

# BDO Denet Monthly Report

## FINANCIAL DEVELOPMENTS IN THE LAST MONTH

- LAW NO. 7566, WHICH CONTAINS SIGNIFICANT FINANCIAL REGULATIONS, HAS ENTERED INTO FORCE
- THE REDISCOUNT RATE HAS BEEN REDUCED FROM 44.25% TO 39.75%
- THE DIGITAL SERVICES TAX RATE HAS BEEN REDUCED GRADUALLY
- INFLATION ADJUSTMENT HAS BEEN POSTPONED FOR THE 2025, 2026, AND 2027 ACCOUNTING PERIODS UNDER LAW NO. 7571

# December 2025 Financial Agenda

Dear Readers,

As we leave another year behind, it is fair to say that December was a particularly intense and decisive month in terms of legislative developments. The implementation challenges encountered throughout 2025, and the increasing cost pressures shaped the regulations enacted in the final month of the year; and it has been observed that these regulations have produced consequences not only in the short term but also extending into 2026 and beyond.

In particular, the process of determining the minimum wage has been closely monitored not only from the perspective of employees' income levels, but also in terms of employers' cost structures, employment decisions, and the sustainability of registered employment. When the regulations introduced in December are assessed together with social security premiums, contribution-based earnings limits, and various exemption practices, they clearly reveal the need for more cautious and holistic planning on the part of employers in 2026.

With Law No. 7566, the premium rates that entered into force as of 1 January 2026 and the increases in the Social Security Institution (SSI) contribution-based earnings ceiling are poised to become one of the most significant cost increase items for employers in 2026. This regulation makes it inevitable to reassess wage policies and personnel cost projections.

In particular, the increase in the contribution-based earnings ceiling significantly raises the premium burden for employees whose wage levels are close to or exceed this ceiling. The impact of this regulation will be felt more prominently in sectors with a high concentration of white-collar employees and in organizations that adopt high-wage policies; this will necessitate a reassessment of labor costs, budgeting processes, and wage increase policies in 2026. In this respect, Law No. 7566 constitutes a regulation that must be carefully addressed not only from a compliance perspective, but also from the viewpoints of human resources, finance, and strategic planning.

At the same time, the strengthening of the inspection approach in labor and social security law practices, along with a shift toward a more selective structure in administrative fines and incentive schemes, will require the business community to keep regulatory compliance higher on its agenda than ever before. In this context, it is anticipated that 2026 will be a year in which inspections related to labor legislation will be conducted more intensively and systematically; and that inspections will increase particularly with respect to registered employment, wage practices, working hours, and social security obligations. The secondary regulations published in December and the implementation-oriented guidance indicate that a more systematic and data-driven approach will be adopted in the fields of labor and social security in 2026.

On the tax legislation side, the updates to monetary thresholds made at year-end and the limited number of regulations appear, in general, to be a continuation of the fiscal discipline policy. When evaluated together with the regulations in the labor and social security fields, the importance of addressing financial and operational planning in a holistic manner once again becomes evident for employers.

In this month's Bulletin, we have included our Bulletins and other studies prepared in relation to the legal regulations enacted during the December 2025 period. You may find the details on the following pages.

On this occasion, I would like to wish all our readers a happy new year and hope that 2026 will be a more predictable, balanced, and sustainable year for both the business world and employees.

Sincerely,

**Dr. Cahit EVCİL**

**Partner / Labor and Social Security**

BDO İstanbul Office





We wish you a  
year filled with  
peace, success,  
and hope.

*Happy New Year!*

# BDO Academy January Training Calendar Published!

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

| <b>Date</b>      | <b>Courses</b>  |
|------------------|---|
| January 13, 2026 | <b>Basic Transfer Pricing Training</b>                            |
| January 15, 2026 | <b>Training on Double Tax Agreements and Payments Made Abroad</b> |
| January 16, 2026 | <b>Process Management and Internal Control Training</b>           |



For detailed information and registration:

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

# BDO tax talks is starting!

Our free online meeting series, organized exclusively **for our full certification and tax advisory clients**, will begin in January, offering a friendly and interactive environment.

Join us to discuss current tax topics together and secure your place.



# Tax



**ANNOUNCEMENTS: THE FILING DEADLINE FOR DOMESTIC MINIMUM TOP-UP TAX RETURNS HAS BEEN EXTENDED**  
**TAX 2025-024**  
**02/12/2025**

Within the framework of the Fifth Chapter added to the Corporate Tax Law No. 5520 by Law No. 7524, the Domestic and Global Minimum Top-Up Tax has entered into force.

The filing deadlines for the Domestic Minimum Top-Up Tax returns relating to the 2024 accounting period, which were required to be submitted by the end of 31 December 2025, as well as the payment deadlines for the taxes accrued upon these returns, have been extended until the end of Thursday, 15 January 2026.

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



**ANNOUNCEMENTS: 01/12/2025 THE DOMESTIC MINIMUM TOP-UP TAX RETURN HAS BEEN MADE AVAILABLE IN THE E-DECLARATION TEST ENVIRONMENT**  
**TAX 2025-025**  
**02/12/2025**

The “Domestic Minimum Top-Up Tax Return” prepared for this purpose has been made available in the new “e-Declaration Test” system in order to allow taxpayers and professional practitioners to experience the data entry and calculation processes.

Multinational enterprise groups whose annual consolidated revenue in the ultimate parent entity’s consolidated financial statements exceeds the Turkish lira equivalent of EUR 750 million in at least two of the four accounting periods preceding the accounting period in which the income is reported fall within the scope of the domestic and global Minimum Top-Up Tax application. The taxpayers of the return are affiliated entities and joint ventures that are part of multinational enterprise groups and resident in Türkiye. In order to fulfill the declaration obligation, one of the group member affiliated entities resident in Türkiye must be authorized by the multinational enterprise group.

Within this scope, in order for the authorized entities to be able to test the relevant return, they are required to establish, in their own name, the taxpayer registration titled “0063 – Domestic Minimum Top-Up Tax” at the tax office directorates to which they are affiliated for corporate tax purposes.

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

# Tax



**BULLETIN:**  
**TAX 2025-066**  
**03/12/2025**

## **THE CONSTITUTIONAL COURT HAS ANNULLED ARTICLE 1 OF LAW NO. 3095 ON STATUTORY INTEREST AND DEFAULT INTEREST, FINDING IT UNCONSTITUTIONAL WITH RESPECT TO NON-CONTRACTUAL OBLIGATIONS**

As is known, the statutory interest rate is regulated under article 1 of Law No. 3095 on Statutory Interest and Default Interest (the “Law”). In the first paragraph of the said article, it is stipulated that where interest is required to be paid pursuant to the Turkish Code of Obligations No. 6098 and the Turkish Commercial Code No. 6102, and the rate has not been determined by contract, such payment shall be made at an annual rate of twelve percent; while the second paragraph provides that the President is authorized to determine this rate on a monthly basis, to reduce it by up to ten percent, or to increase it by up to one fold.

With Presidential Decision No. 8485 dated 20/05/2024, the statutory interest rate was set at an annual rate of 24%, effective as of 01/06/2024.

In a lawsuit filed for compensation of damages suffered due to the destruction of an immovable property as a result of an earthquake, article 1 of the Law was examined by the Constitutional Court through an objection procedure, and the Court annulled the said provision by majority vote, finding it unconstitutional with respect to non-contractual obligations. The Constitutional Court ruled that, particularly during periods of high inflation, the statutory interest rate’s failure to compensate for actual damages renders this regulation contrary to the right to property (article 35 of the Constitution), the right to legal remedies (articles 36 and 40 of the Constitution), and the principle of equality (article 10 of the Constitution).

We are of the opinion that, by citing this decision as a precedent, it may be possible to file lawsuits seeking compensation for actual damages suffered instead of applying the statutory interest rate and to obtain favorable outcomes. This is because judicial authorities tend not to give effect to regulations that are known to be unconstitutional.

You may access the full text of the decision by clicking the relevant [link](#).

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

# Tax



**BULLETIN:**  
**TAX 2025-067**  
**10/12/2025**

## **THE APPLICATION PERIOD OF THE COMMUNIQUÉ ON THE PROCEDURES AND PRINCIPLES REGARDING THE IMPLEMENTATION OF ARTICLE 376 OF THE TURKISH COMMERCIAL CODE ON CAPITAL LOSS HAS BEEN EXTENDED**

Until 1 January 2027, in the calculations made within the scope of article 376 of the Turkish Commercial Code (TCC) regarding capital loss or over-indebtedness, the full amount of foreign exchange losses arising from foreign currency–denominated liabilities that have not yet been performed, as well as half of the total of expenses arising from leases accrued in 2020 and 2021, depreciation expenses, and personnel expenses, may be excluded from consideration. In determining these amounts, calculations shall be made in a manner that avoids any duplication. With respect to the calculations to be made, no entries shall be recorded in the financial statements prepared pursuant to article 13 of the Communiqué; instead, this matter shall be disclosed for informational purposes in the footnotes.

