



TAX NEWSLETTER

INTRODUTORY NOTE

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

In particular, this month we highlight Transfer Pricing.

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

Good reading!

(Joel Almeida)

MAY TAX CALENDAR

Deadline	Obligation
Until 10 th	Delivery, in the Directorate of Tax Areas, of the revenues collected by the Public Services in the previous month.
	Payment of contributions to the National Institute of Social Security (INSS) of the previous month-paragraph. 3, art. 13 of Decree no. 53/2007 of 3 rd December.
Until 15 th	Delivery of VAT returns (normal regime) with Recoverable Tax - line a), paragraph 1, art. 32 of CIVA-Law no. 13/2016, of 30 th December.
Until 20 th	Payment of PIT (IRPS) and CIT (IRPC) withheld at source in the previous month- paragraph 3 of article 29 of PIT Code Regulation, approved by Decree no. 8/2008, of 16 th April and paragraph 5 of article 67 Of the CIT code, approved by Law no. 34/2007, of 31 st December.
	Payment of stamp duty paid in respect of the previous month - Article 17 of Decree no. 6/2004 of 1 st April.
	Payment of the Petroleum Production Tax for the previous month, paragraph 2 of article 11 of the Regulation Specific Regime of Petroleum Taxation, approved by decree 32/2015 of 31 st December.
	Payment of Mining Tax for the previous month, paragraph 2 of article 9 of the Regulation of the Specific Regime of Mining Activity, approved by Decree 28/2015 of 28 th December.
Until the last day of the month	Payment of VAT in respect of the previous month by the taxable persons of the normal regime - line b), paragraph. 1, article 32 of the VAT Code, approved by Law no. 13/2016, of 30 th December.
	Payment of the 1st instalment of payment for IRPC account, a) of paragraph 1 of article 27 of the CIRPC Regulation, approved by Decree No. 9/2008, of 16 th April.
	Delivery of the Annual Income Tax Return for the previous year by taxable persons - no. 1, article 39 of the CIRPC Regulation approved by Decree No. 9/2008, of 16 th April - Models 22 (Organized Accounting) and 22. A (Simplified bookkeeping regime).
	Payment at the end of the IRPC relating to the previous year's income - item b) no. 1 art. 27 of the CIRPC Regulation approved by Decree no. 9/2008, of 16 th April
During the month until the last day of June	Delivery of the annual statement of Accounting and Fiscal information for the previous financial year by the taxable persons of the IRPS – 2 nd category and taxable persons of IRPC – M 20 and annexes – Paragraph 3, article 40 of the CIRPC regulation, approved by decree 9/2008 of April 16 th

TRANSFER PRICING IN MOZAMBIQUE

On September 12th 2017, the Council of Ministers approved the Transfer Pricing Regime, it was published by Decree 70/2017 and came into force on January 1st 2018. The regime applies to CIT, who carry out operations between related parts.

Transactions between related parts must establish the same conditions as those that would have been established between independent entities, when dealing with similar transactions.

Thus, the conditions are presented for an entity to be eligible to prepare the Transfer Pricing file.

Main conditions

Taxable persons with the characteristics below are subject to prepare the Transfer Pricing Dossier:

- Be Taxpayers of Corporate Income Tax (CIT);
- Has reached the turnover of 2,500,000.00 MZN or more in the year in question;
- Have made transactions with related parties under the conditions described below:
 - i. An entity and the holders of its capital, or spouses, ascending or descending, directly or indirectly, hold a stake of not less than 10% of the capital or voting rights;
 - ii. Entities in which the same holders of capital, their spouses, ascending or descending, directly or indirectly, hold a stake of not less than 10% of the capital or voting rights;

- iii. A company and the members of its corporate bodies or of any body of administration, management, management or supervision, as well as their spouses or relatives in the ascending or descending lines;
- iv. Companies in which the majority of members of the member bodies, or members of any management, management or supervisory body, are the same persons or, if different persons, are bound by marriage, de facto union or kinship in a straight line;
- v. Entities linked by tying contact, party group or other of equivalent effect;
- vi. Companies that are in domain relation;
- vii. Entities between which, by way of commercial, financial, professional or legal relations between them, directly or indirectly established or practiced, situations of dependence occur in the exercise of their activity.

Obligations and deadlines

- Fill and submit the Model 20 Annex I “*Declaração Anual de Rendimentos de Preços de Transferência*”, until the last day of June;
- Prepare Transfer Pricing documentation, until the last day of June.

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