



# BDO Denet Monthly Report

FINANCIAL DEVELOPMENTS IN THE LAST MONTH

- THE CIRCULAR OF THE SOCIAL SECURITY INSTITUTION (SSI) REGARDING THE IMPLEMENTATION OF PROVISIONAL ARTICLE 5 OF PRESIDENTIAL DECREE NO. 2025/9903 HAS BEEN PUBLISHED
- THE DEFINITION OF SMES HAS BEEN UPDATED

# August 2025 Financial Agenda

Dear Readers,

While preparing this article, as I always do, I looked through our list of circulars and announcements to recall what had happened on our financial agenda in August. What I saw quite surprised me.

As you can also see in detail in our Bulletin, there do not appear to be any significant changes in the financial legislation in August. But if that is truly the case, then why didn't we feel this "gap"? On this occasion, I realized that our intense preoccupations in August stemmed not from new legislative changes, but rather from the practices and implementation changes of the tax administration.

I believe the most important topic of discussion in August was the exorbitant increases in property taxes awaiting us. Our partner, Erdoğan Sağlam, through his articles on T24, not only played a role in keeping these discussions on the agenda but also succeeded in raising awareness about practical solutions to this issue. You can find these articles in the "Published Articles & Columns" section of our Bulletin. At the time of writing this article, statements from ruling party officials regarding the possibility of legal arrangements on this issue were continuing one after another. I hope this matter will be resolved fairly as soon as possible, without requiring a large number of taxpayers to resort to litigation.

Another topic of debate in August was based on a news report by Anadolu Agency. In the report titled "A New Phase in the Fight Against Forgery in Financial Documents," it was stated that the Tax Inspection Board had launched a new initiative targeting acts of forgery in financial documents, that stricter measures and policies would begin to be implemented as of October 1, that in this context the tax evaluations based on "unknowingly using fake documents" would be terminated and instead an approach assuming the document was "knowingly" used would be adopted, and thus the majority of taxpayers using fake documents would henceforth be treated as committing "tax evasion" and subjected to a threefold tax loss penalty.

Although no legal change had been made, many lawyers and colleagues expressed that such a change in practice could not be introduced on a matter falling under criminal law. I view and follow such reports more as attempts to shape public perception. During Mehmet Şimşek's term as minister, many such reports were made for the purpose of creating public perception, and they are still being made. Otherwise, I think everyone agrees that it is not possible for acts and transactions that were not previously considered tax crimes to be included within the scope of tax crimes through an administrative change in practice.

Another piece of news reflected in the press in August was the announcement of the 2024 top taxpayers in income tax and corporate tax. In fact, these lists are published to show the nationwide top 100 rankings for income and corporate taxes, but at this rate these announcements will lose their meaning. Because each year, more taxpayers prefer not to have their names disclosed. In the income tax list, only 21 taxpayers' names were disclosed; 79 taxpayers chose not to have their names published.

# August 2025 Financial Agenda

In the 2023 list, 73 taxpayers' names were not disclosed. Although the situation is somewhat better in the corporate tax list, there we see that 32 taxpayers in the 2024 list did not want their names to be published. I believe everyone has a guess as to the reasons for this, but it is worth reflecting on these reasons more carefully.

In order to determine the procedures and principles regarding the significant tax changes introduced by Law No. 7555, the Revenue Administration also released four draft communiqués for public consultation in August. In this context:

- The “Draft Communiqué No. 24 Amending the Corporate Tax General Communiqué (Serial No: 1)” regarding the amendments to Article 32/A of the Corporate Tax Law,
- The “Draft Communiqué No. 10 Amending the General Communiqué on the Law on Supporting Research, Development and Design Activities (Serial No: 4)” regarding the amendments to the second paragraph of Article 3 of Law No. 5746,
- The “Draft Income Tax General Communiqué No. 331” regarding the explanation of the amendments made to the third paragraph of the provisional Article 2 of Law No. 4691 and to the provisional Article 1 of Law No. 6550,
- The “Draft Communiqué No. 15 Amending the Special Consumption Tax (List II) Implementation General Communiqué” regarding the amendments to the Special Consumption Tax Law No. 4760

were announced on the Presidency's website. By the time our Bulletin was prepared, all of these communiqués had been published in the Official Gazette dated 04.09.2025 and entered into force.

