella Fund	Real Estate/ Debt / Growth
	Master / Feeder	Infrastructure



# Family Office

## OUR SERVICES

•Assisting with the application of the Overseas Family Office (Single) ("SFO") Licence and the Overseas Family Office (Multiple) ("MFO") Licence.

•Structuring of wealth protection vehicles such as Trust and Foundations.

•Drafting of Family constitutive documents

•Accounting, Fiduciary administration compliance and risk services.

•Investment advisory and estate administration.

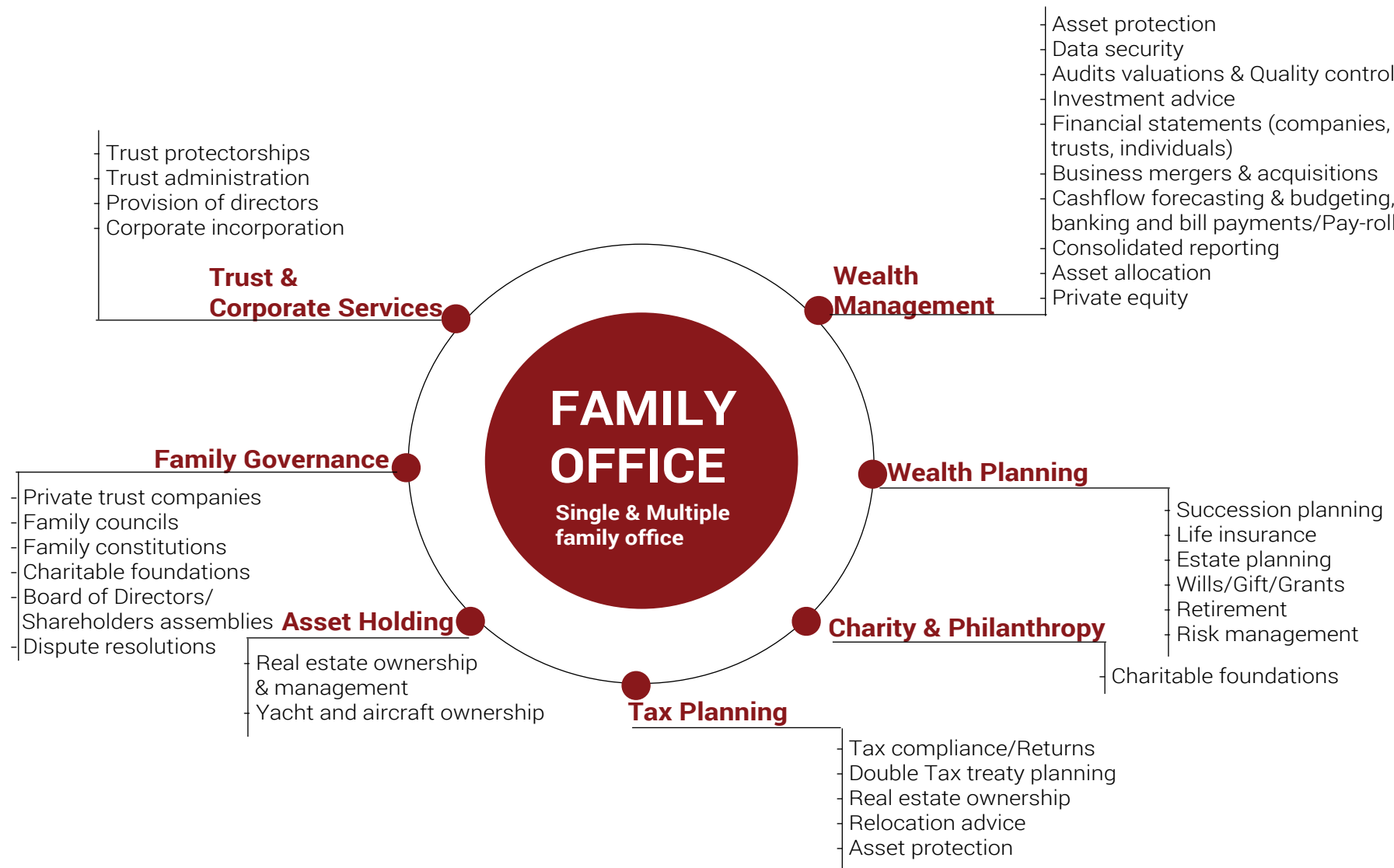
### WHY CHOOSE A MULTI-FAMILY OFFICE?