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



**ANNOUNCEMENTS: DOMESTIC AND GLOBAL MINIMUM TOP-UP TAX**  
**TAX 2025-027**  
**11/12/2025**

To access our information document containing summary explanations within the scope of the Domestic and Global Minimum Top-Up Tax, please click [here](#).

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



**BULLETIN:**  
**TAX 2025-068**  
**12/12/2025**

## **2026 YILINDAN İTİBAREN GERÇEK USULE GEÇECEK BASİT USULE TABİ MÜKELLEFLERİN KAPSAMI YENİDEN BELİRLENMİŞTİR THE SCOPE OF TAXPAYERS SUBJECT TO THE SIMPLE METHOD WHO WILL TRANSITION TO THE REAL METHOD AS OF 2026 HAS BEEN REDETERMINED**

With Presidential Decision No. 10380, certain groups of taxpayers have been excluded from the scope of the simple method.

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



**BULLETIN:**  
**TAX 2025-069**  
**17/12/2025**

## **THE 2026 MINIMUM FEE TARIFF FOR PUBLIC ACCOUNTANCY, CERTIFIED PUBLIC ACCOUNTANCY AND SWORN-IN CERTIFIED PUBLIC ACCOUNTANCY HAS BEEN PUBLISHED**

The 2026 minimum fee tariff for public accountants, CPA, and sworn-in CPA services has been determined by the Ministry of Treasury and Finance and published in the Official Gazette dated 17 December 2025 and numbered 33110. The tariff will enter into force on 1 January 2026.

# Tax

Even if the service agreement was executed before 1 January 2026, if the service is to be provided in 2026, the 2026 minimum fee tariff must be taken into account in determining the minimum amount of the fee to be charged. This tariff sets forth the minimum service fees inclusive of VAT, and there is no restriction on charging or paying fees above the amounts specified in the tariff.

Acceptance of work for a fee below the minimum amounts set forth in the Minimum Fee Tariff is prohibited, and disciplinary sanctions shall be imposed on professionals acting contrary to this rule (article 46 of Law No. 3568).

It is mandatory for full certification agreements for 2026 to be executed within January.

To access the 2026 Minimum Fee Tariff for Public Accountancy, Certified Public Accountancy, and Sworn-in Certified Public Accountancy services, please click [here](#).

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



**ANNOUNCEMENTS: THE E-INVOICE UPDATE REGARDING DELIVERIES MADE WITHIN THE SCOPE OF INVESTMENT INCENTIVES HAS BEEN PUT INTO EFFECT AS OF 22/12/2025**  
**TAX 2025-029**  
**19/12/2025**

The Turkish Revenue Administration has published the Technical Guide on e-Invoices Regarding Deliveries Made within the Scope of Investment Incentives, which specifies the fields to be used in e-invoices to be issued within the scope of the Investment Incentive Certificate (IIC) by taxpayers included in the e-Invoice and e-Archive Invoice applications. The guide was first published on 22/11/2025 and most recently updated on 09/12/2025 on the website [ebelge.gib.gov.tr](http://ebelge.gib.gov.tr).

In the announcements made by the Turkish Revenue Administration, it is stated that the developments specified in the guide must be completed by 22/12/2025. As of this date, e-invoices and e-Archive invoices to be issued by taxpayers for deliveries made within the scope of the Investment Incentive Certificate must be created in accordance with the rules set forth in the technical guide.

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

# Tax



**BULLETIN:**  
**TAX 2025-071**  
**19/12/2025**

## **THE DURATION OF THE 0% WITHHOLDING TAX APPLIED TO INCOME AND GAINS DERIVED FROM GOVERNMENT BONDS, TREASURY BILLS, AND LEASE CERTIFICATES HAS BEEN EXTENDED**

Pursuant to Temporary Article 4 of Decree No. 2006/10731, which determines the withholding tax rates applied under Temporary Article 67 of the Income Tax Law, a 0% withholding tax rate had been applied to income and gains derived from Government bonds and Treasury bills issued by the Ministry of Treasury and Finance, as well as to income and gains derived from lease certificates issued by asset leasing companies established under Law No. 4749 on the Regulation of Public Financing and Debt Management, provided that such instruments were acquired between the effective date of the said article and 31/12/2025 (inclusive).

With Presidential Decision No. 10706 recently issued, the date of 31/12/2025 has been amended to 30/06/2026. This amendment entered into force on the publication date of the Decision and applies to income and gains derived from Government bonds and Treasury bills acquired as of 01/01/2026, as well as to lease certificates issued by asset leasing companies established pursuant to Law No. 4749 on the Regulation of Public Financing and Debt Management.

Accordingly, for the aforementioned instruments acquired (not issued) between 01/01/2026 and 30/06/2026, the withholding tax rate shall continue to be applied at 0% until such instruments are disposed of.

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



**BULLETIN:**  
**TAX 2025-072**  
**19/12/2025**

## **AMENDMENTS INTRODUCED TO THE ACT OF FEES UNDER LAW NO. 7566**

With Law No. 7566 on the Amendment of Tax Laws and Certain Laws and Decree Laws, published in the Official Gazette dated 19/12/2025 and numbered 33112 (hereinafter referred to as “Law No. 7566” or the “Law”), significant amendments have been introduced to tax legislation. Some of these amendments relate to Law No. 492 on Act of Fees. In this Bulletin, the amendments made to the Act of Fees are examined.

- The tax loss penalty to be applied in cases where real estate title deed fees are underpaid has been increased.
- A notary fee at a rate of 0.2% has been introduced for the sale and transfer transactions of new and second-hand vehicles.
- The definition of the tax base for title deed fees applicable to real estate transfers has been clarified.
- The scope of the annual fee practice has been expanded.

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

# Tax



**BULLETIN:**  
**TAX 2025-073**  
**22/12/2025**

## **THE APPLICATION PERIODS OF CERTAIN PROVISIONS IN VARIOUS LAWS, WHICH WERE SCHEDULED TO EXPIRE ON 31/12/2025, HAVE BEEN EXTENDED UNDER LAW NO. 7566**

With Law No. 7566 published in the Official Gazette dated 19/12/2025 and numbered 33112, certain extensions have been introduced in tax legislation. Within the scope of articles 29, 31, and 32 of the Law, the application periods of certain temporary regulations that were set to expire on 31/12/2025 have been extended.

Within this framework;

- The application period of the regulation stipulating that no economic enterprise shall be deemed to be formed due to certain passive-type income of associations and foundations has been extended until 31/12/2035. (Corporate Tax Law Temporary Article 2)
- The application period of the regulation regarding the issuance of post-dated checks has been extended until 31/12/2028. (Check Law Temporary Article 3)
- The application period of the VAT exemption granted for deliveries and services provided within the scope of the Istanbul Seismic Risk Mitigation and Emergency Preparedness Project has been extended until 31/12/2035. (Temporary Article 16 of Law No. 6111)

These extensions entered into force as of the publication date of the Law.

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



**BULLETIN:**  
**TAX 2025-074**  
**22/12/2025**

## **AMENDMENTS INTRODUCED TO THE INCOME TAX LAW UNDER LAW NO. 7566**

With the Law published in the Official Gazette dated 19/12/2025 and numbered 33112, certain significant amendments have been made to the Income Tax Law. The relevant regulations entered into force as of the publication date of the Law.

The key amendments within this scope are summarized below:

- The deduction of interest expenses on residential rental income has been abolished.

Interest expenses related to loans used for immovable properties leased as residences may no longer be deducted from rental income.

This regulation applies to income earned as of 01/01/2025 and will be reflected in income tax returns to be filed in 2026.

- The 4th provisional tax period has been reintroduced.

# Tax

For income taxpayers subject to the real method and corporate tax taxpayers, the 4th provisional tax return covering the last three months of the accounting period has once again become mandatory.

The application is valid for taxation periods starting as of 01/01/2025.

- The withholding tax exemption applicable to certain investment fund participation units has been narrowed.

The withholding tax exemption based on a one-year holding period has been abolished for participation units of investment funds that are sold exclusively to qualified investors, are not traded on Türkiye Electronic Fund Trading Platform (TEFAS) and are not subject to portfolio limitations.

This regulation entered into force as of 19/12/2025.

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



**BULLETIN:**  
**TAX 2025-075**  
**22/12/2025**

## **THE REDISCOUNT RATE APPLIED IN TAX PROCEDURES HAS BEEN REDUCED FROM 44.25% TO 39.75%**

With the Communiqué on the Determination of Interest Rates to Be Applied in Rediscount and Advance Transactions, published by the Central Bank of the Republic of Türkiye in the Official Gazette dated 20/12/2025 and numbered 33113, amendments have been made to the rediscount rates applied in tax procedures.

Within this scope;

- The discount interest rate to be applied to rediscount transactions carried out against promissory notes with a remaining maturity of up to 3 months has been reduced from an annual rate of 43.25% to 38.75%.
- The interest rate to be applied in advance transactions has been reduced from an annual rate of 44.25% to 39.75%.

