

VALUE ADDED TAX CODE

Law No. 32/2007 of 31 December

Amended by Laws No. 3/2012 of 23 January, 13/2016 of 30
December, 16/2020 of 23 December, 22/2022 of 28 December
and 10/2025 of 29 December

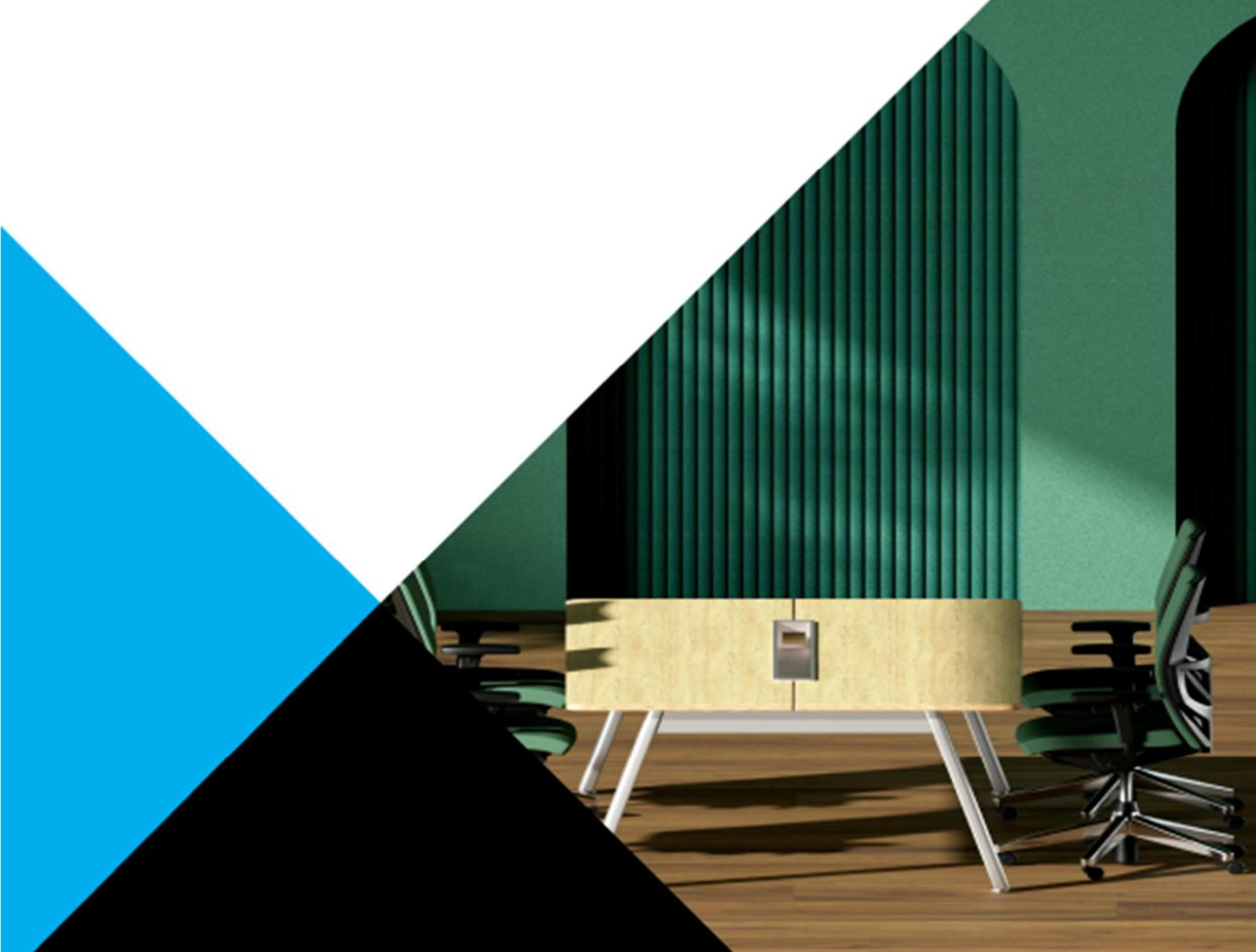


TABLE OF CONTENTS

PREAMBLE	1
CHAPTER I – INCIDENCE.....	3
ARTICLE 1 – (Scope).....	3
ARTICLE 2 – (Subjective incidence).....	3
ARTICLE 3 – (Transfer of assets).....	4
ARTICLE 4 – (Provision of services).....	7
ARTICLE 5 – (Importation).....	7
ARTICLE 6 – (Location of operations).....	8
ARTICLE 7 – (Chargeable event).....	10
ARTICLE 8 – (Enforceability).....	11
CHAPTER II – EXEMPTIONS	13
SECTION I – EXEMPTION IN DOMESTIC TRANSACTIONS	13
ARTICLE 9 – (Exempt transfers of goods and provision of services).....	13
ARTICLE 10 – (Public entities and non-profit organizations).....	18
ARTICLE 11 – (Waiver of exemption).....	18
SECTION II – EXEMPTIONS ON IMPORTS.....	19
ARTICLE 12 – (Exempt imports).....	19
SECTION III – EXEMPTIONS ON EXPORTS, SIMILAR OPERATIONS AND INTERNATIONAL TRANSPORT	21
ARTICLE 13 – (Exports, assimilated operations and exempt international transport).....	21
SECTION IV – OTHER EXEMPTIONS.....	23
ARTICLE 14 – (Customs and tax regimes and others).....	23
CHAPTER III – TAXABLE AMOUNT.....	25
SECTION I – TAXABLE AMOUNT IN DOMESTIC OPERATIONS.....	25
ARTICLE 15 – (Tax Base in Domestic Operations).....	25
SECTION II – TAXABLE AMOUNT ON IMPORTATION.....	28
ARTICLE 16 – (Import Tax Base).....	28
CHAPTER IV – FEES	29
ARTICLE 17 – (Tax Rate).....	29

TABLE OF CONTENTS

ARTICLE 17-A – (Transfers of goods and services subject to the reduced rate of 5%).....	29
CHAPTER V – ASSESSMENT AND PAYMENT OF THE TAX.....	30
SECTION I – RIGHT TO DEDUCT.....	30
ARTICLE 18 – (Deductible tax).....	30
ARTICLE 19 – (Conditions for the exercise of the right to deduction)	31
2. There is, however, no right to deduct the tax relating to transactions giving rise to the payments referred to in paragraph c) of paragraph 6 of article 15 and to the supply of goods and services provided for in article 17-A.....	31
ARTICLE 20 – (Exclusions from the right to deduct).....	31
ARTICLE 21 – (Birth and exercise of the right to deduction).....	33
ARTICLE 22 – (Partial deduction).....	35
SECTION II – PAYMENT OF TAX.....	36
ARTICLE 23 – (Payment of Tax Assessed by the taxpayer)	36
ARTICLE 24 – (Payment of the Tax paid on the initiative of the services)	37
SECTION III – OTHER OBLIGATIONS OF TAXABLE PERSONS	37
ARTICLE 25 – (Scope of obligations)	37
Article 25-A (Entities with more than one establishment).....	38
ARTICLE 26 – (Non-resident taxable persons).....	38
ARTICLE 27 – (Issuance of invoices or equivalent documents).....	39
ARTICLE 28 – (Repercussion of the tax).....	40
ARTICLE 29 – (Goods sent to consignment).....	41
ARTICLE 30 – (Invoicing with Tax included)	41
ARTICLE 31 – (Exemption from invoicing).....	41
ARTICLE 32 – (Periodic Declaration).....	42
ARTICLE 33 – (Declaration of isolated operations).....	42
ARTICLE 34 – (Calculation of the tax included in the price).....	43
SECTION IV – SPECIAL REGIMES.....	43
SUBSECTION I – Exemption regime.....	43
Revoked.....	43

TABLE OF CONTENTS

<i>SUBSECTION II – Simplified taxation regime</i>	45
SECTION V – COMMON PROVISIONS	47
<i>ARTICLE 51 – (Tax rectifications)</i>	47
<i>ARTICLE 52 – (Responsibility of the purchaser)</i>	48
<i>Article 53 (Transitional provisions)</i>	49
ANNEX I OF PARAGRAPH H) OF PARAGRAPH 12 OF ARTICLE 9 OF THE VAT CODE LIST OF GOODS EXEMPT FROM VAT	50
ANNEX II OF PARAGRAPH E) OF PARAGRAPH 13 OF ARTICLE 9 OF THE VAT CODE LIST OF GOODS EXEMPT FROM VAT	60
ANNEX III OF PARAGRAPH G) OF PARAGRAPH 1 OF ARTICLE 9 OF THE VAT CODE LIST OF GOODS EXEMPT FROM VAT	62
ANNEX IV OF PARAGRAPH 16 OF ARTICLE 9 OF THE VAT CODE - LIST OF GOODS EXEMPT FROM VAT	70
WHY MOORE?	72
MOORE NO MUNDO	72
MOORE MOÇAMBIQUE	74
OUR SERVICES.....	74
<i>Expert Consulting Services</i>	74
<i>Auditing</i>	74
<i>Accounting Services</i>	75
<i>Taxation</i>	75

PREAMBLE

If there is a need to amend the Value Added Tax (VAT) Code, approved by Law No. 32/2007, of 31 December, amended by Law No. 3/2012, of 23 January, amended and republished by Law No. 13/2016, of 30 December, and by Law No. 22/2022, of 28 December and by Law No. 3/2025, of 21 May, under the provisions of paragraph 2 of article 127, in conjunction with paragraph 1 and paragraph o) of paragraph 2 of article 178, both of the Constitution of the Republic, the Assembly of the Republic determines:

Article 1. Articles 3, 6, 12, 18, 19, 21, 23, 25, 26, 27, 31, 32, 33 and 34 of the Value Added Tax (VAT) Code, approved by Law No. 32/2007, of 31 December, amended by Law No. 3/2012, of 23 January, amended and republished by Law No. 13/2016, of 30 December, are hereby amended. by Law No. 22/2022, of 28 December and by Law No. 3/2025, of 21 May, which are now worded as follows:

Article 2. Articles 25-A and 53 of the Value Added Tax (VAT) Code, approved by Law No. 32/2007 of 31 December, amended by Law No. 3/2012 of 23 January, amended and republished by Law No. 13/2016 of 30 December, and by Law No. 22/2022 of 28 December and by Law No. 3/2025, are added. of 21 May, which is worded as follows:

Article 3. Article 21(8) and Subsections I and II of Section IV of the Value Added Tax (VAT) Code, approved by Law No. 32/2007 of 31 December, as amended by Law No. 3/2012 of 23 January, as amended and republished by Law No. 13/2016 of 30 December and by Law No. 22/2022, are hereby repealed. of 28 December and by Law no. 3/2025, of 21 May.

Article 4. It is incumbent upon the Government to regulate this Law within 180 days from the date of its publication.

Article 5. This Law enters into force on 1 January 2026.

Approved by the Assembly of the Republic, on 12 December

of 2025. — The President of the Assembly of the Republic, Margarida Adamugi Talapa.

Promulgated on December 29, 2025. Publish yourself.

The President of the Republic, Daniel Francisco Chapo.¹

¹ Text given by article 1 of Law no. 10/2025 of 29 December. Previous wording: If there is a need to amend the Value Added Tax Code, approved by Law No. 32/2007, of 31 December, amended and republished by Law No. 13/2016, of 30 December, and amended by Law No. 16/2020, of 23 December, the Assembly of the

Republic, under the provisions of paragraph 2 of article 127 and paragraph o), of paragraph 2 of article 178, both of the Constitution of the Republic, the Assembly of the Republic determines:

Article 1. Articles 9, 10, 12, 15, 17, 20 and 21 of the Value Added Tax Code, approved by Law No. 32/2007, of 31 December, amended and republished by Law No. 13/2016, of 30 December, and amended by Law No. 16/2020, of 23 December, are hereby amended to read as follows:

Article 2. The following Article 17a is added:

Article 3. Annex I referred to in paragraph 12(h) and Annex III referred to in paragraph 1(g), all of Article 9, which are an integral part of this Code, are hereby amended.

Annex IV referred to in Article 9(16), which is an integral part of this Code, is added.

Article 4. Credits created before the entry into force of this Code shall remain valid.

The period referred to in paragraph 8 of article 21 of this Code counts from the entry into force of this Law.

Article 5. It is incumbent upon the Government to regulate this Law, within 90 days from the date of its publication.

Article 6. This Law enters into force on January 1, 2023.

Approved by the Assembly of the Republic, on December 7, 2022. — The President of the Assembly of the Republic, Esperança Laurinda Francisco Nhiumane Bias.

Promulgated on December 22, 2022.

Public.

The President of the Republic, FILIPE JACINTO NYUSI.

CHAPTER I – INCIDENCE

ARTICLE 1 – (Scope)

1. The following are subject to value added tax, VAT:

- (a) supplies of goods or services effected for consideration within the national territory, in accordance with Article 6, by taxable persons acting as such;
- b) imports of goods.

2. The Mozambican territory covers the entire land surface, maritime zone and airspace delimited by borders, including the areas where, in accordance with Mozambican law and international law, the Republic of Mozambique has sovereign rights in relation to the prospection, research and exploitation of natural resources, the seabed, its subsoil and the overlying waters.

ARTICLE 2 – (Subjective incidence)

1. The following are taxable persons:

- a) Natural or legal persons resident or with a permanent establishment or representation in national territory who, independently and on a regular basis, carry out, with or without profit, activities of production, trade or provision of services, including extractive, agricultural, forestry, livestock and fishing activities;
- b) natural or legal persons who, not carrying out an activity, also carry out, independently, any taxable transaction provided that it fulfils the conditions for the real incidence of Personal Income Tax or Corporate Income Tax;
- c) non-resident natural or legal persons without a permanent establishment or representation who, even independently, carry out any taxable transaction, provided that such transaction is connected with the exercise of their business activities wherever it occurs or when, regardless of this connection, such transaction fulfils the conditions for the real incidence of Personal Income Tax and Corporate Income Tax;
- (d) natural or legal persons who, in accordance with customs legislation, import goods;
- e) natural or legal persons, who unduly mention value added tax on an invoice or equivalent document.

2. The natural or legal persons referred to in subparagraphs a) and b) of the preceding paragraph shall also be taxable persons for the acquisition of the services referred to in paragraph 7 of article 6, under the conditions set out therein.

3. The State and other legal persons governed by public law are not taxable persons when:

(a) carry out transactions within the scope of their powers of authority, even if there is a direct consideration;

(b) carry out operations in favour of the population without any direct compensation.

4. The State and the other legal persons governed by public law referred to in the preceding paragraph are, in any event, taxable persons when they carry out some of the following activities and for the taxable transactions arising therefrom, unless it is found that they carry them out in a non-significant manner:

a) telecommunications;

b) distribution of water, gas and electricity;

(c) transport of bens;

d) transportation of people;

e) transfer of new goods whose production is intended for sale;

f) operations of agricultural, forestry, livestock and fishing organizations;

g) canteens;

h) radio and radio-television broadcasting;

(i) provision of port and airport services;

j) Operation of fairs and exhibitions of a commercial nature;

k) storage.

5. The provisions of paragraph 4 of this Article shall be regulated by the Council of Ministers.

ARTICLE 3 – (Transfer of assets)

1. In general, the transfer of assets is considered to be the onerous transfer of tangible assets in a manner corresponding to the exercise of the right of ownership.

2. For the purposes of paragraph 1 of this Article, electricity, gas, heat, cold and the like **and digital goods**² shall be considered tangible property.

² Text added by article 1 of Law no. 10/2025 of 29 December.

