

doing business in Seychelles



country profile											
government structure	<ul style="list-style-type: none"> • Executive: The president is both the chief of state and head of government. The president is directly elected by absolute majority popular vote, in two rounds if needed, for a five-year term and is eligible for one additional term. Cabinet is appointed by the president. • Legislative: Seychelles has a unicameral National Assembly. • Judicial: The highest courts are the Seychelles Court of Appeal, the Supreme Court of Seychelles, and the Constitutional Court. The subordinate courts are the Magistrates' Court of Seychelles, Family Tribunal and Employment Tribunal for labour-related disputes. • Next presidential elections: October 2025. 										
economic data	<table> <tbody> <tr> <td>• Nominal GDP (USD billions):</td> <td>1.61</td> </tr> <tr> <td>• GDP per capita (USD):</td> <td>16 173.75</td> </tr> <tr> <td>• Inflation rate (% change):</td> <td>3.00</td> </tr> <tr> <td>• Government revenue (% of GDP):</td> <td>35.79</td> </tr> <tr> <td>• Government gross debt (% of GDP):</td> <td>73.03</td> </tr> </tbody> </table> <p><i>*Source: IMF (December 2023 estimates)</i></p> <ul style="list-style-type: none"> • Seychelles has a mixed developing economy that is heavily reliant on the services sector, particularly tourism. • Seychelles is also a major seafood processing hub and fisheries is the second most important industry after tourism. • Seychelles has, however, moved to reduce the dependence on tourism by promoting the development of the offshore financial, information and communication sectors and renewable energy. • The main industries also include diamond mining, iron ore, rutile and bauxite mining, and small-scale manufacturing (beverages, textiles, and footwear). • Seychelles' main export partners are the United Arab Emirates, the United Kingdom, France, British Virgin Islands, Zambia, Mauritius, and Japan. The main export commodities include refined petroleum, fish, recreational boats, cigarettes, and animal meal. • Seychelles' main import partners are the United Arab Emirates, Qatar, British Virgin Islands, Germany, France, China, Spain, and South Africa. The main import commodities include recreational boats, refined petroleum, fish, aircraft, and cars. 	• Nominal GDP (USD billions):	1.61	• GDP per capita (USD):	16 173.75	• Inflation rate (% change):	3.00	• Government revenue (% of GDP):	35.79	• Government gross debt (% of GDP):	73.03
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risk ratings	<ul style="list-style-type: none"> • S&P Global Overall Country Risk (Q4 2023): 48/211 • Corruption Perceptions Index (2022): 23/180 										

international treaties and memberships	
international and regional organisations and customs unions	<ul style="list-style-type: none"> • African Continental Free Trade Area Agreement • African Development Bank Group • African Union • Alliance of Small Island States • Common Market for Eastern and Southern Africa ("COMESA") • Commonwealth • Group of 77 • Indian Ocean Commission • International Monetary Fund • International Organisation of the French-speaking World (<i>Organisation Internationale de la Francophonie</i>) • Organisation of African, Caribbean and Pacific States ("OACPS") • Southern African Development Community • United Nations • World Bank Group • World Customs Organization • Seychelles receives preferential treatment under the agreements listed here: http://ptadb.wto.org/Country.aspx?code=690
bilateral investment treaties	<ul style="list-style-type: none"> • Seychelles has bilateral investment treaties in force with Cyprus and France. • Treaties have been signed with China and Egypt, but these have not yet entered into force.
investment-related agreements / institutions	<ul style="list-style-type: none"> • Cotonou Agreement (may be succeeded by the European Union and OACPS Partnership Agreement) • Multilateral Investment Guarantee Agency • World Trade Organization
dispute resolution	<ul style="list-style-type: none"> • Convention on the Settlement of Investment Disputes between States and Nationals of Other States (ICSID Convention) • United Nations Commission on International Trade Law (UNCITRAL) • United Nations Convention on the Recognition and Enforcement of Foreign Arbitral Awards (New York Convention)
intellectual property ("IP") treaties	<ul style="list-style-type: none"> • A comprehensive list of IP-related treaties signed by Seychelles is available at: https://wipolex.wipo.int/en/legislation/members/profile/SC?collection=treaties • See the trade marks section below for further detail.



