

LEGAL NEWSLETTER | OCTOBER 2026

LEGISLATIVE UPDATES



OCT/26

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This edition contains a selection of the most recent legislation covering the areas of education, labour and public finances.

OCTOBER

- Presidential Order No. 67/2026, of 1 September, appoints Felisberto Dinis Navalha as Governor of the Bank of Mozambique
- Presidential Order No. 68/2026, of 1 September, appoints Benedita Maria Guimino as Vice-Governor of the Bank of Mozambique
- Decree No. 52/2026, of 3 September 2026, approves the Domestic Work Regulation and repeals Decree No. 40/2008, of 26 November
- Decree No. 54/2026, of 8 September 2026, redefines the legal regime applicable to the operation of private education activities in Mozambique and repeals Decree No. 11/90, of 1 June
- Resolution No. 72/2026, of 14 September 2026, approves the Public Finance Management Strategy 2026-2035, abbreviated as EGFP

NEW LEADERSHIP AT THE BANK OF MOZAMBIQUE

Presidential Orders No. 67/2026 and No. 68/2026, both of 1 September, introduce new leadership at the Bank of Mozambique.

Among the challenges identified for the new leadership are strengthening financial inclusion, preserving the value of the Metical, coordinating monetary and fiscal policy, combating money laundering and deepening the financial system.

DOMESTIC WORK REGULATION

Decree No. 52/2026, of 3 September, approves the new Domestic Work Regulation, strengthening protection for a traditionally vulnerable sector.

Among the main changes is the requirement to enter into a written employment contract, with a legally defined minimum content, making the employer responsible for registering the worker with the social security system and paying the corresponding contributions.

As a rule, the new regime sets the minimum age for admission to domestic work at 18, allowing limited exceptions for minors over the age of 15.

It also sets clearer limits on working time, establishing a maximum of 48 hours per week and 8 hours per day, as well as a minimum rest period of 8 hours overnight for live-in domestic workers. The Regulation also recognises rights related to maternity and paternity, including 90 days of maternity leave and 7 days of paternity leave, and strengthens protection for pregnant workers against termination of employment.

Among other changes, the new regime establishes measures to prevent and combat workplace harassment and the abuse of disciplinary authority, rules on occupational safety and health, provides for out-of-court dispute resolution mechanisms, strengthens the compensation regime applicable to termination of employment, and provides for the possibility of setting a specific minimum wage for the domestic work sector.

Although the Decree was published on 3 September 2026, the Regulation will come into force 180 days after its publication, meaning it is expected to take effect in March 2027.

LEGAL REGIME APPLICABLE TO THE OPERATION OF PRIVATE EDUCATION ACTIVITIES IN MOZAMBIQUE

Decree No. 54/2026, of 8 September, redefines the legal regime for private education in Mozambique and repeals Decree No. 11/90, of 1 June, aligning it with the National Education System Law.

The new regime covers pre-school education, general and adult education, vocational education, foreign-curriculum schools and language teaching. The opening and operation of private educational institutions now depend on licensing, including in cases of territorial expansion, and are also subject to demonstrating technical-pedagogical, financial and asset-related capacity.

The Decree formalises the regime applicable to the activity/role of private tutor, recognises the different types of private institutions, including community, philanthropic and for-profit institutions, exempting community institutions from paying licence fees.

In terms of quality and transparency, institutions teaching foreign curricula are now subject to specific requirements, including accreditation of the relevant curriculum in the country of origin and the inclusion of content relating to the Portuguese Language, Social Sciences, Geography and History of Mozambique.

The institutions in question must disclose and justify changes to tuition fees, enrolment fees and other charges on an annual basis. The Decree came into force on the date of its publication, 8 September 2026. Educational institutions already in operation have 18 months to comply with the new provisions and must therefore review their procedures and licensing requirements within the adaptation period set out in the diploma.

PUBLIC FINANCE MANAGEMENT STRATEGY 2026-2035 (EGFP)

Resolution No. 72/2026, of 14 September, approves the Public Finance Management Strategy 2026-2035 (EGFP), which sets out the reform framework for the public finance system for the next decade.

The Strategy is based on five objectives: strengthening fiscal transparency and accountability, mobilising revenue efficiently, improving strategic planning and budgeting, executing expenditure with a focus on service delivery, and sustainably managing State assets, including the State Business Sector and the Sovereign Fund.

The EGFP also includes cross-cutting pillars relating to human capital, digital transformation and climate resilience, providing for coordination mechanisms, three-year operational plans and periodic assessments under the PEFA methodology. Its implementation is also intended to strengthen the State's financial autonomy and reduce dependence on external financing.

