
CHAMBERS GLOBAL PRACTICE GUIDES

Corporate Immigration 2025

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**Portugal: Law & Practice
and Trends & Developments**

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PORTUGAL



Law and Practice

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SRS Legal has an immigration and citizenship department fully dedicated to immigration and citizenship matters, which advises foreign citizens and corporate clients on relocation procedures to Portugal. It also provides personalised legal advice to clients seeking to obtain a residence permit and benefit from the special regime of Residence Permit for Investment Activity in Portugal (or Golden Visa). The team has

expertise in Family Reunification, Golden Visa, Residence for European Citizens, and Residence for Highly Skilled Workers visas, as well as intra-corporate transfer residence visas and visas for those living off individual revenue. The team often advises clients on citizenship applications based on ascendancy, residency or marriage.

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1. Policy

1.1 Immigration Policy

Portugal is a country that welcomes immigrants and has proven to be a sought-after place for foreign citizens to live, either temporarily or permanently.

The Portuguese Immigration Law has been subject to several amendments over the years, with the introduction of new types of visas and residence permits aimed at attracting more foreign citizens to Portugal and streamlining the immigration procedure. Examples include the Tech Visa, the Digital Nomad Visa, the Job Seeking Visa and the Community of Portuguese Language Countries (CPLP) Visa. Portugal now has a wide range of visas for foreign citizens who wish to relocate to the country, depending on whether their purpose is to study, to work (including remote working), to reunite with family or simply to enjoy life in Portugal.

There are two types of national visas in Portugal:

- the Temporary Stay Visa for stays of up to 12 months; and
- the residence visa (which is later converted into a residence permit) for those who intend to relocate to Portugal for longer than 12 months.

There are also two types of residence permits:

- the temporary residence permit, the validity of which varies from one to three years; and
- the permanent residence permit, which is valid for five years and may be applied for if a temporary residence permit has been held for at least five years, provided that the applicant meets the requirements.

1.2 Upcoming Policy Changes

Expression of Interest

Until the end of May 2024, foreign citizens who entered Portugal on a visa exemption or a Schengen Visa could apply directly in Portugal for a Subordinate Work Residence Permit, an Independent Work Residence Permit, a Migrant Entrepreneur Residence Permit, a Start-up Visa or a Digital Nomad Residence Permit through the mechanism called expression of interest. Of the work-related residence permits that could be initiated directly in the national territory, the expression of interest mechanism was by far the most widely used. This mechanism attracted more applicants than the immigration office's capacity, which led to a huge backlog and left 400,000 applicants in vulnerable situations as it took around two years for them to receive their residence permit.

The expression of interest regime was revoked by the Portuguese government in early June 2024, significantly reducing the number of work residence permit applications initiated directly in the national territory. The Agency for Integration, Migration and Asylum (AIMA) has been making efforts to reduce the backlog and process pending applications, through the implementation of more efficient application procedures.

Cooperation Protocol for Regulated Labour Migration

On 1 April 2025, a Cooperation Protocol for Regulated Labour Migration was signed between the government and some confederations, aiming to respond to the labour shortage. The protocol was signed by the Directorate General for Consular Affairs and Portuguese Communities (DGACCP), AIMA, the Immigration and Border Coordination Unit of the Internal Security System and the Employment and Vocational Training Institute (IEFP) on behalf of the government,

and also by the Portuguese Business Confederation, the Portuguese Farmers' Confederation, the Portuguese Trade and Services Confederation, the Portuguese Tourism Confederation and the Portuguese Construction and Real Estate Confederation.

The Protocol's purpose is to tackle the labour shortage through a regulated and expedited visa application process while ensuring that foreign employees will be able to integrate in the local community.

2. Visa Options

2.1 Sponsor-Based Employment Visas

In Portugal, sponsor-based employment visas as usually regulated in other countries do not exist as such, but there are several visa and residence permit types in relation to which an employment contract is the basis for the application.

Employment-Based Visa and Residence Permits

Seasonal Work Visa

Visa types

There are two types of visas for seasonal work, depending on the duration:

- a Short-Stay Seasonal Work Visa, valid for up to 90 days; and
- a Temporary Stay Seasonal Work Visa, for stays over 90 days.

This visa is valid for the duration of the employment contract and cannot exceed nine months within a 12-month period. If the visa is valid for less than nine months, it may be extended for a maximum of nine months within a 12-month period.

Seasonal workers are not bound to the activity for which the visa was granted, permitting greater flexibility when carrying out seasonal activities at one or successive employers.

Visa requirements

Seasonal Work Visas (Short-Stay or Temporary Stay) may be granted to foreign citizens who:

- have a valid travel document;
- have not been subject to a removal order and are not currently under a subsequent period of prohibition of entry and stay in Portugal, the EU or the Schengen Area;
- have valid travel insurance covering any necessary medical expenses, medical emergency and medical repatriation;
- have adequate medical protection, in similar terms to those available to national citizens, or medical insurance for the periods that may not be covered by medical protection, as well as work accidents insurance provided by the employer;
- hold an employment contract or promissory employment contract signed with a temporary work agency or an employer established in Portugal that specifies the location, time and type of work, as well as the respective duration of employment, salary and the duration of paid vacation to which they are entitled;
- have means of subsistence;
- have adequate accommodation by means of a lease or equivalent contract, or have accommodation provided by the employer, which must comply with minimum health and safety standards – if the accommodation is provided by the employer and is not free of charge, the rent must be proportional to the remuneration of the employee and under no circumstances can it be automatically deducted from the employee's remuneration, nor exceed 20% thereof;

- fulfil Portuguese legal requirements in the case of a regulated profession;
- hold a valid transport document that guarantees their return to the country of origin (only for Short-Stay Seasonal Work Visa); and
- hold a travel document valid for the duration of the visa (only for Temporary Stay Seasonal Work Visa).

