Guidance Note on Qualified Domestic Minimum Top-up tax (QDMT tax) Notification

1. General Information

QDMT tax is a tax imposed in Mauritius on resident companies forming part of multinational enterprise (“MNE”) groups having consolidated annual revenue of €750M or more in at least 2 of the 4 fiscal years immediately preceding the fiscal year of the Ultimate Parent Entity (“UPE”).

2. Covered person

A “covered person” means an entity which –

i. is a member to whom QDMT tax applies;
ii. is located in Mauritius or is the ultimate parent entity of the multinational enterprise group and is incorporated in Mauritius;
iii. is a member of the same multinational enterprise group or is a person that is a joint venture of the member’s ultimate parent entity or a joint venture subsidiary; and
iv. is not an excluded person.

All covered persons shall notify the Director-General of the identification of the designated person resident in Mauritius responsible to file the QDMT tax return.

The notification return does not apply to members of MNE groups that are not resident in Mauritius.

3. Closing Date of Accounts

The closing date of accounts is the return date of the covered person.

4. Ultimate Parent Entity

Ultimate parent entity means either –

a) an entity that –
   i. owns directly or indirectly a controlling interest in any other entity; and
   ii. is not owned, with a controlling interest, directly or indirectly by another entity; or
b) in the case the group is a single entity with one or more foreign permanent establishments, the main entity of a group.

5. Fiscal year of the UPE

- **i.** The fiscal year of the UPE is the accounting period used in the consolidated financial statements; or
- **ii.** in the case consolidated financial statements are not prepared, the calendar year.

6. Designated Person

The person designated to file the QDMT tax return shall be a company forming part of the MNE group and shall be resident in Mauritius.