

BDO Denet Monthly Report

FINANCIAL DEVELOPMENTS IN THE LAST MONTH

- THE LIMITS FOR DETERMINING THE COMPANIES SUBJECT TO INDEPENDENT AUDIT HAVE BEEN AMENDED
- THE RATE OF LEVY ON CERTAIN CONSTRUCTION AND REPAIR WORKS OVER THE YEARS HAS BEEN REDUCED FROM 5% TO 1%
- MATERNITY ALLOWANCE REGULATION HAS BEEN PUBLISHED

April 2025 Financial Agenda

Dear Readers,

April was the declaration period for corporate income taxpayers. As in every year, this declaration period brought to the agenda issues open to debate in terms of filing with reservations. Of course, since this year marks the first time inflation adjustment has had tax consequences, many issues have been the subject of reservation due to the administration's allegedly unlawful interpretation of the regulation. In addition, many other matters have also been declared with reservation by taxpayers and will be pursued in court.

Our partner Erdoğan Sağlam has nicely summarized the topics that may be subject to reservation in one of his articles. You can read it [here](#).

We would like to remind those who file a return with reservation that they must file a lawsuit within 30 days from the date of assessment.

Another significant development in April was that tax offices requested explanations from taxpayers, mainly regarding their corporate tax returns, via email or phone. Although these requests, based on the results of the Ministry's tax risk analysis software, caused concern among taxpayers, the results obtained by the software—based on limited data—could be explained through the taxpayers' more detailed calculations. Naturally, due to differences in interpretation, it is quite possible that tax offices may refer taxpayers for audits when they are not satisfied with the explanations. Another interesting aspect of this issue is that these explanations were requested unofficially via email or phone. This has been explained as a way to allow taxpayers the opportunity to file amended returns with regret if there are any incorrect declarations.

Another similar situation involved the letters sent under the title of "Return Oversight Study" by the Tax Inspection Board to approximately forty thousand corporate income taxpayers. These letters informed the recipients that, as a result of a risk analysis study, they had been identified as risky taxpayers and that special attention should be paid while submitting their 2024 tax returns. It was also stated that if the submitted returns fail to address the identified risks, a tax inspector assigned to the case would launch an investigation. However, these letters did not specify exactly what the identified risks were. It appears that due to time constraints, detailed risk areas were not communicated, but the taxpayers were made aware that they are being monitored.

It seems that the Ministry will continue to carry out such extensive and intensive inspections in the coming periods, using the technical resources and data it possesses.

April 2025 Financial Agenda

Another major development this month was related to the regulation introduced by the Corporate Income Tax General Communiqué No. 23, which stated that previous years' losses cannot be deducted from the domestic minimum corporate tax base. In a case filed for the annulment of this regulation on the grounds that it was contrary to the law, the 3rd Chamber of the Council of State ruled to suspend its execution (with Decision No. E.2024/5700 dated February 10, 2025). The Ministry's objection to this ruling was rejected by the Tax Law Chamber of the Council of State (with Decision No. 2025/3 dated April 9, 2025). It is now expected that the 3rd Chamber of the Council of State will annul the regulation entirely. In fact, the Ministry has already updated the temporary tax return preparation program in accordance with this decision. Thus, while submitting the 2025 temporary tax returns, previous years' losses can be deducted when determining the domestic minimum corporate tax base.

As can be seen, all the above developments point to how intensively the Ministry of Treasury and Finance is focusing on maximizing tax collection from taxpayers. Of course, it is both the Ministry's natural right and duty to collect tax revenues in full and at the highest level possible. However, we hope that in doing so, it always acts in accordance with lawful interpretations.