3. The following shall also be considered as transmissions, under the terms of paragraph 1 of this article:

a) the material delivery of goods in execution of a lease agreement, with a clause, binding on both Parties, for the transfer of ownership;

(b) the physical supply of movable property resulting from the performance of a contract of sale, in which the retention of title is provided for until the time of full and partial payment of the price;

(c) transfers of goods between principal and commissioner carried out in performance of a commission contract defined in the Commercial Code, including transfers between consignee and consignee of goods sent to consignment. In the sales commission, the commissioner is considered to be the buyer; in the purchase commission, the buyer is considered the principal;

d) the non-return, within 180 days from the date of delivery to the consignee, of the goods sent on consignment;

e) the permanent use of the company's assets for the own use of its owner, of the staff or, in general, for purposes other than it, as well as their free transfer, when, in relation to these assets or the elements that constitute them, there has been a total or partial deduction of the tax. Samples and gifts of small value, the limits of which are subject to regulation, are excluded from the regime established in this paragraph;

f) the allocation of goods by a taxable person to an exempt sector of activity, as well as the allocation to fixed assets of goods referred to in paragraph 1 a) of article 20, when in relation to these goods or the elements that constitute them, there has been a total or partial deduction of the tax;

g) The transfer of second-hand goods by taxable dealers and by sales organisers on an auction basis, including works of art, collector's items and antiques, as defined in paragraph 6 of this article, is subject to special regulations.

4. Unless proven otherwise, goods acquired, imported or produced which are not present in the taxable person's establishments and those which have been consumed in quantities which, having regard to the volume of production, must be regarded as excessive shall be deemed to have been transferred by the taxable person. Goods that are in any of the aforementioned places are also considered to have been acquired by the taxable person.

5. Although they are regarded as transfers of goods, tax is neither payable nor payable on transfers for consideration or free of charge of a business establishment,

of all or part of an estate which is capable of constituting an independent branch of activity, where, in any case, the purchaser is, or will be, by the fact of acquisition, a taxable person among those referred to in Article 2(1)(a) who carries out only transactions in respect of which the right to deduct is carried out.

6. For the purposes of paragraph 3(g), the following definitions shall apply:

a) second-hand goods – used movable property, capable of reuse in the state in which it is or after repair, but not renewed or transformed and, always excluding precious stones and precious metals, coins or articles of such materials not being understood as such;

b) Objects of art – are goods authored by the artists themselves, such as original paintings, paintings and drawings, with the exception of industrial drawings, engravings, prints and lithographs with a limited circulation of 200 copies, as well as other objects of art in the field of sculpture and statuary, with the exception of jewellery and unique ceramic specimens executed and signed by the artist;

c) collector's items – postage stamps, tax stamps, postmarks, first-day envelopes, postal pads and the like, obliterated or not, but which are not in circulation or intended to be put into circulation, collections and specimens for collections of botanical zoology, mineralogy or anatomy or which are of historical, archaeological, paleontological-ethnographic or numismatic interest;

d) antiques – goods, excluding works of art and collectors' items, that are more than one hundred years old;

e) taxable dealer – the taxable person who, in the course of his activity, buys second-hand goods for resale;

f) Auction sales organiser – a taxable person who, in the course of his activity, offers the sale of an asset, in his own name, but on behalf of a principal, under the terms of a sales commission contract, with a view to its award by auction;

(g) Auction Organiser's Principal – any person who delivers a good to an auction organiser under a sales commission contract with a view to its auction award;

h) Renovated goods – those in which the value of the materials used in the respective repair is higher than the value of the acquisition of the good, plus the value of the labor used;

i) Transformed goods – those that are subject to a repair that leads to the modification of any of their essential characteristics.

7. For the purposes of paragraph 2 of this Article, digital assets shall mean intangible

assets represented, stored or transmitted in electronic form, which have economic value, and which can be appropriated, titled, controlled, transferred or licensed by digital means. This category includes, among others, software, digital content, digital data for economic purposes, cryptocurrencies, e-books, social media profiles and other virtual assets, as well as functionally comparable accounts, accesses and digital identifiers.³

ARTICLE 4 – (Provision of services)

1. A supply of services shall mean any transaction effected for consideration which does not constitute the transfer or importation of goods within the meaning of Articles 3 and 5 respectively.
2. The following shall also be considered to be supplies of services for consideration:
 - (a) the provision of services free of charge by the undertaking itself for the particular needs of the proprietor, the person or, in general, for purposes unrelated to him;
 - b) the use of the company's assets for the own use of its owner, of the staff or, in general, for purposes unrelated to it and also in exempt sectors of activities when, in relation to these assets or the elements that constitute them, there has been a total or partial deduction of the tax.
3. Where the provision of services is carried out by the intervention of an agent acting in his own name, the latter shall successively be the purchaser and provider of the service.
4. The provisions of paragraph 5 of article 3 shall apply, under the same conditions, to the supply of services.
5. Transactions carried out by travel agents and tour operators, the application of which is subject to special regulations, shall also be considered to be the supply of services.

ARTICLE 5 – (Importation)

1. Imports of goods are considered to be their entry into the national territory.
2. In the case of goods that are placed in one of the situations provided for in paragraph 1 of article 14, their effective entry into the national territory for the purposes of their classification as importation is only considered to have occurred if and when they are released for consumption.

³ Text added by article 1 of Law no. 10/2025 of 29 December.

ARTICLE 6 – (Location of operations)

1. Supplies of goods which are situated in the national territory at the time when transport or dispatch to the purchaser begins or, in the absence of dispatch or transport, at the time when they are made available to the purchaser shall be taxable.

2. Notwithstanding the provisions of the preceding paragraph, the transfer made by the importer and any subsequent transfers of goods transported or dispatched from abroad shall also be taxable, where such transfers take place before importation.

3. Without prejudice to the provisions of the following paragraphs, the supply of services whose supplier, has its registered office, permanent establishment or domicile from which the services are supplied in the national territory shall be taxable.

4. The provisions of the preceding paragraph shall not apply to the following operations:

(a) the supply of services relating to a property situated outside the national territory, including those for the purpose of preparing or coordinating the execution of real estate works and the provision of real estate agent experts;

b) work carried out on movable tangible property and related expert opinions, carried out wholly or essentially outside the national territory;

c) Provision of services of an artistic, scientific, sports, recreational, educational and similar nature, including those of the organisers of these activities and the provision of services that are ancillary to them, which take place outside the national territory;

d) transportation, for the distance traveled outside the national territory.

5. The following shall always be taxable, even if the provider does not have its registered office, permanent establishment or domicile in the national territory:

(a) the supply of services relating to immovable property situated in the national territory, including those for the purpose of preparing or coordinating the execution of immovable property works and the services of real estate experts and agents;

b) work carried out on movable tangible property and related expert opinions, carried out wholly or essentially in the national territory;

c) Provision of services of an artistic, scientific, sports, recreational, educational and similar nature, including those of the organisers of these activities and the provision of services that are ancillary to them, which take place in the national territory;

d) transportation, for the distance traveled in the national territory.

6. For the purposes of paragraphs 4 and 5(d), the distance travelled in the national territory shall be considered to be the distance taken outside the national territory, in cases where the places of departure and arrival are located there. For this purpose, a return transport is considered to be two transports, one for the outward journey and the other for the return journey.

7 The following transfers of digital goods and services⁴ are also taxable, the transferor and the⁵ supplier of which do not have a registered office, permanent establishment or domicile in the national territory from which the goods are transferred⁶ and the services are provided:

(a) assignment or authorisation to use copyrights, licences, trade marks and other similar rights;

b) advertising services;

c) telecommunications services;

d) services of consultants, engineers, lawyers, economists and accountants, study offices in all fields, including those of organization, research and development;

e) data processing and provision of information;

f) banking, financial and insurance and reinsurance operations;

g) making personnel available;

(h) the services of intermediaries who intervene in the name and on behalf of others in the supply of the services listed in the subparagraphs of this paragraph;

(i) an obligation not to exceed, even partially, a trade or profession or a right referred to in the subparagraphs of this paragraph;

j) leasing of movable tangible property, as well as the financial leasing of the same assets.

k) Digital goods and services:⁷

(i) provision of computer sites, website domiciliation, remote maintenance of

⁴ Text added by article 1 of Law no. 10/2025 of 29 December

⁵ Text added by article 1 of Law no. 10/2025 of 29 December.

⁶ Text added by article 1 of Law no. 10/2025 of 29 December.

⁷ Text amended by article 1 of Law no. 10/2025 of 29 December. Previous wording: " (...) (k) services performed electronically.

programs and equipment;

(ii) provision of programs and their updating;

(iii) provision of images, texts and information and availability of databases;

(iv) the supply of music, films and games, including games of chance and gambling, and political, cultural, artistic, sports, scientific or leisure broadcasts or demonstrations;

(v) provision of distance learning services.

(vi) other similar **goods**⁸ and services.

8. **The transfers of digital goods**⁹ and the provision of services referred to in the previous paragraph are not taxable even if the provider has its registered office, permanent establishment or domicile in the national territory whenever the acquirer is a person established or domiciled abroad.

9. **For the purposes of paragraph 7(k) of this Article, digital services shall be deemed to be: services of an intangible nature performed by electronic means, provided by means of software, platforms, networks, algorithms or digital infrastructures, which enable the user to access, generate, process, store, communicate or enjoy information, as well as to carry out operations or transactions at a distance, regardless of the location of the parties. They cover services that are automated or provided with or without minimal human intervention, including access to platforms, SaaS applications, cloud computing services, media and streaming services, digital financial services, digital intermediation, and any comparable electronic functionalities made available remotely.**¹⁰

ARTICLE 7 – (Chargeable event)

1. Without prejudice to the provisions of the following paragraphs, the tax shall be due and shall become chargeable:

a) in the transfer of goods, at the time when the goods are made available to the purchaser;

b) in the supply of services, at the time of their performance or at the time when, prior to the same, the price is charged or debited in whole or in part, in which case

⁸ Text added by article 1 of Law no. 10/2025 of 29 December.

⁹ Text added by article 1 of Law no. 10/2025 of 29 December.

¹⁰ Text added by article 1 of Law no. 10/2025 of 29 December.

they are considered to be carried out for the respective amount;

c) in imports, at the time when customs clearance occurs, or the auction or sale takes place.

2. If the supply of goods involves transport by the supplier or by a third party, the goods shall be deemed to be made available to the purchaser at the time when the transport begins; if they involve an obligation on the part of the supplier to install or assemble, they shall be deemed to be made available to the purchaser at the time when such installation or assembly is completed.

3. In the case of continuous supplies of goods and services resulting from contracts giving rise to successive payments, the goods shall be deemed to be made available and the services shall be rendered at the end of the period to which each payment relates, and the tax shall be due and payable for the respective amount.

4. In the case of the supply of goods and services referred to in Article 3(3)(e) and (f) and Article 4(2) respectively, the tax shall be due and chargeable at the time when the applications of goods or services provided for therein take place.

5. In the case of transfers of goods between the principal and the commissioner referred to in Article 3(3)(c), the tax shall be due and shall become chargeable at the time when the commissioner makes them available to the purchaser.

6. In the case referred to in Article 3(3)(d), the tax shall be due and payable at the end of the period referred to therein.

7. Where the goods are made available to a Contracting Party before they have produced the translative effects of the contract, the tax shall be due and chargeable at the time when those effects occur, except in the case of the transfers of goods referred to in Article 3(3)(a) and (b).

8. Where the goods are placed under one of the regimes or procedures referred to in paragraph 2 of article 5, the chargeable event and the chargeability of the tax shall only occur at the time when they cease to be subject to these regimes or procedures.

9. In the case of operations carried out by travel agencies and tour operators, the provision of services shall be deemed to have been made at the time of full payment, or immediately before the start of the trip or accommodation, whichever occurs first, considering the start of the trip at the time when the first service is provided to the customer.

ARTICLE 8 – (Enforceability)

Notwithstanding the provisions of the preceding article, whenever the transfer of goods or the provision of services gives rise to the obligation to issue an invoice or equivalent document, under the terms of article 25, the tax shall become chargeable:

- a) if the deadline for issuance is respected, at the time of its issuance;
- b) if the deadline for issuance is not respected, at the time when it ends;
- c) if the transfer of goods or provision of services gives rise to payment, even partial, prior to the issuance of the invoice or equivalent document, at the time of receipt of such payment, for the amount received, without prejudice to the provisions of the preceding paragraph.

CHAPTER II – EXEMPTIONS

SECTION I – Exemption in domestic transactions

ARTICLE 9 – (Exempt transfers of goods and provision of services)

The following are exempt from the tax:

1. The following transfers of goods and services of health:

(a) the provision of medical and health services and closely related operations by public hospitals¹¹, dispensaries and the like;

(b) hand-operated or motor-operated wheelchair transmissions and similar vehicles for the disabled, apparatus, braille typewriters, braille printers, articles and other prosthetic or compensating material intended to replace, in whole or in part, any limb or organ of the human body or the treatment of fractures, and, as well as those intended to be used by the blind or to correct hearing;

c) the transmission of human organs, blood and milk;

(d) the transport of the sick or injured in ambulances or other appropriate vehicles by duly authorized bodies;

e) the transmissions of mosquito nets;

(f) transmissions of medicinal products, proprietary medicinal products and other pharmaceutical products intended exclusively for therapeutic and prophylactic purposes, and transmissions of pastes, gauze, hydrophilic cotton, adhesive strips and dressings and the like, whether or not impregnated or coated with any substances, for hygienic, medicinal or surgical uses.

g) the supply of goods to be used as raw materials, intermediate products and components for the manufacture of medicines, when they are carried out by public or private establishments integrated in the National Health Service, included in the Customs Tariff and detailed in Annex III, which is an integral part of this Code.

2. Transfers of assets carried out by public entities or non-profit organizations, as follows:

(a) the supply of goods and the provision of social assistance services and the transfer of related goods, carried out by public entities or non-profit-making bodies

¹¹ Amended by article 1 of Law no. 22/2022 of 28 December. Previous wording: "a) (...) hospitals, clinics (...)."

whose purposes and object are recognised by the competent authorities;

(b) the supply of goods and security-related services provided by public authorities;

(c) the supply of services and the supply of closely related goods carried out in the course of their usual activities by crèches, kindergartens, leisure centres, establishments for unprotected children and young people in a normal family environment, residential homes, work houses, establishments for disabled children and young people, rehabilitation centres for disabled persons, nursing homes, day centres and social centres for the elderly, holiday camps, youth hostels or other social facilities belonging to public entities or non-profit organisations whose purposes and object are recognised by the competent authorities;

d) the provision of services carried out by public entities or non-profit organizations, which operate establishments or facilities intended for the practice of artistic, sporting, recreational and physical education activities to persons who practice such activities;

e) The provision of services consisting of providing visits, guided or not, to museums, art galleries, monuments, parks, forest perimeters, botanical gardens, zoos and the like, belonging to the State, other public entities or non-profit entities, provided that they are carried out by the entities themselves or duly authorized non-profit organizations, through their own agents. This exemption also covers supplies of goods closely related to the abovementioned supply of services;

f) the provision of personnel by religious or philosophical institutions to carry out activities exempt under the terms of this Code or for the purpose of spiritual assistance;

(g) the provision of services carried out in the collective interest of their members by non-profit-making bodies, provided that these bodies pursue objectives of a political, trade union, religious, patriotic, philanthropic, recreational, sporting, cultural, civic or representative of economic interests nature and the only consideration is a fee fixed in accordance with the respective statutes

(h) the supply of goods and services by entities whose usual activities are exempt in accordance with paragraph 2(a), (a), (b), (c), (d) and (g) and (a) and (b) of paragraph 3 of this article, in the case of occasional events aimed at raising funds for their exclusive benefit; provided that their number does not exceed eight per year.

3. The following supplies of goods and services in vocational education and training:

a) the provision of services that have as their object education, as well as the transmission of goods and related services, when they are carried out by public

establishments¹² integrated in the National Education System and recognized by the Ministry that supervises the area of Education;

(b) the supply of services for vocational training and the supply of goods and related services, such as the provision of accommodation, food and teaching materials, by public authorities;

¹³4. Banking and financial transactions, subject to stamp duty¹⁴.

5. The letting of real estate for residential purposes¹⁵.

6. Insurance and reinsurance operations, as well as the provision of related services, carried out by brokers and other insurance intermediaries, subject to stamp duty¹⁶.

