



**BUREAU  
VERITAS**

# CORPORATE TAXATION IN MOZAMBIQUE

CORPORATE TAXATION IN  
MOZAMBIQUE: KEY ISSUES TO  
CONSIDER ON DOUBLE TAXATION  
TREATIES & WHT ISSUES

2022



**BUREAU VERITAS**  
**AT A GLANCE**



# A BUSINESS TO BUSINESS TO SOCIETY COMPANY

Our employees serve our clients and are inspired by society; they make Bureau Veritas a *B2B - Business to Business to Society* service company that contributes to **positively transforming the world we live in.**

Thanks to our unrivalled expertise, technical knowledge and worldwide presence, we support our clients by managing **quality, safety, health and sustainability risks**, to the benefit of society as a whole.

Our mission: **Shaping a World of Trust** by ensuring **responsible progress.**

# KEY FIGURES

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**€5.0**

**billion**

revenue in 2021

**80,000**

employees



**400,000**

clients

More than  
**1,600**

offices & laboratories  
in 140 countries



# REVENUE AND PEOPLE BREAKDOWN BY GEOGRAPHY





# ACTIVITIES & ORGANIZATION

# BUREAU VERITAS IN MOÇAMBIQUE



## Compliance

ISO 9001:2015,  
ISO 14001:2015  
ISO 45001:2018  
ISO 17021:2015



+ 350

Skilled Employees



Accredited Inspectors  
by LEEA  
NDT LII Inspectors  
IRCA Certified Auditors  
Certified Trainers



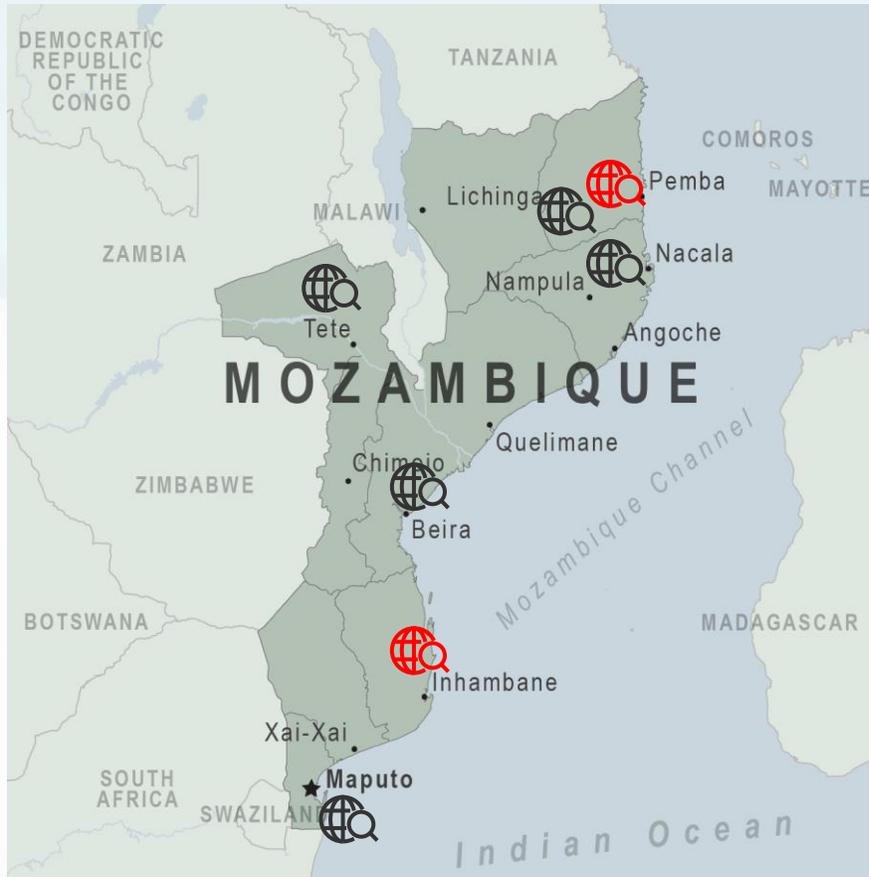
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Laboratories for the  
analysis of Water, Oil,  
Diesel, Graphite and Coal  
  
Accreditation 17025 for  
Water and Coal

# OUR PRESENCE THROUGHOUT THE COUNTRY

## MOZAMBIQUE

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# SOME REFERENCES





**BV in Moz**

**DTT AND WITHHOLDING TAX: OUR  
EXPERIENCE**



# DTT EXEMPTION APPLICATION

## PROCESS OVERVIEW

Fairly easy process...

### | 1. CONTRACT



Contract should be translated to Portuguese and notarized.