The newly determined rates entered into force as of 20/12/2025.

Pursuant to General Communiqué No. 238 of the Tax Procedure Law (TPL), since the rate taken as a basis for rediscount transactions for tax purposes is the annual advance interest rate, the rediscount rate to be applied in cases where no interest rate is specified on the promissory note has become 39.75%, effective as of 20/12/2025. Accordingly, this rate shall be taken into account in rediscount transactions to be carried out as of 31/12/2025.

- For promissory notes denominated in foreign currency, where no interest rate is stated on the note, LIBOR shall continue to be taken as a basis pursuant to article 280 of the TPL.

# Tax

- Within the scope of the regulation on post-dated checks, the period allowing the issuance of post-dated checks and subjecting such checks to rediscount has been extended until 31/12/2028 under Law No. 7566.

Detailed explanations regarding the rediscount of receivable and payable notes as well as post-dated checks are provided in our Bulletin No. 2002/91.

On the other hand, the statutory default interest rate applicable to commercial transactions shall continue to be applied at 53.25% as of 01/01/2025, and this rate has not been affected by the above-mentioned changes.

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



**ANNOUNCEMENTS: THE “E-DECLARATION” APPLICATION FOR VALUE ADDED TAX HAS BEEN EXPANDED BY THE REVENUE ADMINISTRATION AS PART OF THE RENEWAL OF THE ELECTRONIC DECLARATION SYSTEM WITH NEW, UPDATED, AND OPEN-SOURCE SOFTWARE**  
**TAX 2025-030**  
**22/12/2025**

Within the scope of the e-Declaration application developed by the Turkish Revenue Administration for the purpose of renewing the Electronic Declaration System, Value Added Tax Returns (VAT1, VAT2, VAT2B, VAT4, VAT9015) have started to be received gradually through the e-Declaration system in designated provinces.

In addition, as of 01/01/2026, if professional practitioners use accounting software that has completed integration with the e-Declaration system, it will also be possible to submit tax returns via integration (web service).

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



**BULLETIN: TAX EXEMPTIONS HAVE BEEN GRANTED FOR VARIOUS TAXES TO INVESTMENT MONITORING AND COORDINATION DIRECTORATES UNDER LAW NO. 7566**  
**TAX 2025-076**  
**22/12/2025**

With Law No. 7566 published in the Official Gazette dated 19/12/2025 and numbered 33112, certain tax exemptions have been introduced for Investment Monitoring and Coordination Directorates. These regulations aim to ensure the more effective execution of public investments.

Within this scope;

- Vehicles registered and recorded in the name of Investment Monitoring and Coordination Directorates have been exempted from Motor Vehicle Tax. This exemption entered into force as of 19/12/2025.
- Transactions related to the registration, annotation, and cancellation of title deeds concerning immovable properties and in rem rights acquired by Investment Monitoring and Coordination Directorates have been exempted from title deed fees. This regulation has been applicable as of 19/12/2025.

# Tax

- Transfers and deliveries carried out through the sale of immovable properties owned by Investment Monitoring and Coordination Directorates have been exempted from Value Added Tax. This exemption will enter into force as of 01/01/2026.

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



**BULLETIN:**  
**TAX 2025-077**  
**22/12/2025**

## **VARIOUS TAX INCENTIVES HAVE BEEN GRANTED UNDER LAW NO. 7566 IN RELATION TO THE 2026 UEFA EUROPA LEAGUE FINAL, THE 2027 UEFA CONFERENCE LEAGUE FINAL, AND THE 2032 UEFA EUROPEAN FOOTBALL CHAMPIONSHIP**

With the Law published in the Official Gazette dated 19/12/2025 and numbered 33112, certain tax incentives have been introduced in relation to the 2026 UEFA Europa League Final, the 2027 UEFA Conference League Final, and the 2032 UEFA European Football Championship organizations. These regulations aim to support the hosting of such international events in Türkiye.

The main regulations introduced within this scope are summarized below:

- Value Added Tax Exemption

Goods deliveries and services provided within the scope of these matches and organizations to UEFA, participating teams, and legal entities involved in the organization whose place of business, legal seat, and business center are not located in Türkiye have been exempted from Value Added Tax.

Likewise, goods deliveries and services to be provided by such persons and entities in connection with these matches and organizations shall also not be subject to Value Added Tax. This exemption is a full exemption, and any Value Added Tax incurred in relation to these transactions that cannot be offset through deduction may be refunded to taxpayers in cash or by offset.

The Value Added Tax exemption entered into force as of 19/12/2025.

- Income and Corporate Tax Exemption

Income and revenues obtained in Türkiye within the scope of these matches and organizations by UEFA, as well as by participating teams and legal entities involved in the organization whose place of business, legal seat, and business center are not located in Türkiye, have been exempted from income tax and corporate tax. This exemption also covers taxes collected through withholding. The UEFA Türkiye Office shall not be deemed to have formed an economic enterprise due to the income it derives within the scope of the said matches and the Championship. Accordingly, the UEFA Türkiye Office shall not be subject to tax obligations such as bookkeeping and documentation requirements.

# Tax

Double taxation avoidance agreements in force between Türkiye and the countries of residence of the relevant persons and entities remain reserved.

The income and corporate tax exemption also entered into force as of 19/12/2025.

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



**BULLETIN:**  
**TAX 2025-078**  
**24/12/2025**

## **NO INFLATION ADJUSTMENT WILL BE MADE IN THE FOURTH PROVISIONAL TAX PERIOD OF THE 2025 ACCOUNTING YEAR**

With General Communiqué No. 582 of the Tax Procedure Law, it was deemed appropriate that taxpayers within the scope do not apply inflation adjustment in the first, second, and third provisional tax periods of the 2025 accounting year.

With the Law published in the Official Gazette dated 19/12/2025 and numbered 33112, income and corporate tax taxpayers have been obliged to file a provisional tax return for the fourth provisional tax period of 2025 for taxation periods starting as of 01/01/2025.

Following this regulation, General Communiqué No. 587 of the Tax Procedure Law, published in the Official Gazette dated 24/12/2025 and numbered 33117, stipulated that taxpayers within the scope shall also not apply inflation adjustment in the fourth provisional tax period of the 2025 accounting year.

For taxpayers for whom a special accounting period has been determined, no inflation adjustment shall be applied in the fourth provisional tax period of the accounting period starting within the 2025 calendar year.

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



**BULLETIN:**  
**TAX 2025-079**  
**25/12/2025**

## **THE APPLICATION PERIOD OF TEMPORARY ARTICLE 32 OF THE BANKING LAW NO. 5411 ON LOAN RESTRUCTURING, WHICH PROVIDES VARIOUS TAX ADVANTAGES, HAS BEEN EXTENDED BY TWO YEARS**

With Temporary article 32 added to the Banking Law No. 5411, companies experiencing financial difficulties have been granted the opportunity to enter into financial restructuring agreements with banks and other financing institutions. The application period of this regulation has been extended by a Presidential Decision.

Within this scope;

- The application period of Temporary article 32 has been extended for two years as of 28/12/2025 by Presidential Decision No. 10767 published in the Official Gazette dated 25/12/2025. Accordingly, the regulation will remain in force until 27/12/2027.

# Tax

- Within the scope of financial restructuring, credit maturities may be extended, loans may be renewed, additional loans may be granted, receivables may be partially or fully waived, and collateral structures may be amended through framework agreements and contracts based thereon. Transactions carried out within this scope are exempt from fees, stamp duty, banking and insurance transactions tax, and the resource utilization support fund.
- A Corporate Tax exemption shall be applied to gains arising from the sale of assets acquired by creditor institutions within the scope of restructuring.
- Transfers and deliveries carried out within the scope of restructuring have been exempted from Value Added Tax.
- Receivables waived pursuant to contracts shall be considered as worthless receivables for the creditor and as waived receivables for the debtor.
- Incentive certificates, export commitment periods, and the durations of guarantees and sureties provided by credit guarantee institutions in relation to restructured debts shall be deemed to be extended for the period specified in the contract. If restructured debts are restructured again within two years starting from the beginning of the year following the contract date, these tax exemptions and incentives shall not apply.
- Tax, funds, and fee exemptions granted within the scope of restructuring shall not be revoked even if the transactions are not subsequently realized.

Through this regulation, it is aimed to encourage the restructuring process of companies facing financial difficulties and to prevent additional tax burdens.

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



**BULLETIN:**  
**TAX 2025-080**  
**25/12/2025**

## **THE DIGITAL SERVICES TAX RATE HAS BEEN GRADUALLY REDUCED**

With Law No. 7194 published in the Official Gazette dated 07/12/2019 and numbered 30971, the Digital Services Tax was introduced and entered into force on 01/03/2020. The rate of this tax, the taxpayers of which are digital service providers, had been applied at 7.5%.

Within the scope of the authority granted to the President, amendments have been made to the Digital Services Tax rates through Presidential Decision No. 10767.

Accordingly, without making any distinction based on the type of service, the Digital Services Tax rate shall be applied as follows:

- 5% as of 01/01/2026,
- 2.5% as of 01/01/2027.

