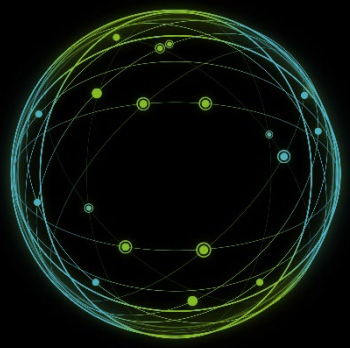
Deloitte.

International Tax
Angola Highlights 2026

Updated July 2026



Investment basics

Currency: Angolan Kwanza (AOA)

Foreign exchange control: Exchange controls generally are administered by the central bank (National Bank of Angola/*Banco Nacional de Angola*) and commercial banks. The import or export of funds is subject to the foreign exchange regulations. Under the private investment regime (see "Incentives" under "Corporate taxation," below), foreign investors can obtain a guarantee of the ability to repatriate profits and dividends arising in Angola if certain conditions are fulfilled.

Accounting principles/financial statements: Companies must prepare financial statements annually in accordance with the Angolan Accounting Law and the General Accounting Plan. IFRS applies for the banking and insurance sectors. Certain companies (such as those with business activities in the banking and insurance sectors) must have their financial statements audited; for others, an independent review may be required.

Principal business entities: These are the limited liability company *(sociedade por quotas)* and public company limited by shares *(sociedade anónimas)*. Foreign entities also may conduct business in Angola through a branch.

Corporate taxation

Rates	
Corporate income tax rate	25% (in general)
Branch tax rate	25%, plus 10% investment income tax on remittances to foreign head office
Capital gains tax rate	10%/25%

Residence: Companies with their head office or place of effective management in Angola are considered resident for tax purposes.

Basis: Resident entities, including entities without legal personality whose income is not directly subject to corporate income tax in the hands of individuals or collective entities, are taxed on worldwide income. Branches of nonresident companies and nonresident legal entities with a permanent establishment (PE) in Angola are subject to tax on (i) the profits of the PE, (ii) profits attributable to Angolan sales of goods and merchandise of the same or a similar kind as those sold through the PE, and (iii) profits attributable to other business activities carried on in Angola of the same or a similar kind as those effected through the PE. Nonresident legal entities without a PE in Angola are liable to corporate income tax at a flat rate, under the occasional services withholding tax regime (see "Rate," below). Branches are taxed at the same rate as subsidiaries and a 10% investment income tax is imposed on remittances to a foreign head office.

Taxable income: Business income is defined broadly and includes all earnings and gains from principal and secondary activities. Tax exemptions or reductions may be granted under the private investment regime (see "Incentives," below). Corporate income tax may apply under one of two taxation regimes: the general regime or the simplified regime.

Under the general regime, taxpayers must maintain written accounting records under Angolan GAAP, and taxable profits resulting from the accounts are adjusted in accordance with the provisions of the corporate income tax code.

The simplified regime applies to corporate taxpayers falling under the VAT exclusion regime (see "Registration" under "Value added tax," below). For the purpose of the simplified regime, the relevant annual turnover threshold applies to the taxpayer's previous accounting year. For a new business, whether the simplified regime may apply is based on projected annual turnover, as per the table of minimum profits (see "Taxable income" under "Individual taxation," below). The following entities are excluded from the simplified regime: public entities or companies, financial institutions, companies liable to a special taxation regime, telecommunication operators, and subsidiaries or registered branches of nonresident entities. A taxpayer may request for the simplified regime to cease to apply after the annual turnover threshold has been exceeded or turnover has been unofficially determined by the Angolan tax authorities for two years (not necessarily consecutive). The request must be submitted by the end of February of the year in which the taxpayer wishes to change to the general regime.

The corporate income tax assessment rules for taxpayers subject to the simplified regime with organized accounting are similar, with the necessary adjustments, to those applicable under the general regime. Taxpayers subject to the simplified regime that use a simplified accounting model or a registration book of purchases, sales, and services provided are entitled to deduct up to 30% of costs incurred. Taxpayers subject to the simplified regime that do not maintain written accounting records may not deduct any expenses and are taxed on turnover. When it is not possible to obtain information on turnover, taxable income is assessed based on the volume of goods purchased or services hired, and, where that information also is not available, taxable income is determined based on the table of minimum profits.