7. supplies of goods and services carried out in the course of the following activities, including processing, carried out on an ancillary basis by the producer himself on the products produced in question, using his own resources, provided that such processing is carried out by means generally used on his holdings:

a) agricultural, including poultry and beekeeping services;

b) silviculture;

c) livestock

d) fishing;

8. The operation and practice of games of chance and social entertainment, under the terms provided for in specific legislation, as well as the respective commissions and all operations subject to special tax on gambling, including the price of betting titles and tickets for access or entry into the gaming areas.

9. The following supplies of goods and services for cultural and artistic purposes:

a) the transfer of copyright and the authorization for the use of intellectual work,

¹² Wording removed by article 1 of Law no. 22/2022 of 28 December. Previous wording: "a) (...) or private (...)."

¹³ Wording removed by article 1 of Law no. 22/2022 of 28 December. Previous wording: "c) the provision of services consisting of lessons given in a personal capacity on subjects of school or higher education."

¹⁴ Text added by article 1 of Law no. 22/2022 of 28 December.

¹⁵ Amended by article 1 of Law no. 22/2022 of 28 December. Previous wording: "5. The letting of real estate:

a) for housing purposes;

b) for commercial, industrial and service provision purposes in properties located in rural areas."

¹⁶ Text added by article 1 of Law no. 22/2022 of 28 December.

when made by the authors themselves, their heirs or legatees;

b) the broadcasts of newspapers, magazines and books considered to be of a cultural, educational, technical or recreational nature.

10. transmissions, of maize, maize flour, rice, bread, iodized salt, powdered milk for infants up to one year old, wheat, wheat flour, fresh or chilled tomatoes, potatoes, onions, frozen horse mackerel, lighting oil, domestic gas-LPG, jet fuel, common bicycles and iron up to 4 speeds¹⁷, condoms and insecticides.

11. The transfer of goods and services carried out within the scope of the supply of war and barracks material, military and paramilitary uniforms, intended for the official use of the National Defence and Security Forces, provided that the activity is carried out exclusively for those services, by establishments recognised by the competent ministry.

12. Other supplies of goods and services as follows:

a) the transmission of stamped values¹⁸;

b) the provision of garbage removal services when carried out by public entities or contracted by them;¹⁹

c) the provision of funeral and cremation services and the transfer of ancillary goods, when carried out by public entities;²⁰

d) operations subject to tax even if exempt from it;

(e) transfers of property used exclusively in an exempt sector of activity or which have not been the subject of a right of deduction, as well as transfers of property acquired excluding the right of deduction in accordance with Article 20.

(f) the supply of goods resulting from the industrial activity of producing feed for breeding and slaughtering animals for human consumption;

g) the transmissions of soybeans, soybean meal, whole soybeans, fish meal, meat meal, bone powders, calcium monophosphate, lysine, methionine, to be used as raw

¹⁷ Text added by article 1 of Law no. 22/2022 of 28 December.

¹⁸ Amended by article 1 of Law no. 22/2022 of 28 December. Previous wording: "a) (...) for their face value, postage stamps in circulation or stamped values and the respective sales commissions."

¹⁹ Amended by article 1 of Law no. 22/2022 of 28 December. Previous wording: "b) the public service for the removal of garbage."

²⁰ Amended by article 1 of Law no. 22/2022 of 28 December. Previous wording: "(c) the supply of services and the supply of goods ancillary to the same services, carried out by funeral and cremation companies;"

material in the industrial activity of production of feed for breeding animals and slaughter for human consumption;

h) the transmission of capital goods, seeds, breeders, fertilizers, pesticides, herbicides, fungicides and the like, as well as nets, hooks and other fishing equipment, included in the Customs Tariff and detailed in Annex I, which is an integral part of this Code;

i) the transmission of needles, syringes and medicines for veterinary use;

j) public passenger transport service.

13. Until 31 December 2025²¹, the following supplies of goods and services:

a) the transmission of sugar;

b) the transmission of raw materials, intermediate products, parts, equipment and components, carried out by the national sugar industry;

c) the transmission of cooking oils and soaps;

d) the transfers of goods resulting from the industrial activity of producing cooking oil and soaps, carried out by the respective factories;

e) the transfers of goods to be used as raw material in the oil and soap industry, included in the Customs Tariff and detailed in Annex II, which is an integral part of this Code;

f) the supply of goods and services, carried out within the scope of the agricultural activity of sugar cane production and intended for industry.

14. The exemption of the goods referred to in subparagraphs b) and f) of the preceding paragraph shall be proved, as the case may be, by means of appropriate customs documents or a declaration issued by the purchaser of the goods and services that they are to be incorporated into the production process.

15. Services provided in the opening of canals, mowing, drainage, supply of water for irrigation, cleaning of drainage ditches, and land spraying carried out in the course of agricultural activity.

16. Until 31 December 2025, the transmissions of factors of production of solar panels for rural electrification, included in the Customs Tariff and detailed in Annex IV,

²¹ Amended by article 1 of Law no. 3/2025 of 21 May. Previous version: 13. (...) 2023.

which is an integral part of this Code.²²

ARTICLE 10 – (Public entities and non-profit organizations)

1. For the purposes of the provisions of Article 9 of this Code, only the organs and institutions of the Public Administration, which perform administrative functions of the State, under the terms of the applicable legislation, are considered public entities.²³

2. For the purposes of Article 9 of this Code²⁴, only non-profit-making bodies shall be considered to be those which:

(a) under no circumstances shall they distribute or make available profits and their management bodies shall not have, by themselves or through an intermediary, any direct or indirect interest in the results of the operation;

b) have bookkeeping covering all their activities and make it available to the tax services, namely to prove what is referred to in the previous paragraph;

(c) charge prices approved by the competent public authorities or, in the case of transactions not eligible for approval, prices lower than those required for similar transactions by taxable commercial undertakings;

(d) do not enter into direct competition with taxable persons.

ARTICLE 11 – (Waiver of exemption)

1. Taxpayers benefiting from the exemptions set out in Article 9(7)(b), (c) and (d) may waive the exemption by opting for the application of the tax to their operations.

2. The right of option shall be exercised by submitting an appropriate declaration to the Directorate of the competent Tax Area, and shall take effect from 1 January of the following calendar year, unless the taxable person commences the activity during the course of the year, in which case the option, to be included in the respective declaration, shall take effect from the beginning of the activity.

3. Having exercised the right of option under the terms of the preceding paragraphs, the taxable person is obliged to remain in the regime for which he has chosen for a period of at least five years, at the end of that period, he remains subject to taxation, unless he wishes to be exempted, in which case he must inform the Tax

²² Text added by article 1 of Law no. 22/2022 of 28 December.

²³ Text added by article 1 of Law no. 22/2022 of 28 December.

²⁴ Text added by article 1 of Law no. 22/2022 of 28 December.

Administration, by submitting the appropriate declaration to the competent Tax Area Directorate before the expiry of that period, which takes effect from 1 January of the following calendar year.

SECTION II – Exemptions on Imports

ARTICLE 12 – (Exempt imports)

1. The following are exempt from tax:

a) Definitive imports of goods whose transfer within the national territory benefits from objective exemption, namely those referred to in paragraph 1(b), (c), (e), (f) and (g), paragraph 9(b), (10), (11)(g), (h) and (i),²⁵ all of article 9:

b) imports of goods, whenever they are exempt from the payment of import duties under the following terms:

(i) Law No. 7/91 of 23 January, as amended by Law No. 14/92 of 14 October, Law on Political Parties;²⁶

(ii) Law No. 4/94, of 13 September, Law that establishes the basic principles that allow the extension of the action of legal persons, natural or collective, public or private, that carry out activities, or, financially and materially support them, in the field of arts, letters, science, culture and social action, Patronage Law;²⁷

(iii) Rules for the acquisition and disposal of motor vehicles for official use by Diplomatic and Consular Missions;²⁸

(iv) Preliminary Instructions of the Customs Tariff.²⁹

(c) imports of goods under the transit, temporary import or drawback arrangements which are totally exempt from customs duties;

d) the re-importation of goods by the person who exported them, in the same state

²⁵ Wording removed by article 1 of Law no. 10/2025 of 29 December. Previous wording: "a) (...) paragraphs a), b), e) and f) of paragraph 13, and paragraph 16, all of article 9 (...)."

²⁶ Amended by article 1 of Law no. 22/2022 of 28 December. Previous wording: "Article 15 of Law No. 7/91, of 23 January;"

²⁷ Amended by article 1 of Law no. 22/2022 of 28 December. Previous wording: "Article 7 of Law No. 4/94, of 13 September;"

²⁸ Amended by article 1 of Law no. 22/2022 of 28 December. Previous wording: "Article 2 et seq. of Decree No. 3/83, of 30 November, under the terms, limits and conditions established therein;"

²⁹ Amended by article 1 of Law no. 22/2022 of 28 December. Previous wording: "Article 22 of the Preliminary Instructions of the Customs Tariff, approved by Law No. 6/2009, of 10 March;"

in which they were exported, when they benefit from exemption from customs duties;

e) the supply of services whose value is included in the taxable base of the imports of goods to which they refer, as established in article 16;

f) gold imports by the Bank of Mozambique;

g) Imports of supply goods which, from their entry into national territory until their arrival at the national port or airport of destination and during their stay there for the normal period necessary for the fulfilment of their tasks, are consumed or are on board vessels engaged in international maritime, river or lake navigation or aircraft engaged in international air navigation;

h) Imports of the vessels referred to in Article 13(1)(f) and of the objects incorporated therein or used for their exploitation;

(i) the importation of aeroplanes referred to in Article 13(1)(g) and of the objects incorporated therein or used for their operation;

j) imports of works of art, when carried out by the artist-authors themselves, residing in the national territory, their heirs or legatees;

k) imports of capital goods classified in class "K" of the Customs Tariff, intended for investments in enterprises authorized under the Investment Law and its regulations;

l) the importation of firefighting vehicles by firefighters' associations that are intended exclusively to be used in their own activity.

2. The following shall benefit from tax exemption or reduction, in the same proportion as they enjoy the reduction of duties:

a) emigrants, civil or military State officials, students and scholarship holders, who return definitively to Mozambique, under the terms, conditions and limits of the respective customs legislation;

b) national miners working abroad, under the terms and conditions to be determined by order of the Minister who supervises the area of Finance;

c) imports of materials and equipment carried out within the scope of development projects financed by specialized agencies and institutions of the United Nations, duly accredited to the Mozambican government, provided that they are intended exclusively for the implementation of the projects.

3. The exemption referred to in paragraph 1(g) of this article shall not apply to:

(a) On-board supplies on the following vessels:

(i) those that are being dismantled or used for purposes other than the achievement of the purposes of international maritime navigation, while such circumstances last;

(ii) those used in hotels, restaurants or floating game rooms or for similar purposes, during their stay in a port or in territorial or inland waters of the national territory;

(iii) recreational activities, during their stay at a point or in territorial or inland waters of the national territory;

(iv) coastal fishing.

(b) fuels and motor fuels other than those contained in normal tanks.

4. The granting of the exemption provided for in paragraph 2(c) of this article depends on a favourable order of the Minister supervising the area of Finance, upon prior application submitted by the promoting entity and accompanied by a detailed list of the goods to be imported and the respective import plan, being granted by the customs services according to the same plan and always after checking by comparison with the list approved in that order.

SECTION III – Exemptions on exports, similar operations and international transport

ARTICLE 13 – (Exports, assimilated operations and exempt international transport)

1. The following are exempt from tax:

(a) the transfer of goods dispatched or transported abroad by the seller or by a third party on his behalf;

b) The transfer of goods dispatched or transported abroad by a purchaser without residence or establishment in national territory or by a third party on behalf of the latter, with the exception of goods intended for the supply of sports and pleasure boats, tourist aircraft or any other means of transport for private use. This exemption is regulated in a specific diploma;

(c) the supply of goods on board vessels engaged in maritime navigation on the high seas and carrying passengers for remuneration or carrying on commercial, industrial or fishing activities;

(d) the transfer of supply goods on board rescue, maritime assistance and coastal fishing vessels, with the exception of shipboard supplies in respect of the latter;

e) the transfer of supply goods placed on board warships, when they leave the

country for a port or anchorage located abroad;

(f) the transfers, conversions, repairs and maintenance, freight and hire of vessels engaged in the activities referred to in subparagraphs (c) and (d), as well as the transfers, rental, repair and conservation of objects, including fishing equipment, incorporated into or used for their exploitation;

(g) transmissions, conversions, repairs, maintenance, freight, leasing of aeroplanes used by airlines principally engaged in international traffic, as well as transmissions, repairs, maintenance and leasing of objects incorporated in or used for their operation;

(h) the transfer of supply goods placed on board the aircraft referred to in the preceding paragraph;

(i) the provision of services other than those referred to in points (f) and (g) of this paragraph, which are made for the direct needs of the vessels and aircraft referred to therein and their cargo;

j) the transfer of goods and services to diplomatic and consular entities, the exemption of which results from international agreements and arrangements entered into by Mozambique;

k) the supply of goods and services to international bodies recognised by Mozambique or to members of the same bodies, within the limits and under the conditions set out in international agreements and conventions entered into by Mozambique;

l) the transfer of goods to duly recognised bodies that export them abroad within the scope of their humanitarian, charitable or educational activities, subject to prior recognition of the right to exemption, in the manner determined in a decree to be regulated;

m) the supply of services, other than those referred to in article 9, which are directly related to the transit, export or import of goods exempt from duty because they have been declared under a temporary regime, drawback or transit, in accordance with paragraph 1(c) of the previous article, or have entered warehouses under the customs or free regime in other areas referred to in the following article;

(n) the supply of services other than those referred to in Article 9 which are connected with the dispatch of goods destined abroad;

o) the transfer of goods and services by the Mozambican Railways to foreign railway companies, in the context of the operation of the railway network of their equipment;

- p) the transport of persons coming from or going abroad;
- q) the supply of services consisting of work carried out on movable property, acquired or imported to be the object of such work in national territory and then dispatched or transported abroad by the person who supplied it, by its recipient not established in the national territory or by a third party in the name and on behalf of any of them;
- r) the transfers to the Bank of Mozambique of gold in bars or other unworked forms;
- s) the provision of services carried out by intermediaries acting in the name and on behalf of third parties, when they are involved in the operations described in this article or in operations carried out outside the national territory.
- t) the transmission of tare or packaging, which serves as a wrapper for goods to be exported.

2. The exemptions provided for in paragraph 1(c), (d) and (h) of this article, with regard to the transfer of beverages, shall be effected through the exercise of the right to deduct or refund the tax, and the provisions of paragraph 1 (d) of article 20 shall not be taken into account for this purpose.

3. For the purposes of this Code, supply goods shall mean:

- (a) in-flight supplies, products intended exclusively for the consumption of crew and passengers being considered as such;
- b) fuels, fuels, lubricants and other products intended for the operation of machinery: propulsion and other technical devices installed on board;
- (c) ancillary products intended for the preparation, processing and preservation of goods carried on board.

SECTION IV – Other Exemptions

ARTICLE 14 – (Customs and tax regimes and others)

1. The following operations shall be exempt from tax, provided that the goods to which they refer have no final use or consumption in the areas mentioned:

- (a) imports of goods which, under customs control and subject to the specifically applicable provisions, are placed under the special economic zone, free zone, free deposit and general free warehouses or which are placed in customs warehouses or duty-free shops for as long as they remain under such arrangements;
- (b) the supply of goods dispatched or transported to the areas or depots referred to

in the preceding subparagraph, as well as the supply of transport services directly connected with such transfers;

c) the transfers of goods that are carried out under the regimes referred to in paragraph a), as well as the supply of services directly related to such transfers, as long as the goods remain in those situations;

(d) the supply of goods which are under the transit, drawback or temporary import arrangements and the provision of transport services directly connected with such operations, for as long as they are considered to be covered by those arrangements.

