Stamp Duty Code

Decree No. 6/2004, of 1 April

as amended by Decree No 38/2005

of August 29

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PREAMBLE

If there is a need to introduce amendments to the Stamp Duty Code and the respective Table, approved by Decree No. 6/2004, of 1 April, in the exercise of the competence conferred by paragraph 2 of Article 72 of Law No. 15/2002, of 26 June, the Council of Ministers decrees: Article 1. Articles 2, 6, 9 and 13 of the Stamp Duty Code, approved by Decree No. 6/2004 of 1 April, are hereby amended to read as follows:

Article 1. The Stamp Duty Code and respective Table, annexed to this Decree and which form an integral part of it, are hereby approved.

Article 2. Articles 6, 14 and 25 of the Table annexed to the Stamp Duty Code, approved by Decree No. 6/2004 of 1 April, are hereby amended, and shall now have the wording set out in the table annexed to this Decree.

Article 3. Articles 17.6, 18.2, 18.2.1, 18.2.1.1, 18.2.1.2, 18.2.2, 18.2.3, 18.3, 18.4, 18.4.1, 18.4.2, 18.4.3, 18.4.4, 18.5, 18.6, 18.7, 18.8, 18.9, 18.10, 18.11, 18.11.1, 18.11.2, 18.12, 18.13, and 18.15 are deleted from the Table annexed to the Stamp Duty Code, approved by Decree No. 6//2004, of 1 April.

Approved by the Council of Ministers, on August 16

of 2005.

Public

the Prime Minister, Luísa Dias Diogo.

CHAPTER I – INCIDENCE

ARTICLE 1 – (Objective incidence)

1. Stamp Duty shall be levied on all documents, contracts, books, papers and acts designated in the Table attached to this Code, and shall be an integral part thereof.

2. Transactions which are subject to value added tax and which are not exempt from value added tax shall not be subject to tax.

ARTICLE 2 – (Subjective incidence)

1. Entities with an economic interest in the realities referred to in article 1 are taxable persons for Stamp Duty, bearing the respective burden.

2. Where there is an economic interest common to several entities, the burden of the tax shall be apportioned proportionally among all of them.

3. For the purposes of the preceding paragraphs, the economic interest shall be deemed to belong to:

a) To the acquirers, in the acquisition of shares and credit rights of the partners and in the acquisition of bonds;

b) To the purchasers, in the acquisition for consideration or by donation of the right of ownership or of partial figures of this right over real estate;

c) To the lessor and the sublessor, in the| lease and sub-lease;

d) To the account holder, on cheques and credit cards;

e) To the borrower, in the lending agreement;

f) Entities required to be presented/constituted in guarantees;

g) To the bettor, in the bets and to the winners in the prizes in the case of games;

h) To the attorney-in-fact and the sub-establishment, in powers of attorney and sub-establishments;

i) To the credit user, in the granting of credit/credit operations;

j) Customers of credit institutions, companies or other financial institutions, in other financial operations carried out by or through these institutions;

k) The policyholder, in insurance, and the intermediary, in the mediation activity;

l) To the drawee and the debtor, in bills of exchange and promissory notes;

m) To the creditor, in the credit instruments not mentioned above;

n) To the applicant, the requester, the first signatory, the beneficiary or the recipient of any other acts, contracts and transactions.

ARTICLE 3 – (Tax substitutes)

Without prejudice to the provisions of the previous article, the entities legally responsible for its assessment and payment, as established in article 14, are also taxable persons of Stamp Duty.

ARTICLE 4 – (Territoriality)

1. Without prejudice to the provisions of this Code and the Table that provides otherwise, Stamp Duty shall be levied on all the facts referred to in article 1, which occurred in national territory.

2. The following are also subject to this tax:

a) Documents, acts or contracts issued or entered into outside the national territory, under the same terms as if they were issued or entered into in the national territory, when presented in Mozambique for any legal purposes;

b) Credit operations carried out and guarantees provided by credit institutions, financial companies or any other entities, regardless of their nature, headquartered abroad, by subsidiaries or branches abroad of credit institutions, financial companies, or any other entities, headquartered in the national territory, to any entities, regardless of their nature, domiciled in this territory, with domicile being considered to be the headquarters, branch, branch or permanent establishment;

c) Interest, commissions and other consideration charged by credit institutions or financial companies headquartered abroad or by subsidiaries or branches abroad of credit institutions or financial companies headquartered in Portugal to any entities domiciled in this territory, the headquarters, subsidiary, branch or permanent establishment of the entities involved in the execution of the operations being considered to be domiciled.

CHAPTER II – EXEMPTIONS

ARTICLE 5 – (Subjective exemptions)

The following entities are exempt from Stamp Duty, when it constitutes their charge under the terms of article 2:

a) The State;

b) Local authorities and their associations and federations of municipalities;

c) Legally recognized social security institutions as well as social security institutions;

d) Public utility associations referred to in Law No. 8/91 of 18 July, duly recognised;

e) Associations of mere public utility that predominantly pursue scientific or cultural, charitable, assistance or charitable purposes.