Properly documented business expenses generally are deductible for corporate income tax purposes, provided the expenses are considered relevant to the generation of profits. Besides being deemed nondeductible, confidential expenses (for which there is no valid supporting documentation and the occurrence and nature of the expenses are not materially verifiable) are liable to "autonomous taxation" (i.e., an additional charge directly added to the assessed tax liability, which may only be set off against available tax credits) at 30%, or at 50% where the expenses are incurred by a taxpayer exempt from, or not liable to, corporate income tax. Expenditure incurred in 2026 on computer platforms used for mobile financial services may be amortized for tax purposes over a maximum period of eight years to provide flexibility to taxpayers, rather than the standard three-year period for computer software, provided that there is technical justification and adequate accounting.

Rate

General

The general corporate income tax rate is 25%. A 35% rate applies to taxable profits derived from business activities in the banking and insurance sectors, and by telecommunication operators and national oil companies. A 10% rate applies to income derived exclusively from agriculture, aquaculture, poultry, fishing, and forestry, etc. Special tax regimes apply to the petroleum and mining sectors. Occasional services provided by nonresident entities are taxed at 6.5%. Income derived from capital investments (including dividends, interest, and royalties) is subject to investment income tax, which normally is paid via withholding at source.

Surtax

There is no surtax.

Alternative minimum tax

There is no alternative minimum tax, but in certain cases taxable income may be determined based on the table of minimum profits (see "Taxable income," above).

Global minimum tax (Pillar Two)

Angola has joined the Statement on a Two-Pillar Solution to Address the Tax Challenges Arising from the Digitalisation of the Economy; however, no further announcement has been made concerning its implementation of rules that generally are in line with the global anti-base erosion (GloBE) or "Pillar Two" model rules published by the OECD/G20 Inclusive Framework on BEPS that are designed to ensure a global minimum level of taxation of 15% for multinational enterprise groups with annual consolidated revenue of at least EUR 750 million.

Taxation of dividends: Dividends received by an Angolan company generally are subject only to investment income tax, at a rate of 10%, to be withheld by the payer company (see "Withholding tax," below) and are excluded from the taxable base of the recipient company for corporate income tax purposes.

Capital gains: Capital gains and losses from the disposal of fixed assets or shares generally are taxed at 25% as business income under the corporate income tax code. If certain conditions are fulfilled (notably that the underlying income is not derived from the taxable person's commercial activities and, as such, is not subject to corporate income tax), capital gains derived from the sale of shares or other instruments generating income subject to investment income tax (such as dividends, interest, and royalties) are not liable to corporate income tax but are subject to investment income tax at 10%. Only 50% of the capital gain on quoted shares and instruments with a maturity of at least three years traded on a regulated listed market is taxable, resulting in an effective rate of 5%.

Losses: Losses may be carried forward for five years but cannot be carried back.

Foreign tax relief: No foreign tax credit provisions exist under domestic legislation; relief may be available only in accordance with an applicable tax treaty.

Participation exemption: An exemption from investment income tax is available for dividends paid by a domestic company with its capital traded on the regulated market to another Angolan resident entity that has held at least 25% of the payer's share capital for more than one year.

Holding company regime: There is no holding company regime.

Incentives: Under the private investment regime, incentives and benefits may be granted to certain investments. Investments in the banking, mining, and oil industries are regulated by special investment regimes, which also may offer incentives. The private investment law applies to private investments of any amount made by domestic or foreign investors. This regime does not apply to investments made by state-controlled legal persons (wholly or majority owned) or to sectors governed by special legislation. Investment projects are subject to a prior declaration regime, a special regime, or a contractual regime. Private investors may choose whichever of the three regimes they prefer, provided the necessary conditions are met. The prior declaration regime requires the submission of the investment proposal to the public entity responsible for registration of the investment and for granting benefits. According to this regime, companies must be incorporated, so it is not necessary to present a private investment registration certificate evidencing the act of incorporation. The special regime applies to investment projects carried out in priority activity sectors and in development areas specified in the law. The contractual regime applies to investments exceeding USD 10 million that create more than 50 jobs. Tax benefits (notably in relation to corporate income tax, stamp tax, property tax, and investment income tax) are available under all regimes.