Simplified procedure

Foreign citizens who have been admitted for the purposes of seasonal work in Portugal at least once in the past five years and who have complied with the legal provisions benefit from a simplified procedure when applying for a new Short-Stay or Temporary Stay Seasonal Work Visa, with the following characteristics:

- the visa application is processed as a priority;
- decisions are issued within 15 days; and
- the following documents are exempted:
 - (a) proof of accommodation;
 - (b) proof of fulfilment of legal requirements in the case of a regulated profession; and
 - (c) a valid transport document that guarantees their return to the country of origin.

Seasonal work is available in the following sectors:

- agriculture, livestock, hunting, forestry and fishing;
- hospitality, restaurants and similar;
- food, liquor and tobacco;
- gross and retail commerce;
- construction; and
- land transport.

Subordinate Work Residence Permit

This is adequate for those who already have a job offer, a promissory employment contract or even an employment contract with a Portuguese

company, regardless of the type of activity and the qualifications or experience of the applicants.

Highly Skilled Activity Work Residence Permit

This is applicable to those who already have a job offer, a promissory employment contract or even an employment contract with a Portuguese company for a highly skilled activity, and have the qualifications and/or experience for the execution of such activity. It is advisable to apply for this visa in the applicant's country of residence rather than directly in Portugal.

Tech Visa Residence Permit

The Tech Visa is a certification programme that aims to simplify the visa and residence permit application for foreign highly skilled citizens to be employed by a company that is certified under the programme.

In April 2019, this programme ceased to be limited to tech and innovative companies, and became applicable to all companies that:

- have been legally incorporated;
- have no debts with the tax authority or social security;
- have no unpaid salaries;
- are not subject to a restructuring procedure;
- identify the desired areas of expertise according to the National Catalogue of Qualifications;
- have an office in Portugal and carry out an activity that requires specialised technical skills, exceptional skills or adequate qualifications;
- develop an activity of production of goods and services that can reach the international market; and
- obtain a positive evaluation of the application on:

- (a) market potential; or
- (b) focus on external markets.

If a company was incorporated more than three years ago, it is necessary to provide a copy of the last annual Simplified Company Information (IES) evidencing its positive net worth.

The Agency for Competition and Innovation (IAPMEI) is the entity competent for the certification of companies under the Tech Visa programme. Once certified, companies can then issue a digital Term of Responsibility to highly skilled third-country citizens who:

- are at least 18 years old;
- are not residing permanently in the EU;
- have fulfilled all tax obligations, when applicable;
- have no criminal record;
- have successfully completed a bachelor's degree or equivalent, and have five years' experience in specialised technical functions; and
- are proficient in Portuguese, English, French or Spanish and have a language level adequate to the functions/duties to be performed.

The requirements for this type of residence visa/permit are similar to those for the Highly Skilled Activity Residence Visa/Permit, with the main difference being that the employer is a certified company and is declaring that the employee is a highly skilled professional qualified for the job when issuing the Term of Responsibility.

Note that companies may only have a maximum of 50% employees hired simultaneously through the Tech Visa programme; companies located inland have a maximum cap of 80%.

It is advisable to apply for this visa in the applicant's country of residence rather than directly in Portugal.

EU Blue Card

The EU Blue Card is a residence permit that entitles its holder to live and develop a highly skilled activity in Portugal. A Portuguese EU Blue Card may also be granted to those who move to Portugal to engage in a highly skilled activity after holding another member state's EU Blue Card for at least 12 months.

Whereas Highly Skilled Activity Residence Permits and Tech Visa Residence Permits are Portuguese highly skilled visas and only count towards the Portuguese permanent residence permit, the EU Blue Card is a highly skilled activity residence permit of the EU, and uninterrupted residence time in other member states may cumulatively count towards the five years of residence necessary to apply for an EU Long-Term Residence Permit, provided that some requirements are met.

Intra-corporate transfer (ICT)

This residence permit is applicable when an employee is transferred within the company or group of companies, from a country abroad to Portugal. It is valid for one year or for the duration of the transfer to Portugal, and is renewable for equal periods up to a limit of three years for managers and specialists or one year for trainees, as long as the conditions at the time of its granting are maintained. In practice and considering all types of visas and residence permits offered by Portugal, and the procedures and processing times required, there is no clear advantage for a foreign citizen to apply for this type of visa.

Visa and Residence Permit Application Procedure

With prior visa application in the country of residence

Most types of residence permits must be preceded by a residence visa application in the foreign citizen's country of residence. Depending on the specific country, visa applications may be submitted directly to a Portuguese consulate or through a service provider. Family members may submit their Accompanying Family Member Visa simultaneously with the main visa applicant.

Once the residence visa is approved, applicants will receive a residence visa that is valid for two entries within a 120-day period, during which they should travel to Portugal and attend an appointment with AIMA to submit their residence permit application. These appointments are generated automatically with the issuance of the visa, and family members might be scheduled for different dates, times or locations in Portugal. Note that the main applicant shall be present at the family member's appointment.

In exceptional cases, if an appointment is not generated automatically, it should be scheduled by the applicant according to AIMA's availability.

Without prior visa application in the country of residence

Highly Skilled Activity/Tech Visa Residence Permit

Applicants for these types of residence permits may start their process directly in Portugal, by scheduling an appointment for the submission of the residence permit application with AIMA. Such appointments depend on AIMA's availability, and it is common for appointments to be scheduled for three or four months later, or even for there not to be any available appointments. Applicants will only be able to schedule

an appointment and apply for their family members' residence permits once they receive their own residence permit (in contrast to the possibility of family members submitting their visa applications simultaneously and travelling to Portugal with residence visas and automatically generated appointments).

Applicants and family members are also required to obtain documents in their home country or country of residency for the residence permit application. Some of these documents have expiry dates, so obtaining and legalising such documents must be well co-ordinated. Once applicants travel to Portugal, it is advisable to grant a power of attorney to someone to obtain and legalise said documents on their behalf.

Another disadvantage of this route is that family members who travelled with the applicant to Portugal may only be able to file their applications a couple of months after arriving in Portugal, during which time they will not be considered to be in a regular situation and will not be allowed to work.

