

The background of the entire page is a 3D digital illustration. It features a glowing, wireframe globe of the Earth in shades of blue and cyan. In the foreground, a white and blue robotic hand is shown in a pointing gesture, with its index finger directed towards the globe. The hand has a futuristic, mechanical appearance with visible joints and glowing blue lights. The overall scene is set against a dark, starry space background with light trails and a bright light source behind the globe.

BDO Denet **Monthly Report**

FINANCIAL DEVELOPMENTS IN THE LAST MONTH

- **THE APPLICATION PERIOD OF THE TEMPORARY ARTICLE 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 BEEN EXTENDED**
- **THE INTEREST REDUCTION CALCULATED ON CASH CAPITAL INCREASES SHALL BE BASED ON A RATE OF 45.34% FOR THE YEAR 2025**

January 2026 Financial Agenda

Dear Readers,

As every year, January was a busy month for taxpayers and financial advisors this year as well. In order to give our clients, who were dealing with year-end closing procedures, a chance to catch their breath, we held our Annual Tax Seminar on Tuesday, January 27.

It was a very successful and dynamic seminar. We would like to thank all our partners who made presentations and our clients who actively participated. We have already started to look forward to our upcoming events with excitement.

We held the first session of our BDO Tax Talks event series, which we specially launched for our full certification and tax consultancy clients, on January 14. With this event, which we plan to hold at least once a month, we will discuss current practice-oriented topics.

The key developments in tax legislation this month can be briefly summarized as follows:

- The application periods of certain fiscal practices that expired on 31 December 2025 have once again been extended. We believe that there is a necessity to collectively review these practices, which are continuously extended.
- The practice of having counter-audit reports prepared, approved and sent by sworn financial advisors via the digital tax office was launched on a voluntary basis from 1 January 2026.
- A requirement to submit a sworn financial advisor certification report (partial certification) has been introduced to benefit from many exemptions, deductions, and transactions in income and corporate tax returns. Benefiting from almost all exemptions and deductions has been made subject to the submission of a certification report. Taxpayers who have full certification are not required to obtain an additional partial certification for transactions for which submission of a certification report is required.
- With Corporate Tax Law Circular No. 71, it has been clarified that revaluation may be applied in the fourth provisional tax period of 2025. Many taxpayers spent this month discussing which option would be more advantageous: the one-time taxable revaluation to be applied pursuant to temporary article 32, or the continuous/tax-free revaluation applied pursuant to repeated article 298/Ç. As this text is being prepared, calculations and discussions on which option would be more advantageous are still ongoing!
- 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 and whose application period expired at the end of 2025, has been extended for five years with Law No. 7573, following reactions and demands. The regulation entered into force to be applied as of 1 January 2026. The reason why this practice has not been converted into a permanent regulation has started to be widely discussed in the public.

We wish all our clients ease and success.
Sincerely,

Erdoğan Sağlam
Managing Partner / Tax
BDO İstanbul Office



BDO Academy February Training Calendar Published!


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

Date	Courses
February 4-5, 2026	Practical Internal Audit Training
February 12, 2026	Applied Corporate Risk Management Training
February 24, 2026	Basic Transfer Pricing Training
February 26, 2026	Training on Double Tax Agreements and Payments Made Abroad

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

Let's meet in February 18!


 **Subject: Current Tax Developments**

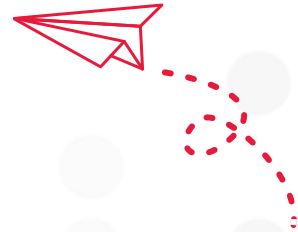
 Erdoğın Sađlam / Managing Partner
Dursun Kűcűkaslan / Tax Partner

 18 February 2026, Wednesday

 14:00 - 15:00

 Microsoft Teams

 Participants: Our Full Certification
and Tax Advisory Clients



Tax



BULLETIN:
TAX 2026-022
13/01/2026

THE INTEREST DEDUCTION CALCULATED ON CASH CAPITAL INCREASES SHALL BE BASED ON THE RATE OF 45.34% FOR THE YEAR 2025

Pursuant to subparagraph (i) added to the first paragraph of article 10 of the Corporate Tax Law by article 8 of Law No. 6637 on the Amendment of Certain Laws and Decree Laws, it is possible for capital companies to deduct, from their corporate income for a period of five years, 50% of the amount calculated until the end of the relevant accounting period by taking into account the “The weighted average annual interest rate applied to commercial loans denominated in Turkish Lira granted by banks” most recently announced by the Central Bank of the Republic of Türkiye (CBRT) for the year in which the deduction is utilized, provided that such amount is shown separately on the corporate tax return in determining the corporate tax base, in respect of the cash portion of capital increases.

