

3 November 2025

Joint MFSA and MTCA Communication on the Senior Employees of Family Offices, Back Offices and Treasury Management Operations Tax Rules, 2025

Reference is made to the Senior Employees of Family Offices, Back Offices and Treasury Management Operations Tax Rules, 2025 (the “Rules”), published in the Government Gazette by way of [Legal Notice 250 of 2025](#). This communication seeks to provide a high-level synopsis of the Rules. Stakeholders are encouraged to refer to the relevant subsidiary legislation, as well as the related [guidelines](#) issued by the Malta Tax and Customs Administration (the “MTCA”).

Scope and Application

The Rules introduce a reduced rate of tax of fifteen percent (15%) for certain senior employees holding eligible offices in Malta, subject to *inter alia* the specific conditions set out in Rule 4 and the limit prescribed in Rule 9.

The Rules are deemed to have come into force on the 1st of January 2025 and shall apply with effect from the year of assessment 2026. The Malta Financial Services Authority (the “MFSA”) has been appointed as the competent authority to which applications for eligibility should be submitted.

Qualifying Contracts of Employment and Eligible Offices

To qualify, income from an eligible office must be subject to tax under Article 4(1)(b) of the Income Tax Act (Cap. 123 of the laws of Malta) and shall consist of emoluments of a minimum of €65,000. This minimum amount will be adjusted by an increase of €10,000 every five years, starting from the year subsequent to the Rules' commencement.

A contract of employment qualifies for benefits in terms of the Rules if the employment is deemed an eligible office as listed in Part I of the Schedule to the Rules. Eligible offices must be held with specific undertakings as identified in Part II of the Schedule to the Rules, including those related to Single Family Offices, Multi Family Offices, and undertakings carrying on Back Office or Treasury Management operations for such offices, provided they are confirmed as such by the MFSA.

Duration for the Applicability of Benefits

The benefits apply for an initial period of five years, which may be extended by two further extensions of five years each, subject to continued adherence to the Rules.

Contact

Queries in relation to the Rules may be directed to servizz@gov.mt.