# Tax

These rate changes entered into force on the publication date of the Decision and shall apply to revenues earned as of the beginning of the year following the publication date.

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



**BULLETIN:**  
**TAX 2025-081**  
**25/12/2025**

## **FINANCIAL STATEMENTS WILL NOT BE SUBJECT TO INFLATION ADJUSTMENT FOR THE 2025 ACCOUNTING PERIOD AND, REGARDLESS OF WHETHER THE CONDITIONS ARE MET, FOR THE 2026 AND 2027 ACCOUNTING PERIODS, INCLUDING THE PROVISIONAL TAX PERIODS**

With the regulations introduced by the Ministry of Treasury and Finance, the periods during which inflation adjustment will not be applied have been finalized.

Within this scope;

- With the Tax Procedure Law General Communiqué dated 24/12/2025, it was deemed appropriate that taxpayers within the scope do not apply inflation adjustment in the fourth provisional tax period of the 2025 accounting year.
- Pursuant to the temporary article added to the Tax Procedure Law by the Law published in the Official Gazette dated 25/12/2025, the financial statements relating to the 2025 accounting period as well as the 2026 and 2027 accounting periods shall not be subject to inflation adjustment.
- Likewise, no inflation adjustment shall be applied in the provisional tax periods of 2026 and 2027.
- For taxpayers for whom a special accounting period has been determined, no inflation adjustment shall be applied in accounting periods ending in 2026, 2027, and 2028.
- The President has been granted the authority to extend the periods during which inflation adjustment will not be applied, including provisional tax periods, for up to three accounting periods.
- Taxpayers continuously engaged in the trading and manufacturing of processed gold and silver shall continue to apply inflation adjustment for the 2025, 2026, and 2027 accounting periods pursuant to a special regulation.

The periods during which inflation adjustment will not be applied shall be deemed periods in which inflation conditions have not been met for the purposes of the revaluation practice, and revaluation may be applied to depreciable assets.

These regulations entered into force as of 25/12/2025.

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

# Tax



**BULLETIN:**  
**TAX 2025-082**  
**25/12/2025**

**THE APPLICATION PERIOD OF REMOTE WORKING TIME RATIOS DETERMINED FOR TECHNO PARKS AND R&D AND DESIGN CENTERS HAS BEEN EXTENDED UNTIL 31/12/2026**

With Law No. 7263, regulations were introduced regarding the consideration of the time spent outside the zone or center by personnel working in Technology Development Zones and R&D and Design Centers within the scope of income tax withholding incentives and other supports.

Within this framework, the periods that may be subject to remote working for the purposes of the income tax withholding incentive and other supports shall continue to be applied until 31/12/2026 at a rate of 100% for IT personnel determined by the Ministry and 75% for other personnel.

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



**BULLETIN:**  
**TAX 2025-083**  
**26/12/2025**

**THE IMPLEMENTATION COMMUNIQUÉ ON DOMESTIC AND GLOBAL MINIMUM TOP-UP TAX HAS BEEN PUBLISHED**

As stated in our [Bulletin No. 2025/49](#), the Domestic and Global Minimum Top-Up Tax entered into force in Türkiye on 02/08/2024 with Law No. 7524 published in the Official Gazette dated 02 August 2024 and numbered 32620.

Accordingly, multinational enterprises whose annual consolidated revenue worldwide exceeds the Turkish lira equivalent of EUR 750 million in at least two of the four accounting periods preceding the accounting period in which the income is reported are required to review their status under the domestic and global minimum top-up tax and to fulfill their obligation to file the relevant tax return. Within this scope, it has been ensured that multinational enterprises exceeding the said revenue threshold are subject to a minimum effective tax rate of 15%.

In this context, the details regarding the application have been published through the Implementation Communiqué on Domestic and Global Minimum Top-Up Tax in the Official Gazette dated 26 December 2025 and numbered 33119.

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

To access our document containing summary information on the Domestic and Global Minimum Top-Up Tax, please click [here](#).

To access the video recording in which we explain the details of the Domestic and Global Minimum Top-Up Tax, please click [here](#).

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

# Tax



**ANNOUNCEMENTS: THE AGREEMENT AND PROTOCOL BETWEEN THE GOVERNMENT OF THE REPUBLIC OF TÜRKİYE AND THE GOVERNMENT OF THE HONG KONG SPECIAL ADMINISTRATIVE REGION OF THE PEOPLE'S REPUBLIC OF CHINA ON THE AVOIDANCE OF DOUBLE TAXATION AND THE PREVENTION OF FISCAL EVASION WITH RESPECT TO TAXES ON INCOME HAVE BEEN APPROVED**

**TAX 2025-031**  
**26/12/2025**

The approval of the Agreement and its Protocol between the Government of the Republic of Türkiye and the Government of the Hong Kong Special Administrative Region of the People's Republic of China on the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income has been deemed appropriate by Law No. 7569.

Within this scope, the Agreement has not yet entered into force and will become effective, following its approval by the President, in accordance with article 28 of the Agreement.

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



**ANNOUNCEMENTS: EXEMPTIONS, DEDUCTIONS, AND APPLICATIONS SUBJECT TO THE SUBMISSION OF A SWORN-IN CPA CERTIFICATION REPORT HAVE BEEN DETERMINED, APPLICABLE AS OF 2025 AND SUBSEQUENT ACCOUNTING PERIODS**

**TAX 2025-032**  
**30/12/2025**

With Communiqué No. 49 published in the Official Gazette dated 30/12/2025, it has become mandatory that certain exemptions, deductions, and applications included in income and corporate tax returns be certified by a certification report to be prepared by Sworn-in Certified Public Accountants.

Sworn-in CPA certification reports relating to transactions subject to certification must be submitted electronically via the Digital Tax Office, either together with the corporate tax return or within two months following the end of the filing period.

Under the Communiqué, numerous exemptions and deductions have been brought within the scope of certification, including foreign participation income, capital gains from the sale of participation shares, share premium, capital gains from the sale of immovable property and participation shares, free zone and technopark income, R&D and design deductions, cash capital increase deduction, reduced corporate tax application, as well as the domestic and global minimum top-up tax application.

Transactions related to the domestic and global minimum top-up tax application have also, for the first time, been explicitly made subject to the requirement to submit a Sworn-in CPA certification report.

For taxpayers whose corporate tax returns are certified under a full certification agreement, there is no need to submit a separate certification report, provided that these matters are duly included in the full certification report in accordance with the report format annexed to the Communiqué. The Communiqué entered into force on 30/12/2025 and applies to income earned as of 01/01/2025.

# Tax

Through this regulation, it is aimed to enhance documentation and audit obligations in the application of certain exemptions and deductions.

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



**BULLETIN:**  
**TAX 2025-084**  
**30/12/2025**

## **THE RECOVERY CONTRIBUTION FEE AMOUNTS TO BE APPLIED IN 2026 HAVE BEEN DETERMINED**

Pursuant to Additional article 11 of the Environmental Law No. 2872, recovery contribution fee amounts are updated each year by taking into account the revaluation rate applicable to the previous year.

In accordance with the provisions of the Tax Procedure Law No. 213, the revaluation rate for 2025 was determined as 25.49%. Based on this rate, the recovery contribution fee amounts listed in Annex (1) to Law No. 2872 have been recalculated through Communiqué No. 2026/1.

The updated recovery contribution fee amounts shall be effective as of 01/01/2026.

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



**ANNOUNCEMENTS:**  
**TAX 2026-01**  
**01/01/2026**

## **COMMUNIQUÉS ON THE REDETERMINATION OF FIXED THRESHOLDS AND AMOUNTS SET FORTH IN CERTAIN LAWS AND COMMUNIQUÉS HAVE BEEN PUBLISHED IN THE OFFICIAL GAZETTE**

The Communiqués published in the Official Gazette dated 31/12/2025 and numbered 33124 (5th Repeated) include explanations regarding the redetermination of fixed thresholds and amounts stipulated in certain laws and communiqués.

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

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



**ANNOUNCEMENTS:**  
**TAX 2026-002**  
**01/01/2026**

## **THE REVENUE ADMINISTRATION HAS PUBLISHED THE 2026 TAX CALENDAR**

Dear Clients: in order to facilitate the monitoring of tax obligations such as declaration and payment deadlines by tax type, notification submission periods, and the uploading deadlines for electronic ledger certificates, the “2026 Tax Calendar” has been made available on the website of the Turkish Revenue Administration in PDF format and on a monthly basis.

The deadlines included in the 2026 Tax Calendar have been prepared by taking into account official holidays and the fiscal holiday.

To access the 2026 Tax Calendar, please click [here](#).

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

# Tax



**BULLETIN:**  
**TAX 2026-001**  
**02/01/2026**

## **THRESHOLDS AND LIMITS REGARDING FUND ALLOCATION AND INVESTMENT OBLIGATIONS FOR BENEFICIARIES OF THE R&D DEDUCTION AND TECHNOPARK EXEMPTION HAVE BEEN REDETERMINED**

With Law No. 7263, an obligation to allocate funds and to invest in venture capital has been introduced for taxpayers benefiting from the R&D and design deduction as well as the technopark exemption.