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legal regime	
applicable legal regime	<ul style="list-style-type: none"> Seychelles' legal system is based on the English common law, French civil law, and customary law.
dispute resolution	<ul style="list-style-type: none"> Parties are encouraged to resolve their investment disputes through arbitration and negotiation. The Investment Act, 2010 provides for an Investment Appeal Panel. An aggrieved investor is entitled to apply to the Investment Appeal Panel for a review of a decision made by a public sector agency with regard to that investor's investment or proposed investment, or for an order where the public sector agency does not issue a decision within the required time limit.
land acquisition, planning, and use	<ul style="list-style-type: none"> With a few specific exceptions, non-Seychellois cannot purchase state land but may hold such land, following land development approval, on a long-term lease. Land on all outlying islands can only be held on long-term leases.
competition	
<i>merger control</i>	<ul style="list-style-type: none"> The Fair Trading Act, 2022 (the "Act") regulates merger control in Seychelles. A merger is defined as the acquisition or establishment, direct or indirect, by one or more enterprises or persons, whether by: (a) sale or purchase of shares or assets; (b) sale or purchase of shares or assets in exchange of shares in the merged enterprise; (c) lease of assets; and (d) amalgamation or combination, or otherwise, of control over the whole or a part of the business of an immediate competitor, supplier, consumer or other enterprise. A notification is required for any public bid for the control of an enterprise. A transaction is required to be notified to the competition authority if the combined annual turnover or combined value of assets, whichever is the higher, of all parties to a merger equals or exceeds SCR10-million. A non-refundable fee of SCR1 500 is payable on submission of a completed merger application form. Where a merger is approved by the competition authority, an additional fee will be imposed on a sliding scale, based on a percentage of the combined turnover or asset value of the merging parties' preceding financial year. In this regard, a fee of 0.1% is payable where the combined turnover or asset value is equal to or exceeds SCR10-million but is less than SCR25-million. Seychelles is a pre-implementation regime, therefore, approval must be sought from the Fair Trading Commission prior to the implementation of the proposed transaction. Failure to notify, or pre-implementation of a notifiable merger, may result in the Fair Trading Commission directing the merging parties to refrain from competing or implementing the merger in the Seychelles market, ordering divestiture and/or imposing financial penalties. Financial penalties may be of such sums, not exceeding SCR500 000 or up to 10% of the turnover of

	<p>the enterprise in Seychelles during the period of breach, up to a maximum period of five years.</p> <ul style="list-style-type: none"> Seychelles is a member of COMESA, which has an operational merger control regime. Merger activities in Seychelles should be conducted with this regional competition body in mind.
<i>prohibited practices</i>	<ul style="list-style-type: none"> The Act prohibits horizontal and vertical agreements, decisions and concerted practices between undertakings, which have as their object or effect the prevention, restriction, or distortion of competition, unless a party to the agreement, decision or concerted practice can prove that any technological, efficiency, or other pro-competitive or public interest gain resulting from it outweighs that effect, or they are exempt. Cartel conduct (such as price fixing, market division, and collusive tendering / bid rigging) and minimum resale price maintenance are prohibited by the Act. The Act also prohibits abuses of dominance. A firm that engages in a restrictive horizontal or vertical agreement, or abuses its dominant position, commits an offence and may face a financial penalty, the amount of which should not exceed SCR500 000 in relation to the prohibited conduct or 10% of the turnover of the enterprise in Seychelles during the period of the breach of the prohibition, up to a maximum period of five years. COMESA regulates prohibited practices in the COMESA Common Market. Activities in Seychelles should be conducted with this regional competition body in mind.
employment	
<i>immigration</i>	<ul style="list-style-type: none"> Expatriates working in Seychelles must hold a valid work permit, known as a Gainful Occupation Permit ("GOP"), or residence permit, either as an employee or as a self-employed individual. There is no restriction on the number of GOPs available, provided that the requirements and procedures for a GOP are met and followed. The investor is, however, required to motivate that a candidate brings an economic benefit to Seychelles and that the required skill cannot be sourced from within Seychelles.
<i>local employment vs secondment</i>	<ul style="list-style-type: none"> In terms of Seychelles' employment legislation, an employee may be seconded to Seychelles, as it is not a legal requirement for either local or foreign employees to be employed by a local entity. However, it is required for an employee to be employed by a local company in terms of the Immigration Decree for work permit purposes. A non-Seychellois cannot be gainfully occupied in a Seychelles International Trade Zone ("SITZ") except under and in accordance with the conditions of a SITZ permit.