•To create a single, confidential point of coordination and control for your family affairs.

•To guard against succession and control challenges

•To navigate increasingly complex international tax laws

•To provide cost efficiencies and eliminate conflicts of interest between advisors.





# Trusts & Trusteeship Services

## General

Our team can structure and administer a wide range of trusts including discretionary trusts, fixed interest trusts, charitable and non-charitable purpose trusts and commercial trust structures to suit your individual needs and circumstances.

A trust is a powerful tool for succession planning, asset protection, taxation and family wealth management purposes. They allow you to direct how your assets are managed during your life and after your death.

Through the use of a trust or a foundation, it is often possible for family assets to be preserved over succeeding generations substantially free from taxation, probate requirements, succession laws, expropriation, and foreign exchange controls.

The underlying assets of the trust we administer include investment and operating companies, bank and brokerage account, properties and luxury yacht.

## Uses of Trust

The main uses of a trust include:

- Commercial or structured finance transactions
- Estate and tax planning
- Succession planning
- Holding of private wealth
- Asset protection and preservation
- Retention of family property
- Minimising the impact of inheritance taxes
- Avoidance of forced heirship
- Provision for the needs of children, the elderly or infirm
- Confidentiality/ anonymity
- Employee 'benefit' schemes
- Charitable purposes

Trusts can be used in a variety of ways including:

- Controlling asset distributions (especially for minor children) over time
- Protecting heirs from family disputes
- Providing for a disabled or special needs family member
- Charitable donations
- Managing assets in the event you become incapacitated.
- Commercial purpose
- Avoid forced heirship

## How we can help?

We provide professional fiduciary services to help ensure the legacy you desire is carried out according to your wishes.

### Trust setup

- Documentation review (corporate trust agreement and ancillary documentation drafted by signing parties counsels).
- Filing of the agreement.
- Advice on Tax under-estate planning

### Administration

- Maintain thorough records
- Providing required statements to beneficiaries
- Gathering and updating information on all trust beneficiaries
- Paying bills
- Managing service level agreements defined by the client

### Accounting and tax reporting

- Tracking and reporting trust principal and income accounting
- Preparing and filing fiduciary income tax returns
- Collecting income from trust assets
- Disbursing funds in accordance with the trust agreement
- Providing tax reporting to beneficiaries

## REDOMICILIATION

We advise on the various advantages that Mauritius, considering on the impacts on the assets, income, administration, passport, taxation and protection and assisted in all aspects as follows:

### Concierge:

- Advice and administrative assistance during their move to Mauritius
- Selection and continued attendance with regard to external experts such as estate agents, bankers, insurance brokers.

### Establishment:

- Assistance with selecting a home
- The interior design and decoration of these properties
- Maintenance services related to the property and gardens

### Administrative formalities:

- Initial registration on arrival and the processes for the family and any pets, if appropriate
- Registration in the Consulate or Embassy
- Drivers licence, vehicle registration and the process for vehicle reregistration
- Organising of all utilities such as gas, electricity, telephone and internet connections
- Television and cable access; mail and insurance
- Ongoing maintenance, servicing and cleaning
- Security and technology aspects such as alarms, computer surveillance systems etc.
- Personal secretary services
- Organisation of parties and receptions with a select choice of catering; dinner and holiday bookings
- Planning services in relation to moving such as ticket bookings.