2. The following are also exempt from this tax:

a) the acquisition and importation of goods intended for gifts to national institutions of public interest and relevant social purposes, provided that such goods are entirely appropriate to the nature of the beneficiary institution and will be used by it in activities of evident public interest;

b) the acquisition of goods intended for offerings to mitigate the effects of natural calamities, such as floods, storms, droughts, cyclones, earthquakes and earthquakes and others of the same nature;

3. It is incumbent upon the Council of Ministers to regulate the application of the exemptions referred to in the preceding paragraph.

CHAPTER III – TAXABLE AMOUNT

SECTION I – Taxable Amount in Domestic Operations

ARTICLE 15 – (Tax Base in Domestic Operations)

1. Without prejudice to paragraph 2 of this Article, the taxable amount of taxable supplies of goods and services shall be the value of the consideration obtained or to be obtained from the purchaser, the customer or a third party.

2. In the case of the supply of goods and services listed below, the taxable amount shall be determined as follows:

a) for the operations referred to in paragraph d) of paragraph 3 of article 3, the amount set out in the invoice to be issued pursuant to paragraph a) of paragraph 1 of article 29;

(b) for the transactions referred to in Article 3(3)(e) and (f), the purchase price, or failing that, the cost price, as reported at the time of the transactions;

(c) for the transactions referred to in Article 4(2), the normal value of the service, as defined in paragraph 4 of this Article;

(d) for the supply of goods or services resulting from acts of public authorities, compensation or any other form of compensation;

(e) for the transfer of goods between the principal and the commissioner or between the commissioner and the principal, respectively, the sale price agreed by the commissioner, less the commission, and the purchase price agreed by the commissioner, increased by the commission;

f) for the supply of second-hand goods by taxable persons who have acquired such goods for resale, the difference, duly justified, between the sale price and the purchase price, excluding the value added tax charged on the transaction, and the latter may opt for the application of the provisions of paragraph 1;

g) For the supply of second-hand goods, carried out by auction sales organisers acting in their own name, under the terms of a sales commission contract and the goods have been acquired in the national territory, the taxable amount is constituted by the amount invoiced to the buyer, under the terms of this code, after deducting:

(i) the net amount paid or payable by the auction organiser to its principal, which corresponds to the difference between the auction price and the amount of the commission obtained or to be obtained by the auction organiser from the

respective principal in accordance with the provisions of the sales commission agreement;

(ii) the amount of tax payable by the auction organiser in respect of the transfer of goods;

(h) for the transfer of goods resulting from judicial or administrative auctions or sales, conciliation or settlement contracts, the value at which the auctions or sales have been carried out or, where appropriate, the normal value of the goods transferred;

i) for the supply of fuel, the price of which is fixed by the Public Authority, carried out by resellers, the value of the consideration determined in accordance with paragraphs 1 and 5 of this article, does not include the Fuel Tax;

j) for the transmission of energy, the price of which is fixed by the Public Authority, the value added tax shall be levied on 62% of the total bill at the value of the consideration determined in accordance with paragraph 1;

k) For the provision of a service whose price is fixed by means of aeronautical taxes, value added tax shall be levied on 85% of the total invoice determined in accordance with paragraph 1;

l) For the provision of public works services in the construction and rehabilitation of roads, bridges, water supply and sanitation infrastructures, rural electrification and agricultural hydraulics, dredging, as well as studies and supervision thereof, 60% of the same shall be deducted from the taxable amount determined pursuant to paragraph 1, for the purposes of the tax assessment;

m) for the supply of drinking water, through the public network, the price of which is fixed by the Public Authority, the value of the consideration determined under the terms of paragraph 1 shall be subject to Value Added Tax on 75% of the total bill.

3. Where the consideration is not defined in whole or in part in cash, the taxable amount shall be the amount received or receivable, plus the normal value of the goods or services given in exchange.

4. The normal value of goods or services shall mean the price, increasing the amounts referred to in paragraph 5 of this Article, in so far as they are not included in the price, which a purchaser or consignee, at the stage of trade at which the transaction takes place and under normal conditions of competition, would have to pay to an independent supplier, at the time and place in which the operation is carried out or at the nearest time and place, to obtain the good or service.

5. The taxable amount of taxable supplies of services shall include:

(a) taxes, duties, levies and other charges, with the exception of value added tax itself;

b) the ancillary expenses charged when they relate to commissions, packaging, transport and insurance on behalf of the client.

6. The taxable amount referred to in the preceding paragraph shall exclude:

a) the amounts received as compensation declared by the court, for total or partial breach of contracts;

b) the discounts, rebates or bonuses granted;

(c) sums paid in the name and on behalf of the purchaser of the goods or the recipient of the services, recorded by the taxpayer in appropriate third-party accounts;

d) the amounts relating to packaging, provided that they have not actually been transacted and the invoice or equivalent document contains the elements referred to in the final part of paragraph b) of paragraph 5 of article 27.

7. For the purposes of paragraph 1, when the value of the consideration is lower than that which should result from the use of the current or normal wholesale or retail retail prices, or the current or normal prices at the service, depending on the nature of the transfers, the tax authorities may correct them.

8. Whenever the elements necessary to determine the taxable amount are expressed in a currency other than the national currency, the equivalence in meticals shall be made according to the rules established in Law No. 2/2006, of 22 March.

9. For the purposes of paragraph 2(l) of this article, the following definitions shall apply:

a) water supply and sanitation infrastructures, water supply, sanitation, drainage systems, wells and boreholes, dams and water treatment plants.

b) rural electrification, the construction and rehabilitation of infrastructures for the production, transmission and distribution of electricity in rural areas, within the scope of public rural electrification projects.

c) Agricultural hydraulics - the works of collection, conduction, water distribution, drainage, dams and protection, access roads, interiors of irrigated perimeter, art and land systematization.

10. For transactions subject to the reduced rate, the value of the supply of goods and services shall be the value of the consideration obtained or to be obtained from the

purchaser, the customer or third parties for carrying out those transactions.³⁰

SECTION II – Taxable Amount on Importation

ARTICLE 16 – (Import Tax Base)

1. The taxable value of imported goods shall be the customs value, determined in accordance with customs laws and regulations, plus, to the extent that they are not included therein, the following elements:

(a) import duties and any other taxes or duties actually payable on importation, excluding value added tax itself;

b) ancillary expenses, such as packaging, transport, insurance and other charges, which occur up to the first place of destination of the goods within the country.

2. The first place of destination is considered to be that which appears on the transport document under which the goods are introduced into the national territory or, failing that, the place where the first cargo breakage takes place within the country.

3. Discounts for prompt payment and those that appear separately on the invoice are excluded from the taxable value of imported goods.

4. In cases of non-tax-exempt re-importation, pursuant to Article 12(1)(d), of goods temporarily exported and which have been repaired, processed or completed abroad shall be the taxable amount of the transaction carried out abroad, determined in accordance with the provisions of paragraph 1 of this Article.

³⁰ Text added by article 1 of Law no. 22/2022 of 28 December.

CHAPTER IV – FEES

ARTICLE 17 – (Tax Rate)

1. The tax rate is 16%.³¹
2. The applicable rate shall be that in force at the time when the tax becomes chargeable.

ARTICLE 17-A – (Transfers of goods and services subject to the reduced rate of 5%)

The following supplies of goods and services are subject to the reduced rate of 5%:

- (a) the provision of medical and health services and closely related operations carried out by private hospitals, clinics, dispensaries and the like;
- b) the provision of services that have as their object education, as well as the supply of goods and related services, when they are carried out by private establishments integrated in the National Education System and recognized by the Ministry that supervises the area of Education;
- (c) the supply of services for vocational training and the supply of goods and related services, such as the provision of accommodation, food and teaching materials, by private entities;
- (d) the provision of services consisting of lessons given in a personal capacity on subjects of school or higher education.³²

³¹ Amended by article 1 of Law no. 22/2022 of 28 December. Previous wording: "1. (...) 17%."

³² Text added by article 2 of Law no. 22/2022 of 28 December.

CHAPTER V – ASSESSMENT AND PAYMENT OF THE TAX

SECTION I – Right to deduct

ARTICLE 18 – (Deductible tax)

1. In order to calculate the tax due, taxable persons shall deduct, in accordance with the following articles, from the tax levied on the taxable transactions they have carried out:

(a) the tax which has been invoiced to them on the purchase of goods and services by other taxable persons;

b) the tax due on the importation of goods;

c) the tax paid for the acquisition of the services indicated in paragraph 7 of article 6;

(d) tax paid as a recipient of taxable transactions carried out by taxable persons established abroad, where they do not have a legally accredited representative and have not invoiced the tax;

e) the tax borne on repairs, maintenance, or other services rendered, in the case of resellers of second-hand goods.

2. Only the tax mentioned in invoices or³³ equivalent documents issued by **taxable persons registered for VAT³⁴** purposes and dispatch tickets for imports issued in legal form in the possession of the taxable person shall be entitled to deduct.

3. Tax resulting from a simulated transaction or in which the price shown on the invoice or equivalent document is simulated may not be deducted.

4. The right to deduct tax on the acquisition of second-hand goods is also not allowed when the taxable value of their subsequent transfer is the difference between the sale price and the purchase price, under the terms of Article 15(2)(f).

5. Tax resulting from transactions in which the transferor of the goods or service provider has not paid the assessed tax into the State coffers may also not be deducted when the taxable person is or should have been aware that the transferor of the goods or service provider does not have an adequate business structure

³³ Text added by article 1 of Law no. 10/2025 of 29 December.

³⁴ Text added by article 1 of Law no. 10/2025 of 29 December.

capable of carrying out the declared activity.

6. In cases where, pursuant to Article 15(2)(j), (k), (l) and (m), the assessment of the tax is levied on a reduced taxable amount, the right to deduct the tax incurred in respect of such transactions shall be exercised in the same proportion.³⁵

ARTICLE 19 – (Conditions for the exercise of the right to deduction)

1. Only tax charged on goods or services acquired, imported or used by the taxable person for the performance of the following transactions may be deducted:

a) Transfers of goods and services subject to taxes and not exempt from them;

b) Transfers of goods and services consisting of:

(i) exports and operations exempted under Article 13;

(ii) operations carried out abroad that would be taxable if they were carried out in the national territory;

(iii) provision of transport services whose value is included in the taxable base of the imported goods, under the terms of Article 16(1)(b);

(iv) supplies of goods and services covered by Article 14(1)(b), (c) and (d) and (2);

(v) Supplies of goods and services covered by paragraph 7(a), paragraph 10, paragraph 12(f) and paragraph 13(d) and (f), all of article 9.

2. There is, however, no right to deduct the tax relating to transactions giving rise to the payments referred to in paragraph c) of paragraph 6 of article 15 and to the supply of goods and services provided for in article 17-A.³⁶

ARTICLE 20 – (Exclusions from the right to deduct)

1. However, the tax contained in the following expenses shall be excluded from the right to deduct:

(a) expenditure relating to the acquisition, manufacture or importation, leasing including leasing, use, conversion and repair of passenger cars, pleasure boats, helicopters, aeroplanes, motorcycles and motorcycles. A tourist vehicle is considered to be any motor vehicle, including a trailer, which, due to its type of construction and equipment, is not intended solely for the transport of goods or for agricultural, commercial or industrial use, or which, being mixed or for the transport

³⁵ Text added by article 1 of Law no. 10/2025 of 29 December.

³⁶ Text added by article 1 of Law no. 10/2025 of 29 December.

of passengers, has no more than nine seats, including the driver;

(b) expenditure on fuel normally usable in motor vehicles, with the exception of the purchase of diesel, for which tax is deductible at the rate of 50%, unless the following goods are concerned, in which case the excise duty on diesel fuel is wholly:

(i) heavy passenger vehicles;

(ii) vehicles licensed for public passenger transport, with the exception of rent a car;

(iii) diesel-consuming machines, other than registered vehicles;

(vi) tractors with exclusive or predominant use in the performance of cultivation operations inherent to agricultural activities;

(c) transport and travel expenses of the taxable person and his staff;

(d) expenditure relating to accommodation, food, beverages and tobacco and reception costs, including those relating to the reception of persons outside the undertaking;

e) Expenditure on telephone calls, except those relating to fixed telephone services, in the name of the taxable person;

(f) entertainment and luxury expenditure, which is considered to be such if by its nature or amount does not constitute normal operating expenditure.

2. The right to deduct shall also exclude the tax paid on the transfer of goods and services subject to taxation at the reduced rate provided for in Article 17-A of this Code.³⁷

3. The right of deduction shall not be excluded in the following cases:

a) expenses mentioned in paragraph a) of n.§ 1 of this article³⁸, when they relate to goods whose sale or exploitation is the object of the taxable person's activity, without prejudice to the provisions of paragraph 1 (b) of this article³⁹ in relation to fuels that are not acquired for resale;

(b) accommodation and food costs incurred by commercial travellers, acting on their own account, in the course of their professional activity.

³⁷ Text added by article 1 of Law no. 22/2022 of 28 December.

³⁸ Amended by article 1 of Law no. 22/2022 of 28 December. Previous wording: "2. a) (...) previous number (...)."

³⁹ Amended by article 1 of Law no. 22/2022 of 28 December. Previous wording: "2.a) (...) of the same number (...)."

ARTICLE 21 – (Birth and exercise of the right to deduction)

1. The right to deduct shall arise at the time when the deductible tax becomes chargeable, in accordance with the provisions of Articles 7 and 8.
2. The amount of deductible tax shall be subtracted from the amount of tax due for taxable transactions carried out in each tax period.
3. The deduction shall be made in the tax period corresponding to the date of issue of the invoice or equivalent document in the respective periodic return.
4. If it is not possible to make the deduction within the period referred to in the previous paragraph, the taxable person may exercise the right to deduct within 90 days after the moment when the tax became chargeable.
5. Where the deduction of the tax to be made exceeds the amount due for the transactions in the corresponding period, the excess shall be deducted in the following tax periods.
6. If, after 4 months from the period of commencement of the excess, a credit of more than 100,000.00 MT persists in favour of the taxable person, the taxpayer may, if he does not wish to maintain, in whole or in part, the procedure established in the previous paragraph, request the corresponding refund.
7. Regardless of the period referred to in the preceding paragraph, the taxable person may request the corresponding⁴⁰ refund when:
 - a) has registered in a given month a credit in its favour in excess of 500,000.00 MT, and must consider the oldest credits sequentially;⁴¹
 - b) there is cessation of activity;
 - c) the taxable person falls under paragraph 3 of article 25, or under the regime of articles 35 or 42.

8. Repealed.⁴²

9. The tax administration may require a guarantee, bank guarantee or other legal form of guarantee, to cover the remaining tax liability, provided that the amount of

⁴⁰ Text added by article 1 of Law no. 22/2022 of 28 December.

⁴¹ Amended by article 1 of Law no. 22/2022 of 28 December. Previous wording: "7. a) (...) of the current year".

⁴² Text repealed by article 1 of Law no. 10/2025 of 29 December. Previous wording: "Notwithstanding the provisions of paragraphs 6 and 7 of this article, if 12 months have elapsed in relation to the period in which the excess began, it maintains systematic Value Added Tax credits, it must request, if it does not wish to do so in its entirety, the refund of at least 50% of the accumulated VAT credit."

the claim exceeds 100,000.00 MT, which must be maintained until proof of legitimacy, by the respective tax services, but never for a period exceeding one year.

10. Refunds, when due, must be made by the competent services of the Tax Administration within **150 days**⁴³ from the date of submission of the respective application.

11. For the purposes of the provisions of this article, the Minister who supervises the area of Finance, in relation to certain activities, may consider as non-existent the operations that give rise to the deduction, or those that do not confer this right, whenever they constitute a significant part of the total turnover and the procedure provided for in paragraphs 2 and 3 of article 22 of this Code is not viable .

12. The tax authorities may suspend the period for granting a refund when, due to a fact attributable to the taxable person, it is not possible to ascertain the legitimacy of the refund requested, for a period of 30 days from the date of notification.