The Minister of Finance is responsible for approving the complementary rules necessary for implementing the Strategy. The Resolution came into force on the date of its publication, on 14 September 2026.



LEGISLATION THAT CAME INTO FORCE IN SEPTEMBER 2026

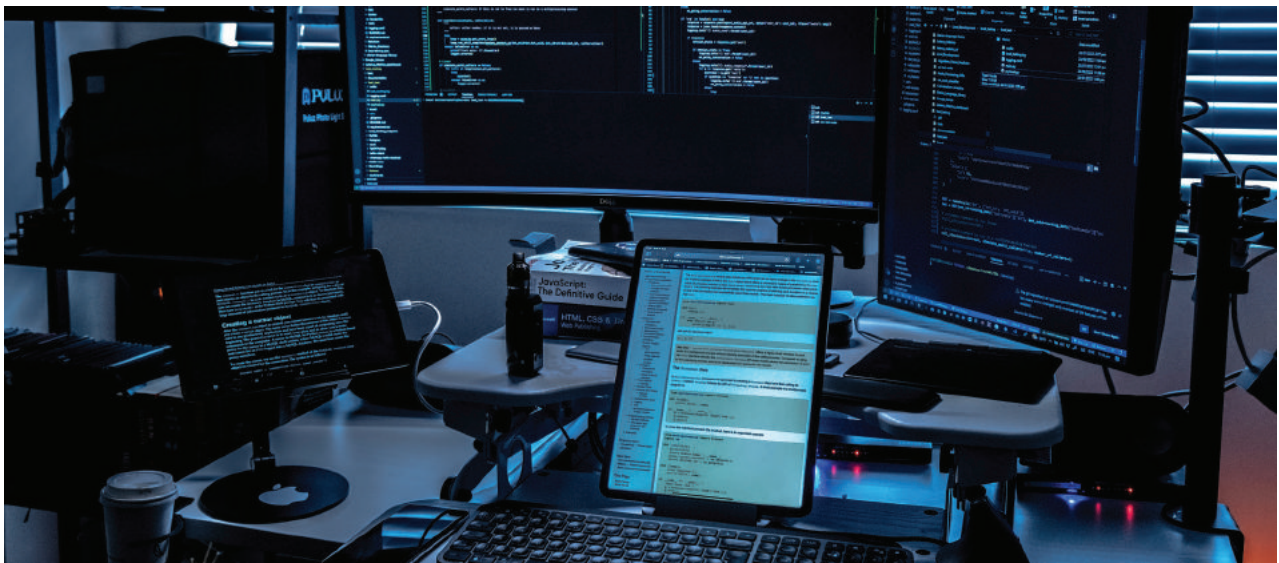


CYBERSECURITY | NEW REGIME COMES INTO FORCE

Law No. 13/2026, on Cybersecurity, published on 1 July 2026, came into force on 29 September 2026. The diploma establishes the new national legal framework applicable to cybersecurity, including mechanisms for protecting networks, information systems and critical infrastructure.

CYBERCRIME | NEW CRIMINAL REGIME COMES INTO FORCE

Law No. 14/2026, on Cybercrime, came into force on 29 September 2026. The diploma establishes the regime applicable to the prevention, investigation and prosecution of crimes committed through information and communication technologies, also introducing rules on the preservation and collection of digital evidence and international cooperation.



CONVERSATIONS ON JUSTICE, GOVERNANCE AND LEGAL CERTAINTY IN MOZAMBIQUE

In our conversations on justice, governance and legal certainty in Mozambique, we cover topics across three different dimensions of strengthening the Mozambican legal system: combating financial crime (integrity of the financial system), compliance with international human rights commitments, and the expansion of judicial infrastructure.

COMBATING MONEY LAUNDERING

In September 2026, Mozambique took part, in Kigali, Rwanda, in the 26th Meeting of the Council of Ministers of ESAAMLG — the Eastern and Southern Africa Anti-Money Laundering Group — and in the public-private sector dialogue on financial crime. This participation came after Mozambique was removed, in October 2025, from the FATF Grey List, having completed the 26 actions of its reform plan. The country is now in a phase of consolidating its reforms, preparing the progress report due to be submitted to ESAAMLG in 2027 and the next mutual evaluation cycle scheduled for 2029.