Regards,

Haluk Erdem

Partner / Tax

BDO Istanbul Office



BDO Academy May Calendar

Date	Courses
May 8, 2025	Basic Payroll Training
May 13, 2025	Transfer Pricing Training
May 14, 2025	ISO 27001:2022 Transition Training
May 15, 2025	Double Taxation Treaties and Overseas Payments Training
May 15, 2025	ESG Risk Management Training
May 21, 2025	Applied Enterprise Risk Management Training
May 22, 2025	Social Security Legislation Employer Practices Training
22 - 23 May 2025	Applied Internal Audit Training
26 - 30 May 2025	ISO/IEC 27001 Information Security Management System Lead Auditor Training (CQI and IRCA Approved)
May 27, 2025	Process Management and Internal Control Training
May 29, 2025	Basic Customs and Foreign Trade Knowledge for Managers and Manager Candidates



For detailed information and registration:
<https://bdoakademi.com.tr/>

Tax



BULLETIN:
TAX 2025-043
03/04/2025

THE RATE OF LEVY ON CERTAIN CONSTRUCTION AND REPAIR WORKS OVER THE YEARS HAS BEEN REDUCED FROM 5% TO 1%

As is known, advance payments and progress payments made for construction and repair works that span more than one calendar year are subject to withholding tax pursuant to Article 94 of the Income Tax Law and Articles 15 and 30 of the Corporate Tax Law.

With Presidential Decree No. 9707, published in the Official Gazette dated 30/03/2025 and numbered 32857, amendments have been made to the relevant Decrees, and the applicable withholding tax rates have been redefined as follows:

- 1% on progress payments made to contractors for the construction and repair of railway lines, tramways, funiculars, monorails, subways, and urban rail transportation systems,
- 1% on progress payments made to contractors for ship construction and repair works,
- 5% on progress payments made to contractors for all other works.

You can review our [Bulletin](#) for the details.



ANNOUNCEMENT: **THE DEADLINES FOR FILING AND PAYING CORPORATE TAX RETURNS FOR THE 2024 ACCOUNTING PERIOD, THE TIME FOR CREATING AND SIGNING E-LEDGERS, AND THE TIME FOR UPLOADING ELECTRONIC LEDGERS AND CERTIFICATE FILES TO THE INFORMATION PROCESSING SYSTEM OF THE REVENUE ADMINISTRATION HAVE BEEN EXTENDED**

With Tax Procedure Law Circular No. 188, dated April 29, 2025, the following extensions have been announced:

- The submission deadline for Corporate Income Tax Returns related to the 2024 fiscal period, which was originally due by the end of April 30, 2025, and the payment deadline for taxes accrued based on these returns, have been extended until the end of Monday, May 5, 2025.
- Due to May 10, 2025 falling on an official holiday, the deadlines for the creation and signing of e-Ledgers that must be completed by May 12 and May 14, 2025, as well as the uploading of the relevant electronic ledger and certification files (berat) to the Revenue Administration's Information Processing System, have been extended until the end of Friday, May 16, 2025.

You can review our [Announcement](#) for the details.

PEOPLE
COMMUNICATION
CLIENT NEEDS
VALUE
COMMITMENT

Labor Law & Social Security



BULLETIN:
LABOR LAW AND
SOCIAL SECURITY
2025-027
10/04/2025

MATERNITY ALLOWANCE REGULATION PUBLISHED

The “Regulation on Birth Assistance” was published in the Official Gazette dated 10/04/2025 and numbered 32866. This Regulation sets out the procedures and principles for the payment of birth assistance to Turkish citizens.

Under the scope of this Regulation, applicants who meet the necessary conditions will be entitled to receive:

- TRY 5,000 lump-sum for the first child,
- 1,500 per month for the second child from the month of application until the child reaches five years of age (inclusive of the 60th month),
- 5,000 per month for the third and subsequent children from the month of application until the child reaches five years of age (inclusive of the 60th month).

Birth assistance is paid without any taxes or deductions and cannot be seized.

You can review our Bulletin for the details.



BULLETIN:
LABOR LAW AND
SOCIAL SECURITY
2025-028
22/04/2025

REGULATION AMENDING THE REGULATION ON THE PROCEDURES AND PRINCIPLES REGARDING THE EXECUTION OF ACTIVE LABOUR FORCE SERVICES

With the “Regulation Amending the Regulation on the Procedures and Principles Regarding the Implementation of Active Labour Force Services” published by the Turkish Employment Agency (İŞKUR) in the Official Gazette dated 19/04/2025 and numbered 32875, certain articles of the “Regulation on the Procedures and Principles Regarding the Implementation of Active Labour Force Services” published in the Official Gazette dated 08/04/2022 and numbered 31803 have been amended. New sub-clauses and provisional articles—Provisional Article 4, Provisional Article 5, and Provisional Article 6—have also been added.