2.2 Pathways to Permanent Residence

Foreign nationals holding temporary residence permits for at least five years may apply for a permanent residence permit, which is valid for five years and can be renewed for successive periods of five years.

All work residence permits lead to permanent residence permits. Temporary Stay Visas, which include Seasonal Work Visas, do not qualify for permanent residence permits in Portugal due to the temporary nature of these types of visas.

The main requirements for the permanent residence permit application are:

- having held a temporary residence permit in Portugal for at least five years;
- not having been convicted, during the last five years of residence in Portugal, of a crime or crimes for which the punishment, alone or in combination, exceeds one year of imprisonment;
- having means of subsistence and adequate accommodation;
- having basic knowledge of Portuguese – namely, level A2 or above of the Common European Framework of Reference for Languages scale (CEFR); and
- not having debts to the Portuguese Tax Authority and Social Security.

2.3 Un-sponsored Work and Investment Visas

Job Seeking Visa

As its name suggests, this type of visa is designed for individuals who wish to travel to Portugal to seek a job, allowing foreign citizens to travel to Portugal, enter into an employment contract, start working and apply for a residence permit in Portugal. In order to apply for this visa, applicants must submit an online expression of interest (different from the one mentioned in 2.1 **Sponsor-Based Employment Visas**) in enrolling with the IEFP, including the following information:

- personal information;
- contact details;
- level of education;
- experience information, covering areas of professional experience and number of years;
- desired areas of work; and
- language knowledge.

Upon submission of the declaration, applicants will receive a declaration by email, with which they will be able to apply for the Job Seeking

Visa. The visa is valid for 120 days, extendable for an additional 60-day period, allowing one entry into Portugal. It includes an appointment at AIMA for applicants to file the residence permit application. On the day of the appointment, applicants should have already entered into an employment contract; applicants who do not secure an employment contract within the maximum 180-day period of validity of the visa must leave Portugal and will only be able to apply for a new Job Seeking Visa after one year.

This visa may only be requested in the applicant's country of residence.

Due to the nature of this visa, family members can only begin their process once the applicant has been granted a residence permit.

Independent Professional Activity/Migrant Entrepreneur or Start-Up Visa

The following applicants may follow this route:

- independent professionals who have a service provision contract or a written proposal for liberal professions in Portugal, and have the professional competence for such activity;
- migrant entrepreneurs who intend to invest in Portugal or who have already executed investment operations in Portugal; and
- start-up owners who have signed an incubation contract with a certified incubator and have a declaration issued by IAPMEI.

Digital Nomad Visa/Residence Permit

This visa allows foreign citizens to live in Portugal, either temporarily or long term, while remotely carrying out a subordinate (under an employment contract) or independent (under a service provision contract) professional activity for their employer or clients domiciled or with headquarters outside Portugal.

This type of visa is not applicable for those who wish to work remotely for an individual or entity domiciled or with headquarters in Portugal.

Digital nomads must demonstrate the existence of an employment or services provision contract, and prove average monthly income equivalent to at least four minimum monthly salaries in Portugal for the past three months prior to the visa application. In 2025, the minimum monthly salary is of EUR870, meaning that applicants must prove average monthly income of at least EUR3,480.

There are two subtypes of this visa.

- The Digital Nomad Temporary Stay Visa:
 - (a) this may be requested by applicants who intend to live and work remotely in Portugal for up to 12 months;
 - (b) it must be applied for in the applicant's country of residence; and
 - (c) once granted, applicants will receive a visa sticker that is valid for the duration of the intended stay.
- The Digital Nomad Residence Visa:
 - (a) this may be requested by applicants who wish to relocate to Portugal for more than 12 months;
 - (b) it must be applied for in the applicant's country of residence; and
 - (c) once granted, applicants will receive a visa sticker, which should be converted into a residence permit that is initially valid for two years and renewable for periods of three years.

Residence Permit for People Living Off Individual Revenue

This residence permit is preceded by a residence visa application and must be applied for in the applicant's country of residence. It is commonly

known as the D7 visa and is applicable to those who have revenue from movable or immovable property or intellectual or financial assets, and intend to relocate to Portugal and live off their individual revenue. Holders of a residence permit for people living off individual revenue may also develop a professional activity in Portugal or work remotely for a foreign entity. Retirees may also apply for this type of residence permit.

Accompanying Family Member Visa/ Residence Permit

Family members who intend to accompany a Temporary Stay or Residence Visa applicant on their relocation to Portugal may now file their visa application simultaneously with said applicant. This procedure will allow families wishing to move to Portugal to better plan their relocation, as they will be able to travel together and apply for the residence permit at the same time, avoiding any prolonged separation of family members.

Holders of Accompanying Family Member Residence Visas must attend an appointment at AIMA and convert their visa into a residence permit, which allows its holder to work in Portugal.

EU Citizens and Family Members

EU citizens who intend to live in Portugal for more than three months must register with the municipality of the area of their residence and obtain a Certificate of Registration of EU Citizen, which is valid for five years. This implies that the citizen shall choose the location in which to live before registering with the competent municipality.

Non-EU family members that accompany an EU citizen to Portugal for more than three months may apply for a Residence Card for Family Members of an EU citizen, which is also valid for five

years. The application is submitted directly in Portugal, at AIMA, with a prior appointment. The EU Family Member Residence Card enables its holder to live and work in Portugal.

If the EU citizen does not establish residence in Portugal, the non-EU family member must apply for another type of visa in order to live and work in Portugal.

CPLP Residence Permit

The CPLP entered into a Mobility Agreement establishing the legal basis for greater mobility and circulation among its member states: Angola, Brazil, Cabo Verde, Timor-Leste, Equatorial Guinea, Guinea Bissau, Mozambique, Portugal and São Tomé e Príncipe. The Mobility Agreement entered into force in 2022, and the Portuguese Immigration Law was amended to accommodate special conditions for the granting of visas to the citizens of CPLP member states.