Under the free zones regime, customs exemptions and tax benefits may be granted for private investments, as well as access to special migratory, labor, foreign exchange, and financial regimes. All types of private investments are allowed, with a focus on agro-industrial development, labor-intensive industries, and high-tech and high-value-added industries that use and transform domestic raw materials to produce goods intended for export. The development of all classes of industrial, agro-

industrial, technological, commercial, or service activities is allowed. Investors interested in developing activity in these areas must submit the investment project to the public entity responsible for managing the free zone and are subject to the signing of an investment contract that regulates the terms and conditions for its execution.

Documented costs incurred by taxpayers in the agricultural and livestock sectors for investments in infrastructure essential for the production and distribution of products such as water, electricity, or access roads that benefit the communities where they operate are amortizable over five fiscal years immediately following the investment, subject to prior authorization from the tax authorities.

Compliance for corporations

Tax year: The tax year is the calendar year.

Consolidated returns: Large taxpayers (as defined by an order of the Ministry of Finance and including all financial institutions and oil companies) may file consolidated corporate income tax returns if approved by the tax authorities; however, each company in the tax group must also file a separate corporate income tax return. Under the special group taxation regime, where certain requirements are met (e.g., one company holds directly or indirectly at least 90% of the subsidiary's share capital that grants more than 50% of the voting rights), the corporate income tax payable may be based on the combined profits and losses of all group companies. The regime applies only to large taxpayers and approval must be obtained from the tax authorities.

Filing and payment: Corporate income tax must be paid annually by 31 May following the end of the relevant tax year for taxpayers under the general regime, or by 30 April following the end of the relevant tax year for taxpayers subject to the simplified regime. Under the general regime, a provisional tax payment equal to 2% of the taxpayer's turnover for the first six months of the accounting period must be paid by 31 August during the relevant period.

Taxpayers liable to corporate income tax under either the general regime or the simplified regime are required to submit tax returns electronically.

Penalties: Penalties are imposed for the late payment of corporate income tax.

Rulings: Taxpayers may request a binding ruling from the tax authorities. A ruling is valid for at least one year, after which the tax authorities may review the ruling and potentially change their position for subsequent years.

Individual taxation

Rates		
Individual income tax rate	**Monthly taxable income (AOA)**	**Rate/Tax payable (AOA)**
	Up to 150,000	0%
	150,001–200,000	12,500 + 16% of taxable income exceeding 150,000
	200,001–300,000	31,250 + 18% of taxable income exceeding 200,000
	300,001–500,000	49,250 + 19% of taxable income exceeding 300,000
	500,001–1,000,000	87,250 + 20% of taxable income exceeding 500,000
	1,000,001–1,500,000	187,249 + 21% of taxable income exceeding 1,000,000
	1,500,001–2,000,000	292,249 + 22% of taxable income exceeding 1,500,000
	2,000,001–2,500,000	402,249 + 23% of taxable income exceeding 2,000,000
	2,500,001–5,000,000	517,249 + 24% of taxable income exceeding 2,500,000
	5,000,001–10,000,000	1,117,249 + 24.5% of taxable income exceeding 5,000,000
	Over 10,000,000	2,342,248 + 25% of taxable income exceeding 10,000,000
Capital gains tax rate		Varies

Residence: The general tax code provides specific tax residence criteria for individuals, but the personal income tax code does not use the concept of tax residence for the taxation of income earned by individuals.

Basis: Angola operates a source-based system of taxation. All individuals are liable to personal income tax in Angola on Angolan-source income from employment, i.e., income paid or borne by an Angolan employer, and all local sources of income are subject to tax in Angola.

Taxable income: The concept of remuneration for personal income tax purposes is defined broadly and includes remuneration paid or payable in cash or in kind to an individual in the form of regular or incidental, or fixed or variable compensation. Remuneration derived from employment or self-employment is divided into three groups:

- Group A: Remuneration derived by employees (paid by a corporate employer under an employment contract concluded in accordance with the labor law), public servants, and members of boards of directors or other statutory bodies;
- Group B: Remuneration derived by independent freelancers who carry out activities on the list included as an appendix to the personal income tax code; and
- Group C: Remuneration derived from industrial or commercial activities, as provided in the table of minimum profits (attached to the personal income tax code). This table sets out the minimum deemed taxable income by profession based on the location of the individual.

