

TR262

Facts

X was incorporated in Mauritius on 14 September 2009 as a private company limited by shares. X holds a Global Business Licence.

At incorporation, the principal activity of X was that of an investment holding company focusing on investments in the logistics, rail, terminals and infrastructure space. Over the years X diversified its business as laid below.

Currently, X principally derives income from the following business activities:

- Equity investments holding
- Ocean Freight Project - chartering in and out of vessels
- Syrah Project - logistic services
- Rail activity - leasing of locomotives/rolling stock
- Trading of commodities
- Debt investment
- Chartering of vessels and Ocean Freight

Point at issue

Whether the total chargeable income of X should be taken into consideration for the purpose of computing the chargeable income attributable to export?

Ruling

On the basis of the facts mentioned above, it is ruled that for the purpose of computing the chargeable income attributable to export, the apportionment method should take into account the total chargeable income of X in accordance with section 44B(2) of the Income Tax Act.