13. The tax authorities may also suspend the declared credits for a period of **60 days**⁴⁴ from the date of notification, when it is not possible to ascertain the legitimacy of the declared credit due to a fact attributable to the taxable person⁴⁵. **At the end of the aforementioned period and without the taxpayer presenting the requested documents, the Tax Administration must cancel or correct the credit now suspended.**⁴⁶

14 The Tax Administration may also suspend the declared credits, for a period of 60 days, counted from the date of notification, when due to a fact attributable to the taxable person it is not possible to ascertain the legitimacy of the declared credit. At the end of the aforementioned period and without the taxpayer presenting the requested documents, the Tax Administration must cancel or correct the credit now suspended.

15. The right of the taxable person to request reimbursement when due is time-barred within a maximum period of 10 years, counted from the date of birth of the

⁴³ Text amended by article 1 of Law no. 10/2025 of 29 December. Previous wording (...) 30 days (...)

⁴⁴ Text amended by article 1 of Law no. 10/2025 of 29 December. Previous version(...) 30 days (...)

⁴⁵ Text amended by article 1 of Law no. 10/2025 of 29 December. Previous wording(...) of the refund requested(...)

⁴⁶ Text amended by article 1 of Law no. 10/2025 of 29 December. Previous version: "13. The Tax Administration may also suspend the declared credits, when due to a fact attributable to the taxable person it is not possible to ascertain the legitimacy of the requested refund, for a period of 30 days, counted from the date of notification."

right to deduct.⁴⁷

ARTICLE 22 – (Partial deduction)

1. Where the taxable person, in the course of his activity, makes supplies of goods and services, part of which does not give rise to the right to deduct, the tax borne on the acquisitions shall be deductible only as a percentage corresponding to the annual amount of transactions giving rise to the deduction.

2. Notwithstanding the provisions of the preceding paragraph, the taxable person may make the deduction, according to the actual use of all or part of the goods and services used; provided that it communicates the fact in advance to the General Directorate of Taxes, without prejudice to the latter requiring certain special conditions or to cease this procedure in the event of significant distortions in taxation.

3. The Tax Administration may oblige the taxable person to proceed in accordance with the provisions of the preceding paragraph:

(a) where the taxable person carries out separate economic activities;

(b) where the application of the procedure referred to in paragraph 1 leads to significant distortions in taxation.

4. The percentage of deduction referred to in paragraph 1 shall be determined by a fraction comprising, in the numerator, the annual amount, excluding tax, of the supplies of goods or services in respect of which VAT is deductible in accordance with Articles 18 and 19(1) and, in the denominator, the annual amount, excluding tax, of all transactions carried out by the taxable person, including those outside the scope of the tax.

5. The calculation referred to in the preceding paragraph does not, however, include transfers of fixed assets that have been used in the activity of the undertaking or real estate or financial transactions that are ancillary to the activity carried on by the taxable person.

6. The deduction percentage, provisionally calculated on the basis of the amount of operations carried out in the previous year, shall be corrected according to the values referring to the year to which it relates, giving rise to the corresponding adjustment of the deductions made, which shall be included in the declaration of

⁴⁷ Text amended by article 1 of Law no. 10/2025 of 29 December. Previous wording(...) 15. The discipline of reimbursements is regulated in special legislation (...)

the last period of the year to which it relates.

7. Taxable persons who start the activity or substantially change it may deduct tax on the basis of an estimated provisional percentage, to be entered in the declarations of commencement and of the changes that have taken place.

8. To determine the percentage of deduction, the quotient of the fraction shall be rounded to the nearest hundredth.

9. In respect of certain activities, transactions giving rise to deduction, or those not giving rise to such a right, may be regarded as non-existent where they constitute an insignificant part of total turnover and the procedure provided for in paragraphs 2 and 3 is not feasible.

SECTION II – Payment of Tax

ARTICLE 23 – (Payment of Tax Assessed by the taxpayer)

1. Without prejudice to the special regime provided for in Articles 42 et seq., taxable persons shall be required to submit to the Tax Authorities the declaration referred to in Article 32, the amount of the original tax determined in accordance with Articles 18 to 22 and Article 51, by means of payment permitted by law.

2. Taxable persons acquiring the services referred to in paragraph 7 of article 6, **with the exception of subparagraph k)**,⁴⁸ as well as those covered by paragraph 3 of article 26, shall also be required to submit to the competent authorities, the declaration referred to in paragraph **2 of article 33**⁴⁹, the amount of tax chargeable, **in accordance with the terms to be regulated**⁵⁰.

3 The persons referred to in Article 2(1)(e) and Article 33 shall submit the corresponding tax to the competent authorities, within the time limits and by the means permitted by law

4. It is incumbent upon the Council of Ministers to establish in specific legislation the development of all procedures relating to the system of collection and reimbursement of the tax.

⁴⁸ Text amended by article 1 of Law no. 10/2025 of 29 December. Previous wording (...) number 7 of article 6, as well as those covered (...).

⁴⁹ Text amended by article 1 of Law no. 10/2025 of 29 December. Previous wording (...) number 4 of article 25 (...)

⁵⁰ Amended by article 1 of Law no. 10/2025 of 29 December. Previous wording (...) through the legally permitted means of payment (...)

ARTICLE 24 – (Payment of the Tax paid on the initiative of the services)

1. Whenever the tax is assessed on the initiative of the services, without prejudice to specific provisions, the taxable person shall be immediately notified to make the payment, with the competent authorities, within the regulated periods.
2. The tax due on imports shall be paid at the competent customs offices at the time of customs clearance.
3. The tax on the transfer of goods resulting from auctions, judicial or administrative sales, conciliation or transaction contracts paid at the time the payment is made or, if it is partial, at the time of the first payment of the costs, emoluments or other charges due. The assessment is carried out by applying the respective rate to the taxable amount, determined in accordance with paragraph g) of paragraph 2 of article 15.

SECTION III – Other obligations of taxable persons**ARTICLE 25 – (Scope of obligations)**

1. In addition to the obligations to pay the tax, the taxable persons referred to in Article 2(a), (b) and (c) shall be required, subject to the provisions of **other**⁵¹ provisions, to:
 - (a) submit, in accordance with the manner and form prescribed by law, a declaration of commencement, alteration or cessation of its activity;
 - b) Issue an invoice or document equivalent to each supply of goods or provision of services, as defined in articles 3 and 4 of this law;
 - c) Submit a monthly declaration relating to the operations carried out in the exercise of its activity during the preceding month, indicating the first and last order number of the series of invoices issued or other equivalent documents, the tax due or existing credit and the elements that served as the basis for its calculation.
 - d) Have adequate accounts for the calculation and supervision of the tax.
2. The obligation of periodic declaration provided for in the preceding paragraph shall continue even if there are no taxable transactions in the corresponding period.
3. Taxable persons who exclusively carry out tax-exempt transactions shall be exempt from the obligations referred to in paragraph 1(b), (c) and (d), unless such

⁵¹ Amended by article 1 of Law no. 10/2025 of 29 December. Previous wording (...) special provisions (...).

transactions give rise to the right to deduct in accordance with Article 19(1)(b).

4. The provisions of the preceding paragraph shall not apply to taxable persons who, although carrying out only exempt transactions that do not give rise to the right to deduct, have to pay the tax that under the terms of paragraph 7 of article 6 or paragraph 3 of article 26, who, however, are only required to submit the corresponding periodic return in relation to the months in which those assessments have taken place.

5. Supplies of goods and services exempted under Article 9(1)(b) and (f), Article 13(1)(a) to (l), (n), (o), (r) and (t) and Article 14(1) and (2)(c) shall be substantiated, as the case may be, by means of appropriate customs documents or declarations issued by the purchaser of the goods or user of the services, indicating the destination to which they are given.

6. The absence of the supporting documents referred to in the preceding paragraph shall result in the obligation of the transferor of the goods or service provider to pay the corresponding tax.

7. The taxable persons referred to in paragraph 4 of article 26 shall be required to submit a monthly declaration, accompanied by the statement of the withholdings made, in appropriate forms, under the terms to be regulated.⁵²

Article 25-A (Entities with more than one establishment)

Entities with more than one establishment must, in the periodic declaration, indicate the sales by establishment and other transactions carried out in them, under the terms to be regulated.⁵³

ARTICLE 26 – (Non-resident taxable persons)

1. In relation to operations carried out in the national territory by non-resident tax persons, without a permanent establishment in Mozambique, the obligations arising from the application of this law must be fulfilled by a representative resident in the national territory, with a power of attorney with sufficient powers. In this case, the representative is jointly and severally liable with the representative for the fulfillment of such obligations.

2. The appointment of the representative shall be communicated to the other Contracting Party before the operation is carried out.

⁵² Text added by article 1 of Law no. 10/2025 of 29 December.

⁵³ Text added by article 2 of Law no. 10/2025 of 29 December.

3. In the absence of a representative appointed in accordance with paragraph 1, the obligations provided for in this law relating to the supply of goods and services carried out in the national territory by non-resident taxable persons must be complied with by the purchasers of the goods or recipients of the services who do so in the exercise of a commercial activity, industrial or professional.

4. The obligations set out in this Code regarding the transfer of goods and the provision of digital services by non-residents, when the acquirer is a taxable person, located in the national territory, must be complied with by the acquirer, under the terms to be regulated.⁵⁴

ARTICLE 27 – (Issuance of invoices or equivalent documents)

1. Taxable persons shall be required to issue an invoice or equivalent document for each supply of goods or provision of services, as defined in Articles 3 and 4 of this Law.

2. The invoice or equivalent document referred to in the preceding paragraph must be issued within the deadlines to be regulated.

3. Invoices or equivalent documents shall be replaced by return notes or notes, in the case of returns of goods previously transacted between the same persons.

4. The documents referred to in the preceding paragraphs shall be processed, at least in duplicate, with the original being sent to the customer and the copy to the supplier's file.

5. Invoices or equivalent documents shall be issued in a national language and currency, dated, numbered sequentially and shall contain the following particulars:

a) the names, company names or company names and the registered office or domicile of the supplier of goods or service provider and of the recipient or purchaser, as well as the corresponding tax identification numbers of the taxable persons ;

b) the quantity and usual denomination of the goods transmitted or the services rendered. Untraded packages must be separately indicated and expressly stated that they have been returned;

c) the price net of tax, and the other elements included in the taxable amount;

d) the rate and amount of tax due;

⁵⁴Text added by article 1 of Law no. 10/2025 of 29 December.

- (e) the reason justifying the non-application of the tax, if any.
- f) Bank Identification Number abbreviated as NIB, to which the payment of the State is made.
6. The return notes or notes must contain, in addition to the date, the elements referred to in paragraphs a) and b) of the previous paragraph, as well as a reference to the one to which they relate.
7. The sequential numbering referred to in numbers 5 and 6, when it does not result from electronic processing or electronic sending, must be printed in authorized printers, under the terms to be regulated.
8. The documents issued for transactions assimilated to the transfer of goods pursuant to Article 3(3)(e) and (f) and the provision of services referred to in Article 4(3) shall mention only the date, nature of the transaction, the taxable amount, the tax rate and the amount thereof.
9. When issuing invoices or equivalent documents whose content is processed electronically, the taxable person must use specific invoicing software authorized by the Tax Administration.
10. Taxable persons must submit⁵⁵ to the Tax Administration the invoices **or equivalent documents issued**⁵⁶ in each transaction of transfer of goods or services, **under the terms to be regulated.**⁵⁷

ARTICLE 28 – (Repercussion of the tax)

1. The amount of the tax assessed shall be added to the value of the invoice or equivalent document, for the purpose of demanding it from the purchasers of the goods or users of the services.
2. In transactions for which the issuance of an invoice or equivalent documentation is not mandatory, the tax shall be included in the price, for the purposes of the provisions of the preceding paragraph.
3. The passing-on of the tax shall not be compulsory in the transactions referred to in Article 3(3)(e) and (f) and Article 4(2).

⁵⁵ Wording removed by article 1 of Law no. 10/2025 of 29 December. Previous wording (...) submit electronically to the Tax Administration (...).

⁵⁶ Text added by article 1 of Law no. 10/2025 of 29 December.

⁵⁷ Text amended by article 1 of Law no. 10/2025 of 29 December. Previous wording (...) using e-invoicing or tax machines (...).

ARTICLE 29 – (Goods sent to consignment)

1. In the case of delivery of goods on consignment, invoices or equivalent documents shall be issued within five working days from the following:

- a) from the moment of shipment of the goods to the consignment;
- b) the time when, in respect of such goods, the tax is due and chargeable in accordance with paragraphs 5 and 6 of article 7.

2. The invoice or equivalent documentation, processed in accordance with paragraph 1(b) of this article, shall always refer to the documentation issued in the situation referred to in paragraph a) of the same paragraph.

ARTICLE 30 – (Invoicing with Tax included)

Invoices issued by retailers and service providers may indicate the price including tax and the fee, replacing the elements provided for in Article 27(5)(c) and (d), and "VAT included".

ARTICLE 31 – (Exemption from invoicing)

1. The obligation to invoice the following transactions shall be waived where the customer is an individual who does not use the goods or services purchased for the exercise of a commercial or industrial activity and the transaction is carried out in cash:

- (a) transfers of goods by retailers or street vendors;
- b) transmissions of goods made through automatic distribution devices;
- c) provision of services in which it is customary to issue a receipt, entrance or transport ticket, password or other printed document to the bearer, proof of payment;
- d) other services whose value is less than 100.00 Mt.

2. The exemption from invoicing referred to in paragraph 1 of this article does not exclude the obligation to issue receipts for the sale of goods or services rendered, which must be printed and numbered in printers **and systems⁵⁸**, authorized by the Tax Administration.

3. Printed sales receipts or receipts for services may be issued, under the terms to be regulated.

⁵⁸ Text added by article 1 of Law no. 10/2025 of 29 December.

4. Taxable persons who purchase goods or services from retailers and service providers referred to in the exemption from invoicing in the previous paragraph must always require the respective invoice.

5. Other situations of exemption from invoicing may be established by the Council of Ministers, whenever the requirement of the obligation of invoicing and related obligations proves to be particularly onerous, as well as in cases where the provisions of paragraph 1 of this article favour tax evasion, restrict the exemption from invoicing provided for therein, change the minimum invoicing values or require the issuance of an appropriate document to prove the operation carried out.

ARTICLE 32 – (Periodic Declaration)

1. Taxable persons shall be required to submit to the competent authority the declaration provided for in Article 25(1)(c) and (d)⁵⁹ on a monthly basis, within the following periods:

a) until the fifteenth day of the following month, in the case of the periodic declaration with credits **or without operations;**⁶⁰

(b) by the last day of the month following the month to which the transactions covered therein with payment relate ; **and**⁶¹

(c) by the tenth day of the month following that to which the transactions carried out pursuant to Article 26(4) relate.⁶²

2. In the event of cessation of activity, the declaration referred to in the preceding paragraph for the last period shall be submitted to the competent authority within 30 days from the date of cessation.

ARTICLE 33 – (Declaration of isolated operations)

1. Taxable persons who occasionally carry out ⁶³ a taxable transaction under the conditions referred to in Article 2(1)(b) and (c) must submit the declaration to the respective competent authority by the end of the month following the conclusion

⁵⁹ Text amended by article 1 of Law no. 10/2025 of 29 December. Previous wording (...) in paragraph c) of paragraph 1 (...).

⁶⁰ Text added by article 1 of Law no. 10/2025 of 29 December.

⁶¹ Text added by article 1 of Law no. 10/2025 of 29 December.

⁶² Text added by article 1 of Law no. 10/2025 of 29 December.

⁶³ Text amended by article 1 of Law no. 10/2025 of 29 December. Previous wording (...) carry out a single taxable transaction (...).

of the transaction.

2. The obligations provided for in paragraphs 1 to 3 of article 26 relating to the supply of goods and services carried out in the national territory by non-resident taxable persons must be complied with by means of the declaration of isolated transactions.⁶⁴

ARTICLE 34 – (Calculation of the tax included in the price)

In cases where the invoicing or its registration is processed by values with tax included, under the terms of the previous articles, the calculation of the corresponding taxable base is obtained by dividing those values by 116⁶⁵, multiplying the quotient by 100 and rounding the result, down or down, to the nearest unit, without prejudice to the adoption of any other method leading to the same result.