Specific rules apply for the computation of taxable income for each group.

Income derived from capital investments (including dividends, interest, and royalties) also is taxable but is subject to investment income tax, not personal income tax.

Rates: The following rates apply to taxable income:

- Group A: Progressive personal income tax rates, with a maximum rate of 25%;
- Group B: A flat 6.5% rate applies to income liable to withholding tax; income not subject to withholding tax is liable to a 25% personal income tax rate; and
- Group C: A flat 6.5% rate applies to income liable to withholding tax. The 6.5% rate also applies to income from sales of goods and services (not subject to withholding tax) up to AOA 10 million of annual turnover, above which the rate is 25%. The 25% rate also applies, regardless of turnover, to all taxable income obtained by taxpayers with organized accounting, determined in accordance with the corporate income tax code. A 10% rate applies to Group C taxpayers carrying out agricultural, forestry, livestock, and fishing activities with turnover exceeding AOA 10 million.

Income derived from capital investments is subject to investment income tax at 10%, which normally is paid via withholding at source.

Capital gains: Capital gains and losses from the disposal of fixed assets or shares generally are taxed under the personal income tax code and subject to the progressive tax rates set out in the table above. If certain conditions are fulfilled, capital gains derived from the sale of shares are not subject to personal income tax, but are subject to investment income tax, which normally is paid via withholding at source. The investment income tax rate is 10%, but an effective rate of 5% may apply in certain circumstances (see “Capital gains” under “Corporate taxation,” above).

Deductions and allowances: Certain compensation-related items are exempt from, partly exempt from, or not subject to personal income tax, such as allowances for travel and accommodation (applicable only to public servants); social allowances (e.g., family allowances, up to 5% of the employee’s monthly basic salary); maternity, death, and labor accident allowances; old age, disability, and survivor’s pension contributions; social security contributions; and severance payments (all up to maximum ceilings provided in the labor law). Meal and transportation allowances up to AOA 30,000 per month per allowance are not subject to personal income tax. There are no specific concessions for expatriates. Basic costs incurred in connection with self-employment activities may be considered deductible up to 30% of the relevant gross income, provided that the independent worker maintains organized or simplified accounting records.

Foreign tax relief: No foreign tax credit provisions exist under domestic legislation; relief may be available only in accordance with an applicable tax treaty.

Compliance for individuals

Tax year: The tax year is the calendar year.

Filing status: Employees are not required to submit tax returns if their only income is from employment. For other taxpayers, joint filing is not permitted; spouses must file separate tax returns.

Filing and payment: The employer must withhold tax on monthly employment income based on the applicable personal income tax rates and pay the tax to the government by the end of the month following the month in which the income was paid. Individuals engaged in business activities must file a tax return by 31 March of the year following the year to which the income relates.

Penalties: Most infringements of the personal income tax rules, including failure to file a tax return and errors and omissions in tax returns, are subject to penalties as set out in the general tax code.

Rulings: Taxpayers may request a binding ruling from the tax authorities. A ruling is valid for at least one year, after which the tax authorities may review the ruling and potentially change their position for subsequent years.

Withholding tax

Rates

Type of payment	Residents		Nonresidents	
	Company	Individual	Company	Individual
Dividends	10%	10%	10%	10%
Interest	5%/10%/15%	5%/10%/15%	5%/10%/15%	5%/10%/15%
Royalties	10%	10%	10%	10%

Dividends: Dividends paid to residents and nonresidents qualify as section B income under the investment income tax code and are subject to investment income tax withheld at a rate of 10%. The investment income tax rate on dividends paid to nonresidents may be reduced under an applicable tax treaty.

Interest: Interest paid on loans, including current account loans, to residents and nonresidents generally is liable to 15% investment income tax. If the loans are granted by shareholders or the interest is derived from current or term deposits placed with financial institutions, the rate is 10%. Interest on treasury notes and bonds and on central bank securities also is subject to a 10% rate (5% if derived from instruments with a maturity of at least three years). The investment income tax rate on interest paid to nonresidents may be reduced under an applicable tax treaty.

