

LABOR NEWSLETTER

// Angola

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PODCAST

EMPLOYMENT MATTERS

Episode 719: 2026 Employment Law Year in Review: Angola, Gabon & Mozambique

OPINION

THE CONSOLIDATION OF THE LABOR LAW REFORM: WHAT CHANGED IN 2025 AND THE IMPACT ON COMPANIES

The end of 2025 confirmed the consolidation of the labour law reform in Angola, following the enactment of supplementary legislation to the General Labour Law, significantly strengthening regulatory requirements, inspection activity and the level of accountability imposed on employers. Considering this continuous amendment movement, here we review the key legislative developments of 2025 and their practical impact on business activity:

- Strengthening of the labour infringements framework – Presidential Decree No. 50/25, of 19 February 2025 approved a new labour administrative offences regime, classifying infringements as minor, serious and very serious offences, alongside a general increase in fines and a clarification of ancillary sanctions. In practical terms, this legislation results in a tangible increase in companies' legal and financial exposure.
- Social security obligations as a structural risk – This framework was further reinforced by Presidential Decree No. 253/25, of 27 November 2025, which tightened mandatory social protection requirements and highlighted the direct link between human resources management and strict compliance with contributory obligations. Non-compliance now exposes companies to significant administrative offence risks, with direct legal and financial consequences.
- Expatriate employment: increased scrutiny – Presidential Decree No. 49/25, of 18 February 2025 introduced material changes to the regime applicable to non-resident foreign workers, with direct implications for contract duration, registration procedures with Employment

Centres and the mandatory registration of contracts entered into with holders of temporary stay visas. The decree further clarified that resident foreign nationals fall within the concept of “national workforce”, eliminating ambiguities under the previous regime and raising the level of formal compliance required.

- Temporary work and manpower agencies under tighter control – Presidential Decree No. 51/25, of 19 February 2025 imposed greater discipline on the use of temporary work, restricting its use to the same conditions, grounds and maximum durations provided for fixed-term employment contracts under the General Labour Law, while also reinforcing the licensing requirements applicable to manpower agencies.

All considered, the legislation enacted in 2025 confirms a clear trend: Angolan labour law is evolving towards a more demanding model, less tolerant to non-compliance and strongly oriented towards regulatory conformity. In this context, the review of labour and employment practices is no longer a purely legal exercise and has become a core management decision.

In light of this evolving regulatory environment, a preventive and strategic approach is required to mitigate administrative and sanctioning risks, notably through:

- Labour compliance audits;
- Review of contractual templates and labour management practices;
- Reassessment of expatriate employment and the use of temporary work.

Within this new regulatory framework, the preventive review of labour and employment practices assumes a key role as a risk-mitigation tool and as support for informed and sustainable business decision-making.

For 2026, the approval of new legislation on Collective Bargaining, Trade Unions and the Right to Strike is expected, which will also represent key pillars of the national legal framework.

You may find additional insights in our Year in Review podcast (only available in English language).

CASE LAW

DISCIPLINARY DISMISSAL: A STRINGENT INTERPRETATION OF PROCEDURAL GUARANTEES LEADS TO THE SUSPENSION OF THE DISMISSAL (Judgment of the District Court of Luanda – 1st Section of the Labor Chamber, 20 January 2026)

In the context of an injunction, the Luanda District Court ordered the suspension of a disciplinary dismissal and determined the provisional reinstatement of the employee, considering that there was a serious likelihood of the disciplinary procedure being null and void.

The case originated from the dismissal of an employee in a management position in the context of alleged failures to monitor an import process that caused significant economic losses to the employer. Despite the seriousness of the facts alleged, the Court focused its assessment on the formal regularity of the disciplinary procedure, concluding that there were serious flaws in the guarantees of the employee’s defense. In particular, the Court pointed out that the summons for the disciplinary interview contained expressions of prejudgment, which were subsequently reproduced in the final report. This circumstance was considered likely to compromise the impartiality of the procedure and to undermine the purpose of the employee’s

hearing. In addition, the fact that the body that initiated the disciplinary procedure was also responsible for applying the sanction reinforced, in the Court's view, the evidence of a violation of the guarantees of defense.

The Court found that this action deprived the employee of a real and effective possibility of defense, constituting a violation of the legal regime for disciplinary proceedings provided for in the General Labor Law. It also considered that there were serious indications that the dismissal could be declared illegal and that its maintenance until a final decision could cause serious damage to the employee.

As a result, the dismissal was suspended, the worker was provisionally reinstated, and the payment of wages due until the final decision was ordered.

The decision thus reflects a particularly strict interpretation of procedural guarantees in precautionary measures without any legal basis. It is true that making the suspension of dismissal dependent on a rigorous assessment of the form of the procedure, referring the analysis of the material seriousness of the facts to the main action, are normal requirements. However, to claim that the fact that the same body initiated and decided the disciplinary procedure is grounds for invalidating a disciplinary process is to forget that a process of this nature is always triggered and finalized by the same entity: the employer. The decision in question leaves us completely perplexed.

As a final note, this decision, despite being an incorrect application of the law in our view, confirms a certain decision-making trend that we have been observing regularly: for employers, the understanding expressed in the decision in question reinforces the

need for and importance of scrupulous compliance with the guarantees of defense of the employee in disciplinary proceedings, namely in the wording of the note of offense and in the functional separation between the investigation of the proceedings and the disciplinary decision, under penalty of the dismissal being suspended as a precautionary measure, regardless of the seriousness of the alleged facts.

LEGAL NEWS

- **Presidential Decree No. 7/26, of 7 January 2026** – Approves the amendment to the Regulation on Professional Internships for Citizens Educated in the Education and Vocational Training System. – Repeals Presidential Decree No. 300/20, of 23 November 2020.

KEY OBLIGATIONS TO CONSIDER

- Submission of the payroll register to the INSS and payment of contributions by the 10th day of the following month (electronic submission mandatory for companies with more than 20 employees).
- By 30 April 2026, submission to the MAPTSS of the nominal register of employees (RENT model), with reference to March remuneration.
- Submission to MIREMPET of the Annual Balance Report of the Human Resources Development Plan, by 31 March, where applicable.

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