You can review our Bulletin for the details.

GRC



BULLETIN:
GRC 2025-001
14/04/2025

CYBER SECURITY LAW NO. 7545: A MOVE TO STRENGTHEN TURKEY'S NATIONAL POWER IN CYBERSPACE

A comprehensive legal regulation has been enacted to ensure national security in cyberspace and to protect digital assets.

The new Cybersecurity Law (the Law) introduces legal and institutional arrangements to safeguard Turkey's national power in cyberspace and to establish a sustainable digital security architecture. It sets out the fundamental principles and strategies for identifying and eliminating existing and potential internal and external threats to the country's cybersecurity, minimizing the impact of cyber incidents, and protecting all relevant actors—primarily public institutions and organizations—against cyberattacks.

This Law, which stands out as a strategic step taken to strengthen Turkey's cybersecurity, defines the central authority in the field of cybersecurity. It also mandates the implementation of cybersecurity strategies across a wide spectrum covering public and private sectors as well as natural persons, and introduces penal sanctions for behaviors and attitudes that violate the regulations.

You can review our [Bulletin](#) for the details.

Incentives and Government Supports



**BULLETIN:
INCENTIVES AND
GOVERNMENT
SUPPORTS 2025-005
22/04/2025**

COMMUNIQUE ON EXTENSION OF TIME FOR COMPLETION VISA FOR GES INVESTMENTS HAS BEEN PUBLISHED

With the Communiqué Amending the Communiqué on the Implementation of the Decision on State Aids in Investments published in the Official Gazette dated 19 April 2025 and numbered 32875, the following amendments have been made to the Communiqué on the Implementation of the Decision on State Aids in Investments:

- For SPP (Solar Power Plant) investments that use domestic panels which do not meet the criterion of being domestically produced starting from the ingot slicing and earlier stages, and for which an investment incentive certificate was issued before 28/02/2025, the application deadline for the investment completion visa has been extended until 31/05/2025,
- It has been stipulated that at the investment completion visa application stage, conditions such as the issuance of an acceptance report will not be required, and that applying to the relevant public institutions and organizations as well as distribution companies for the necessary documents will be sufficient for the completion visa.

You can review our Bulletin for the details.

Audit



ANNOUNCEMENT:
UFRS 2025-001
22/04/2025

DECISION ON THE AMENDMENT OF THE DECISION ON DETERMINING THE COMPANIES SUBJECT TO INDEPENDENT AUDIT

The “Decision on the Amendment of the Decision on the Determination of Companies Subject to Independent Audit” was published in the Official Gazette dated 01 May 2025 and numbered 32887.

Subparagraphs (2) and (3) of paragraph (b) of the first clause of Article 3 of the “Decision on the Determination of Companies Subject to Independent Audit,” which was enacted by the Presidential Decision dated 29/11/2022 and numbered 6434, have been amended.

The threshold values for the companies specified in the list are as follows:

- Total assets: 120 million TRY,
- Annual net sales revenue: 150 million TRY,
- Number of employees: 100.

For companies not covered under subparagraphs (1) and (2), the threshold values are as follows:

- Total assets: 300 million TRY,
- Annual net sales revenue: 600 million TRY,
- Number of employees: 150.

This Decision shall enter into force on the date of its publication and shall be taken as the basis for determining whether companies are subject to audit for fiscal periods beginning on or after 01/01/2025.

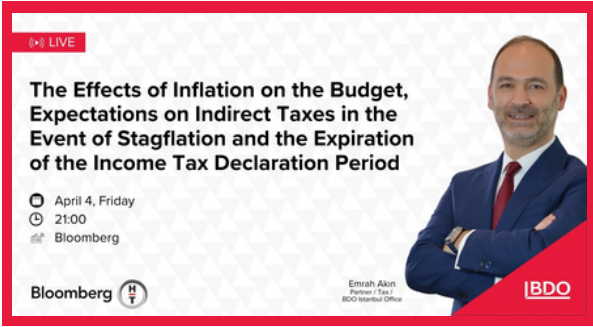
[You can review our Announcement for the details.](#)

Featured News and Publications of the Month



The latest edition of BDO's Global Transfer Pricing News provides strategic assessments of customs valuation and transfer pricing, as well as coverage of key topics such as Canada-US transfer pricing, 'Amount B' developments, the UK's annual transfer pricing report and regulatory overview, India's Union Budget 2025 and CbCR updates in Australia. You can watch the seminar video via the link!