Royalties: The rate of investment income tax on royalties paid to residents and nonresidents is 10%. The investment income tax rate on royalties paid to nonresidents may be reduced under an applicable tax treaty.

Fees for technical services: Tax resident entities or entities operating in Angola through branches or PEs must withhold corporate income tax at 6.5% on service payments made to resident and nonresident entities. Certain services are not subject to withholding tax. If the service provider is resident in Angola, the taxes withheld on income earned can be set off against the corporate income tax payable under certain conditions. If the service provider is a nonresident, the amount withheld in Angola is a final tax and cannot be recovered in Angola.

Tax resident entities or entities operating in Angola through branches or PEs must withhold personal income tax at 6.5% on service payments made to individuals. Certain services are not subject to withholding tax. If the service provider is resident in Angola, the taxes withheld on income earned can be set off against the personal income tax payable under certain conditions. If the service provider is a nonresident, the amount withheld in Angola is a final tax and cannot be recovered in Angola.

Branch remittance tax: The remittance of profits by a branch to a foreign head office is subject to investment income tax withheld at 10%.

Other: Other residual income arising from capital investments is subject to withholding tax at 15%.

Anti-avoidance rules

Transfer pricing: The arm's length principle applies to related party transactions. The Angolan tax authorities can make adjustments that are deemed necessary for determining the taxable amount when a "special relationship" exists between entities, regardless of whether these entities are liable to corporate income tax, if the conditions established for transactions between the entities are different from those that normally would be agreed upon in relations between independent entities. The transfer pricing rules generally cover commercial transactions, including any transaction for goods, rights, or services, as well as financial transactions.

The following transfer pricing methods may be used: (i) comparable uncontrolled price method; (ii) resale price method; and (iii) cost plus method.

A transfer pricing file must be prepared by all Angolan taxpayers that have recorded total revenue of more than AOA 7 billion and submitted to the tax authorities within six months after the end of the tax year to which it relates.

Interest deduction limitations: There are no thin capitalization rules. Interest expense incurred on shareholder loans is deductible for corporate income tax purposes up to the average annual interest rate set by the central bank.

Controlled foreign companies: There are no controlled foreign company rules.

Anti-hybrid rules: There are no anti-hybrid rules.

Economic substance requirements: See "General anti-avoidance rule," below.

Disclosure requirements: For purposes of conducting inspections and collecting taxes, the tax authorities may require any taxpayer and any other person to provide information, documents, or other items.

Exit tax: There is no exit tax.

General anti-avoidance rule: Under the general anti-avoidance rule, acts that have been carried out, under any circumstances, for the purpose of obtaining a tax advantage by abusive use of legal forms are to be disregarded for tax purposes and tax imposed in accordance with the rules applicable to the substance or economic reality of the transaction. For this purpose, an abusive use of legal form occurs whenever an act is not conducted for valid economic reasons reflecting its true economic substance. If the declared contractual price differs from the actual price of a legal business transaction, tax is applied to the actual price. A draft decision to apply the anti-abuse provision must be justified via a notification issued to the taxpayer by the local tax office, including a description of the legal acts or business transactions carried out by the taxpayer that are deemed abusive and evidence to demonstrate that they were aimed at obtaining a tax advantage in the form of a reduction, elimination, or deferral of tax that would otherwise be due.

The taxpayer has the right to a preliminary hearing to challenge the proposal to apply the anti-abuse provision and must present evidence in its defense within 15 days of the issuance of the notification; additional evidence may not be introduced at a subsequent stage. After the preliminary hearing, the local tax office must prepare a reasoned opinion on the application of the procedure for the consideration of the chairman of the board of directors of the tax authorities.

Where the general anti-abuse provision applies, compensatory interest is payable at 2.5%.

Value added tax

Rates	
Standard rate	14%
Reduced rates	1%/2%/5%/7%

Taxable transactions: VAT is imposed on the supply of goods and services and on imports into Angola.

Rates: The standard VAT rate is 14%.

