

A large, artistic image of a globe covered in green moss and water droplets, serving as the background for the lower half of the page. The globe is tilted, showing the Americas. The moss is vibrant green and textured, with many small, clear water droplets scattered across its surface and the globe itself. The background is a soft, out-of-focus green.

BDO Denet Monthly Report

FINANCIAL DEVELOPMENTS IN THE LAST MONTH

- A COMMUNIQUÉ AMENDING THE GENERAL COMMUNIQUÉ ON VAT IMPLEMENTATION HAS BEEN PUBLISHED
- STAMP DUTY, FEES AND SPECIAL CONSUMPTION TAXES HAVE BEEN INCREASED
- A COMMUNIQUÉ REGARDING THE EXPLANATION OF SIGNIFICANT AMENDMENTS TO THE REDUCED CORPORATE TAX APPLICATION HAS BEEN PUBLISHED

September 2025 Financial Agenda

Dear Readers,

In September, as the Parliament was in recess, no new legislative regulations regarding tax legislation were enacted. The most significant legislative changes during this month were the increases in stamp duty, fees, and SCT (Special Consumption Tax) amounts/rates with Presidential Decree No. 10364, and the increases in departure fees and financial activity fees with Presidential Decrees No. 10381 and No. 10382.

As you may recall, with Law No. 7555 published in July, amendments were made to the reduced corporate tax application and various laws encouraging R&D activities. The major changes in the reduced corporate tax application included the introduction of 4-year/10-year time limits for utilizing the right to deduction, regulations regarding investment contribution amounts not utilized despite the presence of profit, arrangements on the scope of income derived from other activities, and priority rules in the application of reduced tax rates. On this occasion, we would like to reiterate that for investment incentive certificates obtained before the publication date of the Law (24/7/2025), as well as for those obtained after this date but applied for before 16/6/2025 and not rejected, the provisions of article 32/A of the Corporate Tax Law prior to the amendments introduced by the Law will continue to apply. With the Communiqué Amending the General Communiqué on Corporate Tax (Serial No: 1) (Serial No: 24), explanations and examples regarding these legislative changes were provided.

In our country, various incentives exist for R&D activities under the “Law No. 4691 on Technology Development Zones,” the “Law No. 5746 on Supporting Research, Development and Design Activities,” and the “Law No. 6550 on Supporting Research Infrastructures.” One of the most important of these incentives is the exemption from income tax and stamp duty on the wages of personnel engaged in these activities. While none of these three laws originally imposed a quantitative limit on income tax incentives for wages, with Law No. 7555, the income tax and stamp duty exemptions have now been limited to forty times the minimum wage. Any excess over this amount will no longer benefit from the exemption. Based on this regulation, three general communiqués were published in the Official Gazette dated 04.09.2025 and numbered 33007. These communiqués contain explanations and examples regarding the restrictive changes to the exemption practices. According to the explanations in the communiqués, the limitation of forty times the minimum wage will be applied on a per person and per month basis, rather than per employer or per year.

On the other hand, in September, the Communiqué Amending the General Communiqué on VAT Implementation (VAT Communiqué Serial No: 55) was also published. The communiqué included explanations on certain exemption practices. In addition, detailed explanations and calculation examples regarding the inclusion of VAT incurred on depreciable economic assets (ATİK) in the refund account were also provided. Another significant regulation introduced last month was the narrowing of the scope of taxpayers benefiting from the simplified procedure. Exercising the authority granted to him, the President, with Presidential Decree No. 10380, excluded certain taxpayer groups from the scope of the simplified procedure.

September 2025 Financial Agenda

According to the Decree, except for districts with a population not exceeding 30,000 as of the last day of the previous calendar year, based on the latest data published by the Turkish Statistical Institute, in provinces that are metropolitan municipalities, taxpayers engaged in the following activities will be taxed under the real regime:

- a) Those engaged in the production of any kind of goods,
- b) Those engaged in the purchase and sale of any kind of goods (excluding those engaged solely in itinerant or market-based retail trading without opening a workplace),
- c) Those engaged in any kind of construction-related work,
- d) Those engaged in any kind of maintenance and repair work for motor vehicles,
- e) Those operating restaurants and similar service businesses,
- f) Those operating entertainment and leisure venues,
- g) Those engaged in urban passenger transportation activities.