ARTICLE 6 – (Other exemptions)

1. The following are exempt from this tax:

a) The policies referred to in the attached table, of reinsurance, taken from companies operating legally in Mozambique;

b) The policies referred to in the attached table, of the insurance of the "Life" and "Health" lines;

c) The writings of any contracts that must be entered into within the scope of spot or forward operations carried out, registered, settled or cleared through the Mozambique Stock Exchange and which have as their object, directly or indirectly, securities;

d) Loans to residents, including the respective interest, commissions and guarantees provided, granted by Mozambican credit institutions or by funds legally constituted for industrial, agricultural, forestry, livestock, fishing and rural trade purposes, in the national territory;

e) Loans, including interest, for the acquisition, construction, reconstruction or improvement of own housing;

f) Loans with the characteristics of supplies, including the respective interest, made by partners to companies in which an initial term of not less than one year has been stipulated and are not repaid before the expiry of this period;

g) The constitution and increase of the share capital of companies;

h) The incorporation and increase of the capital resulting from the transfer by one or more commercial companies of the total assets or of one or more branches of their activity to one or more commercial companies in the process of incorporation or already existing;

l) Public debt securities and their interest, including their transmission, issued to finance the deficit of the Estácio Budget and the State Treasury, as well as securities of the Monetary Authority, including the operations of the Interbank Money Market (MMI) and the Interbank Foreign Exchange Market (MCI);

j) Transfers of shares of companies and securities representing the capital of companies, as well as bonds, when carried out as a prerequisite for admission to the listing of the Mozambique Stock Exchange;

k) Guarantees of obligations, when materially ancillary to contracts specially taxed in the attached Stamp Duty table and are constituted simultaneously with the guaranteed obligation, even if in a different instrument or title;

i) Gaming betting, not subject to excise gaming tax, when promoted by non-profit entities;

m) The financial leasing contract provided for in the respective Regulation approved by Decree No. 45/94 of 12 October, as well as the guarantees and other acts and documents that are part of the operation;

n) The donations and distributions provided for in articles 3.2 and 3.3 of the Table, made to the spouse, descendants and ascendants;

o) Orphan inventory processes; poverty notices, separate family councils and any other acts in the interest of minors or interdicted persons; the expropriation proceedings in the public interest brought by the State and the terms and public acts brought by the State and the precise terms and acts for the collection of the debts due to the expropriated persons, including writs of payment; motion to stay proceedings against compensation awarded for expropriations, when these motions are upheld; military processes; disciplinary proceedings brought against civil servants; proceedings in which the National Treasury, the Public Prosecutor's Office or any charitable establishment is a party, including the documents that are extracted from the same proceedings at the request of these entities and those that are necessary to initiate and instruct them;

p) writs for the withdrawal of deposits provisionally made for auctions or supplies not awarded to depositors, those for withdrawals of costs referred to in the Code of Tax Executions, withdrawals of bills of exchange and deposits made by State services when their withdrawal is made to give them a legal purpose other than their delivery to non-official entities.

2. The provisions of paragraph 1(/t) shall not apply where the shareholder is an entity domiciled in a territory subject to a preferential tax regime as provided for in Article 59 of the Corporate Income Tax Code (CIRPC), approved by Decree No. 21/2002 of 30 June.

3. For the purposes of paragraph 1(*d)* and *(e)* of this article, a loan shall be understood as only a contractually documented credit (rent credit), excluding credit in a collateralized current account, overdraft, bills of exchange and promissory notes.

ARTICLE 7 – (Mention of exemption)

Whenever any exemption occurs, the legal provision granting it will be indicated in the document or title.

CHAPTER III - TAXABLE AMOUNT

ARTICLE 8 – (Taxable amount)

1. The taxable amount of Stamp Duty is that resulting from the Table, without prejudice to the provisions of the following paragraph.

2. In contracts of indefinite value, their determination shall be made by the parties, in the document formalising it, on the basis of criteria and elements which make it possible to estimate the economic value of the act.

3. When a price to be in force at a future date is fixed as the value of the contract, the tax shall be paid according to the current price on the date of formalization of the act.

4. In the event that there is no background or it is not possible to estimate the economic value of the act, the tax will be in the fixed amount of 5 000 000.00 MT.

5. When the taxable amount is determined by indirect methods, the rules of income tax shall be applied, mutatis mutandis.

ARTICLE 9 – (Amount represented in foreign currency)

1. Whenever the elements necessary to determine the taxable amount are expressed in a currency other than the national currency, the exchange rates to be used are the valuation exchange rates, published by the Bank of Mozambique, on the date of the incurrence of the tax obligation.