### Family's assistance:

- Various services for children, such as inscriptions to nurseries, day care and schools, as well as baby-sitters
- Management of domestic staff

## CAPTIVE INSURANCE

We provide end-to-end captive management services and bespoke services that can be accessed by captives on a stand-alone basis.

Mauritius Captive Insurance Laws allow pure captives and captives insuring second party and third party risk to be licensed, (ie general, long term and reinsurance business) Rent-a-captive and cell captives are also permitted.

### Formation of the captive vehicle.

- We can provide a duly licensed and regulated "Protected Cell Company" to accommodate clients' ring-fenced/protected "cells" designed to segregate the assets and liabilities of each cell from the others, thus protecting each cell from the creditors of other cells.

- This structure allows the promoter to develop risk management strategies without the complexities and associated costs of a conventional company

### Administrative and operational support

- Underwriting
- Policy documentation
- Premium administration and claims handling
- Liaison with business partners (reinsurers/brokers/legal advisors/actuaries, etc.)

### Financial Management Services

- This structure allows the promoter to develop risk management strategies without the complexities and associated costs of a conventional company.

#### Cash management:

Premium collection, cash flow management, payment of obligations and cash monitoring. Investment of excess funds and cash management of outwards reinsurance programmes.

#### Investment services:

Formulation of investment guidelines, asset manager selection, investment monitoring and accounting

### Company Secretarial Services

- Coordination of shareholders' and directors' meetings.
- Solicitation of meeting proxies.
- Reservation of accommodation and other necessary arrangements for board, shareholder and policy-holder meetings.
- Review of technical aspects of meeting minutes.
- Compliance & regulatory returns/ reporting
- Regulatory reporting services Including tax filings, monitoring compliance with statutory requirements.

## Corporate Tax

Mauritius has a harmonised tax system- a 15% tax rate is applied across board (income, corporate and VAT) dividends paid by a Mauritius resident company and gains derived from the sale of units, securities or debt obligations are exempt from income tax in Mauritius.

Corporate means private and public limited liability company, sole proprietorship, branch of a foreign company, and société.

A corporation resident in Mauritius is subject to tax on its worldwide income.

A non-resident corporation is liable to tax on any Mauritius-source income, subject to any applicable tax treaty provisions.

Corporations are liable to income tax on their net income at a flat rate of 15%. Companies engaged in the export of goods are liable to be taxed at the rate of 3% on the chargeable income attributable to exports based on a prescribed formula.

Residence - definition

Incorporation & Central control and management in Mauritius.

Branches are taxed in the same way as subsidiaries.

Taxable income = chargeable income, which consists of business/trading profits and passive income. Normal business expenses are deductible in computing taxable income.

Companies exporting goods are subject to tax at 3% on the chargeable income attributable to exports.

Taxation of dividends – Dividends paid by a Mauritius-resident company are exempt from income tax.

Foreign dividends are taxable, but a credit may be claimed for underlying tax and withholding tax.

Capital gains – No tax is imposed on capital gains in Mauritius.

### Anti-avoidance rules:

Transfer pricing – No transfer pricing rules - arm's length test required.

No interest deduction limitation rules. However, the domestic law provides that only interest expenditure incurred in respect of capital employed exclusively in the production of gross income is deductible for tax purposes.

Controlled foreign companies – CFC rules applicable after 1 July 2020 (more than 50% of the participation rights held directly or indirectly by a resident company)

Economic substance requirements – employ adequate staff, and incur a minimum amount of expenditure proportionate to their level of activities

Income tax is payable on total net income before distribution at the following rates:

<b>Global Business companies ( Trading)</b>	15
<b>Freeport operators or Private Freeport Developers carrying on Freeport activities other than providing goods and services on local markets</b>	15
<b>Authorised Companies (non-resident)</b>	Exempt
<b>Companies engaged in the export of goods</b>	3
<b>All other companies (except for specified income, see below)</b>	15

