



Mozambique

Tax Indicators	Residents	Non-residents
Fiscal year-end	December (companies may apply for a different tax year)	December (but branches may apply for a different tax year)
Companies:		
Company tax	32%	32%
Tax on capital gains	Part of business income	Part of business income
General sales tax	n/a	n/a
Value-added tax	17%	17%
Individuals:		
Individual marginal tax rate (maximum)	32%	32%
Basis of taxation	Residence	Source
Withholding tax		
Dividends ¹	20%	20%
Interest	20%	20%
Royalties	20%	20%
Technical and management fees	20%	20% ²
Exchange controls	Exist	Exist
Thin capitalisation	Debt to equity ratio of 2:1 applies	
Transfer pricing	Arm's length principle applies.	
Double tax treaties	Botswana, Macau, Mauritius, India, Italy, Portugal, South Africa, UAE and Vietnam	
Treaties awaiting conclusion and/or ratification	n/a	

Contacts

For more detailed information, please do not hesitate to contact your tax services team:

Mozambique

Joao Martins +258 21 350 400
joao.l.martins@mz.pwc.com

Malaika Ribeiro +258 21 350 400
malaika.ribeiro@mz.pwc.com

South Africa (Africa Desk)

Evelyn Bening +27 11 287 0964
evelyn.bening@za.pwc.com

Ibikunle Olatunji +27 11 797 5317
ibikunle.x.olatunji@za.pwc.com

Elandre Brandt +27 11 797 5822
elandre.brandt@za.pwc.com

(1) Dividends received by a Mozambican resident entity from another Mozambican resident entity, which is subject to corporate tax, are excluded from both dividend (withholding) tax and corporate tax, provided that the following conditions are met:

- (i) A shareholding requirement of at least 25%; and
- (ii) The shareholding has been held for at least two consecutive years prior to the payment of dividends.

(2) The non-resident withholding tax rate on telecommunication services and international transport services is 10%.



© 2012 PricewaterhouseCoopers (PwC), a South African firm, PwC is part of the PricewaterhouseCoopers International Limited (PwCIL) network that consists of separate and independent legal entities that do not act as agents of PwCIL or any other member firm, nor is PwCIL or the separate firms responsible or liable for the acts or omissions of each other in any way. No portion of this document may be reproduced by any process without the written permission of PwC.

This publication is provided by PricewaterhouseCoopers Tax Services (Pty) Ltd for information only, and does not constitute the provision of professional advice of any kind. The information provided herein should not be used as a substitute for consultation with professional advisers. Before making any decision or taking any action, you should consult a professional adviser who has been provided with all the pertinent facts relevant to your particular situation. No responsibility for loss occasioned to any person acting or refraining from action as a result from using the information in the publication can be accepted by PricewaterhouseCoopers Tax Services (Pty) Ltd, PricewaterhouseCoopers Inc or any of the directors, partners, employees, sub-contractors or agents of PricewaterhouseCoopers Tax Services (Pty) Ltd, PricewaterhouseCoopers Inc or any other PwC entity. The information contained in the publication is based on our interpretation of the existing legislation as at 31 December 2011. Whilst we will have taken every care in preparing the publication, we cannot accept responsibility for any inaccuracies that may arise.