### | 2. M3 FORMS



Obtained at the Moz tax authorities and completed. Send to supplier for signature by their tax authorities

### | 3. T.R.F



Supplier to submit Tax Residence Certificate (issued by the foreign tax authorities)

### | SUBMIT TO TAX | AUTHORITY



Submit signed contract, M3 forms and TRF to Moz tax authority

# PLANNING REQUIRED

WAY AROUND

## FORWARD PLANNING

**ANTICIPATE THE PROCESS, ENGAGE THE SUPPLIER FOR EXTENDED TERMS, GET A TAX ADVISOR ON BOARD**

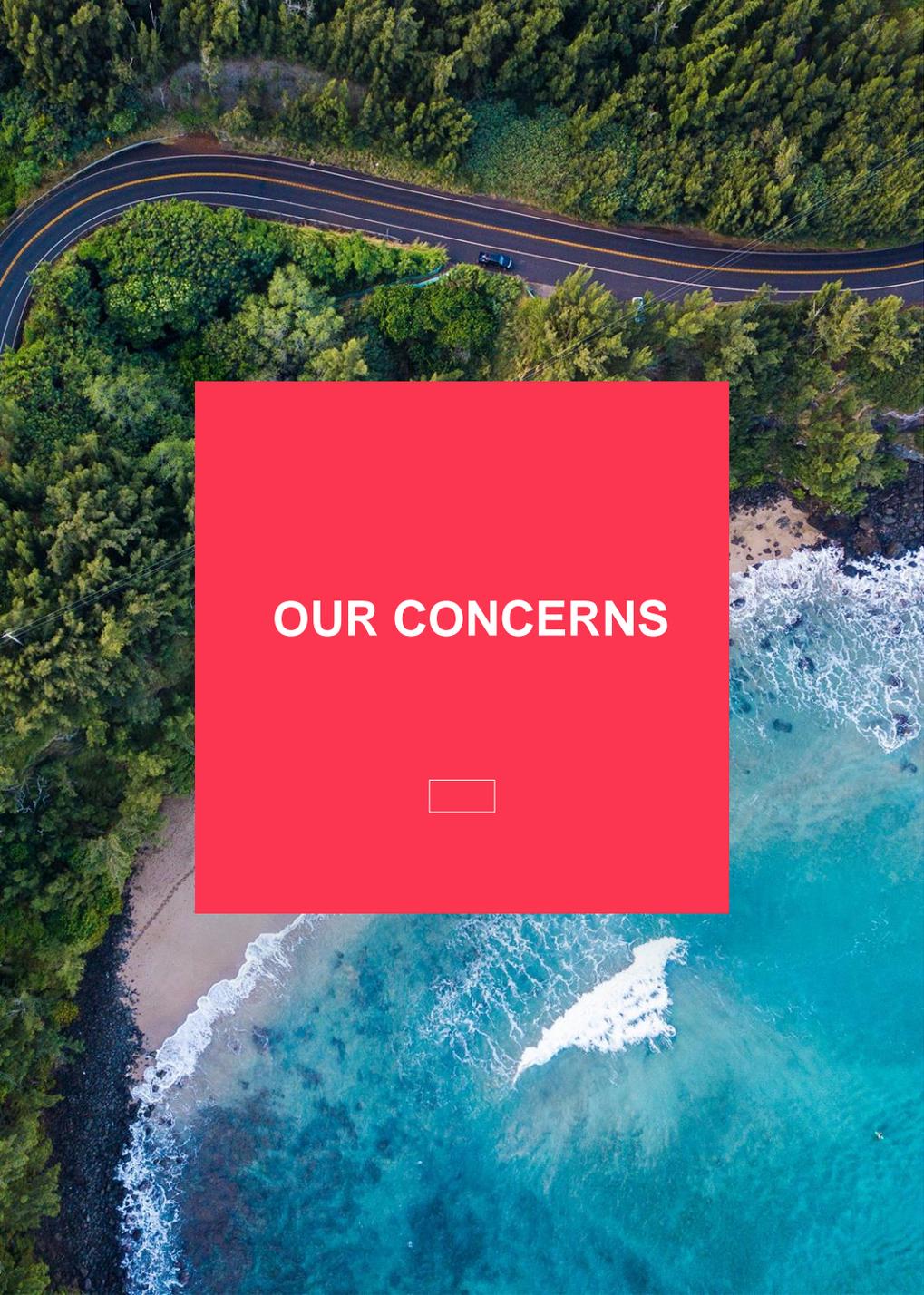
CONSULT

## ENGAGE THE MOZ TAX AUTHORITY EARLY

**DISCUSS THE TRANSACTION WITH THEM BEFORE SUBMISSION OF DOCUMENTS**



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## OUR CONCERNS

### FIRST POINT

#### Only a handful DTTs currently

- | There are currently 9 DTTs in place. There is no DTT with France where our parent company is resident.