In March 2023, AIMA launched an online platform for the submission of CPLP residence permit applications. Until 13 February 2025, only CPLP citizens with pending expressions of interest filed before 31 December 2022 or with Portuguese visas issued after 31 October 2022 could apply for the CPLP residence permit through the online platform. Currently, applicants eligible under the Mobility Agreement who entered into Portugal legally can request an appointment for the submission of the CPLP residence permit application; this permit enables its holder to live and work in Portugal.

Temporary Protection for Residents in Ukraine

Portugal has offered temporary protection to people fleeing the war in Ukraine. The certificate granted under the temporary protection was

initially valid for one year and implied the issuance of a Portuguese tax number, social security number and a Portuguese health system number, so that applicants could start working.

In March 2025, the government extended the protection until 4 March 2026.

Investment Visas

Golden Visa

Please note that this is a different residence permit than the Migrant Entrepreneur Visa referred to above.

The Golden Visa is a special type of residence permit that may be granted to citizens from countries outside of the EU or EEA who execute one of the following qualifying investments:

- the creation of at least ten job positions;
- a capital transfer of an amount equivalent to or greater than EUR500,000, to be used for research activities developed by public or private scientific research institutions, integrated in the National Scientific and Technological System (*Sistema Científico e Tecnológico Nacional*);
- a capital transfer of an amount equivalent to or greater than EUR250,000, to be used for investing in or providing support to the artistic production and recovery or maintenance of national cultural heritage;
- a capital transfer of an amount equivalent to or greater than EUR500,000, for the acquisition of units in non-real estate collective investment entities, incorporated under Portuguese legislation, with a maturity of at least five years at the time of investment, if at least 60% of the value of the investments is addressed to commercial companies with a registered office in Portugal (investment funds or venture capital funds are included); and

- a capital transfer of an amount equivalent to or greater than EUR500,000, to be used for the incorporation of a company with a head office in Portugal, combined with the creation of at least five permanent jobs, or to increase the share capital of an existing company, with the creation of at least five permanent jobs or the maintenance of at least ten jobs with a minimum of five permanent jobs, and for a minimum period of three years.

The residence permit is initially granted for two years and is renewed for successive two-year periods, provided that the investment is maintained and the applicant stays in Portugal for at least 14 days in every two-year period.

Holders of a Golden Visa residence permit may live and work in Portugal, and are also entitled to regroup their family members.

2.4 Business Visitors

As a rule, the development of remunerated professional activities in Portugal requires an appropriate visa. Portugal is part of the EU, and EU citizens can live, move and work in any EU member state without restrictions.

Foreign citizens listed in Annex II of Regulation (EU) 2018/1806 are exempted from holding a visa when visiting Portugal, but will need an appropriate visa for undertaking remunerated activities in Portugal. Visitors who travel to Portugal on a visa are restricted to the purposes for which the visa was issued. Visa-exempted citizens and holders of Schengen Visas travelling to Portugal as business visitors may undertake the following activities:

- attending conferences, congresses, events or fairs;

- participating in meetings, negotiations or trade deals;
- visiting clients, partners or suppliers; and
- executing research and networking activities.

2.5 Pre-Travel Authorisation

The European Union is preparing the launch of the European Travel Information and Authorisation System (ETIAS), which will start operations in the last quarter of 2026. Non-EU visa-exempt nationals will need to apply for an ETIAS before travelling to any of the 30 European countries requiring an ETIAS, which will be linked to the traveller's passport number. Travellers will be able to apply for an ETIAS through the official ETIAS website or the ETIAS mobile application. The ETIAS travel authorisation is valid for three years or until the passport to which it is linked expires, whichever occurs first.

2.6 Remote Working

The Digital Nomad Visa/Residence Permit (see 2.3 Un-sponsored Work and Investment Visas) is the appropriate visa for individuals who wish to relocate to Portugal and work remotely for a foreign individual or entity, or as a self-employed professional.

3. Visa Requirements

3.1 Prerequisite Language Requirements

Portugal does not impose any language requirements for obtaining a visa or residence permit. However, depending on the visa route, it may be necessary to demonstrate Portuguese, English, French or Spanish language proficiency appropriate to the job, namely in the case of a Tech Visa application.

Those who intend to apply for a permanent residence permit (those who have been on a tempo-

rary residence permit for five years are eligible) need to prove minimum Portuguese A2 level of the Common European Framework of Reference scale by filing a certificate issued by an approved school or exam centre.

3.2 Medical Certificates or Vaccinations

As a rule, medical certificates or vaccinations are not required for visa application purposes. However, depending on the country from which the applicant is applying and the circumstances at the time, Portuguese authorities might require a medical certificate to be filed together with the visa application.

3.3 Sponsor Requirements

Minimum Requirements

Visa and residence permits based on employment contracts have the following minimum requirements in terms of salary or qualifications.

- Work Residence Visa/Permit or Job Seeking Residence Permit: Portuguese minimum monthly salary, which is EUR870 in 2025.
- Highly Skilled Activity Residence Visa/Permit:
 - (a) employment contract or service provision contract for a highly skilled activity with a duration of at least six months;
 - (b) academic qualifications and/or professional experience adequate for the activity to be executed;
 - (c) minimum monthly salary of at least 150% of the national average gross annual salary or 300% of the index value of social support (IAS) – in 2025, the IAS is EUR522.50, so the minimum monthly salary required is EUR1,567.50; and
 - (d) for employment in professions belonging to a group of activities particularly in need, the minimum monthly salary is at least 120% of the national average gross annual salary or 200% of the IAS, so

the minimum monthly salary required is EUR1,045.

- Tech Visa:
 - (a) employment contract or service provision contract for a highly skilled activity with a duration of at least 12 months;
 - (b) academic qualifications and/or professional experience adequate for the activity to be executed; and
 - (c) minimum monthly salary of at least 250% of the IAS, so the minimum monthly salary required is EUR1,306.25.
- EU Blue Card:
 - (a) employment contract or service provision contract for a highly skilled activity with a duration of at least six months;
 - (b) academic qualifications and/or professional experience adequate for the activity to be executed;
 - (c) minimum monthly salary of at least 150% of the national average gross annual salary, which in 2025 is EUR2,405; and
 - (d) for employment in professions belonging to a group of activities particularly in need, the minimum monthly salary is at least 120% of the national average gross annual salary (so EUR1,925).