According to this regulation, if the total amount of the R&D and design deduction and the technopark exemption benefited from as reported on the corporate tax return exceeds a specified threshold, taxpayers are required to transfer a certain amount calculated over the benefited deduction and exemption amount to a fund account within equity. This allocated fund must be directed, by the end of the relevant year, to venture capital investment fund units, venture capital investment companies, or as capital to entrepreneurs operating in incubation centers within the scope of technoparks, all established for the purpose of investing in entrepreneurs resident in Türkiye.

This obligation was first applied with the corporate tax returns for the 2021 tax year.

In addition, effective as of 01/01/2026;

- The minimum deduction and exemption threshold has been set at TRY 5,000,000.
- The rate to be transferred to the fund account under equity has been maintained at 3%.
- The upper limit of the annual fund amount to be transferred has been maintained at TRY 100,000,000.

The new rates and amounts shall be applied to the R&D and design deduction and technopark exemption to be benefited from in the 2025 corporate tax return to be filed by 30/04/2026.

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



**BULLETIN:**  
**TAX 2026-002**  
**05/01/2026**

## **THE APPLICATION PERIOD OF TEMPORARY ARTICLE 17 OF THE VALUE ADDED TAX LAW, WHICH ALLOWS THE DEFERRAL/WRITE-OFF OF VAT CALCULATED ON DELIVERIES MADE WITHIN THE SCOPE OF THE INWARD PROCESSING REGIME, HAS NOT BEEN EXTENDED**

As of 01/01/2026, VAT-exempt deliveries under the deferral/write-off mechanism will no longer be possible for domestic sales made within the scope of the inward processing and temporary admission regimes. However, imports made within the scope of the inward processing and temporary admission regimes will continue to be exempt from VAT. It is not known whether the failure to extend the application period of the article was due to an oversight or a deliberate decision.

# Tax

That said, a similar situation had previously occurred when the application period of the article expired on 31/12/2010. Subsequently, with Law No. 6111 dated 25/02/2011, the application period of the article was extended until 31/12/2015, and this amendment entered into force on its publication date, effective retroactively as of 31/12/2010. At that time, deliveries made between 01/01/2011 and 25/02/2011 were able to be brought within the scope of the deferral/write-off mechanism through the mutual agreement of buyers and sellers, and previously filed tax returns were corrected accordingly.

If a new extension is introduced, it is anticipated that the implementation will follow a similar approach as described above. However, until such an extension is enacted, deliveries made must be subject to VAT.

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



**BULLETIN:**  
**TAX 2026-004**  
**05/01/2026**

**THE VALUES TO BE TAKEN AS A BASIS FOR THE VALUABLE PROPERTY TAX IN 2026 HAVE BEEN DETERMINED, AND THE TAX RETURN MUST BE FILED BY 20 FEBRUARY 2026**

For residential properties located within the borders of Türkiye whose building tax value, as determined pursuant to article 29 of the Property Tax Law, exceeded TRY 15,709,000 in 2025, a Valuable Property Tax return must be filed by 20 February 2026.

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



**BULLETIN:**  
**TAX 2026-005**  
**05/01/2026**

**CHANGES IN THE THRESHOLDS AND AMOUNTS SET FORTH IN THE INCOME TAX LAW EFFECTIVE AS OF 1 JANUARY 2026**

Under repeated article 121 of the Income Tax Law No. 193 (ITL), which regulates the compliant taxpayer tax credit application, there is an upper limit to the amount of the tax credit, and this amount is applied by increasing it each year at the revaluation rate determined for the previous year in accordance with the provisions of the Tax Procedure Law No. 213. Fractions not exceeding 5% of the amount calculated in this manner are disregarded. The President is authorized to increase the rate and amount specified in the first paragraph by up to twofold, reduce them to zero, or restore them to their statutory rate and amount.

As is known, with Tax Procedure Law General Communiqué No. 585, the revaluation rate for 2025 was announced as 25.49%.

Since no determination was made by the President for 2026, the Ministry of Treasury and Finance, through Income Tax General Communiqué Serial No. 332, has determined the thresholds and amounts to be applied as of 01/01/2026 by increasing the amounts applicable for the previous year at the revaluation rate, as set out in our Bulletin.

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

# Tax



**BULLETIN:**  
**TAX 2026-006**  
**05/01/2026**

## **THE MINIMUM SPECIAL CONSUMPTION TAX (SCT) AMOUNT ON MOBILE PHONES HAS BEEN INCREASED TO TRY 456 FOR 2026**

As is known, temporary article 6 of the Special Consumption Tax (SCT) Law provides that, until 31/12/2033, for “portable transmitting (cellular) radio telephone” devices with a receiver, if the tax calculated according to the applicable rate shown is less than TRY 160 for each unit of such goods, a tax of TRY 160 per unit shall be collected instead of the tax calculated according to the rate.

It is stipulated that this amount, or the amount determined by applying the revaluation rate, shall be applied by increasing it each year at the revaluation rate determined for the previous year in accordance with the provisions of the Tax Procedure Law No. 213. This amount, which has been applied as TRY 364 as of 01/01/2025, has been increased to TRY 456 by the Communiqué on the Amendment of the SCT General Communiqué published in the Official Gazette dated 31/12/2025 and numbered 33124.

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



**BULLETIN:**  
**TAX 2026-007**  
**05/01/2026**

## **THE UPPER LIMIT FOR THE SALE OF VEHICLES EXEMPT FROM SCT FOR PERSONS WITH DISABILITIES HAS BEEN INCREASED TO TRY 2,873,900 FOR THE YEAR 2026**

As is known, pursuant to subparagraph (a) of paragraph (2) of the first paragraph of article 7 of the Special Consumption Tax (SCT) Law, among the goods listed in List (II) annexed to the Law that are subject to registration and have a domestic contribution ratio of at least 20% (increased to 40% by Presidential Decision No. 9321, effective as of 27/12/2024), the first acquisition of such goods by disabled or incapacitated persons with a disability rate of 90% or more, as classified under the Turkish Customs Tariff Schedule, is exempt from SCT once every ten years. In order to benefit from this exemption, it is not required that the vehicle be specially equipped or that the disabled or incapacitated person personally use the vehicle.

The upper limit serving as the basis for the application of the exemption for vehicles under tariff position 87.03 was applied as TRY 2,290,200 in 2025. This upper limit has been increased to TRY 2,873,900 by the Communiqué published in the Official Gazette dated 31/12/2025 and numbered 33124.

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

# Tax



**BULLETIN:**  
**TAX 2026-008**  
**05/01/2026**

## **THE ENVIRONMENTAL CLEANING TAX AMOUNTS TO BE APPLIED IN 2026 HAVE BEEN DETERMINED**

As is known, pursuant to the fourth paragraph of the repeated article 44 of the Municipal Revenues Law No. 2464, as amended by Law No. 5035, the environmental cleaning tax for residential properties is collected based on the amount of water consumption and is shown on water bills.

The environmental cleaning tax amounts for residential properties, which were applied at TRY 3.30 per cubic meter in metropolitan municipalities and TRY 2.40 in other municipalities for 2025, have been determined as TRY 4.00 per cubic meter in metropolitan municipalities and TRY 3.00 in other municipalities as of 01/01/2026.

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



**BULLETIN:**  
**TAX 2026-009**  
**05/01/2026**

## **THE FIXED STAMP DUTY AMOUNTS AND THE MAXIMUM STAMP DUTY AMOUNT TO BE APPLIED IN 2026 HAVE BEEN DETERMINED**

As is known, pursuant to the first paragraph of repeated article 30 of the Stamp Duty Law, as amended by article 6 of Law No. 5281, the fixed stamp duties set forth in Table (1) annexed to the Stamp Duty Law (including the thresholds determining the minimum and maximum amounts of fixed and proportional duties) are applied, effective from the beginning of each calendar year, by increasing the amounts applied in the previous year at the revaluation rate determined and announced for the previous year.

The Ministry of Treasury and Finance announced the revaluation rate applicable for 2025 as 25.49% through Tax Procedure Law General Communiqué No. 585. However, with article 2 of the Presidential Decision dated 30/12/2025 and numbered 10783, published in the Official Gazette dated 31/12/2025 and numbered 33124, it was decided that, effective as of 01/01/2026, the fixed stamp duty amounts applied in 2025 for the papers listed in Table (1) annexed to the Stamp Duty Law shall be increased by 18.95%, taking into account the revaluation rate.

On the other hand, the upper limit stipulated in the first paragraph of Article 14 of the Law, which was applied as TRY 24,477,478.90 in 2025, has also been increased by 18.95% and determined as TRY 29,115,961.10. Accordingly, the amount of stamp duty to be collected from each document to be issued in 2026 may not exceed TRY 29,115,961.10.