SECTION IV – Special Regimes

SUBSECTION I – Exemption regime

Revoked⁶⁶

⁶⁴ Text added by article 1 of Law no. 10/2025 of 29 December.

⁶⁵ Amended by Article 1 of Law No. 10/2025 of 29 December. Previous wording 34. (...) of the 117 (...)

⁶⁶ Text Repealed by article 3 of Law no. 10/2025 of 29 December. Previous version: " SECTION IV – Special regimes

SUBSECTION I – Exemption regime

ARTICLE 35 – (Scope)

1. Taxable persons who, not having or being required to have regularly organized accounts for the purposes of income taxation, nor engaging in import, export or related activities, have reached, in the previous calendar year, a turnover equal to or less than 750 000.00 MT, shall benefit from tax exemption.

2. In the case of taxable persons who start their activity, the turnover to be taken into account shall be established in accordance with the forecast made for the current calendar year and contained in the declaration of commencement of activity, after confirmation by the Directorate-General of Taxes.

3. Where the reference period in the year of commencement of activity for the purposes of the preceding paragraphs is shorter than the calendar year, the turnover for that period shall be converted into a corresponding annual turnover.

4. The turnover provided for in the preceding paragraphs is made up of the value of the transfers of goods and/or services that served as the basis for the determination of the taxable income under the terms of the Personal Income Tax Code and the Corporate Income Tax Code, always excluding Value Added Tax. If there is no taxable income, because there is a permanent exemption from those taxes, the elements that would have been taken into account in the absence of such exemption are considered.

5. Notwithstanding the provisions of the preceding paragraph, taxable persons who carry out exempt transactions without the right to deduct and at the same time carry out a taxable ancillary activity may determine their turnover for the purposes of the provisions of paragraph 1, taking into account only the

values relating to the ancillary activity.

ARTICLE 36 – (Right to deduct)

Taxable persons who benefit from the tax exemption under the terms of paragraph 1 of the previous article are excluded from the right to deduct provided for in article 18 of this Code.

ARTICLE 37 – (Option for the normal regime)

1. Taxable persons eligible for exemption from tax pursuant to paragraph 1 of article 35 may waive such exemption and opt for the normal application of the tax to their taxable transactions.

2. The right of option shall be exercised by submitting an appropriate declaration to the competent Tax Area Directorate, and shall take effect from 1 January of the following calendar year, unless the taxable person commences its activity during the year, in which case the option made in that declaration shall take effect from the beginning of the activity.

3. Having exercised the right of option in accordance with the preceding paragraphs, the taxable person shall be required to remain under the scheme for which he has chosen for a period of at least five years. If, at the end of this period, you wish to return to the exemption regime, you must inform the Tax Administration of this, by submitting, before the end of that period, to the Directorate of the competent Tax Area the declaration of changes, which takes effect from 1 January of the year following the end of the said period.

ARTICLE 38 – (Option for the Exemption regime and regime changes)

1. If the taxable persons included in the normal regime meet the requirements set out in paragraph 1 of article 35 and wish to apply the exemption regime, they must submit a declaration of the changes that occur.

2. The declaration referred to in the previous paragraph must be submitted to the competent Tax Area Directorate during the month of January, taking effect from 1 January of the year in which it is submitted. In the case of late submission, it takes effect only from 1 January of the calendar year following the one in which it is lodged.

3. In all cases of change from an exemption regime to a tax regime or vice versa, the Directorate-General for Taxes may take the measures it deems necessary in order to prevent the taxable person concerned from enjoying unjustified advantages or suffering equally unjustified losses, in particular by not taking account of minor changes in turnover or due to exceptional circumstances.

ARTICLE 39 – (Invoicing)

Taxable persons exempt under the terms of paragraph 1 of article 35, when issuing invoices for goods transmitted or services provided in the exercise of their commercial, industrial or professional activity, must affix to it the words "VAT – Exemption Regime"

ARTICLE 40 – (Special Obligations)

1. Taxable persons exempted under the terms of paragraph 1 of article 35 shall be required to submit the declarations of commencement and cessation of activity.

2. The taxable persons referred to in paragraph 1 of this article are also required to submit, in duplicate until the last working day of February of each year, to the Directorates of Tax Areas, Border Posts, Tax Posts and Collection Posts, to which they are attached, a declaration stating the purchases and sales or services provided during the previous year.

3. Exempt taxable persons who exceed the exemption limit in a given year shall be notified to submit the declaration of changes, within fifteen days, based on the turnover they considered to have achieved.

4. Tax shall be payable on transactions carried out by taxable persons from the month following the

SUBSECTION II – Simplified taxation regime**Revoked⁶⁷**

submission of the declaration required under the preceding paragraph.

ARTICLE 41 – (Exemption from other obligations)

1. Taxable persons exempted under the terms of paragraph 1 of article 35 are exempt from the other obligations provided for in this law.
2. Notwithstanding the provisions of the preceding paragraph, exempt taxable persons shall be obliged to keep in good shape and to present the documents proving their acquisition whenever requested.

⁶⁷ Text Repealed by article 3 of Law no. 10/2025 of 29 December. Previous wording: "SUBSECTION II – Simplified taxation regime"

ARTICLE 42 – (Scope)

1. Taxpayers with an annual turnover of more than MT 750,000.00 and less than MT 2,500,00.00, who do not have, nor are required to have, accounts regularly organized for income tax purposes, do not carry out import, export or related activities, are subject to the simplified taxation regime, provided for in this subsection.
2. The taxpayers referred to in the preceding paragraph shall assess the tax due to the State by applying a percentage of 5% to the value of sales made or services performed, with the exception of sales of tangible capital goods that have been used in the activity carried out by them.
3. No amount of tax incurred shall be deducted from the tax determined pursuant to paragraph 2.
4. The annual turnover referred to in paragraph 1 shall be the value definitively taken into account for the purposes of income taxation.
5. In the case of taxpayers who start their activity, the turnover is established in accordance with the forecast made by the taxpayer in the declaration of commencement of activity and confirmed by the Directorate-General of Taxes.
6. When the period of activity is less than the calendar year, it shall be converted into a corresponding annual turnover.
7. In any event, taxable persons who, being included in the normal regime on the date of cessation of activity, restart this or the other within twelve months of the cessation of activity, may not, in any case, benefit from the simplified taxation regime.
8. Notwithstanding the provisions of paragraph 4, taxable persons who carry out exempt transactions without the right to deduct, and at the same time carry out a taxable ancillary activity, shall determine their turnover for the purposes of the provisions of paragraph 1, taking into account only values relating to the ancillary activity.

ARTICLE 43 – (Option for the regime)

1. Taxpayers who are eligible for the simplified taxation regime provided for in Article 42 may waive such a regime and opt for the normal application of the tax to their taxable transactions.
2. The right of option shall be exercised by submitting an appropriate declaration to the competent Tax Area Directorate and shall take effect from 1 January of the following calendar year, unless the taxable person commences its activity during the year, in which case the option made in that declaration shall take effect from the beginning of the activity.
3. Having exercised the right of option in accordance with the preceding paragraphs, the taxable person shall be required to remain under the scheme for which he has chosen for a period of at least five years.

If, at the end of this period, you wish to return to the simplified taxation regime, you must inform the Tax Administration of this by submitting, before the end of that period, to the Directorate of the competent Tax Area, a declaration of changes, which will take effect from 1 January of the year following the end of the said period.

ARTICLE 44 – (Option for the simplified taxation regime)

1. If the taxable persons included in the normal regime meet the requirements set out in paragraph 1 of article 42 and wish to apply the simplified taxation regime, they must submit the declaration of the changes.

2. The declaration referred to in the previous paragraph must be submitted to the competent Tax Area Directorate during the month of January, taking effect from 1 January of the year in which it is submitted. In the case of late submission, it takes effect from 1 January of the calendar year following the one in which it is lodged.

ARTICLE 45 – (Invoicing)

Invoices or equivalent documents issued by taxpayers subject to the simplified taxation regime provided for in article 42 do not give the purchaser the right to deduct, and they must expressly state the words "VAT - Does not confer the right to deduct".

ARTICLE 46 – (Change of regime)

In cases of transition from the normal regime to the normal regime of simplified taxation, or conversely, the General Directorate of Taxes, may take measures it deems necessary in order to prevent the taxable person from enjoying unjustified advantages or suffering equally unjustified losses. In particular, it may not take account of changes in turnover that are insignificant or due to exceptional circumstances.

ARTICLE 47 – (Bookkeeping obligations)

1. Taxpayers subject to the special tax regime provided for in article 42 shall be obliged to register, within thirty days from their receipt, the invoices, equivalent documents and return notes or notes relating to goods or services acquired, as well as the documents issued in relation to goods or services transmitted, and to keep them in good order and in compliance with the register of active and passive transactions.

2. In order to comply with the provisions of paragraph 1, taxpayers must have the following documents:

- a) Purchase record book;
- b) Record book of sales and services rendered;
- c) Register of general expenses.

3. The books referred to in paragraph 2 shall, before being used, be presented, with numbered sheets, to the Directorate of the competent Tax Area, so that the respective Director may initial them and sign the terms of opening and closing.

ARTICLE 48 – (Exit from the regime)

In cases where there are well-founded grounds for believing that the simplified taxation regime provided for in Article 42 confers unjustified advantages on the taxpayer or causes serious distortions of competition, the Directorate-General for Taxation may at any time compel the taxpayer to apply the normal tax regime.

ARTICLE 49 – (Payment and other obligations)

1. Taxpayers subject to the simplified taxation regime provided for in article 42 are also required to:

- a) To declare the commencement, alteration or cessation of its activity in accordance with the law;
- b) To pay to the competent authority, by means of an approved model guide, the tax due for each quarter

SECTION V – Common provisions

ARTICLE 51 – (Tax rectifications)

1. The provisions of Articles 27 et seq. shall be complied with whenever, after the invoice or equivalent document has been issued, the taxable amount of a transaction or the respective tax is rectified for any reason.

2. If, after the passive transactions have been registered, the transaction is cancelled or its taxable amount reduced as a result of invalidity, termination, termination or reduction of the contract, by the return of goods or by the granting of rebates or discounts, the supplier of the goods or service provider may deduct the corresponding tax until the end of the tax period following that in which the circumstances that led to the cancellation arise of the assessment or the reduction of its taxable amount.

3. In the case of inaccurate invoices that have already given rise to the registration referred to in the previous paragraph, the rectification is mandatory when tax has been paid, unless it can be carried out without any penalty until the end of the tax period following that to which the invoice to be rectified relates. It is optional if there is excess tax, but it can only be made within one year.

4. If the purchaser of the goods or the recipient of the service who is a taxable person for the purposes of the tax, the purchaser of the goods or the recipient of the service

of the calendar year, respectively and in order, in the months of April, July, October and January of the following year:

c) to submit, to the competent Tax Area Directorate, in triplicate and by the last day of February of each year, a declaration containing the purchases and/or services rendered.

2. In the event of a change in turnover that requires the taxpayer to apply the normal tax regime, the declaration of the changes verified must be submitted during the month of January of the calendar year following the year to which the turnover relates.

3. Where, for the purposes of personal income tax or corporation tax, a turnover-based taxable income has been definitively fixed in excess of the limit established in Article 42, the taxpayer shall submit a declaration of the changes within 15 days of notification of such fixation.

4. The application of the normal regime shall take place from the quarter following the quarter in which the submission of the declaration of changes referred to in the preceding paragraphs becomes mandatory.

5. In the event of cessation of activity, the payment of the tax and the submission of the declaration referred to in paragraph 1(c) must be made within 30 days of the cessation.

ARTICLE 50 – (Retention of documents and records)

The books, records and supporting documentation required under Article 47 shall be kept in good order for five subsequent calendar years."

who is a taxable person has already registered a transaction in respect of which his supplier or service provider has cancelled, a reduction in the taxable amount or a correction to the lower end of the amount invoiced, shall correct the correction by the end of the tax period following the receipt of the amending document, the deduction made.

5. In the event that the taxable amount of a transaction or the respective tax is corrected downwards, the adjustment in favour of the taxable person may be made only when he has proof that the purchaser was aware of the correction or that he has been refunded the tax, failing which the respective deduction shall be deemed undue.

6. The correction of material or calculation errors in the accounting or bookkeeping records and in the declarations referred to in Article 32 and Article 49(b) and (c) shall be mandatory when there is underpaid tax and may be carried out without penalty until the end of the following period. It is optional if there is excess tax, but it can only be paid within a period of one year, which, in the case of the exercise of the right to deduct, is counted from the date on which the respective right arises under the terms of paragraph 1 of article 21.

7. In duly justified cases, the correction of the errors referred to in the previous paragraph resulting in excess tax may still be authorised within five years following the period to which the error relates, by means of a request addressed to the Director General of Taxes.

8. Taxable persons may also deduct the tax invoiced on credits considered irrecoverable as a result of enforcement, bankruptcy or insolvency proceedings, without prejudice to the obligation to pay the tax corresponding to the credits recovered, in whole or in part, in the tax period in which they are received, without observing the limitation period.

9. In the case provided for in the first part of the preceding paragraph, the purchaser of the goods or services who is a taxable person shall be notified of the total or partial cancellation of the tax, for the purposes of rectifying the deduction initially made.

10. Whenever the taxable amount is subject to reduction, the amount of the taxable amount must be divided between consideration and tax, at the time of issuance of the respective document, if the rectification of the tax is also sought.

ARTICLE 52 – (Responsibility of the purchaser)

1. The purchaser of the goods or services who is a taxable person of the referred to in Article 2(1)(a), (b) and (c), acting in that capacity, and who is not exempt, shall be jointly and severally liable with the supplier for the payment of the tax, where the

invoice or equivalent document which is mandatory to be issued pursuant to Article 24 has not been issued, contains an incorrect indication as to the name or address of the interveners, the nature or quantity of the goods transmitted or services supplied, the price or amount of tax due.

2. The purchaser or recipient who proves that he has paid to the supplier, duly identified, all or part of the tax due shall be released from the joint and several liability provided for in the preceding paragraph, for the amount corresponding to the payment made, except in the case of bad faith.

Article 53 (Transitional provisions)

Taxpayers who are integrated in the Exemption and Simplified Taxation Regime regimes will now comply with the material and formal obligations under the terms of this Law.⁶⁸

⁶⁸ Text added by article 1 of Law no. 10/2025 of 29 December.

ANNEX I OF PARAGRAPH H) OF PARAGRAPH 12 OF ARTICLE 9 OF THE VAT CODE LIST OF GOODS EXEMPT FROM VAT⁶⁹

GUIDELINE CODE	DESCRIPTION OF GOODS
0102.21.00	Domestic cattle Purebred breeders
0102.31.00	Buffaloes Purebred breeders
0103.10.00	Live swine Purebred breeders
0104.10.10	Sheep Purebred breeders
0104.20.10	Goats Purebred breeders
0105.11.10	Roosters and hens (weighing not more than 185g) Certified Breeders
0105.12.10	Wagons and turkeys (weighing not more than 185g) Certified Breeders
0105.13.10	Ducks Certified Breeders
0105.14.10	Geese Certified Breeders
0105.94.10	Roosters and hens Certified breeders and layers
0301.99.10	Breeding fish
0306.36.10	Cameroon Shrimp larvae not exceeding 1 mm in length
0402.21.10	Milk powder, granules or other solid forms, concentrated, not containing added sugar or other sweetening matter, of a fat content by weight exceeding 1.5%, for use in industry, put up in packings of a capacity of 25 kg or more
0404.90.10	Whey for lactation of puppies

⁶⁹ Table amended by article 3 of Law no. 22/2022 of 28 December.