Implications: This reinforces the need to maintain effective mechanisms for preventing and detecting illicit financial transactions. It may increase the confidence of banks, investors and international partners in the Mozambican financial system. It requires greater cooperation between the Government, the Bank of Mozambique, financial institutions, lawyers and other entities subject to anti-money laundering rules. Leaving the Grey List does not mean the end of the reforms; the Bank of Mozambique itself notes that the 2026–2030 period corresponds to a new phase of sustainability for the national system for preventing and combating money laundering.

UN HUMAN RIGHTS CONFERENCE/PROCESS

In September, Mozambique took part in the 63rd session of the United Nations Human Rights Council, in Geneva, as part of the fourth cycle of the Universal Periodic Review (UPR). The country decided to accept 284 of the 292 recommendations put forward by other States regarding the human rights situation in Mozambique, placing eight recommendations under review/noted. The areas covered include access to justice, the rule of law, protection of vulnerable groups, the modernisation of the justice system and prison conditions. The UN stressed that adopting the recommendations does not mark the end of the process, but the beginning of its most important phase: implementation over the next four years.

Implications: This creates international commitments that the Government will need to turn into concrete measures. It places greater international attention on the functioning of the rule of law and access to justice in Mozambique. It may encourage legislative and institutional reforms, including the modernisation and digitalisation of the justice sector. Implementation will depend not only on the Government but also on Parliament, the courts, human rights institutions, civil society and international partners.

BEYOND BORDERS

OBSERVANCE OF ESG RULES BY COMPANIES OPERATING INTERNATIONALLY



EU STRENGTHENS FIGHT AGAINST GREENWASHING

At the end of September 2026, new EU rules came into application under the Empowering Consumers for the Green Transition (EmpCo) directive. Companies now face greater scrutiny over generic environmental claims such as “green”, “sustainable” or “environmentally friendly”. Such claims will need to be backed by verifiable information. The legislation also restricts certain environmental labels created by companies themselves and sets stricter rules for claims of climate neutrality. Penalties can reach up to 4% of annual turnover in certain cases.

Implication: Companies that advertise or make claims about sustainability need to ensure they can prove what they state. This increases the importance of legal review of marketing campaigns, ESG reports, websites, packaging and information directed at investors.

EUROPEAN RULES ON FORCED LABOUR IN SUPPLY CHAINS

The EU is preparing to apply the Forced Labour Regulation, which will make it possible to prevent products made with forced labour from entering or being marketed in the European market. The measure complements the European rules on corporate sustainability due diligence, increasing pressure on companies to identify and address human rights risks in their global supply chains. The new product rules are expected to apply from December 2027.

Implication: International companies will need to pay closer attention to their suppliers, subcontractors and production chains. Commercial contracts may increasingly include stricter clauses on human rights, audits, disclosure duties, compensation and the possibility of terminating contracts where serious violations are identified. For African companies exporting to the EU, this may make ESG due diligence an increasingly important condition for maintaining business relationships with European buyers.

A LEGAL HELPING HAND

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DID YOU KNOW THAT AN ARBITRATION CLAUSE CAN PREVENT A DISPUTE OVER HOW TO RESOLVE THE DISPUTE ITSELF?

When entering into a commercial contract, it is important to decide in advance how any disputes will be resolved. An arbitration clause, also known as a compromissory clause, allows the parties to agree that certain disputes will be submitted to arbitration rather than to the courts.

A clear and complete clause provides greater predictability and legal certainty, reducing the risk of later disputes over jurisdiction, applicable procedure or the scope of the arbitration.

Key points to consider:

- A clear statement that disputes arising from the contract will be submitted to arbitration, excluding other forums;
- Determination of the arbitral institution or the applicable arbitration rules;
- Choice of the place (seat) of arbitration;
- Indication of the law applicable to the contract and, where relevant, a distinction between the law applicable to the contract and to the arbitration agreement;
- Specification of the language and the number of arbitrators;
- Precise delimitation of the disputes covered by the clause, avoiding ambiguity as to its scope.

A poorly drafted arbitration clause can turn the discussion about the contract into a preliminary discussion about where, how and by whom the dispute itself should be resolved.

Tip: *before signing a contract, it is not enough to ask “do we have an arbitration clause?”. It is essential to ask: “is the clause clear enough to work when we actually need it?”*

This publication is for informational purposes only and does not constitute legal advice. Its content is based on legislation in force and information disclosed through news channels as of its publication date and may not reflect subsequent developments. The application of the matters addressed depends on the specific circumstances of each case, and it is therefore recommended that appropriate legal advice be obtained before making any decision based on the information provided.

For further clarification or legal assistance, please contact our team.