2. If there is no exchange rate on the date referred to in the previous paragraph, the exchange rate of the last previous quotation published on that date shall apply.

ARTICLE 10 – (Amount represented in cash)

The equivalence in a national currency unit of the values in kind is made according to the following rules and in the order indicated:

a) At the officially fixed price;

b) By the official purchase price;

(d) the value of the market under competitive conditions.

ARTICLE 11 – (Correction of the taxable amount)

1. Without prejudice to the provisions of Article 8, the Tax Office of the area of domicile of the taxable person may amend the taxable amount declared whenever, in contracts of indefinite value or in determining the equivalence in national currency units of securities represented in kind, the rules of Articles 8 and 10 respectively have not been followed.

2. The procedure referred to in the preceding paragraph shall not prejudice the application of penalties corresponding to the use of inappropriate criteria or false elements in the determination of the taxable amount.

CHAPTER IV – TAXA

ARTICLE 12 – (Fees)

1. The tax rates are those set out in the attached Table, in force at the time the tax obligation arises.

2. For the cases provided for in paragraph 2 of article 6, tax shall be payable at the rate of the acts listed in article 1 of the Schedule, to be applied on the value of the capital or increase thereof.

3. There will be no accumulation of tax rates in the same act or document.

4. When more than one fee is prescribed, only the highest is due.

CHAPTER V – SETTLEMENT AND PAYMENT

ARTICLE 13 – (Birth of the tax obligation)

For the purposes of the obligations provided for in this Chapter, the tax liability shall be deemed to have arisen:

a) In acts and contracts, at the time of signature by the parties;

(b) in insurance policies, at the time of the collection of premiums;

c) On credit cards and cheques issued by credit institutions domiciled in national territory, at the time of collection of the issuance fee, whether the printing is carried out by the credit institution or by any other entity;

d) In documents, acts or contracts issued or entered into outside the national territory, at the time they are presented in Mozambique to any entities;

e) In bills issued in national territory, at the time of signature by the drawer or discount thereof by credit institutions;

f) In bills issued abroad, at the time they are accepted, endorsed or presented for payment in national territory;

g) In blank bills and promissory notes, at the time when they can be filled in under the terms of the respective filling agreement;

h) In credit operations, at the time they are carried out; if the credit is used in the form of a current account, bank overdraft or any other means in which the term is not determined or determinable, on the last day of each month;

i) In operations carried out by or with the intermediation of credit institutions, financial companies or other entities legally equivalent to them, at the time of the collection of interest, premiums, commissions and other considerations, interest and commissions being considered effectively charged when debited from customers' current current accounts;

j) In public wills, at the time they are made, and in closed or international wills, at the time of approval and opening;

k) In the books, before their use, unless single sheets recorded by a computer system or similar are used for subsequent use in the form of a book, in which case the tax shall be considered due within sixty days following the end of the financial year or the cessation of activity;

() Loans made by the partners to companies in which a term of not less than one year is stipulated and are repaid before that period, at the time of repayment;

m) In other cases, on the date of issue of the documents, titles and papers or of the occurrence of the facts;

n) In the case of acts, contracts, documents, titles, books, papers and other facts provided for in the Table annexed to this Code in which legal persons or natural persons do not intervene in any capacity in the exercise of the activity of commerce, industry or provision of services, when they are presented to any public entity.

ARTICLE 14 – (Settlement and payment)

1. The assessment and payment of the tax shall be the responsibility of the following entities:

(a) notaries, registrars of the civil, commercial and land registers and other public bodies, including State establishments and bodies, in respect of acts, contracts and other acts in which they are involved, with the exception of those concluded before notaries relating to credit and guarantees granted by credit institutions, financial companies or other entities legally equivalent to them and by any other financial institutions, and when, under the terms of paragraph n) of the previous article, contracts or documents are presented to them for any legal purpose;

b) Entities granting credit and guarantee or creditors of interest, premiums, commissions and other considerations;

c) Credit institutions, financial companies or other entities legally equivalent to them. residents who have discounted credit securities, intermediated credit operations, guarantees or interest, commissions and other consideration due by residents in national territory to credit institutions or companies domiciled outside this territory;

d) Borrowing entities, beneficiaries of the guarantee or debtors of interest, commissions and other consideration in the case of the operations referred to in the previous paragraph that have not been intermediated by credit institutions, financial companies or other entities legally equivalent to them, and whose creditor does not carry out the activity, under the freedom to provide services, in Mozambican territory;

e) Insurance companies in relation to the sum of the insurance premium, the cost of the policy and any other amounts collected jointly or in a separate document, as well as the commissions paid to intermediaries net of tax;

f) Entities issuing bills and other credit instruments, entities issuing cheques, credit and debit cards and promissory notes or, in the case of securities issued abroad, the first entity involved in the negotiation or payment;

g) Lessor and sublessor, in leases and sub-leases;

h) Other entities that intervene in acts and contracts or issue or use documents, books, titles or papers;

i) Representatives who, for this purpose, are mandatorily appointed in Mozambique by credit institutions or financial companies that, in Mozambican territory, carry out financial operations under the freedom to provide services that are not intermediated by credit institutions or financial companies domiciled in Mozambique;

j) Representatives who, for this purpose, must be appointed in Mozambique by any entities that, in Mozambican territory, carry out any other operations covered by the application of this Code under the freedom to provide services.

