

Guidelines for
LETTER OF NO OBJECTION



June 2024

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Introduction

As part of winding up procedures, Resident Companies with turnover exceeding **MUR 100M**, Protected Cell Companies, Global Businesses, Authorised Companies, Amalgamating Companies, Trusts and Foundations ought to apply for a Letter of No Objection from the Mauritius Revenue Authority (MRA).

This leaflet is for information only.

Resident companies with turnover exceeding MUR 100M, Protected Cell companies, Global Businesses, Authorised Companies and Amalgamating Companies

Under **Section 309(3) of the Companies Act**, any request for a company to be removed from the register at the Corporate & Business Registration Department shall be accompanied by a written notice from MRA stating that there is no objection to the company being removed from the register.

As regards Protected Cell Companies, these consist of a core cell and a set of cells where each cell is an entity of its own. When the singular/core cell is wound up, a request for Letters of No Objection are made for the core cell and the set of cells.

As such, the above-mentioned companies are required to submit a formal request for that written notice to MRA and submit the following information and scanned copies of all the following documents on the following centralised email address noc.application@mra.mu



Documents	Domestic companies with turnover exceeding MUR100M, Global Businesses (excluding authorised companies), and Amalgamating Companies	Protected Cells Companies	Authorised companies
Formal request for the letter of No Objection	√	√	√
Certificate of incorporation and any certificate of change of name	√	√	√
Letter from the Financial Services Commission upon change of status to an 'Authorised Company'	-	-	√
Shareholders' and/or Directors' winding up resolutions	√	√	√
Draft terminal income tax return till date of winding up and any other outstanding income tax return	√	√	√
Audited financial statements or signed unaudited management accounts or financial summaries for last three income years prior to the period of winding up	√	√	√
Signed management accounts from last balance sheet date to date of winding up	√	√	√
Bank statements for the last year in operation	√	√	√
Confirmation that the company has ceased its activities from date of winding up	√	√	√
Value Added Tax (VAT) Deregistration Form in case the company is registered for VAT	√	√	√
Where the company's central management and control is outside Mauritius, reasons why the company considers itself to be tax resident outside Mauritius, supported by relevant documentary evidence	-	-	√
Local income amount derived as from the date the company's status changed to 'Authorised'	-	-	√
Cells structure	-	√	-

Trusts & Foundations

Since 01 July 2021, all trusts and foundations set up in Mauritius ought to register at MRA for a Tax Account Number and submit income tax returns. Where the trusts and foundations were set up on or before 30 June 2021, certificates of non-residence may be submitted where the beneficiary(ies), trustee(s), settlor(s) and founder(s) are tax resident outside Mauritius up to the year of assessment 2024/2025.

Upon termination of the trust and upon winding up of the Foundation, the respective trustees and the Foundation's administrators must notify MRA of same and request a Letter of No Objection to be sent to the Financial Services Commission and to the Registrar of Foundations respectively for onward removal from their Register.

Trustees and Administrators wishing to obtain the Letter of No Objection from MRA should submit the following information and scanned copies of **all** the following documents on the centralised email address noc.application@mra.mu

Documents	Trusts	Foundations
Formal request for the letter of No Objection	√	√
Certificate of registration	√	√
Trust Deed/Foundation Charter	√	√
Trustees'/Council members' winding up resolutions	√	√
Certificate of declarations of non-residence, where relevant	√	√
Draft terminal income tax return till date of winding up and any other outstanding income tax return	√	√
Audited financial statements or signed unaudited management accounts for last three income years prior to the period of winding up	√	√
Signed management accounts from last balance sheet date to date of winding up	√	√
Bank statements for the last year in operation	√	√
Confirmation that the trust/foundation has ceased its activities from date of winding up	√	√

Notes

- Only complete applications will be entertained.
- For any outstanding payment of tax liability, please effect payment at time of request.
- If the company holds a valid Tax Residence Certificate ('TRC') after the winding up date, kindly return the original TRC to this office;
- Where the company is registered for filing obligations under the Foreign Account Tax Compliance Act (FATCA), it is required to liaise with the FATCA team on fatcacsruni@mra.mu prior to deregistration.
- Where the company is registered for filing obligations under the Income Tax (Country-by-Country) Regulations, it is required to file its CbC report/ notification until date of winding-up.
- The application form for the cancellation of VAT Registration is available [here](#)
- For any information, kindly contact:

LTD NOC Unit

Large Taxpayer Department

Telephone: 207 6000 (Ext: 2566)

Email address: noc.application@mra.mu





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