This Decree will enter into force on 1/1/2026, meaning that as of this date, those engaged in the aforementioned activities will be taxed under the real regime. In other words, the income tax exemption granted to them will be applied for the last time on their 2025 earnings. At the same time, the deliveries and services performed by these taxpayers after 1/1/2026 will also be subject to VAT.

On this occasion, we hope that our October bulletin will be beneficial to all our readers and colleagues.

Sincerely,

M. EMEK KURT

Partner / Tax

BDO Istanbul Office



29 October

1923

A black and white historical photograph is overlaid on the red background. It depicts a group of men in formal attire, including suits and a military uniform with a peaked cap. They appear to be walking in a procession. The image is semi-transparent, allowing the red background and the large '1923' text to be visible through it.

Happy Republic Day!

The rising new generation, the future is yours.
We founded the Republic, you are the ones to
elevate it and keep it alive.

BDO Academy October Training Calendar Published!

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

History	Training Name
7 – 8 October 2025	ISO/IEC 27001:2022 Internal Auditor Training
9 October 2025	Double Taxation Agreements and Payments Made Abroad Training
16 October 2025	Process Management and Internal Control Training
20 - 24 October 2025	ISO 22301 Business Continuity Management System Lead Auditor Training (CQI & IRCA Approved)
23 - 24 October 2025	Applied Internal Audit Training
23 October 2025	Applied Corporate Risk Management Training



For detailed information and registration:

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

Applied Corporate Risk Management Training

Effectively managing the risks faced by organizations is critical for sustainable success. In this training organized by BDO Academy, we provide participants with risk management approaches and practices in line with international standards.

Led by Tuğçe Aydoğan, Partner Responsible for Risk Advisory Services at BDO Turkey, the Applied Corporate Risk Management Training aims to provide participants with both the theoretical knowledge and practical examples, helping them develop effective risk management processes within their organizations.

Watch the related video [click here](#).



Who Should Attend?

Senior management, risk managers, internal control and internal audit managers, internal auditors



Training Dates:

October 23 • November 27 • December 18



For detailed information and registration:

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

Tax



BULLETIN:
TAX 2025-055
04/09/2025

GENERAL COMMUNIQUÉS REGARDING THE AMENDMENTS TO VARIOUS LAWS PROMOTING R&D ACTIVITIES UNDER LAW NO. 7555 HAVE BEEN PUBLISHED

In our country, there are various incentives for R&D activities under the “Law No. 4691 on Technology Development Zones,” “Law No. 5746 on Supporting Research, Development and Design Activities,” and “Law No. 6550 on Supporting Research Infrastructures.” One of the most significant of these incentives is the exemption from income tax and stamp duty on the wages of personnel engaged in these activities.

With Law No. 7555 on the Protection of the Value of the Turkish Currency and the Law Amending Certain Laws and the Decree Law No. 635, restrictions have been introduced to this incentive element.

To access the Communiqué Amending the General Communiqué on Law No. 5746 on Supporting Research, Development and Design Activities, [click here](#).

To access the Communiqué Amending the General Communiqué on Law No. 5746, [click here](#).

To access the Income Tax General Communiqué, [click here](#).

You can review our Bulletin for the details.



BULLETIN:
TAX 2025-056
06/09/2025

A COMMUNIQUÉ AMENDING THE GENERAL COMMUNIQUÉ ON VAT IMPLEMENTATION HAS BEEN PUBLISHED

With Communiqué No. 55, published in the Official Gazette dated 04/09/2025 and numbered 33007, amendments have been made to the General Communiqué on VAT Implementation.

The communiqué includes explanations on the following matters:

- VAT exemption on deliveries and services provided to petroleum exploration activities (Article 1),
- VAT exemption on deliveries and services related to defense industry projects (Article 2),
- VAT exemption on vehicle deliveries related to national defense and internal security (Article 3),
- Extension of the VAT exemption period for manufacturing and tourism investments (Article 4),
- VAT exemption in transactions related to fused foundations and public immovable properties (Article 5),
- Inclusion of the SCT collateral calculated on petroleum product imports in the VAT base (Article 6),
- Refund application for depreciable economic assets (Article 7/a),
- Minimum amount eligible for refund claims in transactions giving rise to refund rights (Article 7/b).