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

# Tax



**BULLETIN:**  
**TAX 2026-010**  
**05/01/2026**

## **THE MOTOR VEHICLE TAX, STAMP DUTY, AND FEE AMOUNTS TO BE APPLIED IN 2026 HAVE BEEN INCREASED BY 18.95%**

The revaluation rate for 2025 was determined as 25.49% (twenty-five point forty-nine) and was announced through the Tax Procedure Law General Communiqué (Serial No: 585) published in the Official Gazette dated 27/11/2025 and numbered 33090. The President has determined the revaluation rate, by exercising the authority granted under various laws through the Presidential Decision dated 30/12/2025 and numbered 10783 (the “Decision”), to be applied to motor vehicle tax amounts, the upper limit of stamp duty to be collected per document, and fixed stamp duty and fee amounts.

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



**BULLETIN:**  
**TAX 2026-011**  
**05/01/2026**

## **COMMUNIQUÉ ON THE IMPORT INSPECTION OF TOBACCO, TOBACCO PRODUCTS, ALCOHOL, AND ALCOHOLIC BEVERAGES**

With the Communiqué on the Import Inspection of Tobacco, Tobacco Products, Alcohol, and Alcoholic Beverages (Product Safety and Inspection: 2026/19), published in the Official Gazette dated 31/12/2025 and numbered 33124 (4th Repeated) and entering into force as of 01/01/2026, the procedures and principles regarding the importation of the said products have been revised.

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



**BULLETIN:**  
**TAX 2026-012**  
**05/01/2026**

## **THE MOTOR VEHICLE TAX AMOUNTS TO BE APPLIED IN 2026 HAVE BEEN DETERMINED**

As is known, the Motor Vehicle Tax (MVT) for each year is determined pursuant to article 10 of the MVT Law by increasing the MVT amounts of the previous year by the revaluation rate applicable for that year. Under the second paragraph of the said article, the President is authorized to determine new rates, provided that they do not exceed 50% above and are not less than 20% of the revaluation rate, and to redetermine vehicle values either separately or collectively.

The revaluation rate for 2025 was determined as 25.49% (twenty-five point forty-nine) and was announced through the Tax Procedure Law General Communiqué (Serial No: 585) published in the Official Gazette dated 27/11/2025 and numbered 33090.

However, by Presidential Decision dated 30/12/2025 and numbered 10783, the said revaluation rate was determined as 18.95% (eighteen point ninety-five) to be applied in the determination of the 2026 motor vehicle tax amounts for the vehicles listed in Tariff (I) under article 5, Tariffs (II) and (IV) under article 6, and Tariff (I/A) under Temporary article 8 of Law No. 197.

# Tax

On the other hand, within the scope of the authority set forth in article 5 of the Motor Vehicle Tax Law prior to its amendment by Law No. 7061, the Council of Ministers, through Decision No. 2004/8327, determined that if the MVT amounts applicable to automobiles, panel vans, off-road vehicles, and similar vehicles listed in Tariff (I) exceed 5% of the motor insurance (casco) values announced by the Insurance Association of Türkiye, the tax amounts applicable to vehicles in the same age group shall be applied as the tax amount corresponding to vehicles in the immediately lower bracket.

In our view, although the said Council of Ministers Decision was issued within the scope of the authority set forth in article 5 of the Motor Vehicle Tax Law prior to its amendment by Law No. 7061, it continues to be valid for the year 2026 and should be taken as a basis in practice.

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



**BULLETIN:**  
**TAX 2026-013**  
**05/01/2026**

## **GENERAL COMMUNIQUÉ NO. 99 OF THE ACT OF FEES REGARDING THE FEES TO BE COLLECTED FROM TRANSACTIONS TO BE CARRIED OUT BY OUR CAREER AND HONORARY CONSULATES AS OF 1 JANUARY 2026 HAS BEEN PUBLISHED**

With General Communiqué No. 99 of the Act of Fees, the exchange rate in US Dollars to be used as the basis for calculating consular fees and the fees for all kinds of transactions carried out by the Career and Honorary Consulates of the Republic of Türkiye in foreign currency, as well as the coefficients to be applied separately or jointly to these transactions and related tariffs, have been determined and announced.

Pursuant to the provisions of repeated article 138 of the Act of Fees, the fixed fees set forth in the tariffs annexed to the Act of Fees, as well as the thresholds determining the minimum and maximum amounts of fixed and proportional fees, have been redetermined effective as of 1 January 2026 and announced in the tariffs annexed to General Communiqué No. 99 of the Act of Fees.

Within this framework, the exchange rate to be used as the basis for calculating the fees to be collected from transactions to be carried out by the Career and Honorary Consulates of the Republic of Türkiye has been determined as USD 1 = TRY 43.05; and the coefficients to be applied to these transactions have been redetermined as shown in the table included in our Bulletin.

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

# Tax



**BULLETIN:**  
**TAX 2026-014**  
**05/01/2026**

**THE THRESHOLDS AND AMOUNTS SET FORTH IN THE TAX PROCEDURE LAW HAVE BEEN INCREASED BY THE REVALUATION RATE (25.49%), EFFECTIVE AS OF 01 JANUARY 2026**

Paragraph three of repeated article 414 of the Tax Procedure Law (TPL) stipulates that “the fixed thresholds set forth in this Law and the monetary penalties for which minimum and maximum amounts are specified shall be applied by increasing them each year by the revaluation rate determined pursuant to this Law for the previous year. Fractions not exceeding five percent of the fixed thresholds and amounts calculated in this manner shall be disregarded. The President is authorized to increase or decrease the thresholds and amounts determined in this way by up to half, and to increase relative thresholds by up to twofold or decrease them by up to half, or to restore them to their statutory levels.” Furthermore, paragraph three of article 104 of the same Law provides that “the Ministry of Treasury and Finance is authorized to increase the amount specified in subparagraph (4) of the first paragraph by up to tenfold, reduce it to zero, and determine the scope, form, timing, and duration of the announcement, as well as the procedures and principles regarding the implementation of the article.”

On the other hand, with Tax Procedure Law General Communiqué No. 585, the revaluation rate for the year 2025 was announced as 25.49%.

The amounts of the thresholds before the amendment and the new amounts are shown in the list included in our Bulletin.

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



**BULLETIN:**  
**TAX 2026-015**  
**05/01/2026**

**THE DEADLINE FOR ISSUING E-ARCHIVE INVOICES HAS BEEN POSTPONED FOR CERTAIN TAXPAYERS**

Previously, with the Communiqué on the Amendment of the Tax Procedure Law General Communiqué No. 509 (Serial No: 573);

- The threshold for issuing e-Archive invoices was amended, and as of 1 January 2025, invoices amounting to TRY 3,000 or more (VAT included) may not be issued as paper invoices, regardless of whether the recipient is a taxpayer or not.
- As of 01 January 2026, all invoices, regardless of the amount, were required to be issued electronically.

This time, with the Communiqué on the Amendment of the Tax Procedure Law General Communiqué No. 509 (Serial No: 589), published in the Official Gazette dated 31/12/2025 and numbered 33124, this practice has been postponed for certain taxpayers.

# Tax

Accordingly;

For invoices to be issued by taxpayers who are not included in the e-Archive invoice application, in respect of taxpayers whose commercial earnings are determined under the simple method and taxpayers who keep books on the operating account basis;

- If the invoice amount exceeds TRY 3,000, for the period between 01/01/2025 and 31/12/2026,
- Regardless of the amount, as of 01/01/2027,

such invoices must be issued as e-Archive invoices.

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



**BULLETIN:**  
**TAX 2026-016**  
**05/01/2026**

## **THE DEPARTURE FEE HAS BEEN INCREASED**

With the Communiqué on the Amendment of the General Communiqué on the Application of the Departure Fee (Serial No: 1), published in the Official Gazette dated 31/12/2025 and numbered 33124 (5th Repeated), the departure fee, which had been applied as TRY 1,000, has been increased by the revaluation rate (25.49%) and raised to TRY 1,250 as of 1 January 2026.

Pursuant to article 1 of Law No. 5597 on the Departure Fee and the Amendment of Various Laws, for departures made until the end of the tenth day of January, no additional payment shall be required for departure fees that were paid based on the amount valid as of the end of 2025.

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



**BULLETIN:**  
**TAX 2026-017**  
**06/01/2026**

## **THE COMMUNIQUÉ ON THE PREPARATION, APPROVAL, AND SUBMISSION OF COUNTER-EXAMINATION REPORTS IN ELECTRONIC FORMAT HAS BEEN PUBLISHED**

The Communiqué on the Electronic Submission of Counter-Examination Reports Added to Sworn-in Certified Public Accountant Certification Reports (Serial No: 1) was published in the Official Gazette dated 24 December 2025 and numbered 33117 and entered into force on the same date.

The purpose of this Communiqué is to utilize advanced information technologies in the preparation, approval, and submission of counter-examination reports appended to sworn-in certified public accountant certification reports prepared by sworn-in certified public accountants within the framework of Law No. 3568 and other relevant legislation, and to ensure that such reports are transmitted to the administration in an easy, fast, economical, and secure manner.