A reduced rate of 7% applies to hotel and meal services, provided that certain requirements are met by the service providers. A reduced rate of 5% applies to imports and local supplies of some basic food products such as water, pasta, fruit, meat, fish (with some exceptions), milk and yogurts, cooking oil, bakery and pastry products, and agricultural inputs. The 5% rate also applies to imports or local purchases of industrial equipment by manufacturers, upon the taxpayer's request and the approval of the tax authorities.

In the province of Cabinda, a reduced VAT rate of 1% applies to imports and transfers of certain goods, and a reduced 2% rate to port and water distribution services carried out in the province by companies domiciled or with an establishment in Cabinda.

Entities covered by the general VAT regime are required to charge VAT on supplies at the applicable rate (unless a VAT exclusion applies). Entities subject to the general regime that perform exclusively VAT-exempt operations with no right to input VAT recovery are subject to stamp tax at 1% on the receivables.

For entities covered by the simplified VAT regime, VAT is due at a flat rate of 7% on turnover (the total volume of invoiced transactions or imports made by the taxable person in each year), which therefore also includes transactions exempt from VAT and advanced payments, except for leases of immovable property, which are subject to stamp duty. Taxpayers under the simplified regime may deduct 10% of the VAT invoiced to them by suppliers operating under the general VAT regime.

Registration: There are three VAT regimes in Angola: (i) the general VAT regime; (ii) the simplified VAT regime; and (iii) the VAT exclusion regime. The general regime applies to (i) large taxpayers (those registered at the tax office for large taxpayers (*Repartição Fiscal dos Grandes Contribuintes* (RFGC)) or those opting for the regime and accepted by the tax authorities, (ii) taxpayers with an annual turnover of at least AOA 350 million, and (iii) all entities in the manufacturing industry that, in the last 12 months, have registered turnover or a value from import operations greater than AOA 25 million. The simplified regime applies to taxpayers with an annual turnover or value from import operations between AOA 25 million and AOA 350 million, other than those in the manufacturing industry. Taxpayers with annual turnover below AOA 25 million generally fall within the VAT exclusion regime and are not subject to the VAT rules.

Where there is an increase in turnover or the value from import operations so that the thresholds for the exclusion and simplified VAT regimes are exceeded, the taxpayer must change to a new VAT regime by the end of the month following the one in which the operation causing the change in turnover occurred. If the change is not made voluntarily, the tax authorities can enforce the adjustment to the regime.

Filing and payment: VAT is due monthly under the general and simplified VAT regimes and is payable by the 15th day of the second month following the return period (e.g., the VAT payable according to the May VAT return must be paid by 15 July). The supplier generally is liable for the payment of VAT but if the purchaser is a taxable person registered for VAT in Angola, the purchaser is liable for payment under the reverse charge mechanism when the supplier of services is either a nonresident taxable person without a PE in Angola, or an entity not registered for VAT in Angola with a fiscal representative in Angola. Liability for the payment of VAT on the import of goods falls on the importer.

A special VAT payment scheme (withholding VAT) applies to oil investment companies, executing entities of the Angola LNG Project, and the government, as well as any of its services and local authorities (except for publicly owned companies), which are required to withhold 100% of the VAT. The Angolan central bank, commercial banks, insurance and reinsurance

companies, and recognized telecommunication operators also are within the scope of the special scheme but are required to withhold only 50% of the VAT charged by suppliers. Taxpayers subject to the scheme must pay the VAT withheld directly to the government. The special VAT payment scheme does not apply to transactions carried out between entities that withhold VAT at 50%. Imports made by public entities, except public companies, may be made under the special VAT payment scheme. If VAT is not withheld, and is paid by the customer to the supplier, the supplier issuing the invoice is responsible for payment of the VAT to the government by the 15th day of the second month following receipt.

Nonresident companies making taxable supplies to which the reverse charge mechanism does not apply must register in Angola and appoint an Angolan fiscal representative to ensure compliance with the nonresident supplier's VAT obligations, namely registration, filing of VAT returns, and payment of VAT (although a simplified regime is legally possible, in practice taxpayers must appoint a fiscal representative).

Angolan taxpayers that fall within the scope of the general or simplified VAT regimes must file monthly standardized files extracted from their invoicing software (the supplies' SAF-T (AO) file) with information regarding supplies made during the period. A purchases' SAF-T (AO) file also must be submitted in respect of purchases unless the taxpayer includes all acquisitions (whether or not subject to VAT) in the supplier's annex to the monthly VAT return.