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<i>fixed-term contracts and temporary employment services</i>	<ul style="list-style-type: none"> Fixed-term contracts are allowed in terms of the Employment Act, 1995 for a minimum of three months, with no specified maximum period. The Employment Act requires a break of at least 90 days between a subsequent fixed-term contract with an employee unless it is deemed to have been a contract of continuous employment. Labour broking is allowed in Seychelles, subject to the labour broker obtaining a licence from the Seychelles Licensing Authority.
<i>payment in local currency</i>	<ul style="list-style-type: none"> It is not a legal requirement for remuneration to be paid in local currency.
<i>restraint of trade agreements</i>	<ul style="list-style-type: none"> Restraint of trade agreements are valid and enforceable in Seychelles. However, the agreement cannot stipulate an indefinite period for the restraint of trade. In practice, a one-year time period is usually allowed.
foreign investment regime	
investment regime	<ul style="list-style-type: none"> The Investment Act, 2010 governs business and foreign investment in Seychelles. The Seychelles Investment Board ("SIB") is responsible for promoting and facilitating local and foreign investments.
registration / licensing requirements	<ul style="list-style-type: none"> An investor must submit a business plan to the SIB, which will circulate it to the referral agencies for government approval. Once the business plan has been approved, a business or company must be registered at the Registration Division (Company Registry).
non-industry specific registrations / licences	<ul style="list-style-type: none"> The following general non-industry specific registrations / licences may be required:
<i>Seychelles Licensing Authority ("SLA")</i>	<ul style="list-style-type: none"> Investors must apply for a business licence, renewable annually, at the SLA should the business be licensable. The SLA would inspect the business premises to verify the address and confirm that the office space meets the necessary safety requirements for business activities. A site inspection would also be conducted by inspectors and relevant consulting agencies such as the Planning Authority, Seychelles Tourism Board, Fire Safety and Rescue Agency, and the Departments of Public Health, Environment, and Information Communication Technology, and the Landscape and Waste Management Agency to assess building standards and safety. For certain sectors, approval by the SIB must be obtained prior to applying for the business licence.
<i>Seychelles Revenue Commission ("SRC")</i>	<ul style="list-style-type: none"> All taxpayers must register with the SRC for a Tax Identification Number (TIN).

<i>Seychelles Pension Fund ("SPF")</i>	<ul style="list-style-type: none"> All new businesses must register as employers with the SPF within seven days of hiring an employee.
industry-specific licences	<ul style="list-style-type: none"> Industry-specific licences may also be required.
incentives	<ul style="list-style-type: none"> Incentives include: <ul style="list-style-type: none"> various tax concessions available to encourage investment in the tourism, fishery, agricultural and offshore sectors; concessions available to main contractors and subcontractors during the construction phase, and during major renovation or extension, of any approved tourism or hotel project of at least SCR25-million; a 15% corporate income tax rate applicable to the fish processing and aquaculture sector for a period of 10 years with effect from 1 January 2023; a special deduction calculated as the lower of 5% of the taxable business income or actual expenditure incurred for marketing and promotion; special accelerated depreciation rates applicable to capital investments for farming and fisheries; a 200% deduction for approved training expenditure incurred (150% before 1 January 2022); and a 125% deduction for salaries paid to an individual who has graduated from the Seychelles Institute of Technology, the Farmers' Training Centre, the Maritime Training Centre or the Seychelles Tourism Academy, in respect of 12 months of full-time employment and a 125% tax deduction for salaries paid to a part-time student from any of the institutions mentioned above, in respect of his/her work attachment.
exchange control regulation	<ul style="list-style-type: none"> Seychelles does not impose any foreign exchange controls on income and capital repatriations.
types of entities available for foreign investment	<ul style="list-style-type: none"> Public or joint-stock companies; limited liability company; limited partnership; proprietary company; foundation; protected cell company; and offshore company.