### Withholding Tax

#### Rates

Type of payment	Residents		Nonresidents	
	Company	Individual	Company	Individual
<b>Dividends</b>	0%	0%	0%	0%
<b>Interest</b>	0%	15%	15%	15%
<b>Royalties</b>	10%	10%	15%	15%
<b>Fees for technical services</b>	0%	0%	10%	10%

#### Notes:

- All companies (including GBL companies) will qualify for an 80% exemption in relation to certain specified foreign-source income (e.g. foreign dividend not allowed as deduction in source country, interest income, foreign-source income derived by a Collective Investment Scheme [CIS], closed end funds, CIS manager, CIS administrator, investment adviser or asset manager licensed or approved by the FSC, income derived by companies engaged in ship and aircraft leasing, income derived from the leasing and provision of international fibre capacity, interest income derived by a person from money lent through a peer-to-peer lending platform operated under a licence issued by the relevant authority after the five-year tax holiday, income derived from reinsurance and reinsurance brokering activities, income derived from the sale, financing arrangement, and asset management of aircraft and its spare parts, including aviation-related advisory services).

## Value added tax

Value added tax – 15% (Some supplies are zero rated or exempt.)

Registration threshold is MUR 6M

Filing and payment on a monthly or quarterly basis.

## Other taxes incentives

- No payroll tax
- No stamp duty
- No inheritance or wealth tax
- No alternative minimum Tax
- No participation exemption
- No withholding tax on dividends paid by a Mauritian resident company.
- No capital gains tax.
- No actual foreign tax credit is allowed on foreign-source income if the company has claimed the 80% exemption.
- Freeport companies (excluding local trading activity) shall continue to be exempt from tax until 30 June 2021, subject to the Freeport certificate being issued on or before 14 June 2018
- ◆- Partial exemption of 80% on foreign dividends, interest, income derived by a collective investment scheme (CIS), closed end fund, CIS manager, CIS administrator, investment adviser or asset manager, as the case may be, licensed or approved by the FSC;
- 8 Year tax holiday to Global Headquarters;
- ◆- 8 Year tax holiday on income derived from the manufacture of pharmaceutical products, medical devices and high-tech products;
- ◆- 8 Year tax holiday on income derived from the exploitation and use of deep ocean water for providing air conditioning installations, facilities and services;
- ◆- 5 Year tax holiday on income derived by a company from activities carried out as a project developer or project financing institution in collaboration with the Mauritius Africa Fund for the purpose of developing infrastructure in the Special Economic Zones; and
- ◆- 5 Year tax holiday to a Global Treasury Activities Licence; a Global Legal Advisory Services Licence; an Overseas Family Office (Single) Licence; or an Overseas Family Office (Multiple) Licence.
- Tax treaties: Mauritius has concluded 46 tax treaties. The OECD multilateral instrument entered into force for Mauritius on 1 February 2020.

## Individual Taxation

### Rates

<b>Individual income tax rate</b>	15% (in general)
<b>Capital gains tax rate</b>	0%

*Residence - having spent 183 or more in an income year in Mauritius, or at least 270 days in the tax year and the two preceding tax years.*

*Basis – Residents are taxed on Mauritius-source income and foreign income remitted to Mauritius. Nonresidents are taxed only on Mauritius-source income.*

*Taxable income – Taxable income includes employment income, pensions, income from a trade or profession, rent, and interest.*

*Rates – The standard rate is 15%, but a reduced rate of 10% applies to individuals whose annual net income does not exceed MUR 650,000.*

*A solidarity levy of 5% is applicable on annual leviable income exceeding MUR 3.5 million.*

*Deductions and allowances – Personal deductions and reliefs are consolidated under the income exemption threshold.*

*Foreign tax relief – An individual is entitled to claim a credit for actual foreign tax suffered on foreign-source income against the Mauritius tax liability arising on the same income.*

*Tax year – The tax year is from 1 July to 30 June.*



## CONTACT

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