GUIDELINE CODE	DESCRIPTION OF GOODS
0407.11.00	Birds' eggs, in shell, fresh, preserved or boiled Certified hatching eggs
0511.10.00	Bovine semen
0511.10.10	Semen of other species
0511.99.10	Bovine embryos
0511.99.20	Embryos of other species
0602.90.20	Forest plant and fruit tree seedlings
0701.10.00	Seed potatoes
0701.90.00	Other
0702.00.00	Tomatoes, fresh or chilled
0703.10.11	Onions From seed
0703.10.19	Other
0713.32.10	Adzuki beans intended for sowing
0713.33.10	Common beans Intended for sowing
0713.39.10	Other Beans Intended for sowing
0801.19.10	Hybrid Coconut Seed
0801.19.20	Non-hybrid coconut seed
1001.11.00	Durum wheat For sowing
1001.91.00	Other For sowing
1002.10.00	Rye For sowing
1003.10.00	Barley For sowing
1004.10.00	Oatmeal For sowing
1005.10.00	Corn For sowing

GUIDELINE CODE	DESCRIPTION OF GOODS
1006.10.10	Paddy rice Intended for sowing
1007.10.00	Grain sorghum For sowing
1008.21.00	Millet For sowing
1008.90.21	Mixed Up For sowing
1008.90.91	Other cereals For sowing
1101.00.00	Wheat flours or mixture of wheat and rye
1102.20.00	Corn flour
1201.10.00	Soya, whether or not crushed For sowing
1202.30.00	Peanuts For sowing
1204.00.10	Flax seeds For sowing
1206.00.10	Sunflower seeds For sowing
1207.21.00	Cotton Seeds For sowing
1207.30.00	Castor seeds
1207.40.10	Sesame seeds For sowing
1207.50.00	Mustard seeds
1207.60.00	Safflower seeds
1207.70.00	Melon Seeds
1207.91.00	Poppy or poppy seeds
1207.99.10	Other seeds for sowing
1209.10.00	Sugar beet seeds
1209.21.00	Alfalfa seed (lucerne)

GUIDELINE CODE	DESCRIPTION OF GOODS
1209.22.00	Trevó seeds (<i>Trifolium</i> spp)
1209.23.00	Fescue seeds
1209.24.00	Kentucky meadow grass seeds (<i>Poa pratensis</i> L.)
1209.25.00	Azevém seeds (<i>Lolium multiflorum</i> Lam, <i>Lolium perente</i> L.)
1209.29.00	Other seeds
1209.30.00	Seeds of herbaceous plants grown especially for their flowers
1209.91.00	Other Vegetable seeds
1209.99.00	Other seeds
1901.10.10	Dairy preparations for infants and children aged young age, put up for retail sale
1901.10.30	Therapeutic food preparations based on dairy products or cereals
2106.90.20	Compound product for fortification of food intended for human consumption, containing some of the following micronutrients, vitamins, iodine, zinc, folic acid and iron (e.g. products called PREMIX)
2309.90.10	Preparations, additives of a kind used in shrimp aquaculture, poultry farming, livestock farming and high-concentration premixes
3101.00.00	Fertilisers of animal or vegetable origin, whether or not mixed with each other or chemically treated; fertilisers resulting from the chemical mixing or treatment of products of animal or vegetable origin
3102.10.00	Mineral or chemical fertilizers, nitrogenous: Urea, whether or not in aqueous solution
3102.21.00	Mineral or chemical fertilisers (fertilisers), nitrogenous (nitrogenated): Ammonium sulphate
3102.29.00	Other mineral or chemical fertilisers (nitrogenated)
3102.30.00	Mineral or chemical fertilizers, nitrogenous: Ammonium nitrate, whether or not in aqueous solution
3102.40.00	Mineral or chemical fertilizers, nitrogenous: Mixtures of ammonium nitrate with calcium carbonate or other inorganic matter not having fertilising power

GUIDELINE CODE	DESCRIPTION OF GOODS
3102.50.00	Mineral or chemical fertilizers, nitrogenous: Sodium nitrate
3102.60.00	Mineral or chemical fertilisers (nitrogen): Double salts and mixtures of calcium nitrate and ammonium nitrate
3102.80.00	Mineral or chemical nitrogenous fertilisers: Mixtures of urea and ammonium nitrate in aqueous or ammoniacal solutions
3102.90.00	Mineral or chemical fertilisers (nitrogen): Other including mixtures not mentioned in the preceding subheadings
3103.11.00	Mineral or chemical fertilisers (fertilisers), phosphate: - Superphosphates Containing by weight 35% or more of diphosphorus pentoxide
3103.19.00	Other superphosphates
3103.90.00	Other mineral or chemical fertilisers (fertilisers), phosphated
3104.20.00	Mineral or chemical fertilizers, potassium: Potassium chloride
3104.30.00	Mineral or chemical fertilizers, potassium: Potassium sulfate
3104.90.00	Other mineral or chemical fertilisers, potassium
3105.10.00	Mineral or chemical fertilisers containing two or three of the following fertilising elements: nitrogen, phosphorus and potassium; other fertilizers. Products of this chapter put up in tablets or similar form, or in packings of a gross weight not exceeding 10 kg.
3105.20.00	Mineral or chemical fertilisers containing the three fertilising elements: nitrogen, phosphorus and potassium
3105.30.00	Mineral or chemical fertilisers, Diammonium hydrogen-orthophosphate (ditonic or dominiacal phosphate)
3105.40.00	Ammonium dihydrogen-orthophosphate (monoammonium phosphate or monoammonical), whether or not mixed with diammonium hydrogen-orthophosphate (diammonium or diamical phosphate)

GUIDELINE CODE	DESCRIPTION OF GOODS
3105.51.00	Other mineral or chemical fertilisers containing the two fertilising elements, nitrogen and phosphorus: Containing nitrates and phosphates
3105.59.00	Other mineral or chemical fertilisers containing the two fertilising elements: nitrogen and phosphorus
3105.60.00	Mineral or chemical fertilizers, containing the two fertilizer elements: phosphorus and potassium
3105.90.00	Other mineral or chemical fertilisers containing two or three of the following fertilising elements: nitrogen, phosphorus and potassium; other fertilisers, products of this chapter, put up in tablets or similar form, or in packings of a gross weight not exceeding 10 kg
3808.91.00	Insecticides
3808.92.00	Fungicides
3808.93.00	Herbicides, germination inhibitors and growth regulators for plants
3808.94.00	Disinfectants
3808.99.00	Other similar products
3821.00.00	Culture media prepared for the development of microorganisms and the maintenance of microorganisms (including viruses and organisms or from plant, human or animal cells
3822.00.00	Diagnostic or laboratory reagents on any medium and prepared diagnostic or laboratory reagents, whether or not presented on a medium, other than those of heading 30.02 or 30.06; Certified Reference Materials
3926.90.10	Floats for fishing
3926.90.40	Animal ID earrings
5608.11.00	Nets made for fishing
6304.20.00	Mosquito nets for bed
6305.10.00	Sacks and bags of jute or other textile bast fibres
8201.10.00	Belt
8201.30.00	Scallops, pickaxes, hoes, rakes, and scrapers

GUIDELINE CODE	DESCRIPTION OF GOODS
8201.40.00	Axes, patterns, and similar edged tools
8201.50.00	Pruning shears (including poultry shears), handled with one hand
8201.60.00	Hedge shears, pruning shears and similar tools, handled with both hands
8201.90.00	Other Hand Tools for Agriculture, Horticulture and Forestry
8202.10.00	Hand saws
8202.20.00	Sheets for band saws
8208.40.00	Saw cutting chains
8413.20.00	Pumps for liquids, even with measuring device, liquid elevators. Hand pumps, other than those of subheadings 8413.11 and 8413.19
8413.81.00	Other Pumps
8413.82.00	Liquid elevators
8419.31.00	Dryers For agricultural products
8421.11.00	Centrifuges, including centrifugal dryers; Creamers
8424.81.00	Mechanical (whether or not hand-held) apparatus for projecting, dispersing or spraying liquids or powders for agriculture or horticulture
8424.90.00	Parties
8425.31.00	Electric motor winches and winches
8425.39.00	Others Winches & Capstans
8432.10.00	Arados e charruas
8432.21.00	Disc Grades
8432.29.00	Others: Harrows, scarifiers, cultivators, extirpaters, hoes and weeders
8432.31.00	Sowers, planters and transplanters
8432.41.00	Manure spreaders and fertilizer spreaders
8432.80.00	Other agricultural, horticultural or forestry machinery for preparing or working the soil or for cultivation

GUIDELINE CODE	DESCRIPTION OF GOODS
8432.90.00	Parts of machinery and apparatus for agricultural, horticultural or forestry uses, for preparing or working the soil or for cultivation
8433.11.00	Motorised lawn mowers, with a cutting device rotating in a horizontal plane, for harvesting or threshing agricultural products
8433.19.00	Other motorized lawn mowers, for harvesting or threshing agricultural products
8433.20.00	Harvesters, including cutter bars for mounting on tractors
8433.30.00	Other machinery for harvesting and disposing hay
8433.40.00	Straw or fodder balers, including balers
8433.51.00	Combine Harvesters
8433.52.00	Other threshing machines and apparatus
8433.53.00	Machines for harvesting roots or tubers
8433.59.00	Other harvesting and threshing machinery
8433.60.00	Machines for cleaning or sorting eggs, fruit or other agricultural products
8433.90.00	Parts of machinery and apparatus for harvesting or threshing agricultural products, including straw or fodder balers; lawn mowers and harvesters; machines for cleaning and sorting eggs, fruit or other agricultural products, other than those of heading number. 84.37
8434.10.00	Milking machines
8434.20.00	Machinery and apparatus, for the dairy industry
8434.90.00	Parts of milking machines and apparatus for the dairy industry
8435.10.00	Presses, crushers, machines and similar apparatus for the manufacture of wine, cider, fruit juices or similar beverages Machinery and apparatus
8435.90.00	Parts of presses, crushers, machinery and the like, for the manufacture of wine, cider, fruit juices or similar beverages
8436.10.00	Machinery and apparatus for the preparation of feedingstuffs and animal feed
8436.21.00	Incubators and brooders for poultry farming

GUIDELINE CODE	DESCRIPTION OF GOODS
8436.29.00	Other machinery and apparatus, for agriculture, horticulture, forestry, poultry farming or beekeeping, including germinators fitted with mechanical or thermal devices
8436.80.00	Other machinery and appliances
8436.91.00	Parts of machinery and apparatus for agriculture, horticulture, forestry, poultry farming or beekeeping, including germinators equipped with mechanical or thermal devices and brooders and brooders for forestry
8436.99.00	Parts of other machinery and apparatus
8437.10.00	Machinery for cleaning, sorting or penetrating grain or dry agricultural products
8437.80.00	Other machinery for the milling or processing of dried cereals or vegetables, other than of a kind used on farms
8437.90.00	Parts of machinery for cleaning, sorting or screening of grains or dried vegetables; machinery for the milling or processing of dried cereals or vegetables, other than of a kind used on farms
8438.30.00	Machinery and apparatus not specified or included elsewhere in this Chapter ... Machinery and apparatus for the sugar industry
8438.60.00	Machinery for the preparation of fruit or vegetables
8501.61.00	Alternating current generators (alternators) Of a power not exceeding 75 KVA
8502.11.00	Compression-ignition internal combustion piston engine generator sets (diesel or semi-diesel engines) Of a power not exceeding 75 KVA
8502.20.00	Generator sets of spark-ignition internal combustion piston engines (combustion engines)
8701.10.00	Single-axle tractors
8701.20.00	Road tractors for semi-trailers
8701.30.00	Lizard tractors
	Other tractors
8701.91.00	Not exceeding 18KW
8701.92.00	Exceeding 18KW but not exceeding 37KW

GUIDELINE CODE	DESCRIPTION OF GOODS
8701.93.00	Exceeding 37KW, but not exceeding 75KW
8701.94.00	Exceeding 75KW, but not exceeding 130KW
8701.95.00	Superior a 130KW
8704.21.90	Other motor vehicles for the carriage of goods, with a high-speed engine compression-ignition piston (diesel or semi-diesel), of gross weight not more than 5 tons
8716.80.00	Other non-self-propelled vehicles (animal-drawn carts)
9507.20.00	Hooks, whether or not mounted on terminals (sedelas)
9507.90.00	Other angling articles

ANNEX II OF PARAGRAPH E) OF PARAGRAPH 13 OF ARTICLE 9 OF THE VAT CODE LIST OF GOODS EXEMPT FROM VAT

GUIDELINE CODE	DESCRIPTION OF GOODS
1203.00.00	Copra
1206.00.90	Others - Sunflower Seeds
1207.20.90	Others- Cotton Seeds
1207.40.90	Others - Sesame Seeds
1207.99.00	Others - Mafurra Seeds
1502.00.00	Fat of bovine, ovine or caprine animals, other than that of heading No 15.03 (Tallow)
1507.10.00	Soya-bean crude oil, whether or not degummed
1508.10.00	Crude peanut oil (raw)
1511.10.00	Crude palm oil, PFAD (for the soap industry) and palm stearin
1512.11.00	Sunflower crude oil (raw)
1513.21.00	Crude palm kernel oil
1515.21.00	Crude corn oil (raw)
1515.50.10	Crude sesame oil (raw)
2508.40.00	Other clays
2530.10.00	Vermiculite, perlite, and chlorites, unexpanded (chemical earths for winterization)
2530.90.00	Other unspecified materials (activated chemical earths)
2712.90.00	Other - White oil (Paraffin oil)
2713.90.00	Other residues of petroleum oils or petroleum jelly
2815.11.00	Caustic soda (solid)
2823.00.00	Titanium oxide (dioxide)
2824.90.00	Other - Lead Oxide - BHT (Antioxidant)
2828.90.00	Other - Hypochlorites - (Irgasan) DP 300)
2836.20.00	Disodium carbonate (sodium)
2836.30.00	Sodium hydrogen carbonate (bicarbonate)
2839.19.00	Other - (Sodium silicate)
2839.90.00	Other - (Magnesium Silicate)

GUIDELINE CODE	DESCRIPTION OF GOODS
3204.19.00	Other - synthetic organic colouring matter - (dyes)
3301.90.00	Other - (Essential Oils)
3402.19.90	Other - (Other organic surface agents or surfactant preparations for industry)
3912.31.00	Carboxymethylcellulose and its salts - C.M.C. (Additive) Other

ANNEX III OF PARAGRAPH G) OF PARAGRAPH 1 OF ARTICLE 9 OF THE VAT CODE LIST OF GOODS EXEMPT FROM VAT⁷⁰

GUIDELINE CODE	DESCRIPTION OF GOODS
1108.11.00	Wheat Amide
1108.12.00	Cornstarch
1108.19.00	Other starches
1301.20.00	Gum – Arabica
1301.90.00	Rubber – lacquer; Gummies, resins, gummies - resins and oleoresins (balm, for example), natural; Other
1505.00.00	Lanolina
1521.90.00	Waxes; Abelhas wax; carnauba wax; spermacete; Little ozocerite
1701.99.00	Sucrose
1702.11.00	Lactose
1702.19.00	Lactose monohydrate (500 mg)
1702.30.00	Glucose
1702.50.00	Standard Futosis
2207.10.10	Ethyl alcohol for hospital use
2507.00.00	Caulino
2709.00.00	Bituminous Mineral Oil
2806.10.00	Chloric Acid
2807.00.00	Sulfuric Acid
2808.00.00	Nitric Acid
2809.10.00	Diphosphorus pentoxidum
2809.20.00	Phosphoric acid
2810.00.00	Boric Acid
2811.22.00	Silicon Dioxide
2811.29.00	Inorganic acids and other inorganic oxygenated components of non-metallic elements Other

⁷⁰ Table amended by article 3 of Law no. 22/2022 of 28 December.