### SECOND POINT

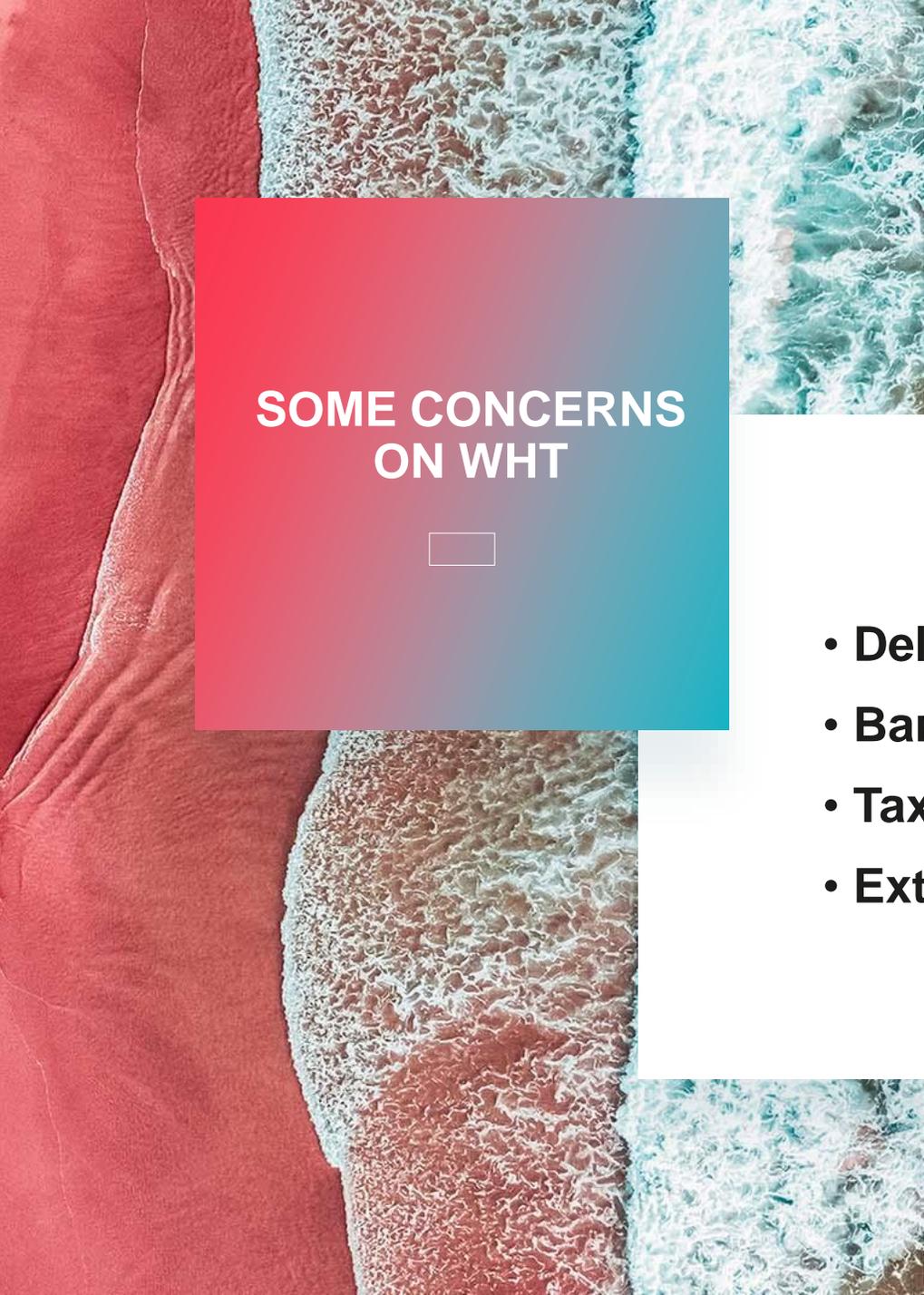
#### Suppliers unwilling to extend payment terms

- | The process takes long and there is no specific turn around times with foreign tax authorities and also with the local tax authorities. Payment may extend beyond 120 days...

### THIRD POINT

#### Extra cost if unsuccessful

- | There is no guarantee for success. Should the application fail, the supplier is likely not going to accept reduced payment.



## SOME CONCERNS ON WHT



- **Delays at the Tax Authorities to issue WHT certificates**
- **Banks suspending foreign payments**
- **Tax certificates not accepted in some jurisdictions**
- **Extra costs to translate the certificates**



# CONTACT



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