Activities Particularly in Need

The activities particularly in need mentioned above for the Highly Skilled Activity Residence Visa/Permit and the EU Blue Card are:

- senior managers of public administration;
- company directors;
- small business directors and managers;
- specialists in physical sciences, mathematics and engineering;
- life science specialists and health professionals;
- secondary and higher education teachers and similar professions; and

- other specialists of intellectual and scientific professions.

Labour Market Test or Quota Restrictions

There are no labour market test requirements nor quota restrictions for employing overseas workers.

Sponsor Requirements

There are no specific requirements that employers must meet in terms of size/structure/turnover in order to be able to hire employees from abroad. However, there are some requirements regarding the employer, depending on the type of residence permit/application procedure, as follows.

- Tech Visa: the company must meet the requirements outlined in **2.1 Sponsor-Based Employment Visas** (Tech Visa Residence Permit).
- Cooperation Protocol for Regulated Labour Migration: only companies with at least 150 employees, a turnover of at least EUR20 million, and no debts towards the Social Security or the Tax Authority may benefit independently from this protocol.

3.4 Employment-Based Visa Limitations

Holders of an employment-based residence permit (except Intra-Corporate Transfer Residence Permits) are not limited to an employer but are otherwise bound to the minimum monthly salary and activity requirements of the residence permit category, as indicated in **3.3 Sponsor Requirements**. Therefore, an employee can enter into an employment contract with a different employer during the validity of the residence permit.

3.5 Criminal Background Checks

All applicants over 16 years of age applying for a Temporary Stay Visa, a residence visa or a Job

Seeking Visa must provide a criminal record certificate from the country of nationality or from the country where the applicant has resided for over a year.

Applicants who have been convicted of a crime punishable in Portugal by an imprisonment sentence of one year or more shall be refused a visa, even if the sentence has not been served or has been suspended.

3.6 Financial Resources

When submitting a national visa application, applicants are required to provide proof of sufficient means of subsistence to live in Portugal, or that they will be able to acquire such means upon arrival in Portugal. This means that income arising from employment contracts or promissory employment contracts, service provision contracts or scholarships is considered when assessing compliance with this requirement.

4. Immigration Process

4.1 Method of Submission

Visa applications are paper-based and submitted in hard copy during the visa application appointment. The documents are then scanned and uploaded to the system so they can be analysed by the visa officer.

As a rule, residence permit applications were also paper-based, with the immigration officer scanning and uploading the documents into the immigration office's system during the residence permit application appointment.

Focus on Digital Means to Process Applications

The Portuguese government has been working towards digitalising various procedures to make

them quicker, simpler and more accessible for all those individuals who wish to come and stay in Portugal.

A reformulation of the visa application system is being implemented by the Portuguese government, aiming to allow applicants to fill out the application form, submit a copy of the visa supporting documents, pay the visa application fee, schedule an appointment at the consulate and follow up the status of the visa application. Current usage of the visa application system is limited to filling out the application form and scheduling appointments, and does not take advantage of the system's potential. Once fully implemented, the visa application system will make the visa application procedure more efficient for both the applicant and the government: applicants would be able to monitor the processing of the visa application through the system, and visa officers would not have to scan the documents previously uploaded by the applicant but could rather assess whether the uploaded documents are in accordance with the original document submitted by the applicant during the appointment or sent by post to the consulate.

AIMA has also introduced changes to the procedure for some types of residence permit applications, with applicants paying the residence permit application fees and uploading the supporting documents prior to the scheduling of the appointment. This way, at the appointment the immigration officers only have to collect the applicant's biometrics and confirm that all mandatory documents have been correctly uploaded.

Most interactions with AIMA (at least the first steps of the applications) are expected to be executed through online platforms, replacing traditional methods and limiting in-person appoint-

ments to absolutely necessary situations. In a digital era, these traditional means have made communication with the entity particularly inefficient, forming an obstacle to the prosecution of AIMA's mission of guaranteeing a close relationship with citizens and ensuring the quality and timely provision of services in terms of documentation, reception, integration and inclusion.

4.2 Country of Application

Visa applications are submitted in the applicant's country of legal residence.

If residing in a country other than the country of nationality, the applicant will have to provide proof of regular status in the country of residence, valid for a date subsequent to the date of expiry of the visa for which the applicant is applying. If the applicant cannot provide this document, the visa application must be submitted in the country of nationality.

For applicants who reside in a country without consular representation, the visa application should be submitted at the consulate with jurisdiction over the applicant's country of residence.

There are no effective rules on submitting applications in conflict areas; such rules/exceptions are set out on a case-by-case basis.

4.3 Visa Processing Times

Visa and residence permit processing times vary depending on the country/AIMA office where the application is filed. The current average processing times are as follows:

- Subordinate Work Visa: 60 working days;
- Independent Professional Activity/Migrant Entrepreneur or Start-up Visa: 60 working days;
- Digital Nomad Visa: 60 working days;

- Job Seeking Visa: 60 working days;
- Highly Skilled Work Visa or Tech Visa: 30 working days; and
- residence permit application: 20 to 90 working days.

These processing times are on the basis that a complete application is submitted and are counted from the day the application is filed. The time it takes to obtain and legalise the necessary documents for the visa/residence permit application may be significant and should also be considered.

4.4 Travel Restrictions Once Application Filed

Temporary Stay Visas allow multiple entries during their validity, so temporary visa holders are free to travel in and out of Portugal.

Job Seeking Visas are only valid for one entry into Portugal, so the holder must stay in Portugal until a residence permit application is granted, whilst residence visas are valid for two entries into Portugal during the validity of the visa.