Although the tax authorities have advised that taxpayers using electronic invoicing (e-invoicing) are not required to prepare and submit invoicing SAF-T (AO) files, the obligation to submit the files has not been officially revoked and the tax authorities have indicated that taxpayers may still be required to make the files available in the context of a future tax audit. See "Electronic invoicing," below, for further information.

For 2026 and subsequent years, an accounting SAF-T (AO) file containing all the information booked in the accounting records must be submitted annually by 10 April of the following year.

As from 1 May 2025, VAT returns are automatically pre-filled as much as possible by the tax authorities based on the information contained in the supplies' SAF-T files and the electronic invoices (e-invoices) communicated to and validated by the tax authorities. Pre-filling of returns is mandatory for all taxpayers subject to the general or simplified VAT regimes, except for oil investment companies. The amount of VAT due is also pre-filled on VAT returns for January 2026 and later periods based on the information reported to the tax authorities either via e-invoicing or the SAF-T files.

Invoices and other relevant fiscal documents must be issued in accordance with the rules in place for each supply of goods or services and advance payments, otherwise the supplier is subject to penalties. The tax authorities have stated that only AOA may be used on invoices and equivalent documents (other than those for import and export operations); foreign currency pricing or exchange rates are not permitted. A new legal regime for invoices entered into force on 20 September 2025 that consolidates into a single legal framework the rules for issuing, rectifying, canceling, and archiving invoices, that previously were addressed in various regulations and administrative guidance issued by the tax authorities over recent years.

Other

Electronic invoicing

E-invoicing is being implemented progressively. As from 1 January 2026, e-invoicing is mandatory for taxpayers registered with the RFGC and taxpayers involved in business-to-government transactions. As from 1 January 2027, e-invoicing will be mandatory for all taxpayers subject to either the general or simplified VAT regime. Taxpayers subject to the VAT exclusion regime wishing to adopt e-invoicing must request authorization to do so from the tax authorities.

A transitional regime applied from 1 October 2025 through 31 December 2025 during which taxpayers could continue to issue invoices in the format currently in force without penalties and the tax authorities validated and certified the e-invoicing software to be used. Taxpayers were able to issue e-invoices during the transitional period once their system had been certified.

Regardless of the VAT regime applicable to the taxpayer, the supply of goods and services exceeding AOA 25 million must be documented by e-invoices or invoices issued on the Taxpayer Portal.

Other taxes on corporations and individuals

Unless otherwise stated, the taxes in this section apply both to companies and individuals and are imposed at the national level.

Social contributions and payroll taxes: Angolan citizens and foreigners with a residence permit must make Angolan social security contributions. The total contribution is 11%, of which 8% is payable by the employer and 3% by the employee. The employer is required to withhold the employee's contribution and remit both contributions to the National Social Security Institute by the 10th day of the month following the month in which the income was paid. Unless it is demonstrated that an expatriate is covered by a foreign social security regime, all expatriate employees must register with the National Social Security Institute and make social security contributions in Angola.

An exceptional regime for the settlement of social security debts by public companies that have been wound up or are in the process of liquidation has been extended through 2026. Companies that voluntarily declare and settle their outstanding social security debts are exempt from related interest and fines. To apply the regime, a request must be made by the liquidating entity, and the relevant outstanding debts must be declared and paid by 31 December 2026.

Capital duty: There is no capital duty.

Real property tax: Property tax is levied on property located in Angola, on the ratable value for passively held or occupied immovable property, or on the rental income for leased property, either urban or rural.

For immovable property that is not rented, property tax is paid by the owner, occupier, or holder of the surface rights by 31 March of the following year (or, upon request, in six consecutive installments). For urban property (except building plots), the property tax rate varies based on the ratable value, as follows: a 0.1% rate on ratable values up to AOA 5 million; a fixed amount of AOA 5,000 for ratable values exceeding AOA 5 million up to AOA 6 million; and where the ratable value exceeds AOA 6 million, the property tax payable is AOA 5,000 plus 0.5% on the excess over AOA 5 million.

Regarding land for construction, a 0.6% property tax rate applies to its ratable value. For rural property, an amount equivalent to AOA 10,397 per hectare is due.