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private limited liability company	
minimum number of shareholders	<ul style="list-style-type: none"> A minimum of two shareholders is required and the maximum allowed is 50. There is generally no requirement for local shareholding, but it may be required depending on the objects of the company, as certain objects can only be pursued by an entity with Seychellois shareholders. The SIB and/or the SLA will specify the percentage, if any, that is allowed to be held by non-Seychellois shareholders.
minimum share capital	<ul style="list-style-type: none"> There are no minimum capital requirements in Seychelles.
directors	<ul style="list-style-type: none"> A private company must have a minimum of two directors. There is no requirement to have any resident directors.
company secretary	<ul style="list-style-type: none"> Every company must appoint a company secretary. The company secretary may be an individual, a company or body corporate, or a firm.
auditor	<ul style="list-style-type: none"> A private company must appoint an auditor who is either a member of a body of accountants (whether established, in or outside Seychelles), or is, for the time being, authorised by the Registrar of Companies to be so appointed.
registered address	<ul style="list-style-type: none"> Every company must have a registered office in Seychelles to which all communications and notices may be addressed, and which must constitute the address for service of legal proceedings on the company. A company may have its registered address at the offices of its accountants, lawyers or a third party.
shelf companies	<ul style="list-style-type: none"> Shelf companies are available for purchase in Seychelles.
registration process	<ul style="list-style-type: none"> Companies are registered at the Registration Division (Company Registry), and it takes approximately one week to complete registration once all the required documents have been submitted.
tax	
tax system	<ul style="list-style-type: none"> Seychelles has a source-based tax system, in terms of which both resident and non-resident companies are subject to tax on income earned from a source in Seychelles.
corporate residence	<ul style="list-style-type: none"> A company is resident in Seychelles if it is: <ul style="list-style-type: none"> incorporated, formed, organised, or established in Seychelles; or managed and controlled by Seychelles residents.
corporate tax rate	<ul style="list-style-type: none"> Resident companies and permanent establishments of foreign companies are subject to corporate income tax at the rate of 15% on the first SCR1-million and 25% on income above SCR1-million. Taxable petroleum income is subject to a rate of 35%.

capital gains tax ("CGT")	<ul style="list-style-type: none"> Capital gains are included in ordinary taxable income and subject to corporate income tax at the standard rate. 																				
withholding tax ("WHT") rates	<table border="1"> <thead> <tr> <th rowspan="2">payment to</th> <th colspan="2">WHT rate</th> </tr> <tr> <th>residents</th> <th>non-residents*</th> </tr> </thead> <tbody> <tr> <td>branch profits</td> <td>N/A</td> <td>N/A</td> </tr> <tr> <td>dividends</td> <td>N/A</td> <td>15%</td> </tr> <tr> <td>interest</td> <td>15% 5% (current accounts, fixed deposits, and call deposits) 0% (government bonds)</td> <td>15% 5% (current accounts, fixed deposits, call deposits, and treasury bills)</td> </tr> <tr> <td>royalties</td> <td>N/A</td> <td>15%</td> </tr> <tr> <td>management, consulting, and technical service fees</td> <td>5% on payments to specified businesses</td> <td>15%</td> </tr> </tbody> </table> <p><i>*The withholding tax rate may be reduced in terms of a relevant double tax agreement.</i></p>	payment to	WHT rate		residents	non-residents*	branch profits	N/A	N/A	dividends	N/A	15%	interest	15% 5% (current accounts, fixed deposits, and call deposits) 0% (government bonds)	15% 5% (current accounts, fixed deposits, call deposits, and treasury bills)	royalties	N/A	15%	management, consulting, and technical service fees	5% on payments to specified businesses	15%
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double tax agreements ("DTAs")	<ul style="list-style-type: none"> DTAs are in force with Bahrain, Barbados, Belgium, Bermuda, Botswana, China, Cyprus, Eswatini, Ethiopia, Guernsey, Indonesia, Isle of Man, Jersey, Kenya, Luxembourg, Malaysia, Mauritius, Monaco, Oman, Qatar, San Marino, Singapore, South Africa, Sri Lanka, Thailand, the United Arab Emirates, Vietnam, and Zambia. 																				
losses	<ul style="list-style-type: none"> Losses may be carried forward for a period not exceeding five years. Losses incurred in one business cannot be set off against profits of another business owned by the same person. 																				
transfer pricing	<ul style="list-style-type: none"> In terms of Seychelles' transfer pricing rules, transactions entered into between "associates" must be entered into on an arm's length basis. Two persons are deemed to be associates if the relationship between them is such that one may reasonably be expected to act in accordance with the intentions of the other, or both persons may reasonably be expected to act in accordance with the intentions of a third person, including: <ul style="list-style-type: none"> a member in an entity and the entity, where the member, alone or together with an associate or associates, controls directly or indirectly, 50% or more of (i) the voting power in the entity; (ii) the rights to a distribution of profits; or (iii) the rights to a return of capital; or two entities, where a person, alone or together with an associate or associates, controls directly or indirectly 50% or more of (i) the voting 																				