2. In the case of tax due on credit operations or guarantees provided by a group of credit institutions or financial companies, the tax may be assessed globally by any of those entities, without prejudice to the liability, in general terms, of each of them in the event of non-compliance.

ARTICLE 15 – (Tax liability)

1. Without prejudice to the provisions of Article 14, persons who, in any other way, intervene in the acts, contracts and transactions, or receive or use the books, papers and other documents, shall be jointly and severally liable with the taxable person, provided that they have intentionally collaborated in the failure to pay the tax, or, on the date of that intervention, reception or use, have not intentionally required the reference referred to in Article 17(2).

2. In the case of the operations referred to in subparagraphs i) and j) of the previous article, the entity to which the services are provided shall always be jointly and severally liable with the issuers of the policies and with the credit institutions, financial companies and other entities referred to therein.

3. The provisions of paragraph 1 shall apply to civil servants who have been convicted of disciplinary proceedings for the intentional failure to pay or failure to pay the tax payment, or for failure to comply with the requirement laid down in the final part of that paragraph.

ARTICLE 16 – (Method of payment)

The Stamp Duty is always paid by means of a guide.

ARTICLE 17 – (Term, place of payment, forfeiture and compensatory interest)

1. Stamp Duty shall be paid by the entities to which this obligation is incumbent at the Tax Offices or any other entity authorized under the law until the 20th day of the month following the month in which the tax obligation has arisen.

2. The documents, titles and books subject to tax shall indicate the amount of the tax and the date of assessment.

3. Whenever the tax is to be assessed by the tax administration and the amount of the assessment is not less than 100 000 MT, the taxable person shall be notified to make its

payment within fifteen days, at the Tax Office of the area to which the liquidation service belongs.

4. The tax due for customs operations shall be assessed by the services of the General Directorate of Customs and paid to these services, together with other customs duties, and shall be due.

5. Whenever, due to a fact attributable to the taxable person, the assessment or payment of part or all of the tax due is delayed, compensatory interest shall be added to the amount of the tax, in accordance with article 76 of the Personal Income Tax Code.

6. The interest referred to in the preceding paragraph shall be calculated on a daily basis, from the day immediately after the expiry of the deadline for the delivery of the tax or, in the case of a delay in the assessment, from the day on which it began, until the date on which the default is regularized or remedied.

7. Stamp duty may only be assessed until the end of the fifth year following the occurrence of the taxable event, and the corresponding assessment must be notified, within the same period, to the taxpayer.

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CHAPTER VI – ACCESSORY OBLIGATIONS AND SUPERVISION

Section I – Reporting and accounting obligations

ARTICLE 18 – (Annual Statement)

1. Taxable persons or their legal representatives shall be required to submit an annual itemized declaration of the stamp duty paid.

2. The declaration referred to in the previous paragraph is of an official format and is an annex to the annual declaration of accounting and tax information provided for in article 106 of the Corporate Income Tax Code (CIRPC) and in article 98 of the Personal Income Tax Code (CIRPS), and must be submitted within the deadlines provided for therein.

3. Whenever the services of the Tax Administration have doubts about any elements contained in the declarations, they shall notify the taxpayers to provide in writing, within the period set for them, in no case less than ten days, the necessary clarifications.

ARTICLE 19 – (Accounting obligations)

1. Entities required to have accounts organized under the terms of the IRPS and IRPC Codes must organize it in such a way as to enable clear and unequivocal knowledge of the elements necessary for the verification of the Stamp Duty paid, as well as to allow its control.

2. In order to comply with the provisions of paragraph 1, the transactions and acts carried out and subject to Stamp Duty shall be registered.

3. The registration of the operations and acts referred to in the preceding paragraph shall be carried out in such a way as to show:

a) The value of the transactions and acts carried out subject to tax, according to the applicable article of the Table;

b) The value of the transactions and acts carried out exempt from tax;

c) The amount of the tax paid, according to the applicable article of the Table;

d) The amount of the offset tax.

4. Persons who under the terms of the IRPC and IRPS Codes are not required to have organised accounts, as well as public services, when required to pay and deliver the Stamp Duty to the State coffers, must have adequate records to comply with the subparagraphs of the previous paragraph.

5. The documents supporting the records referred to in this article and the documents proving the payment of Stamp Duty shall be kept in good order for a period of ten years.