# Tax

This Communiqué covers the procedures and principles regarding the electronic submission, via the Digital Tax Office, of counter-examination reports appended to certification reports by sworn-in certified public accountants who submit their certification reports electronically through the Digital Tax Office.

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



**BULLETIN:**  
**TAX 2026-018**  
**06/01/2026**

## **THE FEES TO BE APPLIED IN 2026 HAVE BEEN DETERMINED**

As is known, pursuant to repeated article 138 of the Act of Fees No. 492, as amended by Law No. 5281, it is stipulated that fractions up to 10 kuruş of the fee amount—calculated as a result of applying fixed fee amounts to the total of unit values and remaining between the minimum and maximum thresholds—shall not be collected. In the last paragraph of the said article, it is stated that the President is authorized to increase the fixed fees set forth in the tariffs annexed to this Law, or the amounts determined by applying the revaluation rate to such fees, as well as proportional fees, either collectively or separately by tariff or by the relevant paragraphs and subparagraphs thereof, up to twentyfold for fixed fees and up to onefold for proportional fees; to reduce the applicable fixed fees by half and proportional fees down to one-tenth of the statutory rates; and to determine new thresholds, amounts, and rates within these limits.

On the other hand, the revaluation rate applicable for 2025 was announced as 25.49% through Tax Procedure Law General Communiqué No. 585.

Accordingly, with General Communiqué No. 98 of the Act of Fees published in the Official Gazette dated 31 December 2025 and numbered 33124, the fee amounts to be applied as of 1 January 2026 have been determined.

On the other hand, we would like to remind that certain documents listed in Tariffs No. (8) and (9) annexed to the Act of Fees fall within the scope of annual fees, and that these fees must be paid by taxpayers **WITHIN THE MONTH OF JANUARY**; otherwise, pursuant to General Communiqué No. 39 of the Act of Fees, they will be required to be paid together with late payment interest.

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

# Tax



**BULLETIN:**  
**TAX 2026-019**  
**06/01/2026**

## **THE NEW EXEMPTION THRESHOLDS AND TAX TARIFF APPLICABLE TO INHERITANCE AND TRANSFER TAX IN 2026**

Pursuant to the second paragraph of article 4 of the Inheritance and Transfer Tax Law No. 7338, which regulates exemptions, the exemption thresholds to be applied in each calendar year under subparagraphs (b), (d), and (e) shall be determined by increasing the exemption thresholds applied in the previous year by the revaluation rate applicable to that year, and amounts up to TRY 1 shall not be taken into account in the course of such increase.

Through the General Communiqué on the Inheritance and Transfer Tax Law (Serial No: 57), the Ministry of Treasury and Finance has determined the exemption amounts to be applied in 2026 by increasing them at the revaluation rate. Accordingly, the exemption thresholds applicable to gratuitous transfers occurring in 2026 are set forth in our Bulletin.

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



**BULLETIN:**  
**TAX 2026-020**  
**06/01/2026**

## **THE FIXED SPECIAL COMMUNICATION TAX AMOUNT PAYABLE UPON THE INITIAL ESTABLISHMENT OF A MOBILE PHONE SUBSCRIPTION HAS BEEN DETERMINED AS TRY 700 FOR THE YEAR 2026**

Paragraph three of article 39 of the Expenditure Taxes Law No. 6802 provides that “upon the initial establishment of a mobile phone subscription (excluding the initial establishment of mobile phone subscriptions exclusively for machine-to-machine data transmission intended for the remote monitoring and execution of works and services by a central server and which are mandatory for such execution, and excluding operator changes), an additional special communication tax of twenty million lira shall be collected. This amount shall be applied by increasing it each year by the revaluation rate determined for the previous year in accordance with the provisions of the Tax Procedure Law No. 213. Fractions not exceeding five percent of the calculated amount shall be disregarded.”

With the Special Communication Tax General Communiqué (Serial No: 24), the said fixed tax amount has been increased at the revaluation rate applicable for 2025 and determined as TRY 700, effective as of 1 January 2026.

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



**BULLETIN:**  
**TAX 2026-021**  
**06/01/2026**

## **THE LIMIT FOR VAT REFUNDS ARISING FROM TRANSACTIONS SUBJECT TO REDUCED RATES WILL BE APPLIED AS TRY 164,000 FOR THE YEAR 2026**

As is known, pursuant to the authority granted under article 28 of the Value Added Tax (VAT) Law, the portion of the VAT amounts incurred due to deliveries and services whose tax rates have been reduced, and which cannot be offset through deduction, that exceeds the limit determined by a Presidential Decision may be refunded by offsetting against the liabilities specified in the relevant section of the VAT General Application Communiqué within the year, on a taxation-period basis, or refunded in cash or by offsetting against such liabilities, provided that it is requested within the following year.

# Tax

Within this framework, the limit, which was applied as TRY 130,700 for 2025 by being increased at the revaluation rate, has been increased at the 2025 revaluation rate and determined as TRY 164,000 for 2026 through the Communiqué on the Amendment of the VAT General Application Communiqué (Serial No: 56).

Accordingly, for 2026, an annual VAT refund may be obtained only if the carried-forward VAT amount as of the end of December 2025 exceeds TRY 164,000. From the calculated refund amount, TRY 164,000 shall be deducted, and the remaining amount may be subject to refund.

In other words, if the refund exceeds TRY 164,000, not the entire refund but the amount calculated after deducting TRY 164,000 from the total refund amount shall be subject to refund.

If the refund within the scope of the reduced rate is received on a monthly basis during 2026, the process shall start by deducting from the first calculated VAT refund amount, and no refund shall be made until the total amount of TRY 164,000 is reached.

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



**ANNOUNCEMENTS: THE DOMESTIC MINIMUM TOP-UP TAX RETURN SYSTEM HAS BEEN OPENED**  
**TAX 2026-03**  
**08/01/2026**

Within the framework of the Fifth Chapter added to the Corporate Tax Law No. 5520 by Law No. 524, the Domestic and Global Minimum Top-Up Tax has entered into force.

For this purpose, the Domestic Minimum Top-Up Tax Return system has been opened. Unless an extension is granted, the returns must be entered into the system by the end of 15 January 2026.

Multinational enterprise groups whose annual consolidated revenue in the ultimate parent entity's consolidated financial statements exceeds the Turkish lira equivalent of EUR 750 million in at least two of the four accounting periods preceding the accounting period in which the income is reported fall within the scope of the domestic and global minimum top-up tax application. The taxpayers of the return are affiliated entities and joint ventures that are part of multinational enterprise groups and resident in Türkiye. In order to fulfill the declaration obligation, one of the group member affiliated entities residents in Türkiye must be authorized by the multinational enterprise group.

Within this scope, in order for the authorized entities to be able to test the relevant return, they are required to establish, in their own name, a taxpayer registration titled "0063 – Domestic Minimum Top-Up Tax" at the tax office directorates to which they are affiliated for corporate tax purposes.

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

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# Labor Law & Social Security



**BULLETIN:**  
**LABOR LAW AND**  
**SOCIAL SECURITY**  
**2025-051**  
**19/12/2025**

## **SIGNIFICANT AMENDMENTS AFFECTING EMPLOYERS AND INSURED PERSONS SEEKING TO COMPLETE THEIR SERVICE PERIODS HAVE BEEN INTRODUCED UNDER LAW NO. 7566**

With Law No. 7566 titled “Law on the Amendment of Tax Laws and Certain Laws and Decree Laws”, published in the Official Gazette dated 19/12/2025 and numbered 33112, significant amendments have been made to the Social Insurance and General Health Insurance Law No. 5510.

Through the changes introduced in borrowing practices, premium rates, and treasury support rates, regulations have been enacted that increase costs for both employers and insured persons seeking to complete their service periods through borrowing.

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

You can review our Bulletin for the details.



**BULLETIN:**  
**LABOR LAW AND**  
**SOCIAL SECURITY**  
**2025-052**  
**24/12/2025**

## **THE MINIMUM WAGE APPLICABLE FOR THE PERIOD 01/01/2026–31/12/2026 HAS BEEN ANNOUNCED**

The minimum wage applicable for the period between 01/01/2026 and 31/12/2026 has been announced by the Ministry of Labor and Social Security.

Within this scope;

- The net minimum wage to be applied between 01/01/2026 and 31/12/2026 has been set at TRY 28,075.50.
- The minimum wage support has been announced as TRY 1,270.00 per employee.

Details regarding the lower and upper limits of contribution-based earnings and other related amounts will be announced separately following the publication of the relevant Circular by the Social Security Institution.

You can review our Bulletin for the details.



**BULLETIN:**  
**LABOR LAW AND**  
**SOCIAL SECURITY**  
**2025-053**  
**25/12/2025**

## **THE APPLICATION PERIOD OF TEMPORARY ARTICLE 10 OF THE UNEMPLOYMENT INSURANCE LAW NO. 4447 HAS BEEN EXTENDED UNTIL 31/12/2026**

With Presidential Decision No. 10769 published in the Official Gazette dated 25/12/2025 and numbered 33118, it has been decided, pursuant to paragraph 12 of Temporary article 10 of the Unemployment Insurance Law No. 4447, to extend the application period of Temporary article 10 until 31/12/2026.