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	power in both entities; (ii) the rights to a distribution of profits in both entities; or (iii) the rights to a return of capital in both entities.										
limitations on interest deductibility	<ul style="list-style-type: none"> There are no thin capitalisation rules in Seychelles, but the deductibility of interest expense is restricted. Interest payable to an associated entity, is deductible only to the extent that it is included in the assessable business income of the associate or is taxable under a withholding provision of the Business Tax Act, 2009. 										
employee taxes	<p>The income tax rates applicable to resident individuals are:</p> <table border="1"> <thead> <tr> <th>chargeable income (SCR)</th> <th>tax rate</th> </tr> </thead> <tbody> <tr> <td>up to 8 555.50</td> <td>0%</td> </tr> <tr> <td>8 555.51 – 10 000</td> <td>15%</td> </tr> <tr> <td>10 001 – 83 333</td> <td>20%</td> </tr> <tr> <td>above 83 333</td> <td>30%</td> </tr> </tbody> </table>	chargeable income (SCR)	tax rate	up to 8 555.50	0%	8 555.51 – 10 000	15%	10 001 – 83 333	20%	above 83 333	30%
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social security contributions	<ul style="list-style-type: none"> Both employers and employees must make monthly social security contributions to the SPF. Both the employer and employee contribution rate is 3% of the employee's total gross salary. 										
payroll taxes	<ul style="list-style-type: none"> There is no payroll tax in Seychelles, however, a tax on non-monetary benefits is payable by the employer at the rate of 15% on the actual cost or taxable value of non-monetary benefits provided to an employee. 										
stamp duty	<ul style="list-style-type: none"> A stamp duty is levied under the Stamp Duty Act (Chapter 226 of 1975) and applies on various instruments and upon various legal acts. Stamp duty at the rate of 5% of the sale price is payable on the transfer of shares, bonds, and other securities. Stamp duty at the rate of 5% of the fair market price is levied on the transfer of immovable property by residents. A notary fee ranging between 1% and 2% of the transfer value also applies. 										
value added tax ("VAT")											
<i>taxable supplies</i>	<ul style="list-style-type: none"> VAT is levied on the supply of goods and services in Seychelles and on the importation of taxable goods and services. 										
<i>VAT rate</i>	<ul style="list-style-type: none"> 15% 										
<i>registration threshold</i>	<ul style="list-style-type: none"> Any person who has an annual turnover of at least SCR2-million must register for VAT purposes. Businesses whose turnover is below the registration threshold may apply for voluntary registration, provided any other registration requirements are met. 										

<i>reverse VAT on imported services</i>	<ul style="list-style-type: none"> To the extent that imported services will be used or consumed in Seychelles other than for making taxable supplies, the recipient of such services is required to declare and pay output VAT on the services in terms of a reverse-charge mechanism.
trade marks	
international conventions, treaties, and arrangements	<ul style="list-style-type: none"> Paris Union World Intellectual Property Organization World Trade Organization / Trade-Related Aspects of Intellectual Property Rights (TRIPS)
classification	<ul style="list-style-type: none"> The International Classification of Goods and Services (Nice Classification) applies. A separate application is required for each class of goods and/or services.
categories of trade marks	<ul style="list-style-type: none"> Provision is made for: <ul style="list-style-type: none"> ordinary trade marks (goods and service trade marks); certification trade marks; defensive trade marks; and series trade marks.
filing requirements	<ul style="list-style-type: none"> Full particulars of the applicant; Power of Attorney (notarised); electronic copy of the trade mark; and certified copy of priority document (if applicable), with a verified English translation.
procedure	<ul style="list-style-type: none"> Applications are examined as to formal requirements as well as conflict with prior applications or registrations. Once accepted, applications are advertised.
oppositions and non-use cancellations	<ul style="list-style-type: none"> Oppositions may be lodged within two months following the date of advertisement of the trade mark application. A registered trade mark may be cancelled on action by an interested party if it has not been used for a continuous period of three years after the date of registration.
duration and renewal	<ul style="list-style-type: none"> A trade mark registration is effective for an initial period of 10 years from filing date, thereafter, renewable for further periods of seven years.



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Celia Becker

Executive | Africa regulatory and business intelligence

cbecker@ENSafrica.com

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LAST UPDATED DECEMBER 2023