Accounting and bookkeeping obligations

The 2026 tax reform did not only change rates. It changed who must keep organised accounts, which documents must be filed with the Tax Authority, and what supporting evidence is required to exercise rights. This issue covers the accounting consequences of those changes.

THE ESSENTIALS IN FOUR POINTS

- With the abolition of the exemption and simplified regimes, taxpayers registered under them fall within the **organised accounting regime**.
- The obligation to **submit invoices electronically** to the Tax Authority is reinforced.
- VAT refund claims now require **monthly analytical trial balances** and detailed listings.
- The duty to keep commercial books does not end when the business ceases — it passes to heirs and liquidators.

1 End of the exemption and simplified regimes

The change with the widest accounting reach in the Tax Package 2026 is the abolition of the Exemption Regime and the Simplified Taxation Regime. Taxpayers registered under them now fall within the organised accounting regime.

In practice, a population of taxpayers that until 2025 complied through simplified records now becomes subject, with no statutory transition period, to full bookkeeping, a chart of accounts, trial balances and financial statements.

RISK TO ADDRESS

The transition is not merely administrative. A taxpayer still operating with records from the previous regime has, since 1 January 2026, been in breach of bookkeeping obligations — with the consequences that follow on inspection, and with practical inability to substantiate deductions or refund claims.

1.1 What the transition requires

- Opening of accounting records under the applicable chart of accounts, with an opening balance sheet as at 1 January 2026;
- Inventory and valuation of assets, stock and liabilities as at the transition date;
- Organisation of the supporting document archive, with originals or electronic equivalents;
- Definition of the internal document collection process and closing frequency.

2 Invoicing and electronic submission

The Tax Package 2026 reinforces the obligation to submit invoices electronically to the Tax Authority. Taxable persons must submit the invoices or equivalent documents issued for each supply of goods or services, under terms to be regulated.

An obligation was also created to file a **digital services return** for supplies by non-residents, by the 10th day of the month following the transactions, under paragraph (c) of article 32 of Law no. 10/2025 of 29 December.

PRACTICAL IMPACT

Electronic submission changes the nature of period-end work. It is no longer possible to regularise invoicing in bulk at the end of the period: the document must exist, correctly issued, at the time of the transaction. Invoicing systems and internal processes must be reviewed accordingly.

3 Supporting documentation for VAT refunds

Decree no. 52/2025 of 29 December, which revised the VAT Refund Regulation, substantially raised the documentary requirements. Claims must now include, among other items:

ITEM REQUIRED	COMMENT
Detailed customer, invoice and transaction listings	Per tax period
Monthly analytical trial balances	Requires accounts to be closed monthly
Service agreements	Duly acknowledged
Evidence of exports and repatriation of proceeds	Where applicable

All supporting documents must be duly signed and stamped, and submitted both in hard copy and by institutional email, external storage devices or other secure file-sharing platforms.

PRACTICAL IMPACT

The requirement for monthly analytical trial balances has a consequence that often goes unnoticed: it forces accounts to be closed every month, rather than quarterly or annually. Companies routinely in a VAT credit position should adjust their closing cycle now, or they will be unable to file the claim in time.

4 Duty to keep commercial books

Regardless of tax status, the Commercial Code requires the commercial entrepreneur to keep commercial books in accordance with the law and appropriate to the business, enabling knowledge of all its transactions as well as information on its financial position and performance.

Cessation of the business does not release the entrepreneur from this duty. On death, it passes to the heirs; on dissolution of a company or other corporate entrepreneur, it falls to the liquidators.

A FREQUENTLY OVERLOOKED POINT

Closing the business does not close the duty to preserve and organise the accounting records. Dissolution and liquidation processes in which documentation was dispersed or destroyed create liability that survives the company itself.

5 Withholding taxes with accounting consequences

Three withholding taxes introduced or amended by the package require dedicated accounting treatment and a separate third-party account:

SITUATION	REGIME	RATE
Digital economy income payable by tax residents	Final withholding	10%
Commissions of electronic money agents	Final withholding	10%
Capital gains in personal income tax	Separate taxation, progressive rates	10% to 32%

The first two await regulations on how the withholding is to be processed.

6 Annual personal income tax return

The exemption from filing the annual Form 10 return for individuals whose only income was employment income already subject to withholding was removed, as was the provision treating that withholding as final.

PRACTICAL IMPACT

For companies, this means the income and withholding statements issued to employees are no longer a mere receipt: they become the instrument each employee needs in order to comply. The quality and timeliness of those statements now matter.

ACCOUNTING ADAPTATION CHECKLIST

1. Confirm each entity's previous status — exemption, simplified or general regime.
2. For those transitioning, prepare an opening balance sheet as at 1 January 2026.
3. Move the closing cycle to a monthly basis, particularly in companies with VAT credits.
4. Review the invoicing system against electronic submission to the Tax Authority.
5. Set up separate third-party accounts for the new withholding taxes.
6. Organise the supporting archive for refund claims, signed and stamped.
7. Prepare the timely issue of income and withholding statements to employees.

Transition to organised accounting

RT Serviços supports entities moving between regimes, from the opening balance sheet to archive organisation and the design of the internal document process.

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Sources: Law no. 10/2025, Law no. 11/2025 and Decree no. 52/2025 of 29 December, Boletim da República no. 248 · Commercial Code, approved by Decree-Law no. 1/2022 of 25 May · RSM Mozambique, *Tax Alert — Tax Package 2026* · PwC, *Tax Flash Mozambique*.