Section II – Other ancillary obligations of public and private entities

ARTICLE 20 – (Annual Declaration of Public Entities)

The services, establishments and bodies of the State and local authorities, including those endowed with administrative or financial autonomy and even if personalised, associations and federations of municipalities, as well as other legal persons governed by public law, legal persons of public utility and public undertakings shall submit to the tax offices of the respective area the declaration referred to in article 18.

ARTICLE 21 – (Preparation of questionnaire)

The services of the Tax Administration may send to natural or legal persons and public services questionnaires regarding data and facts of a specific nature relevant to the control of Stamp Duty, which must be returned, after being completed and signed, within the period indicated to them, which may not be less than ten working days.

ARTICLE 22 – (Tax caution)

When, in judicial proceedings, it is shown that any obligations provided for in this Code directly or indirectly related to the case have not been complied with, the judicial officer must, within ten days, notify the infraction to the Tax Office of the area where the tax event occurred, for the purposes of applying this Code.

ARTICLE 23 – (Credit securities issued abroad)

Credit instruments issued abroad may not be drawn, accepted, endorsed, paid or in any way traded in national territory without the respective tax being charged.

ARTICLE 24 – (Legalization of books)

Books subject to Stamp Duty may not be legalised until the respective tax has been paid, nor the reference required by Article 17(2) has been made.

ARTICLE 25 – (Lease Agreements)

1. The entities referred to in Article 2, as well as lessors and sublessors who, being natural persons, do not carry out commercial, industrial or service activities, are obliged to communicate to the Tax Office of the area where the building is located, the lease and sublease contracts and respective promises, as well as their amendments.

2. The communication referred to in the previous paragraph shall be made by the end of the month following the beginning of the lease, sublease, changes or, in the case of a promise, the availability of the leased property.

3. If the lease or sublease contract is in writing, the notice referred to in paragraph 1 shall be accompanied by a copy of the contract.

ARTICLE 26 – (Individual process)

1. The competent Tax Office shall organise a confidential process in relation to each taxable person, in which the declarations and other elements related to the same are incorporated.

2. Taxpayers, in person or through a duly accredited representative, may examine their individual file at the respective Tax Office.

CHAPTER VII – MISCELLANEOUS PROVISIONS

ARTICLE 27 – (Checks)

1. The cheques shall be printed by credit institutions for the use of the issuing entities that have cash on them.

2. Cheques are numbered by series and, within these, by numbers.

3. Each credit institution shall keep a register of printed cheques containing serial number, number of cheques of each series, total cheques of each printing, date of receipt of printed cheques, stamp duty due and date and place of payment.

ARTICLE 28 – (bills of exchange and promissory notes)

1. The bills issued shall comply with the requirements laid down in the uniform law governing bills of exchange and promissory notes.

2. The model of bills of exchange and their characteristics are established in a Ministerial Diploma of the Minister who supervises the area of Finance.

3. The bills issued by public companies and duly constituted companies shall be printed in the printers authorized for this purpose by order of the Minister who supervises the area of finance.

4. The letters referred to in the previous paragraph contain sequential numbering printed typographically with one or more series, suitably referenced.

5. The acquisition of bills shall be made by means of a request for an official model containing the tax identification of the acquiring entity, as well as the typography, which shall be subject to the same obligations applicable to the printing of invoices with the necessary adaptations.

6. Entities that issue bills of exchange and issue promissory notes must keep a record containing the sequential number, the date of issue and the value of the bill or promissory note, as well as the value and date of payment of the tax.

7. Officially issued bills are requested from the local services of the Tax Administration or in other establishments authorised by the Tax Administration.

8. Promissory notes shall be issued exclusively by credit institutions and financial companies.

CHAPTER VIII – TAXPAYERS' GUARANTEES

ARTICLE 29 – (Taxpayers' guarantees)

Law No. 15/2002 of 26 June, the Basic Law of the Tax System and other applicable legislation apply to taxpayers' guarantees.

ARTICLE 30 – (Tax refund)

1. Without prejudice to the provisions of the preceding articles, taxable persons may request a refund of the tax unduly paid within five years from the date of payment.

2. For the purposes of the preceding paragraph, the interested parties shall submit, together with the application, the documents proving the assessment and payment of the tax.

ARTICLE 31 – (Tax offset)

1. If, after the tax assessment has been carried out by the entities referred to in Article 14(1)(a) to (e), the transaction is cancelled or its taxable amount reduced as a result of an error or invalidity, the entities may offset the tax assessed and paid until the subsequent assessments and supplies relating to the same number or item in the Table are concurrent.

2. In the event of material errors or errors in the calculation of the tax assessed and paid, the correction by the entities referred to in the preceding paragraph may be made by offsetting in subsequent deliveries.

3. The offset of the tax referred to in the preceding paragraphs must be made within one year from the date on which the tax becomes due.