I also humbly wrote a piece on my tax commentary blog about the explanations provided in the draft communiqué regarding the amendment to Article 32/A of the Corporate Tax Law. You can find this article, along with all the articles written by our other partners in August, as well as the announcements and circulars concerning other legislative changes of the month, in our Bulletin.

We welcomed September, which is regarded as the beginning of the autumn season and the return from holiday to a busy working schedule, on a Monday this year. The beginning of autumn and the new working period—September 1st and a Monday... I hope this beginning will be an occasion for a good working season for all of us, and that we will have a pleasant working period in every respect. I wish everyone ease in their work.

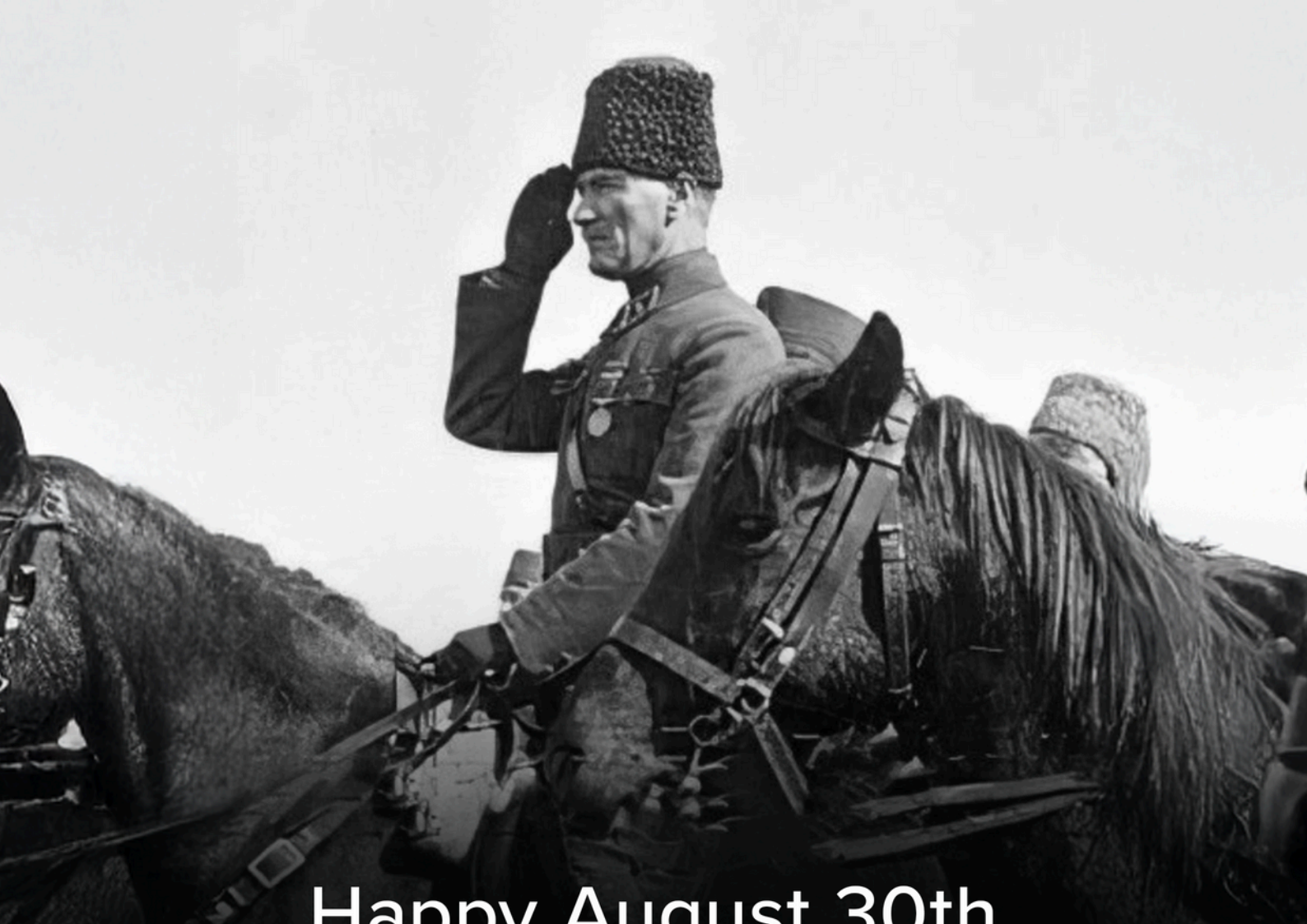
**Erdal GÜLEÇ**

**Partner / Tax**

BDO İstanbul Office







Happy August 30th

*Victory Day!*

We commemorate the 30 August Victory Day,  
the turning point of our national struggle and the symbol  
of our independence and freedom, with pride and gratitude.

For a strong and bright Türkiye, we continue on our  
path with unity, solidarity, and determination.

## BDO Academy September Training Calendar Published!

In September, we continue to enhance your knowledge and skills with our expert trainers in their respective fields:

History	Training Name
2 - 3 September 2025	ISO/IEC 27001:2022 Internal Auditor Training
9 September 2025	Process Management and Internal Control Training
11 September 2025	Transfer Pricing Training
18 - 19 September 2025	Practical Internal Audit Training
22 - 26 September 2025	ISO/IEC 27001 Information Security Management System Lead Auditor Training (CQI and IRCA Certified)
24 September 2025	Basic Customs and Foreign Trade Knowledge for Managers and Manager Candidates
25 September 2025	ESG Risk Management Training



For detailed information and registration:

<https://bdoakademi.com.tr/>