The provision stipulating that the employer’s social security premium incentive, known as the Incentive under Law No. 6111, would expire on 31/12/2025 has been extended for an additional year until 31/12/2026, within the scope of the President’s authority to extend the period of benefiting from the incentive. Accordingly, the period for benefiting from the said incentive will continue for one more year.

To access the relevant Decision, [here](#).

You can review our Bulletin for the details.

# Labor Law & Social Security



**BULLETIN:**  
**LABOR LAW AND**  
**SOCIAL SECURITY**  
**2025-054**  
**26/12/2025**

## **AMENDMENTS REGARDING GENERAL HEALTH INSURANCE PREMIUM DEBTS**

With the Law published in the Official Gazette dated 25/12/2025 and numbered 33118, Temporary article 111 has been added to the Social Insurance and General Health Insurance Law No. 5510.

Within this scope;

- The collection of all unpaid General Health Insurance (GHI) premium debts and the related late payment penalties and default interest accrued for periods prior to 01/01/2016 has been waived.
- If enforcement proceedings have been initiated due to such debts, no collection shall be made for periods prior to 01/01/2016.
- GHI premiums relating to periods prior to 01/01/2016 that were previously paid shall not be refunded nor offset against other debts.
- The relevant debts shall be automatically written off by the Social Security Institution, and there is no need for the concerned individuals to apply separately to SSI directorates.
- Follow-up and collection procedures shall continue for GHI debts relating to periods after 01/01/2016.

Citizens will be able to query their GHI premium debt status through the e-Devlet system. The regulation entered into force as of 25/12/2025.

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

You can review our Bulletin for the details.



**BULLETIN:**  
**LABOR LAW AND**  
**SOCIAL SECURITY**  
**2025-056**  
**29/12/2025**

## **ANNOUNCEMENT REGARDING THE EXTENSION OF THE DEADLINES FOR THE SUBMISSION OF MONTHLY PREMIUM AND SERVICE DOCUMENTS / WITHHOLDING AND PREMIUM SERVICE RETURNS AND THE PAYMENT OF RELATED PREMIUMS FOR THE NOVEMBER 2025 PERIOD FOR CERTAIN PROVINCES AFFECTED BY THE EARTHQUAKES IN KAHRAMANMARAŞ**

Provided that the Monthly Premium and Service Documents / Withholding and Premium Service Returns for the November 2025 period, to be submitted to the Institution by employers located in the provinces of Adiyaman, Hatay, Kahramanmaraş, and Malatya, as well as in the İslahiye and Nurdağı districts of the province of Gaziantep, are filed by the end of 26/01/2026, and that the premiums related to the relevant month/period are paid by 02/02/2026 (as 31/01/2026 falls on a weekend), the Monthly Premium and Service Documents / Withholding and Premium Service Returns for November 2025 shall be deemed to have been submitted within the statutory period, and the related premiums shall be deemed to have been paid within the statutory payment period.

To access the relevant Announcement, please click the [link](#).

You can review our Bulletin for the details.

# Labor Law & Social Security



**BULLETIN:  
LABOR LAW AND  
SOCIAL SECURITY  
2026-01  
06/01/2026**

## **THE NEW SEVERANCE PAY CEILING APPLICABLE BETWEEN 01/01/2026 AND 30/06/2026 HAS BEEN ANNOUNCED**

The new severance pay ceiling has been announced through Circular No. 1 on Financial and Social Rights, dated 06/01/2026 and numbered 4481518, published by the General Directorate of Public Financial Management and Transformation of the Ministry of Treasury and Finance.

Accordingly, the new severance pay ceiling applicable for the period between 01/01/2026 and 30/06/2026 has been determined as TRY 64,948.77.

You can review our Bulletin for the details.

# Featured News and Publications of the Month



We are proud to share our global annual results for the financial year ended on 30 September 2025.

In 2025, we maintained our steady growth and increased our global revenue to USD 11 billion.

Thanks to our digital transformation investments, customer-focused service approach, and corporate culture that supports continuous improvement, we delivered a strong performance on a global scale.



Together with our employees, we conducted a comprehensive First Aid Training program.

This step, taken to raise awareness of correct intervention in life-threatening situations, will make a difference both in the workplace and in everyday life.



BDO Academy trainings continue at full speed!

We have successfully completed the training on Double Tax Agreements and Payments Made Abroad, delivered by our Tax Partner Dursun Küçükbaşkan as the instructor.



We have successfully completed the Practical Enterprise Risk Management Training, delivered with the valuable presentations of Görkem Erdoğan and Kutluhan Kayapınar from the GRC team.



On December 24, we came together for an enjoyable New Year gathering that strengthened our team spirit and trust-based bonds. On this special evening, enriched with dance performances, raffles, and surprise prizes, we made our togetherness even more meaningful by presenting plaques to our colleagues who have been sharing the same values with us for many years.

# Featured News and Publications of the Month

**EMRAH AKIN****Partner - Tax**

BDO Istanbul Office

- TRT Radyo 1 Our Tax Department Partner Emrah Akin evaluated the topic “The Tax Bill on the Agenda of the Turkish Grand National Assembly and Key Highlights of the 2026 Budget” on TRT Radio 1 on December 2.
- Bloomberg Our Tax Department Partner Emrah Akin discussed the topic “What Has Changed in Property Tax?” on Bloomberg HT on December 5.
- Bloomberg Our Tax Department Partner Emrah Akin discussed the topic “The 2026 Budget Negotiations and the New Phase in the CBRT Foreign Exchange Conversion Support” on Bloomberg HT on December 12.
- Bloomberg Our Tax Department Partner Emrah Akin discussed the topic “Tax Delinquents, MASAK’s (Financial Crimes Investigation Board) Tightened Supervision on Cash and Money Transfer Transactions, and How the Income Tax Tariff Will Look in 2026” on Bloomberg HT on December 19.
- Bloomberg Our Tax Department Partner Emrah Akin discussed the topic “Inflation Accounting Postponed and Significant Developments in the Digital Services Tax” on Bloomberg HT on December 26.

# Published Articles & Columns

## ERDOĞAN SAĞLAM

### Managing Partner - Tax

Sworn Financial Advisor  
BDO Istanbul Office

- |     |   |                           |
|-----|---|---------------------------|
| T24 | Four more articles of the omnibus bill containing tax amendments have been adopted: What are the new regulations?   | <a href="#">Şimdi oku</a> |
| T24 | The increase in property tax for 2026 has been limited to twice the 2025 rate   | <a href="#">Şimdi oku</a> |
| T24 | Could the Ministry of Treasury and Finance's late publication of the technical guide for the inventory ledger cause taxpayers to be subject to penalties?                               | <a href="#">Şimdi oku</a> |
| T24 | A new law became necessary: Tax regulations introduced through 17 articles in the omnibus bill and the criticisms   | <a href="#">Şimdi oku</a> |
| T24 | Many people may soon be required to pay the valuable housing tax!   | <a href="#">Şimdi oku</a> |
| T24 | No inflation adjustment will be applied in 2025, 2026, and 2027, regardless of whether the conditions are met!  | <a href="#">Şimdi oku</a> |
| T24 | Which types of income derived from investment funds have been subjected to withholding tax, and how will the practice be applied to equity-intensive funds?                             | <a href="#">Şimdi oku</a> |
| T24 | Which preferential financial practices have had their application periods extended?   | <a href="#">Şimdi oku</a> |
| T24 | The temporary regulation regarding companies' capital loss or over-indebtedness has been extended for one more year   | <a href="#">Şimdi oku</a> |
| T24 | The Communiqué on the preparation, approval, and submission of counter-examination reports in electronic format has been published  | <a href="#">Şimdi oku</a> |
| T24 | The opportunity to procure inputs from the domestic market without VAT under the inward processing regime has ended   | <a href="#">Şimdi oku</a> |
| T24 | An obligation to submit a sworn-in certified public accountant certification report has been introduced for certain exemptions, deductions, and applications applicable to corporations | <a href="#">Şimdi oku</a> |

# Published Articles & Columns

**HALUK ERDEM****Partner – Tax**

Sworn Financial Advisor  
BDO Istanbul Office

T24

The significant risks arising from declaring an undervalued amount as the basis for title deed fees

[Şimdi oku](#)

T24

The tax and social security premium treatment of expenses paid to employees for the use of their own vehicles for company purposes

[Şimdi oku](#)**ERDAL GÜLEÇ****Partner – Tax**

Sworn Financial Advisor  
BDO Istanbul Office

LinkedIn

Hello again to revaluation!

[Şimdi oku](#)**DR. HALİT BAŞBUĞA****Partner – Labour Law and Social Security**

BDO Istanbul Office

Lebib  
Yalkın

On-Call Duty Practice for Healthcare Personnel

[Şimdi oku](#)



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