4. The tax may be offset only if it is duly disclosed in the accounts, in accordance with Article 19(3)(d).

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CHAPTER IX – FINAL PROVISIONS

ARTICLE 32 – (Signature of documents)

1. Declarations, reports and communications shall be signed by the entities required to submit them or by their duly identified representatives or business managers.

2. Declarations, reports and communications that are not duly completed and signed shall be refused, without prejudice to the penalties established for failure to submit them.

ARTICLE 33 – (Sending by post)

1. The declarations provided for in this Code, as well as any other declarative or informative elements that must be sent to the Tax Administration, may be sent by post.

2. In the case provided for in the preceding paragraphs, the remittance must be made in such a way that the receipt takes place within the time limit set, and the time limit shall be deemed to have been fulfilled provided that it is proved that the remittance was made at least five days before the expiry of the time limit.

ANNEX

CONSOLIDATED STAMP DUTY TABLE

Decree No. 6/2004, of 1 April, as amended by Decree No. 38/2005, of 29 August

Note: The amounts are reproduced in MT, in the currency unit contained in the 2004 and 2005 diplomas. The headings deleted in 2005 are retained only to preserve the sequence and facilitate historical consultation.

Article	Incidence of the tax	Fee
1.	Shares of public limited companies and limited partnerships by shares and any securities representing the capital of companies of any nature, as well as bonds, when transferred by simple delivery or endorsement, including those in which the State has a stake - on their value	0,4%
2.	**Construction contractor permit:**	
2.1	Works up to a value of 200 000 000 MT.	500 000 MT
2.2	Works with a value of more than 200,000,000 MT.	800 000 MT
3.	**Acquisition of the right of ownership or of partial figures of this right over real estate, as well as the termination, invalidity or extinction, by mutual consent, of the respective contracts:**	
3.1	Purchase and sale, exchange and onerous assignment of real estate - on value	0,2%
3.2	Inter vivos donations of real estate - on the value	0,4%
3.3	Partitions or divisions of immovable property - on value	0,2%
3.4	Other Onerous Acquisitions of Real Estate - On Value	0,2%
4.	**Lease and sublease of immovable property:**	
4.1	Lease and sublease of real estate - on the highest amount of rent stipulated in the contract, corresponding to one month	2%
4.2	Lease and sublease of real estate for periods of less than one month, without the possibility of renewal or extension - on the highest rent value or increase stipulated for the period of its duration	2%
4.3	Changes involving an increase in rent operated by the revision of contractual clauses - on the highest conventional increase corresponding to one month	2%
4.4	Promise of lease or sublease when followed by the availability of the leased property to the lessee or subtenant - on the highest rent amount corresponding to one month	2%
5.	Acts and terms made before courts and services, establishments or bodies of the State and local authorities, even if personalized, including public institutes, which include lease or bidding of real estate, security deposit for the payment of inheritance and gift tax, assignment, conference of interested parties in which the award of common property is agreed, confession of debt, Surety, Mortgage, Pledge, Liability for Losses and Damages and Transactions - by each	250 000 MT
6.	**Credit cards, issued by credit institutions based or domiciled in Portugal:**	
6.1	If there is any amount paid for each card issued, renewed or replaced - on the amount paid, which cannot be less than 10 000 MT	4%
6.2	There is no payment of any amount - for each card	10 000 MT
7.	Cheques of any nature, issued by credit institutions headquartered or domiciled in national territory - by each one	500 MT

Article	Incidence of the tax	Fee
8.	Lending - on its value, when it exceeds 5 000 000 MT	2%
9.	Civil deposit, whatever its form - on its value	0,2%
10.	Writings of contracts, apostilles, agreements or conventions, not specifically provided for in this Table, including those made before public entities - by each one	200 000 MT
11.	Exploration, research and prospecting of geological resources integrated in the public domain of the State - for each administrative contract	5 000 000 MT
12.	**Guarantees of obligations, whatever their nature or form, always considering as a new operation the extension of the term of the contract:**	
12.1	**Guarantee, guarantee, guarantee, autonomous bank guarantee and surety insurance - on the respective amount, depending on the term:**	
12.1.1	Constituted for a term of less than one year - for each month or fraction thereof	0,02%
12.1.2	Constituted for a term equal to or greater than one year	0,2%
12.1.3	Constituted without a term or for a term equal to or greater than five years	0,3%
12.2	Mortgage and pledge - on the respective value	0,3%
12.3	Other Bond Guarantees	0,3%
13.	**Game Play:**	
13.1	**Bets on games not subject to the excise gaming tax regime, namely those represented by tickets, bulletins, cards, matrices, raffles or tombolas, even if using electronic processes - on the respective value:**	
13.1.1	Mutual Betting	5%
13.1.2	Other bets	5%
13.2	**Cards/tickets for access to gambling rooms, or equivalent documents, under the terms of Law No. 8/94, of 14 December and respective regulations, even if the respective price is not due, it is waived by the concessionaire companies or its approval has not been requested - by each one:**	
13.2.1	**Entry cards in casinos under special license (club casinos):**	
13.2.1.1	C1, valid for one day, on the value, which may not be less than 50 000 MT	50%
13.2.1.2	C2, valid for eight days, on the value, which may not be less than 150 000 MT	50%
13.2.1.3	C3, valid for one month, on the value, which may not be less than 300 000 MT	50%
13.2.1.4	C4, valid for three months, on the value, which may not be less than 400 000 MT	50%
13.2.1.5	C5, valid during the current year, on the value of the value which may not be less than MT 500 000	50%
13.2.2	**Entrance tickets to casinos under license on an exclusive basis (public casinos):**	
13.2.2.1	B1, valid for one day, on the value, which may not be less than 20 000 MT	50%
13.2.2.2	B2, valid for eight days, on the value, which may not be less than 60 000 MT	50%