<https://lnkd.in/eZFxnHn>



Emrah Akin, Partner in our Tax Department, discussed 'The Effects of Inflation on the Budget, Expectations on Indirect Taxes in the Event of Stagflation and the Expiration of the Income Tax Declaration Period' on Bloomberg HT on 4 April.



Emrah Akin, Partner of our Tax Department, evaluated the 'Revenue Administration's Annual Report, Inflation Adjustment Audits by VDK and January-March Budget Results' at Bloomberg HT on 18 April 2025.

Published Articles & Columns

ERDOĞAN SAĞLAM

Partner - Tax

Sworn Financial Advisor
BDO İstanbul Office

T24

Corporate Tax Filing Season Begins Amid Reservation Filing Controversies

[Read Now](#)

T24

Tax Offices Continue to Request Information from Taxpayers via Phone!

[Read Now](#)

T24

Ministry of Treasury and Finance Issues Statement on "Tax Amnesty" Reports

[Read Now](#)

T24

Finance Ministry's Decision Not to Extend Corporate Tax Filing Deadline Sparks Criticism

[Read Now](#)

HALUK ERDEM

Partner – Tax

Sworn Financial
Advisor
BDO İstanbul Office

T24

The status of lending money in foreign currency or Turkish Lira to each other by companies within the same group in terms of legislation

[Read Now](#)

ERDAL GÜLEÇ

Partner – Tax

Sworn Financial
Advisor
BDO İstanbul Office

LinkedIn

How are PPE and exemptions adjusted in inflation adjustment? (2)

[Read Now](#)

How are PPE and exemptions adjusted in inflation adjustment? (3)

[Read Now](#)



İSTANBUL - BDO TÜRKİYE HEADQUARTERS

Eski Büyükdere Caddesi No: 14, Park Plaza K.4
34398 Sarıyer/İstanbul
+90 212 365 62 00
+90 212 365 62 01
+90 212 365 62 02
+90 212 365 62 05
bdo.com.tr
bdo@bdo.com.tr

ANKARA - BDO ANKARA HEADQUARTERS

Eskişehir Yolu Söğütözü Mah. 2177. Sokak
Kat: 8 No: 10-B Via Twins Ofis No:62 Çankaya/Ankara
+90 312 220 25 06
bdo.ankara@bdo.com.tr

İZMİR - BDO İZMİR OFFICE

Adalet Mah., Şehit Polis Fethi Sekin Cad., Novus Plaza
No: 4, Kat: 14 Daire: 143 35530 Bayraklı/İzmir
+90 531 895 72 96
bdo.izmir@bdo.com.tr

TÜRKMENİSTAN - BDO TÜRKMENİSTAN OFFICE

2127 (G.Gulyýew) str., 75 744000
Ashgabat/Turkmenistan
+90 212 365 62 00
bdo@bdo.com.tr

KOSOVA - BDO KOSOVA OFFICE

Ukshin Hoti C 4/3, Hy. A, Kati II 10000
Prishtina
+90 212 365 62 00
bdo@bdo.com.tr

All rights reserved. BDO Denet Bağımsız Denetim ve Danışmanlık A.Ş., BDO Denet Yeminli Mali Müşavirlik A.Ş., BDO Serbest Muhasebeci Mali Müşavirlik A.Ş., BDO Yayıncılık A.Ş., BDO Turizm Danışmanlığı A.Ş., BDO İzmir Yeminli Mali Müşavirlik A.Ş., BDO Ankara Yeminli Mali Müşavirlik A.Ş., BDO Akın ve Demirel Yeminli Mali Müşavirlik A.Ş., BDO Kosova L.L.C. and Denet Barlag Maslahat are joint stock companies and members of BDO International Limited. Each BDO Member Firm is an independent legal entity in its own country. BDO International Limited is a UK company limited by guarantee. Service provision within the network is coordinated by Brussels Worldwide Services BVBA, a limited liability company incorporated in Belgium with its statutory seat in Brussels. BDO is the brand name for the BDO network and for each of the BDO member firms.