# Tax



**BULLETIN:**  
**TAX 2025-054**  
**11/08/2025**

## **NORMAL CONSTRUCTION COST VALUES PER SQUARE METER VALID FOR 2026**

According to the Property Tax Law, the property tax base is calculated based on unit values determined by valuation commissions under repeated article 49 of the Tax Procedure Law for land and plots, and for buildings, based on construction cost values per square meter jointly determined by the relevant ministries, along with land or land share values. These values are increased each year by half of the revaluation rate, and the President has the authority to reduce this rate to zero or increase it up to the full revaluation rate. Land and plot values are re-determined every four years, and within this scope, the values to be applied for the 2026–2028 period were determined in 2025.

The tax value of a building is calculated by taking into account the square meter normal construction cost, the building's surface area, additional equipment such as central heating, air conditioning, and elevators, floor or facade adjustments, depreciation deductions, and the land share. The square meter normal construction costs of buildings to be applied in 2026 were jointly determined by the Ministry of Treasury and Finance and the Ministry of Environment, Urbanization and Climate Change, and were published in the Official Gazette dated 09/08/2025 and numbered 32981, as an annex to the General Communiqué on the Property Tax Law No. 87.

For the annex of the Communiqué, please [click here](#).

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

**PEOPLE**  
**COMMUNICATION**  
**CLIENT NEEDS**  
**VALUE**  
**COMMITMENT**

# Labor Law & Social Security



**BULLETIN:**  
**LABOR LAW AND**  
**SOCIAL SECURITY**  
**2025-044**  
**04/08/2025**

## REGULATION ON AMENDING THE LINES OF BUSINESS REGULATION

Article 2, paragraph 2 of the “Regulation on Amending the Regulation on Lines of Business,” which was published and entered into force by the Ministry of Labor and Social Security in the Official Gazette dated 02/08/2025 and numbered 32974, has been amended, and the phrase “NACE Rev 2” in the said paragraph has been changed to “NACE Rev 2.1.”