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Article	Incidence of the tax	Fee
13.2.2.3	B3, valid for one month, on the value, which may not be less than 120 000 MT	50%
13.2.2.4	B4, valid for three months, on the value, which may not be less than 160 000 MT	50%
13.2.2.5	B5, valid during the current year, on the value, which may not be less than 200 000 MT	50%
13.3	**Social fun game prizes:**	
13.3.1	Lottery Prizes - About Value	5%
13.3.2	Prizes in any of the other modalities of the social fun games - about the value	5%
14.	**Licenses:**	
14.1	**For the operation of food and beverage establishments:**	
14.1.1	Nightclubs and other establishments with space reserved for dancing, namely bars and discos	2 500 000 MT
14.1.2	Other establishments	1 200 000 MT
14.2	For the installation of vending machines in places of public access - per machine	1 200 000 MT
14.3	License to hunt - about the fee amount	10%
14.4	License to cut forest products for commercial or industrial purposes - on the amount of the fee	10%
14.5	Fishing licences, with the exception of small-scale fishing - on the amount of the fee	5%
14.6	**Other licences not specifically designated in this Table, granted by the State and local authorities or any of their services, establishments and bodies, even if personalised, including public institutes, by each one:**	
14.6.1	When any fee or emolument is due for its issuance - on the respective value	5%
14.6.2	Where no fee or emolument is payable	100 000 MT
15.	Traders' books, mandatory under the Commercial Code and other legislation of a commercial nature - for each sheet	5 000 MT
16.	Trademarks and patents - on the value resulting from the fees due for all registrations and diplomas	10%
17.	**Notary and notarial acts:**	
17.1	Deeds, wills and other instruments recorded in the notary's notebooks, including private ones - for each instrument	250 000 MT
17.2	Qualification of heirs and legatees - for each inheritance opened	100 000 MT
17.3	Instruments for the opening and approval of wills, closed and international - by each one	250 000 MT
17.4	**Powers of attorney and other instruments relating to the attribution of powers of voluntary representation, including mandates and sub-establishments:**	
17.4.1	**Powers of attorney and other instruments that grant powers of voluntary representation - for each one:**	

Article	Incidence of the tax	Fee
17.4.1.1	With powers for commercial management	300 000 MT
17.4.1.2	With any other powers	100 000 MT
17.4.2	Sub-establishments - for each one	50 000 MT
17.5	Registration of documents submitted to notaries to be archived - for each registration	20 000 MT
17.6	*Suppressed by Decree No. 38/2005, of 29 August*	—
18.	**Customs operations:**	
18.1	**Appointment permits and customs broker card:**	
18.1.1	On your own, as an independent professional	2 500 000 MT
18.1.2	As a partner, administrator or manager of a customs brokerage company	1 800 000 MT
18.1.3	As an employee of a company or other entity	1 200 000 MT
18.1.4	As a freight forwarder	1 200 000 MT
18.2 a 18.13	*Deleted by Decree No. 38/2005, of 29 August*	—
18.14	Terms of guarantee or letter of credit (included in this article are the terms of responsibility registered by the captains of the ships or their legal representatives, as a guarantee of the lack of volumes at unloading)	0,5%
18.15	*Suppressed by Decree No. 38/2005, of 29 August*	—
19.	**Financial operations:**	
19.1	**(a) the use of credit, in the form of funds, commodities and other securities, by virtue of the granting of credit in any capacity, including credit openings, advances, letters of credit, confessions of debt, bank loans, loans, factoring, treasury operations when involving financing, supplies and any other credit use operations, excluding the obligations referred to in Article 1; always considering as a new credit concession the extension of the term of the contract - on the amount and according to the term:**	
19.1.1	Credit with a term of less than one year - for each month or fraction thereof	0,03%
19.1.2	Credit with a term equal to or greater than one year	0,4%
19.1.3	Credit with a term equal to or greater than five years	0,5%
19.1.4	Credit used in the form of a current account, bank overdraft or any other form in which the term of use is not determined or determinable, on the monthly average obtained through the sum of the outstanding balances calculated daily, during the month, divided by 30	0,03%
19.2	**Operations carried out by or with the intermediation of credit institutions, financial companies or other entities legally equivalent to them and any other financial institutions - on the amount charged:**	
19.2.1	Interest on, inter alia, the discount of government bills and bonds, loans, credit accounts and receivables in liquidation	2%