Holders of a temporary residence permit cannot leave Portugal for more than six consecutive months or a total of eight months during the validity of the residence permit (currently between one and three years).

Holders of a permanent residence permit cannot leave Portugal for more than 24 consecutive months in a period of three years or a total of 30 months during the validity of the residence permit (five years).

Exceeding the periods of leave referred to above may lead to the cancellation of the residence permit, unless a citizen can prove that their absence from Portugal was essential to carry out

professional or business activities, or to engage in activities of a cultural or social nature abroad.

Holders of Golden Visa residence permits and Golden Visa family member residence permits must stay in Portugal for a minimum of 14 days during the validity of the residence permit (currently two years).

4.5 Expedited Visa Processes

Under the Cooperation Protocol for Regulated Labour Migration, the following companies may benefit from an expedited procedure when hiring from abroad:

- companies enrolled with employers' confederations;
- companies enrolled with business associations with more than 30 members and a turnover of at least EUR200 million; and
- companies with more than 150 employees, a turnover of at least EUR20 million and no debts to the Social Security or the Tax Authority.

In accordance with the Protocol, companies that ensure a valid employment contract, travel and health insurance for employees, professional training and teaching of the Portuguese language, and that provide adequate accommodation, may initiate the visa application process for one employee or a group of employees, through the following process:

- the employer sends the list of employees and respective supporting documents for the visa application to DGACCP;
- within two working days, DGACCP will verify if the application is complete and forward the application to the competent consular office;
- the consular office will schedule an appointment within ten days for the employee(s) to

personally submit the original supporting documentation; and

- the visa application is decided within 20 days from the date of the appointment at the consulate.

4.6 Post-Visa Requirements

Once in Portugal, applicants must deal with the following procedures upon the issuance of the residence visa and before the AIMA appointment:

- obtaining a non-resident Portuguese tax number (NIF) – as a foreign citizen not resident in the EU, the applicant needs to appoint a tax representative in Portugal and obtain a non-resident tax number;
- obtaining a social security number (NISS);
- securing long-term accommodation, with it being advisable to enter into a lease agreement with a term of at least one year; and
- executing the final work contract if the visa application was based on a promissory employment contract and registration thereof with the Social Security.

Holders of residence visas must attend an appointment at AIMA to file the residence visa application, after which a residence permit is granted and the respective card is issued. Once the applicant receives the residence permit card, the following steps are to be fulfilled:

- changing the tax residency status from non-resident to resident – this implies that applicants must transfer their tax residence to Portugal and submit an annual declaration on their worldwide income;
- obtaining a Portuguese health system number (*número de utente*); and
- replacing their foreign driver's licence with a Portuguese driver's licence (if applicable).

5. Immigration Costs

5.1 Typical Cost of a Sponsored Employment

The visa and residence permit costs are currently as follows:

- visa application fee: EUR110;
- residence permit fee with residence visa: EUR182;
- residence permit fee without residence visa: EUR324;
- residence permit renewal fee: EUR182; and
- EU citizen family member residence card: EUR33.

Citizens from Angola, Brazil, Cabo Verde, Guinea-Bissau, São Tomé e Príncipe and Mozambique benefit from a reduced fee of EUR58 for most types of temporary residence permit.

The fees to be paid to AIMA are approximate amounts and are updated annually according to the consumer price index.

If the visa application is filed through a service provider, service charges may accrue to the visa fee. Applicants should also take into account the costs of travel health insurance and other personal documents that must be obtained within the procedure to apply for the residence visa/permit application.

5.2 Payment of Visa Costs

There are no rules as to who should be responsible for the payment of the visa costs: they can be paid by the applicant, the employer or a third party.

6. Enforcement

6.1 Enforcement Action

Portuguese authorities including AIMA, the police and the Authority for Labour Conditions co-operate to ensure compliance with the Portuguese Immigration Law and Labour Code. These entities execute occasional inspections in workplaces to make sure employees hold a visa and/or residence permit that enables them to live and work in Portugal, and to ensure that the minimum requirements on work conditions are not being breached.

Inspections may also be executed if any information on these entities' systems raises a red flag, such as a relevant number of residents in the same address or a sudden increase of foreign citizens submitting visa applications based on employment contracts executed with the same employer.

Enforcement actions may be taken against the use of illegal work, the facilitation of illegal immigration or the fraudulent obtention of a residence permit.

Residence permits may be cancelled in the following circumstances:

- if the holder has been the subject of a coercive removal decision or a decision of judicial expulsion from Portugal;
- if the residence permit has been granted on the basis of false or misleading statements or false or falsified documents, or through the use of fraudulent means;
- if there are serious reasons to believe that the residence permit holder has committed serious criminal acts or there are real indications that the holder intends to commit acts of that nature, namely in the territory of the EU; or

- for reasons of public order or security.

6.2 Employer Obligations

In general, employers are obliged to ensure that their employees hold a valid residence permit that enables them to work in Portugal. The employment of foreign citizens without valid entitlement to work in Portugal may be punished with imprisonment and/or a fine, depending on the number of workers employed without valid documentation.

Employers certified under the Tech Visa programme may have their certification cancelled if they do not comply with the legal obligations and requirements.

6.3 Right to Work Check Requirements

The Portuguese government decided to abolish the requirement for employers to publish a job offer on IEFP's website for a period of 15 days and the subsequent issuance of a declaration proving that the job offer was not filled by Portuguese, EU or EEA member state citizens, or third-country nationals legally residing in Portugal. The employer was previously only allowed to hire a foreign citizen upon such verification.

Given the low unemployment rates and the lack of manpower in Portugal, non-highly skilled Subordinate Work Visas are no longer dependent on this work check requirement. IEFP may now even share Job Seeking Visa/Residence Permit holders' information with employers that are hiring.

