



TAX NEWSLETTER

April 2024

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INTRODUTORY NOTE

The purpose of this Tax Newsletter is to draw attention to the relevant aspects of tax /parafiscal obligations of a periodic nature, as well as to highlight those in spite of not being of this nature should be complied during or from this month.

In particular, this month we highlight the new regulation of the Private Investment Law, approved on March 7 by the Council of Ministers.

However, it should be noted that this publication is not exhaustive and does not waive the consultation of the applicable legislation and is intended exclusively to be distributed to Mazars customers and partners.

Good reading!

(Joel Almeida)

APRIL TAX CALENDAR

Deadline	Obligation
Until 5 th	Presentation of the information on the production and sales of minerals - no. 7, art. 4 of the Law of Decree no. 28/2015 of 28 th December.
Until 10 th	Delivery, in the Directorate of Tax Areas, of the revenues collected by the Public Services in the previous month.
	Payment of contributions to the National Institute of Social Security (INSS) of the previous month-paragraph. 3, art. 13 of Decree no. 53/2007 of 3 rd December.
	Settlement of the production tax (Mining Production Tax) – paragraph 1, article 7 of the Law of Decree No. 28/2015 of 28 th December.
Until 15 th	Settlement of the tax on Petroleum Production – paragraph 1, Article 9 of Decree no. 32/2015 of 31 st December.
	Delivery of VAT returns (normal regime) with Recoverable Tax - line a), paragraph 1, art. 32 of CIVA-Law no. 13/2016, of 30 th December.
Until 20 th	Payment of PIT (IRPS) and CIT (IRPC) withheld at source in the previous month- paragraph 3 of article 25 of PIT Code Regulation, approved by Decree no. 8/2008, amended and republished by Decree no. 51/2018, of 31 August, of 16 th April and paragraph 5 of article 67 Of the CIT code, approved by Law no. 34/2007, of 31 st December.
	Payment of the stamp tax settled in respect of the preceding month-Art. 17 of Decree 6/2004 of 1 April
	Payment of the Petroleum Production Tax for the previous month, paragraph 2 of article 11 of the Regulation Specific Regime of Petroleum Taxation, approved by decree 32/2015 of December 31.
	Payment of Mining Tax for the previous month, paragraph 2 of article 9 of the Regulation of the Specific Regime of Mining Activity, approved by Decree 28/2015 of 28 December.
Until the last day of the month	Payment of VAT in respect of the previous month by the taxable persons of the normal regime - line b), paragraph. 1, article 32 of the VAT Code, and the previous quarter for those in the simplified tax regime - article 49 of the VAT Code, approved by Law no. 13/2016, of 30 th December.
	Payment of the ISPC for the previous quarter, paragraph 1, article 15 of the ISPC Regulation, approved by Decree No. 14/2009, of 14 April.
	Delivery of the annual income tax return for the previous financial year by PIT taxpayers who have earned income beyond the 1st Category – no. 1, Article 10 of the PIT Code Regulation approved by Decree no. 8/2008, of 16 April, amended and republished by Decree no. 51/2018, of 31 August - Model 10 and Annexes.
During the month and until 31 May	Final payment of IRPS for the previous year's income - a), Art. 24 of the CIRPS regulation approved by Decree no. 8/2008, of 16 April
During the month and until the last working day of May	Delivery of the annual tax return for the previous financial year by CIT taxpayers - no. 1, art. 39 of the CIRPC Regulation approved by Decree no. 9/2008, of April 16 - Model 22 / 22A.
	Final payment of IRPC and IRPS (excluding individuals who have only received income from the 1st category) relating to income from the previous year - Alinea b) n° 1 art.27 of the CIRPC Regulation approved by Decree no. 9/2008, of 16 April and al. b), art.24 of the CIRPS approved by Decree no. 8/2009, of 16 April
During the month until the last working day of June	Delivery of the Annual Return of Accounting and Tax Information for the previous financial year by IRPS taxpayers - 2nd category and IRPC taxpayers - M 20 and Annexes - no. 3 art. 40 of the CIRPC Regulation, approved by Decree 9/2008 of April 16 and art. 35 of the RCIRPS approved by Decree no. 8/2009 of April 16.

The new Regulation of the Private Investment Law

Contextualization

On March 7th, the Council of Ministers approved the new regulation of the Private Investment Law, through Decree No. 8/2024.

The new regulation complements the legal framework for private investment in Mozambique, recently approved by Law 8/2023, of 9 June. It thus arises as a response to the recently announced Package of Economic Acceleration Measures – PAE. Which, among several objectives, aims to establish tax incentives for new investments in key sectors and the simplification of procedures for the repatriation of capital.

Main Incidents

a) Introduction of Investment Regimes.

The new regulation defines the establishment of two regimes for classifying private investment, namely:

- **Mere Registration Regime:** applies to projects with a Minimum value of national and/or foreign direct investment not exceeding up to 32,000,000,000.00 MT (thirty-two billion meticaís). The following bodies are responsible for deciding on requests approval of investment projects according to their value:
 - ❖ Governor of the Province ≤ 3,500,000,000.00 MT.
 - ❖ General Director of APIEX ≤ 6,500,000,000.00 MT.
 - ❖ Minister who oversees the area of Finance ≤ 32,000,000,000.00 MT
- **Authorization Regime:** Applies to national and/or foreign direct investment projects with a value exceeding 32,000,000,000.00 MT (thirty-two billion meticaís) and is the

responsibility of the Council of Ministers or the Minister who oversees the area of Finance;

b) Reduction of the minimum amount of foreign direct investment

The previous minimum investment value was reduced from 7,500,000.00 MT to 6,500,000.00 MT (six million and five hundred thousand meticaís) for the purposes of transferring profits abroad and invested and re-exportable capital;

c) Reduction of the deadlines for Analysis and decision of Investment Projects

The new decree establishes a period of five days compared to the previous 12 days for the notification of the decision on the investment, dispensing with inter-institutional coordination in investment projects whose activity does not have foreseeable economic, environmental, safety or public health implications, as well as investment projects eligible for the benefit of tax incentives under a special regime. It also reduces the interinstitutional period from 7 to 5 days.

d) Acceptance of external debt in foreign direct investment.

It is now possible to convert the external debt into financial resources for investment projects with the approval of the Bank of Mozambique.

e) Strengthening the obligation to provide information.

Investors now have the duty to submit to APIEX every six months, by means of their own model, information on the stage of implementation of the activities foreseen within the scope of the Project.

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