Article	Incidence of the tax	Fee
19.2.2	Premiums and interest on bills taken, bills receivable on behalf of others, on drafts issued on national squares or on any transfers	2%
19.2.3	Fees for guarantees provided	1%
19.2.4	Other fees and consideration for financial services	2%
20.	Warrants or warrants for the withdrawal and delivery of existing money or values - on the amount to be withdrawn or delivered	0,3%
21.	Forensic, judicial, tax and customs proceedings - per sheet	1 000 MT
22.	Registrations and annotations in registry offices of movable property subject to registration - by each one	100 000 MT
23.	Reporting - on the value of the contract	0,5%
24.	**Insurance:**	
24.1	**Insurance policies - on the sum of the insurance premium, the cost of the policy and any other amounts that constitute income of the insurance companies, collected together with that premium or in a separate document:**	
24.1.1	Life, Accident and Health insurance	1%
24.1.2	Insurance in the "Motor - Civil Liability" branch and other insurance of a mandatory nature, by law	2%
24.1.3	Transport insurance	2%
24.1.4	Insurance for the Marine, Rail and Air Insurance	2%
24.1.5	Surety insurance	3%
24.1.6	Credit insurance	3%
24.1.7	Insurance from any other branches	5%
24.2	Commissions charged for mediation activity - on the respective net amount of stamp duty	2%
25.	**Credit securities:**	
25.1	Bills - on the respective value, with a minimum of 50 000 MT	0,2%
25.2	Promissory notes - on the respective value, with a minimum of 50 000 MT	0,2%
25.3	Orders and writings of any kind, excluding cheques, in which payment or delivery of money is determined with a clause to the order or to the disposal, even if in the form of correspondence - on the respective value, with a minimum of 50 000 MT	0,1%
25.4	Extracts of invoices and invoices checked - on the respective value, with a minimum of 30 000 MT	0,3%
26.	Titles or permits for the concession of use and exploitation of the land and its apostilles - on the amount of the fee	10%
27.	Government debt securities issued by foreign governments, excluding government debt securities issued by Member States of the African Union, when existing or offered for sale in the national territory - at face value	1%

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WHY MOORE?

Moore in the world

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:

- Auditing
- Business Secretarial
- Business Finance
- Accounting
- Recruitment and Training
- Tax Consulting
- Taxation
- Payroll
- 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.

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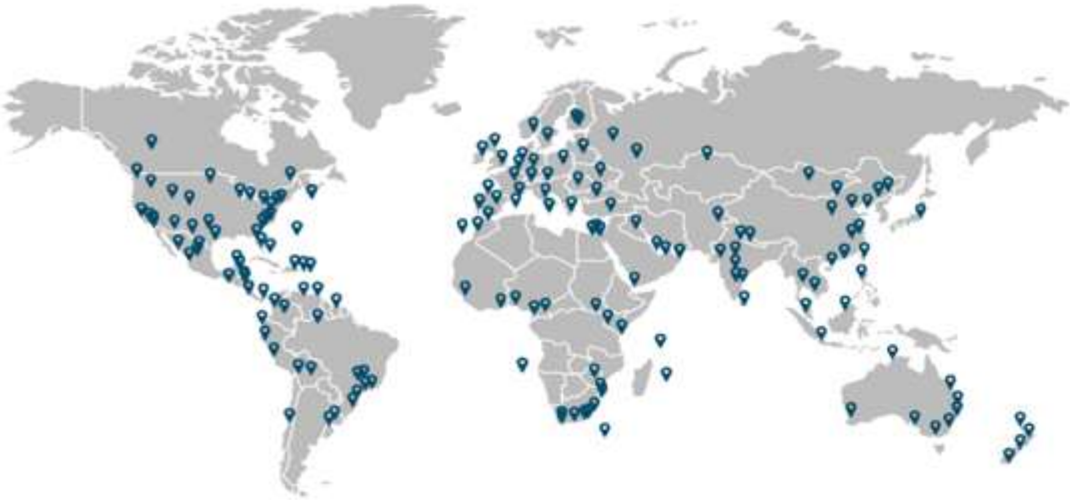

US$ 5.1 Billions | 37,000 people | 114+ countries | 558+ offices

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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
- Preparation of the Transfer Pricing Dossier

- Advice on capital transfer

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