7. Accompanying Family Members/Dependants

7.1 Recognised Family Relationships

The following family relationships are recognised for the purpose of a dependant visa:

- spouses;
- civil partners who have been living in conditions similar to those of married couples for at least two years;
- children under 18 years of age of either of the spouses or civil partners;
- children over 18 years of age of either of the spouses or civil partners, provided that they are dependent, single and studying in Portugal;
- children over 18 years of age of either of the spouses or civil partners, provided that they are dependent, single and studying anywhere (exclusive to Golden Visa residence permits);
- parents of either of the spouses or civil partners that are economically dependent – there is an assumption that parents over 65 years old are dependent; and
- siblings under 18 years of age whose guardianship has been determined by the court.

7.2 Dependant Visas

The Immigration Law was changed to promote greater efficiency in the relocation process of family members by allowing them to file their residence visa application simultaneously with the main applicant.

Due to the nature of the Job Seeing Visa, family members can only begin their process after the applicant has been granted a residence permit.

Once family members receive their family reunification residence permit, they will be able to start working in Portugal, either under an employment contract or as independent contractors.

Trends and Developments

Contributed by:

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SRS Legal

SRS Legal has an immigration and citizenship department fully dedicated to immigration and citizenship matters, which advises foreign citizens and corporate clients on relocation procedures to Portugal. It also provides personalised legal advice to clients seeking to obtain a residence permit and benefit from the special regime of Residence Permit for Investment Activity in Portugal (or Golden Visa). The team has

expertise in Family Reunification, Golden Visa, Residence for European Citizens, and Residence for Highly Skilled Workers visas, as well as intra-corporate transfer residence visas and visas for those living off individual revenue. The team often advises clients on citizenship applications based on ascendency, residency or marriage.

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Corporate Immigration in Portugal: An Overview

Portugal continues to be attractive for those who intend to work, invest here or simply live in the country. This is the result of several procedures aimed at attracting tourism, highly skilled professionals and foreign investment into the country. These days, Portugal is a well-known destination all over the world and is recognised for welcoming foreigners and for being a safe place for families, with highly regarded educational standards.

The fact that Portugal is considered a preferred destination for those who intend to relocate continues to represent a challenge for Portuguese public services, as the continuous increase in the number of immigrants requires constant updates to procedures and raises demand in terms of the number of staff required.

In the elections for the parliament that took place on 10 March 2024, the government adopted several measures to regulate immigration and approved some changes to the law. Elections took place again on 18 May 2025 and the elected government has already announced the approval of new amendments to the immigration law. More details are expected to be released during the coming months.

According to statistics made available by the Agency for Integration, Migration and Asylum (*Agência para a Integração, Migrações e Asilo* – AIMA), as of 31 December 2024 there were at least 1,546,521 foreign residents in Portugal. This number represents around 14% of the Portuguese population. As these are still preliminary numbers, they are expected to increase once the final 2024 report is released.

In 2014, figures showed that there were 395,195 foreign residents, meaning that the number has

increased four times during the last ten years. There has also been an increase of 501,915 residents since 2023, when there were 1,044,606 foreign citizens.

According to the 2023 report, Brazilian citizens represent the highest number of immigrants, with 368,449, corresponding to 35% of the foreign population. Angola is the second highest, with 55,589 residents; the third largest community is represented by 48,885 citizens from Cape Verde; and the United Kingdom is fourth, with 47,409 residents. Citizens from India, Italy, Guinea Bissau, Nepal, China, France and São Tomé e Príncipe are each represented by a community of between 26,460 and 44,051 residents.

It is also relevant to mention that 532,214 immigrants are between 25 and 44 years old.

The basis for visa/residence permit applications was predominantly the Community of Portuguese Language Countries (CPLP) Agreement, which accounted for 45.3% of applications, followed by residence certificates, the execution of a professional activity and requests based on family reunification. Studying visas represent the lowest number of residence permits issued.

Looking at the statistics, and as in previous years, immigrants continue to live in the major Portuguese cities and those along the coast, with Lisbon, Faro and Setúbal attracting the highest number of immigrants – 663,699 (63.5%).

It can probably be concluded that the major legislative changes that took place in 2022 – the introduction of the Job Seeking Visa, Accompanying Family Member Visa and the CPLP Residence Permit, and the elimination of labour market tests – contributed to the relocation of foreign citizens.

For residency by investment, the statistics reveal that 567 residence permits were issued to US citizens in 2023, confirming that Portugal continues to attract a high number of citizens from North America, therefore remaining a popular destination.

There has also been a significant increase in the number of applications on the basis of international protection and asylum, rising from 1,991 requests in 2022 to 2,693 in 2023.

From a different perspective, following the revocation of the specific regime of expression of interest (*manifestação de interesse*) in June 2024, the number of citizens travelling to Portugal with the aim of applying for a residence permit here has reduced by 59%.

Agency for Integration, Migration and Asylum (AIMA)

Agency for Integration, Migration and Asylum (Agência para a Integração, Migrações e Asilo – AIMA) holds administrative competences and, as implied by its name, is responsible for integration, migration and asylum affairs, and for processing residence permit applications.

Given the huge backlog resulting from the lengthy suspension of Portuguese Immigration Office services due to the COVID-19 pandemic and the shortage of officers compared to the increase of immigrants, AIMA is still facing challenges in processing outstanding residence permit applications, as well as the new applications that are filed daily. In June 2024, AIMA revealed that this backlog amounted to around 440,000 applications.

Considering this number and the expected difficulties in dealing with new applications, in July 2024 the government approved the creation of

a specific task force (*Estrutura de Missão*) to deal with pending applications. This task force has been working on data processing, gathering biometric data, the analysis of documents and security checks regarding applications filed before 3 June 2024. Between September 2024 and April 2025, 241,183 appointments were scheduled for citizens affected by the backlog.

Simultaneously, AIMA is executing procedures to hire new officers to process and decide new applications, so that the current backlog can be reduced.

Court proceedings

Given the existing backlog and the lack of response from AIMA, some applicants brought legal proceedings against AIMA with the aim of obtaining court decisions instructing the Immigration Office to execute specific orders and/or issue a decision on their applications.