GUIDELINE CODE	DESCRIPTION OF GOODS
2812.90.00	Halides and oxyhalides of non-metallic elements Other
2813.90.00	Sulphides of non-metallic elements; Commercial phosphorus trisulfide Other
2815.20.00	Potassium Hydroxide
2815.30.00	Sodium or Potassium Peroxides
2819.90.00	Chronic Oxides and Hydroxides Other
2823.00.00	Titanium Oxide
2825.90.00	Hydrazine and hydroxylamine, and their organic salts Other
2827.20.00	Calcium chloride
2827.39.00	Chlorides, oxychlorides and hydrochlorides, bromides and oxybromides iodides and oxyodides Other
2827.60.00	Halide and oxides
2829.19.00	Chlorates and prechlorates; bromates and perbromates; iodatos e periodatos Other
2829.90.00	Chlorates and prechlorates; bromates and perbromates; iodatos e periodatos Other
2832.30.00	Thiosulfates
2833.29.00	Sodium sulfates Other
2834.29.00	Nitrites, nitrates Other
2835.22.00	Monobasic Sodium Phosphate, Dibasic Sodium Phosphate
2835.24.00	Monobasic Potassium Phosphate, Potassium Phosphate
2835.25.00	Calcium hydrogen-orthophosphate (dicalcium phosphate)
2835.29.00	Other phosphates
2836.40.00	Potassium Carbonate
2836.50.00	Calcium Carbonate

GUIDELINE CODE	DESCRIPTION OF GOODS
2836.99.00	Carbonates; Petrocarbonates (percarbonates); commercial ammonium carbonate containing ammonium carbonate Other
2837.19.00	Potassium Cyanide Solution
2839.90.00	Magnesium Trisilicate
2841.50.00	AR Potassium Chromate
2841.61.00	Potassium Permanganate; Potassium Permanganate AR
2841.70.00	Ammonium Molybdate Solution
2841.80.00	Sodium Tungstate
2841.90.00	Potassium Pyroantimoniate
2842.90.00	Other salts of inorganic acids or peroxides
2843.21.00	Silver Nitrate
2843.29.00	Potassium Cyanide; Cupine Alkaline Citrate TS
2847.00.00	Hydrogen Peroxide
2901.29.00	Acyclic hydrocarbons Other
2902.11.00	Cyclohexane
2902.20.00	Benzene
2902.30.00	Toluene
2902.90.00	Methylene Chloride; Dichloromethane;
2903.13.00	Chloroform
2903.14.00	Carbon Tetrachloride
2903.22.00	Trichloroethylene
2904.91.00	Cyclic hydrocarbons Other
2905.11.00	methanol; Metanol HPLC; Metanol P.A
2905.12.00	Isopropyl Alcohol; n-Propyl Alcohol
2905.13.00	Ethanol; chlorobutanol
2905.14.00	Stearyl alcohol; cetyl alcohol; palmitic alcohol
2905.19.00	Propranolol Hydrochloride (200mg)
2905.31.00	Ethinoglycol
2905.32.00	Propylene glycol

GUIDELINE CODE	DESCRIPTION OF GOODS
2905.43.00	Manita or manitol
2905.44.00	D-glucitol (sorbitol)
2905.45.00	Glycerin
2905.49.00	Acetyl alcohols and their halogenated, sulphonated, nitrated or nitrosated derivatives Other
2906.13.00	Sterols and inositols
2906.21.00	Benzyl alcohol
2907.15.00	1-Naftol TS; 2-naftol
2907.19.00	Fénois; Fenois-Alcoois Other
2907.29.00	Pelifenols; phenols-alcohols Other
2909.19.00	Ethyl Eter
2909.49.00	Other Ethers
2912.19.00	Formaldehyde Solution
2912.19.00	Acetaldehyc; Anisaldehyde; p-Dimethylaminobenzaldehyde
2914.11.00	Acetone
2914.13.00	4-methylpentan-2-ol
2915.21.00	Glacial Acetic Acid
2915.24.00	Acetic Anhydride
2915.39.00	Saturated acyclic monocarboxylic acids and their anhydrides, halides, peroxides and peroxyacids, their halogenated, sulphanate, nitrated or nitrosated derivatives Other
2915.50.00	Propionic acid, its salts and its esters
2915.70.00	Palmitic acids, stearic acid, their salts and their esters
2915.90.00	Saturated acyclic monocarboxylic acids and seusanidrides, halides, peroxides and perxiacids; its halogenated, sulphanated, nitrated or nitrosated derivatives
2916.15.00	Oleic and linoleic acid, their salts and esters
2916.31.00	Benzoic acid salts and their esters
2916.32.00	Benzoyl chloride

GUIDELINE CODE	DESCRIPTION OF GOODS
2916.39.00	Sodium benzoate
2917.11.00	Oxalic acid; Amunium oxalate AR
2917.12.00	Adipic acid
2918.11.00	Lactic acid, its salts and esters
2918.12.00	Tartaric Acid
2918.14.00	Citric Acid
2918.15.00	Citric acid salts and esters: Sodium citrate
2918.16.00	Gluconic Acid
2918.19.00	Sodium tartrate, propyl, octylic and dodecyl esters of gallic acid
2918.99.00	Captopril (200mg); Captopril
2921.59.00	Diethylamine
2922.12.00	Diethylamine
2922.15.00	Triethanolamine and its salts
2922.29.00	Procaine Hydrochloride
2922.49.00	Amino compounds with oxygenated functions Other
2923.90.00	Quaternary Salts and Ammonium Hydroxide Other
2924.29.00	Compounds of carboxamide function; Carbonic acid amide function compounds Other
2925.11.00	Sodium saccharin and its salts
2925.19.00	o-Tolina
2926.10.00	Acrylonitrile
2930.90.00	Organic Thiocompounds Other
2932.11.00	Tetrahydrofuran
2932.99.00	Heterocyclic compounds of oxygen heteroatoms only Other
2933.31.00	Pyridine and its salts
2933.39.00	Hetrocyclic compounds exclusively of nitrogen heteroatoms Other

GUIDELINE CODE	DESCRIPTION OF GOODS
2933.91.00	Diazepam; Standard diazepam; Diazepam Related Compound; Diazepam related compound B; Nordazepam standard; Haloperidol (200mg); Haloperido Related Compound A (10mg); haloperidol related compound B (10mg);
2935	Sulfonamides
2936.24.00	Folic acid (500mg) (Vitamin M or Vitamin Bc); Folic Acid (500mg) Compound related to
2936.27.00	Ascorbic acid, ascorbic acid esters
2936.28.00	Tocopherols
2936.29.00	Niacinamide
2937.21.00	Standard Prednison
2937.23.00	Progesterone 20 mg
2939.30.00	Caffeine and its salts
2940.00.00	Chemically pure açúcares
2941.10.00	Penicillins and their derivatives
2941.30.00	Tetraclines and their derivatives
2941.90.00	Anithibitics Other
2942.00.00	Organic compounds
3204.11.00	Disperse dyes and preparations based on such dyes
3206.19.00	Other colouring matter Other
3404.90.00	Microcrystalline wax
3503.00.00	Gelatin
3505.10.00	Sodium starch glycolate (sodium starch glycolate); TS starch gum; starch derivatives
3701.99.00	Films, foils and laminates: plastic films; regenerated cellulose films; aluminum foil or foil; aluminum foils or foils (foil or coated with a plastic layer)
3901.90.00	Polyethylene (low, medium and high density)
3904.90.00	Polyvinyl Clorest (PVP) (with or without plasticizer)
3906.90.00	Acrylic polymer in primary form Other

GUIDELINE CODE	DESCRIPTION OF GOODS
3911.90.00	Synthetic resins
3912.31.00	Carboxymethylcellulose and its salts
3912.90.00	Cellulose and its derivatives Other
3923.30.20	Packaging for packaging medicines and products
3926.90.90	Plastic barrels, plastic pallets
4014.90.00	Toiletries or pharmacy articles of non-hardened vulcanized rubber Other
4821.10.00	Printed labels (pass, fail, quarantine)
5906.10.00	Gummed tape
7010.10.00	Glass Vials, Ampoules
7017.90.00	Laboratory, hygiene and pharmaceutical glassware, whether or not graded or calibrated Other
7310.10.00	Metal barrels
7313.00.00	Iron or steel barbed wire; Twisted wire or strip, whether or not barbed of iron or steel, of a kind used in fences
7604.29.00	Aluminum plates, or aluminum alloys
7607.19.00	Aluminum plates; Films for the manufacture of envelopes, blisters and strips
7612.90.00	Containers for storage and transportation of liquid
7616.91.00	Aluminum pallets
8311.90.00	Other wire, rods, tubes, plates and the like, of base metal
8414.59.00	Laminar flow chambers
8418.50.10	Refrigerators, freezers for laboratory uses for medicinal purposes
8419.89.00	Fluidized bed greenhouse
8456.90.00	Suppository Molding Machine
8480.20.00	Mold bottom plates
9016.00.00	Sensitive scales and weights equal to or less than 5 cg
9018.39.00	Pouch systems

GUIDELINE CODE	DESCRIPTION OF GOODS
9025.19.00	Other Thermometers
9025.90.00	Parts and accessories of measuring instruments

ANNEX IV OF PARAGRAPH 16 OF ARTICLE 9 OF THE VAT CODE - LIST OF GOODS EXEMPT FROM VAT⁷¹

GUIDELINE CODE	DESCRIPTION OF GOODS
3506.91.00	Silicone for solar panel sealing - silicone module sealant photovoltaic STY- 911
3810.90.00	Solar Panel Welding Flux - 952S – Low Pollution
3901.20.00	Vinyl ethylene acetate (EVA) screen for adhesion of solar panel components - Resistant to ultraviolet rays, excellent adhesion to tempered glass and aluminum, with thickness between 0.40 and 050 mm
7007.19.00	Tempered Glass for Solar Panel Production - Fully tempered with low iron content, ultra-clear; Prismatic glass plates, maximum dimensions 2x1meter and thickness of 3.2+/- 0.14mm
7408.29.00	Metal Strips for Solar Panel Soldering (Ribbon) - Tin Plated Copper
7604.10.00	Aluminum Profile Kit for framing (framing/armature) of solar panels - Anodized aluminum (MP9902A)
8451.80.00	Solar Panel Glass Washing Machine - Panel Glass Washing Capacity Up to 500Wp
8461.90.00	Metal strip cutting machine (Ribbon) for welding solar panels - 380V voltage; three-phase; 50Hz; Tack Screen (EVA) Cutting Machine of Solar Panel Components and Backsheet - 380V Voltage; three-phase 50Hz;
8486.20.00	Tabulation and Stringer Machine (formation of rows of solar cells and transport) - Voltage of 380V; three-phase; 50Hz; Solar Panel Laminating Machine - 380V Voltage; three-phase; 50Hz; Solar panel frame placement machine (for mechanical resistance) - 380V voltage; three-phase; 50Hz; Silicone pump for sealing solar panels - Pneumatic; Pressure up to 12 Bars
8486.40.00	Corner application machine for framing solar panels - 380V

⁷¹ Table added by article 3 of Law no. 22/2022 of 28 December.

GUIDELINE CODE	DESCRIPTION OF GOODS
	voltage; three-phase; 50Hz
8536.90.00	Solar Panel Terminal Junction Boxes - Minimum Insulation Condition - IP 67
8541.43.00	Solar Cells - Polycrystalline and monocrystalline
9031.49.00	Solar Panel Quality Testing Machine - 380V Voltage; three-phase; 50Hz; Solar Cell Testing Machine - 380V Voltage; three-phase; 50Hz

WHY MOORE?

Moore no mundo

Founded in London in 1907, Moore is a leading international accounting and consulting group, with a network of 558 firms. Our goal is not only to meet customers' needs in the most effective and cost-effective way, but also to help them develop and achieve future success. We seek to establish the necessary trust in our customer relationships, ensuring that we are their first choice for their business needs.

As one of the top 10 international accounting firms, Moore is growing rapidly, taking a modern and dynamic approach. The company prioritizes customer needs over mere expansion, fostering a unique culture through organic growth. This customer-centric philosophy is based on strong relationships and highly personalized service.

Among our main strategic objectives is the construction of a competitive and quality group, with a strong international customer base, focused on profitability and the strengthening of each region. Customers have access to a wide range of essential services, including:

-
- | | | |
|---|--|--|
| <ul style="list-style-type: none">• Auditing• Business Secretarial• Business Finance• Accounting | <ul style="list-style-type: none">• Recruitment and Training• Tax Consulting• Taxation• Payroll | <ul style="list-style-type: none">• Risk Management, Corporate Governance and Internal Audit |
|---|--|--|
-

Member firms offer a wide range of professional services and specialist skills to support clients' cross-border objectives while maintaining high standards of service at the local level. They adhere to common terms of membership, objectives and auditing standards, with the quality of services being regularly evaluated to maintain Moore's tradition of excellence.

As a global network, we are at the heart of communities around the world. We help you better understand your country, industry and local community – to plan for the present and prepare for the future.



US\$ 5.1 Billions



37,000 people



114+ countries



558+ offices

MOORE MOÇAMBIQUE

Moore Mozambique, aligned with the global network, is an auditing and consulting firm recognized for innovation, quality and commitment to the future. Present in Mozambique since 1999, it was initially associated with the BDO network.

We have a team of approximately 100 highly qualified professionals, dedicated to offering solutions adapted to the needs of our customers.

We believe in a personalized service, in which each client is accompanied by a "Client Service Partner", ensuring proximity, efficiency and excellence in the provision of services. By combining technical expertise, experience and innovation, we create value for our customers.

In recent years, Moore Mozambique has recorded significant growth, consolidating its position in the market and continuously investing in the development of solutions that anticipate the challenges of the future

Our Services

Expert Consulting Services

Moore Mozambique has qualified consultants to develop solutions that add value to companies and other entities that seek our services. Our extensive experience allows us to offer functional and practical solutions, designed by our team with the use of advanced technological tools and always considering the particularities of each business.

Our services include:

- Company valuation
- Feasibility studies
- Investments and financing
- Restructuring of companies and organizations
- Strategic and business plans
- Information systems consulting, focusing on the implementation and development of integrated systems
- Human Resources Consulting
- Specific training

Auditing

In addition to validating financial information from companies and institutions, we analyze not only the correct application of standards and legislation, but also the internal control system and the continuity of operations.

Our professional performance in this area includes, in particular:

- Full audit of financial statements
- Review of internal control
- Limited review of financial statements
- Examination of forward-looking financial information
- Specific audits (incentives, due diligence, accounting, research, statistics)
- Internal audit, management, information technology, taxation and others

Accounting Services

Moore Mozambique is the largest accounting service provider in the country, with more than 30 technicians and several client companies.

We offer the ideal solution for entrepreneurs and institutions that want to focus on their core business, delegating specialized administrative tasks to experienced and qualified professionals.

Our main services include:

- IFRS transition and implementation
- Accounting Services
- Accounting outsourcing
- Payroll services
- Account consolidation
- Education

Taxation

Moore Mozambique monitors the compliance with tax obligations of companies, institutions and individuals, reviewing strategies to optimize tax solutions and minimize tax risks.

Our services include:

- Monitoring compliance with tax obligations and charges
- Mergers and acquisitions
- Insolvency proceedings
- Complete diagnosis of the fiscal situation
- Tax planning and prevention
- Studies on the tax framework
- Capture of tax incentives
- Support in the taxation of expatriates



LAW No. 32/2007 OF 31 DECEMBER

MOORE MOÇAMBIQUE

- Preparation of the Transfer Pricing Dossier
- Advice on capital transfer



MOORE

CONTACTS:

Avenida 25 de Setembro, nº 1230, 3º

Andar, Bloco 5, CP 4200

Maputo

Republic of Mozambique

Tel.: +258 21 300720

Email: eferreira@mooremz.co.mz

Moore Global is an association of independent firms of which Moore – Sociedade de Contabilistas e Auditores Certificados, Lda is part as an independent company, with legal authorization to carry out Audit and Certification of Accounts activities, by order of 27/10/99 of the Vice-Minister of Planning and Finance.

Copyright © Moore – Sociedade de Contabilistas e Auditores Certificados, Lda. All rights reserved.