An additional charge equivalent to 50% of the property tax otherwise due applies to vacant buildings (those with no evidence of having water, electricity, or telecommunication contracts and the respective monthly charges) for more than one year, as well as land for construction not complying with the useful and effective use criteria during three consecutive or six nonconsecutive years.

For leased property, property tax is imposed at a 25% rate on rental income collected. Deemed deductible expenses (i.e., charges for the maintenance and conservation of the immovable property) are capped at 40% of the property's rent or lease value, leading to an effective property tax rate of 15% on gross rental income. If the property rents are paid by a taxpayer with organized accounting, a 15% property tax withholding should be imposed and paid to the treasury by the end of the following month, regardless of the lessor's obligation to submit the annual return per leased building by the end of January of the following year. The property tax payable on rental income may not be lower than the amount that would be due on the underlying ratable value of the property that generates the income. Similarly, if the agreed rent amount is not collected in a certain period, the property tax assessment should be made on the basis of the property's ratable value, with the right for the landlord to deduct any property tax paid when they collect the rent.

Rental income liable to property tax is not subject to corporate income tax.

Transfer tax: Property tax is also imposed on the transfer of property located in Angolan territory. The tax rate is 2% and the tax is paid by the acquirer of the property on the higher of the sales price or the value of the property. Among several other transactions deemed immovable property transfers for property tax purposes, the acquisition of at least 50% of the shares in

limited liability companies or corporations that own immovable property can trigger a property tax liability if it results in the acquiring entity holding more than 50% of the company's share capital.

Transfers of residential properties with a value of up to AOA 40 million are exempt from property tax. For residential properties with a value greater than AOA 40 million up to AOA 100 million, the property tax rate is reduced by 50%.

Stamp duty: Stamp tax is imposed on all acts, contracts, documents, transactions in securities, and other acts listed in the table annexed to the stamp duty code, or in special laws, that take place in Angola. The following also are subject to stamp tax:

- Documents issued or acts or contracts concluded outside Angola on the same terms that would apply had they been issued or entered into in Angola, and that are presented in the country for any legal purpose;
- Loans and guarantees granted outside Angola to an entity with a head office, subsidiary, branch, or PE in Angola;
- Interest, fees, and amounts charged by nonresident entities to entities with a head office, subsidiary, branch, or PE in Angola; and
- Insurance taken out outside Angola in relation to risks located in Angola.

The tax rates are set out in the table annexed to the stamp tax code in effect at the time the tax is due, with no duplication permitted regarding the same facts or transaction. If more than one rate applies to a transaction, the highest rate will prevail. Exemptions apply to certain transactions, including transactions conducted within the Interbank Money Market (as defined by the relevant legislation) and capital increases carried out by a legally established commercial company.

Net wealth/worth tax: There is no net wealth tax or net worth tax.

Inheritance/estate tax: A gift and inheritance tax system applies to gratuitous transfers of movable property located or existing in Angola or transferred from an Angolan resident. For transfers of assets to spouses, ascendants, or descendants, the tax rate is 0.5% where the value of the assets does not exceed AOA 5 million and 1% where the value exceeds that amount. The corresponding rates for transfers of assets between any other individuals are 1% and 2%.

Other: A special contribution on exchange transactions (SCET) applies to international transfers arising from service agreements, the provision of technical assistance, consulting and management services, capital operations (other than transfers of dividends, reimbursement of loan principal, and interest payments), and unilateral transfers (other than certain transfers intended for health and education expenses).

SCET is payable by natural and legal persons governed by private law with a domicile or registered office in Angola who use a financial institution for the transfers. The SCET rate is 2.5% if the sender is a natural person, or 10% if the sender is a legal person. The state and any of its bodies, agencies, and establishments (except public institutions and companies), and oil and diamond investment companies, are exempt from SCET.

Assessment and payment is made by the financial institutions, through a withholding system, when the international transfer is processed. Noncompliance may result in a fine corresponding to the amount of SCET due.

Tax treaties:

For information on Angola's tax treaty network, visit Deloitte International Tax Source.

Tax authorities: *Administração Geral Tributária* (AGT)

Contact us:

Renato Carreira
recarreira@deloitte.co.ao

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