You can review our Bulletin for the details.



**BULLETIN:**  
**LABOR LAW AND**  
**SOCIAL SECURITY**  
**2025-045**  
**27/08/2025**

## THE CIRCULAR OF THE SOCIAL SECURITY INSTITUTION (SSI) REGARDING THE IMPLEMENTATION OF PROVISIONAL ARTICLE 5 OF PRESIDENTIAL DECREE NO. 2025/9903 HAS BEEN PUBLISHED

By the General Directorate of Insurance Premiums of the Presidency of the Social Security Institution (SSI), Circular No. 2025/13 dated 25 August 2025 has been published. The Circular explains the procedures and principles regarding the implementation of Provisional article 5 of the Presidential Decree No. 2025/9903 dated 29 May 2025. Although the Council of Ministers’ Decision No. 2012/3305 was repealed by the said Decree, it was stated that the supports provided under investment incentive certificates previously issued through the provisional articles of the Decision would continue. Accordingly, holders of investment incentive certificates who benefited from the employer’s share of the social security premium support or the social security premium support valid in Region 6, and whose term has expired, may continue to benefit from this support until 31 December 2028 upon request. It was also emphasized that the regulation is applied only in Region 6 and is not valid in other regions.

Employers wishing to benefit from the support must first apply to the Ministry of Industry and Technology, and as a result of the evaluation made by the Ministry, the necessary information must be notified to the SSI electronically and by official letter. Utilization of the incentive will start from the month following the notification’s receipt by the SSI, and employers must meet the conditions specified in Circulars No. 2012/30, 2012/37, and 2023/23, as well as the average number of insured employees determined for the relevant month. In notifications, Law No. 49903 must be used for the employer’s share of the social security premium support, and Law No. 59903 must be used for the joint implementation of the employer’s share of the social security premium and the social security premium support. In the calculation of the average number of insured employees, only those subject to long-term insurance branches and those subject to social security support premiums will be taken into account, and under-reporting or duplicate records will not be considered. In case of undue benefit from the incentive, collections will be made from employers together with delay penalties and interest.

To access the relevant Circular, please [click here](#).

You can review our Bulletin for the details.



# Labor Law & Social Security



**BULLETIN:**  
**LABOR LAW AND**  
**SOCIAL SECURITY**  
**2025-046**  
**28/08/2025**

## **WITH CIRCULAR NO. 2025/12, AN AMENDMENT HAS BEEN MADE TO THE EMPLOYER TRANSACTIONS CIRCULAR NO. 2020/20 REGARDING TIME-BARRED DEBTS**

By the General Directorate of Insurance Premiums of the Presidency of the Social Security Institution, Circular No. 2025/12 dated 25 August 2025, titled “Amendment to Circular No. 2020/20,” has been published. As is known, Circular No. 2012/27 had been repealed by Circular No. 2020/20, but its provisions were preserved unchanged. Upon the annulment of section 7.2 of Circular No. 2012/27 by the Council of State and the finalization of the decision by the Board of Administrative Chambers, the relevant part of the Employer Transactions Circular No. 2020/20 has been re-regulated. Accordingly, the procedures regarding time-barred debts have been addressed under three headings: debts for which enforcement proceedings have not started, debts for which enforcement proceedings have started, and debt inquiries–incentive applications.

Pursuant to article 93 of Law No. 5510, SSI premiums and other receivables are subject to a ten-year statute of limitations. The reasons interrupting or suspending the statute of limitations are regulated under articles 103 and 104 of Law No. 6183 and article 91 of Law No. 5510. The Circular also explains in detail the starting dates of the limitation period. Accordingly, if the receivable arises from a court decision, it must be collected from the date on which the decision becomes final; if it is based on an audit report, from the date of the report; and if it arises from information or documents received from public institutions, from the date on which the document is submitted to the Institution, within ten years. For time-barred debts, debtors will be informed, voluntary payments will be accepted, but enforcement proceedings cannot be initiated.