You can review our Bulletin for the details.

Tax



BULLETIN:
TAX 2025-057
08/09/2025

STAMP DUTY, FEES AND SPECIAL CONSUMPTION TAXES INCREASED BY PRESIDENTIAL DECREES

With the Official Gazette dated 6/9/2025 and numbered 33009, certain declaration stamp duties, fees for gun carrying and possession permits, and the Special Consumption Tax (SCT) amounts/rates on yachts, motor boats, and other marine vehicles for entertainment and sports purposes have been increased.

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



BULLETIN:
TAX 2025-058
09/09/2025

FINANCIAL ACTIVITY FEES HAVE BEEN INCREASED

With the Presidential Decree dated 9/9/2025 and numbered 10382, the fixed fee amounts set out in section "XI- Financial Activity Fees" of tariff no. (8) annexed to the Fees Law have been amended.

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



BULLETIN:
TAX 2025-059
09/09/2025

A COMMUNIQUÉ REGARDING THE EXPLANATION OF SIGNIFICANT AMENDMENTS TO THE REDUCED CORPORATE TAX APPLICATION UNDER LAW NO. 7555 HAS BEEN PUBLISHED

With article 18 of the Law on the Protection of the Value of the Turkish Currency and the Law Amending Certain Laws and DecreeLaw No. 635, published in the Official Gazette dated 24/07/2025 and numbered 32965 ("Law"), very significant amendments have been made to the reduced corporate tax application regulated under article 32/A of the Corporate Tax Law ("CTL").

With the Communiqué Amending the General Communiqué on Corporate Tax (Serial No: 1) (Serial No: 24), published in the Official Gazette dated 4/9/2025 and numbered 33007 ("Communiqué"), explanations and examples regarding these legislative amendments have been provided.

The explanations and examples provided in the Communiqué are in line with those in our Circular No. 2025/053, and this Circular has been prepared to highlight the ones we consider particularly important.

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

Tax



BULLETIN:
TAX 2025-060
09/09/2025

THE DEPARTURE FEE HAS BEEN INCREASED

With Presidential Decree No. 10381, the exit fee stipulated in article 1 of Law No. 5597 on the Departure Fee and the Law on Amending Various Laws has been re-determined as 1,000 TL. Prior to this change, the amount was 710 TL. The increased amount is effective as of the date of publication of the Decree (9/9/2025).

Pursuant to Provisional article 1 of the Decree, for international departures made until the end of the tenth day following the date of publication of this Decree, no difference will be collected for fee payments made based on the amount valid prior to the publication date.

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



BULLETIN:
TAX 2025-061
09/09/2025

THE SCOPE OF TAXPAYERS BENEFITING FROM THE SIMPLIFIED PROCEDURE HAS BEEN NARROWED

According to article 46 of the Income Tax Law, the commercial earnings of those who collectively meet the conditions set forth in articles 47 and 48 of the Law are determined under the simplified procedure.

For tax payers who meet these conditions, the determination and accounting of commercial earnings are subject to a simplified procedure. For them, commercial income is the positive difference between revenues obtained during an accounting period and expenses plus the purchase cost of goods sold. This difference is calculated based on the amounts stated in documents relating to purchases, expenses, and revenues that are required to be issued and received under the provisions of the Tax Procedure Law. Those whose earnings are determined under this procedure, except for the determination of earnings and the book keeping provisions of the Tax Procedure Law, are subject to the provisions regarding reporting, documentation, retention, submission, other obligations, and penalties, as well as the provisions concerning second-class traders stipulated in this Law and other laws. With Presidential Decree No. 10380, certain tax payer groups have been excluded from the scope of the simplified procedure.

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

Tax



BULLETIN:
TAX 2025-062
23/09/2025

COMMUNIQUE AMENDING THE COMMUNIQUE ON KEEPING COMMERCIAL BOOKS NOT RELATED TO THE COMPANY'S ACCOUNTING IN ELECTRONIC FORM

The "Communiqué Amending the Communiqué on Keeping Commercial Books Not Related to the Company's Accounting in Electronic Form" ("Communiqué") was published in the Official Gazette dated 20/9/2025 and numbered 33023.

Thus, the Communiqué on Keeping Commercial Books Not Related to the Company's Accounting in Electronic Form has been amended for the second time.