During 2024, the number of legal proceedings increased significantly. According to information released by the courts, approximately 900 legal proceedings were filed per day against AIMA. The courts are currently facing huge constraints in dealing with such a high number of legal proceedings, which is obviously causing delays.

Measures for citizens in Portugal

Legislation setting out that individuals who have been in Portugal and have been unable to apply for and/or renew their residence permits are in a regular situation has been extended until 30 June 2025.

Cooperation Protocol for Regulated Labour Migration

During the last couple of years, it has been recognised that Portugal needs immigrants, mostly to work in the agriculture, industry and tourism

areas. The procedures in place are not currently sufficient to solve those needs, and are not adequate to allow immigrants to relocate in a timely and efficient manner.

To address this problem, a Cooperation Protocol for Regulated Labour Migration was signed between the government and some confederations on 1 April 2025, aiming to respond to the labour shortage and to implement a more expeditious visa application process.

The Protocol sets out that the Portuguese companies that are enrolled with business confederations and some associations, or that employ more than 150 employees and have a turnover of at least EUR20 million, can contact the Ministry of Foreign Affairs directly and request visa applications for foreign citizens. If the application is complete, the competent consular office will schedule appointments within ten days so that the employee(s) can submit the visa application(s). Such visa application should be decided within 20 days from the day of the appointment.

Document processing

One of the serious challenges faced by the Immigration Office has been the fact that the documentation filed by applicants is frequently incomplete, either because there are documents missing or due to incorrect documents being filed. This results in constraints in the processing and analysis of applications, as some of the officers are dedicated to receiving documents, searching the respective file and annexing the documents to it.

Considering this, according to the information recently released by the Immigration Office, incomplete files will no longer be accepted, and the application will not be received. It will

be up to the applicant to try to schedule a new appointment and to try and file the application on a later stage.

Focus on digital means

Considering the substantial increase in the number of residence permit applications being filed, which requires a huge effort in processing, AIMA has been implementing additional measures to process some applications more efficiently.

Family Reunification platform

One of the main challenges facing AIMA is the number of residents intending to apply for family reunification applications for their family members.

With that in mind, in early 2024 AIMA launched an online platform for processing family reunification applications. Holders of a residence permit that have children aged between five and 18 may initiate the family reunification process for the entire family simultaneously, with AIMA granting an appointment as opposed to the traditional method of constantly calling AIMA's call centre to check for available slots and schedule appointments.

The platform allows the submission of documents for the entire family and the payment of the residence permit application fee. Upon confirmation of payment, AIMA will contact the applicant by order of registration to schedule an appointment for the entire family, to collect each applicant's biometric data.

This platform is expected to be extended to all types of family reunification, regardless of whether there is a minor in the household.

Other AIMA platforms

AIMA expressed its intention to develop a platform where citizens can streamline all procedures, from renewing expired documents to submitting several types of applications, but this unified platform has not yet been fully implemented. Such platform would be of great relevance as it would allow applicants to access a single tool to address several services.

AIMA currently has various platforms allowing different functionalities:

- the ARI portal facilitates Golden Visa applications, including document uploads, the submission of family member applications, payment reference issuance and appointment scheduling;
- the MySEF portal is dedicated to appointment scheduling;
- the Ukraine portal handles requests for the protection of Ukrainian citizens and the granting of a tax number, a social security number and a national health service number; and
- the Family Reunification platform is designed for the submission of family reunification applications and payment reference issuance.

In addition, the following portals/services have been migrated to the AIMA Services portal:

- (a) residence permit applications through the expression of interest mechanism; and
- (b) the renewal of CPLP Residence Permits.

The implementation of a new single platform that combines all the functions of these portals would be helpful in reducing the current backlog faced by the Portuguese Immigration Office.

Golden Visa

Golden Visa applicants are among those facing serious challenges. Although no official information has been released by AIMA, it is expected that there are more than 50,000 pending applications. With that in mind, in late December 2024 AIMA implemented a new procedure aimed to process Golden Visa applications more efficiently.

Under the new procedure, applicants were notified to submit updated documents at the Golden Visa platform within the following six months. This implies obtaining new documents (like criminal records and marriage certificates) in the applicant's country of residence and, amongst others, updating documents related to the investment previously executed in Portugal.

Upon the upload of the new documents, AIMA analyses the application and decides on whether it can be accepted or if additional documents should be filed.

Once the application is accepted, AIMA notifies the applicant of the date and time they should attend an appointment at AIMA in Portugal. The purpose of this procedure is to ensure that only those with complete applications are given an appointment. Such notification is usually sent two to three months in advance of the appointment date.

During the appointment, AIMA collects the applicant's biometric data and the approval fee is paid by the applicant. If no issues arise, the residence card should be issued and sent to the applicant's address in Portugal within 90 working days.

Despite the delays Golden Visa applicants are facing and the existing backlog, the programme

is still attracting a huge number of foreigners. The eligible investments elected by most applicants are the purchase of units in non-real estate collective investment entities (minimum amount of EUR500,000) and the transfer of capital to support artistic production and recovery or maintenance of national cultural heritage, in the value of EUR250,000; this last amount is not an investment but is more comparable to a donation.

Citizenship applications

In addition to its competence for the issuance and renewal of residence permits, AIMA also plays a role in certain parts of the citizenship application process (although the ultimate authority for citizenship applications lies with the Institute of Registries and Notary). As such, during a citizenship application AIMA is consulted to verify whether the applicant has met the minimum residency period in Portugal (when the application is based on residency) and to assess if there is any factor that could jeopardise the citizenship application.

According to the statistics made available for 2023, the majority of citizenship applications (56.3%) are applications for naturalisation. This number includes those who have applied for citizenship based on residency in Portugal. In 2023, AIMA issued 55,784 opinions, 26,591 of which were for Brazilian citizens.

Upon the change to the citizenship law, under which the period elapsed from the date of the residence permit application will also be included in the five-year requirement for legal residency in Portugal, the number of citizenship applications is expected to increase during the coming years.

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