In the case of debts for which enforcement proceedings have started, upon the debtor’s objection that the debt is time-barred, the situation will be evaluated by the Premium Accrual Objection Commission, and the follow-ups regarding time-barred receivables will be canceled. Debts determined to be time-barred by court decisions will also be removed from the files in the same way. Furthermore, time-barred debts will not be taken into account in “no debt” certificates, incentive applications, access to health services, VAT offset transactions, and the return of tender guarantees. Thus, the time-barred debts of employers, insured persons, and general health insurance holders will be monitored in separate tables in the Institution’s records and transactions will be carried out without treating them as actual debts.

To access the relevant Circular, please [click here](#).

You can review our Bulletin for the details.

# Incentives & Government Supports



**BULLETIN:  
INCENTIVES AND  
GOVERNMENT  
SUPPORTS 2025-016  
07/08/2025**

## THE DEFINITION OF SMES HAS BEEN UPDATED

It has been decided to put into effect the “Regulation on Amending the Regulation on Small and Medium-Sized Enterprises,” published in the Official Gazette dated 07/08/2025 and numbered 32979, pursuant to article 407 of Presidential Decree No. 1 on the Organization of the Presidency.

After the amendment, enterprises with fewer than two hundred and fifty employees and with either annual net sales revenue or financial balance sheet not exceeding one billion Turkish Lira will be classified as SMEs.

To access the relevant Regulation, please [click here](#).

You can review our Bulletin for the details.



**BULLETIN:  
INCENTIVES AND  
GOVERNMENT  
SUPPORTS 2025-017  
18/08/2025**

## AMENDMENT TO THE INWARD PROCESSING REGIME COMMUNIQUE

With the Decision No. 10211 on Amending the Inward Processing Regime Decision, published in the Official Gazette dated 16/08/2025 and numbered 32988, the Ministry has been authorized to carry out sectoral potential and risk assessments on the basis of general and trade policy measures regarding inward processing certificate/inward processing permit applications and revision applications; to change the guarantee rates according to the results of the assessments made; to make arrangements regarding the determination of the type of guarantee; or, without prejudice to the provision of the first paragraph of article 117 of the Customs Law No. 4458, to evaluate the certificate/permit application within the scope of the drawback system, to take the necessary measures within this scope, and to determine the procedures and principles regarding the arrangements to be made.

You can review our Bulletin for the details.

# Featured News and Publications of the Month



Emrah Akin, our Tax Partner, evaluated the topic of “2024 Fiscal Year’s Top Taxpayers and the New Era in Fake Document Audits” on TRT Radio on August 22.



Emrah Akin, our Tax Partner, evaluated the topic of “January–July Budget Realizations, 2024 Top Taxpayers, Changes in the Concordat System, and the New Era in Fake Document Audits” on Bloomberg HT on August 22.

# Published Articles & Columns

**ERDOĞAN SAĞLAM**  
**Managing Partner - Tax**  
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T24 In 5 Questions: The Litigation Process Against Excessive Real Estate Tax Assessments

[Read now](#)

T24 The Ministry of Finance Introduces Additional Measures to Prevent the Use of POS Devices Belonging to Others!

[Read now](#)

T24 Lawsuits Against Excessive Real Estate Tax Assessment Decisions Continue, and Limiting Increases Through Legal Regulation is Also on the Agenda!

[Read now](#)

T24 My Warnings on Tax Settlement Practices

[Read now](#)

**HALUK ERDEM**  
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T24 What can be done regarding the losses arising from exempt activities and transactions in the calculation of the domestic minimum corporate tax?

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LinkedIn Am I Obligated?

[Read now](#)

**MEHMET ÖZCAN**  
**Partner – Incentives and Government Supports**

T24 Interest Support for Incentive-Based Investments Increased and Standardized

[Read now](#)

**KEVORK ALTINKAYA**  
**Manager – Tax**

Lebib Yalkın Permanent Establishment and Transfer Pricing Risk in International Trade





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