This Communiqué introduces two significant changes. With the amendment, the board of directors' resolution book has been completely excluded from the scope of obligation, and the period granted for transitioning to the Electronic Book System after falling within the scope of obligation has been extended from two months to six months.

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

PEOPLE
COMMUNICATION
CLIENT NEEDS
VALUE
COMMITMENT

Labor Law & Social Security



BULLETIN:
LABOR LAW AND
SOCIAL SECURITY
2025-048
24/09/2025

SSI ANNOUNCEMENT REGARDING THE APPOINTMENT OF AN EMPLOYER REPRESENTATIVE UNDER LAW NO. 4857 IN WORKPLACE REGISTRATION PROGRAMS

An announcement dated 23/9/2025 has been published by the Social Security Institution (SSI) Directorate General of Insurance Premiums.

As is known, under Law No. 6331, employers or employer representatives who will carry out occupational health and safety services must be registered in the İSG-KATİP system, and these individuals must also appear in the SSI data base as employers or employer representatives.

In order to implement this practice, the necessary updates have been made to allow for the assignment of a separate employer representative for each work place file under Law No. 4857. Accordingly, in new work place registrations carried out via the e-Government Gateway, a section has been added to enable the appointment of an employer representative in accordance with Law No. 4857.

For already registered work place files, the definition of an employer representative under Law No. 4857 will be made by applying to the relevant provincial social security directorates/social security centers.

However, there is no change in the employer representative practice under Law No. 5510.

You can review our Bulletin for the details.

Incentives & Government Supports



**BULLETIN:
INCENTIVES AND
GOVERNMENT
SUPPORTS 2025-018
11/09/2025**

AN ADDITIONAL 3-MONTH PERIOD HAS BEEN GRANTED FOR THE CLOSURE OF INWARD PROCESSING PERMITS AND INWARD PROCESSING AUTHORIZATIONS

With the Communiqué Amending the Inward Processing Regime Communiqué (Export: 2006/12) (Export: 2025/4), published in the Official Gazette dated 11/9/2025 and numbered 33014, the following paragraph has been added to Provisional article 37 of the Inward Processing Regime Communiqué.

(5) For inward processing permits/inward processing authorizations issued before the effective date of this paragraph and after 1/1/2022, for which the export commitment account has not yet been closed (excluding inward processing authorizations issued for goods under tariff positions 7108, 7112.91, 7113.19), provided that an application is submitted to the Ministry within 6 (six) months from the effective date of this paragraph, an additional period not exceeding 3 (three) months, corresponding to half of the original duration of the permit/authorization, shall be granted as of the date on which the application is deemed appropriate.

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

Featured News and Publications of the Month



Emrah Akin, our Tax Partner, evaluated the topic “A New Era in Fake Document Usage Audits, Can Representation and Entertainment Expenses Be Deducted? VDK’s 8-Month Audit Results of 296 Billion TRY” on Bloomberg HT on September 5.



Emrah Akin, our Tax Partner Emrah Akin evaluated the topic “A New Era in Simplified Taxation, The Fiscal Perspective of the Medium-Term Program (OVP), SCT on Yachts and Boats” on Bloomberg HT on September 12.



Emrah Akin, Our Tax Partner, evaluated the topic “Challenges in the Concordat Process and the Expected Regulations” on Bloomberg HT on September 17.



We are at the XXIX. Türkiye Internal Audit Congress as BDO Türkiye!

We are proud to support the XXIX. Türkiye Internal Audit Congress, one of the most prestigious gatherings in the field of internal audit.

Within the scope of the event, BDO Türkiye GRC Partners Betül Ertem Yıldız and Tuğçe Aydoğan, CIA, will share their insights and recommendations on the need for transformation in internal audit amid a risk environment shaped by digitalization, artificial intelligence, and global uncertainties. They will also convey how topic-based requirements provide a road map in cyber security and third-party risks.

Published Articles & Columns

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T24

My Warning son Tax Settlement Practices

[Read now](#)

T24

The fight against forged documents should not turn into a fight against companies!

[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](#)**KEVORK ALTINKAYA**

Manager - Tax

Vergi
Dünyası

The Rationale of Transfer Pricing and Its Place in Legislation

[Read now](#)



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