In Communiqué Serial No. 9 on the Amendment of the Corporate Tax General Communiqué Serial No. 1, it is stated that the interest rate to be taken into account for this deduction refers to the interest rate under “Weighted Average Interest Rates Applied to Loans Granted by Banks” announced by the Central Bank of the Republic of Türkiye (CBRT) for the year in which the deduction is utilized, namely “Commercial Loans (Turkish Lira Denominated) (Excluding Legal Entity Overdraft Accounts and Corporate Credit Cards).”

The said rate was most recently announced on 26/12/2025 on the CBRT website for the year 2025 and is 45.34%.

Within this framework, the rate of 45.34% shall be used in calculating the deductible amount that may be benefited from for the year 2025 on the paid portions of cash capital increases registered after 01/07/2015.

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



ANNOUNCEMENT: **CORPORATE TAX LAW CIRCULAR NO. 71 REGARDING THE POSSIBILITY OF APPLYING REVALUATION IN THE 4TH PROVISIONAL TAX PERIOD OF 2025 HAS BEEN PUBLISHED**
TAX 2026-005
21/01/2026

The revaluation rate to be applied in revaluation to be carried out in 2025 (including the 2025/4th Provisional Tax Period) has been determined as 25.49%. Thus, the unnecessary debate as to whether revaluation would be applied in the 2025/4th Provisional Tax Period has come to an end.

To access the Corporate Tax Law Circular No. 5520, please [click](#).

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

Tax



ANNOUNCEMENT: REVENUE ADMINISTRATION ANNOUNCEMENT REGARDING THE UPLOADING OF E-LEDGER AND E-LEDGER CERTIFICATE FILES ON A MONTHLY OR PROVISIONAL TAX PERIOD BASIS
TAX 2026-006
23/01/2026

As is known, Section “4.3.4” of the Electronic Ledger General Communiqué No. 1 introduced the possibility for e-Ledgers and their certificate files created for monthly periods to be uploaded either on a monthly basis or on a provisional tax period basis.

Within this scope, the “Certificate Upload Preference” made by taxpayers who have been included in the e-Ledger application since previous accounting periods for the 2025 accounting period shall also be valid for the 2026 accounting period.

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

Tax



BULLETIN:
TAX 2026-023
29/01/2026

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 BEEN EXTENDED UNTIL 31/12/2030

As is known, pursuant to Temporary article 17 of the Value Added Tax Law, the President is authorized, in accordance with subparagraph (c) of paragraph (1) of article 11 of the Value Added Tax Law, to allow transactions to be carried out by regions, sectors, or product groups in respect of the delivery, until 31/12/2025, of materials to be used in the production of goods to be exported within the scope of the inward processing and temporary admission regimes. In the application of this article, the periods stipulated under these regimes shall be taken as the export period instead of the period specified in the said subparagraph.

In the event that the export is not carried out in accordance with the prescribed conditions, the tax not collected in due time shall be collected from the purchaser together with late payment interest, by applying a tax loss penalty.

This article, which has been applied for approximately 27 years since 29/07/1998 by being extended many times, was most recently extended on 17/11/2020 until 31/12/2025.

However, the period that ended on 31/12/2025 had not yet been extended until today, although an extension was expected.

Finally, the anticipated regulation was enacted with Law No. 7573 on the Amendment of Certain Laws and Decree-Law No. 375.

With this Law, the end of the application period of the aforementioned Temporary article 17 has been re-determined as 31/12/2030. As the regulation entered into force on its publication date to be applied as of 01/01/2026, it is possible for VAT-inclusive deliveries made up to this date to be included within the scope of deferral/write-off. For this purpose, it is possible to return invoices previously issued with VAT and issue new invoices within the scope of deferral/write-off.

While we consider this extension, which relieves exporters and domestic sellers who face unfair competition against imports, to be appropriate, we find it meaningless that this regulation, which has been kept alive through a temporary article for approximately 32 years with this extension, has not been converted into a permanent provision.

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

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Labor Law & Social Security



**BULLETIN:
LABOR LAW AND
SOCIAL SECURITY
2026-003
08/01/2026**

CIRCULAR NO. 2026/2 REGARDING THE LOWER AND UPPER LIMITS OF EARNINGS SUBJECT TO PREMIUMS AND THE AMOUNTS BASIS FOR CERTAIN TRANSACTIONS

The Social Security Institution Presidency, General Directorate of Insurance Premiums, has published the Circular dated 07/01/2026 and numbered 2026/2 titled “Lower and Upper Limits of Earnings Subject to Premiums and the Amounts Basis for Certain Transactions.”

Pursuant to article 39 of Labor Law No. 4857, the Minimum Wage Determination Commission has determined the daily minimum wage corresponding to normal daily working hours to be applied for the year 2026 as TRY 1,101.

With the said Circular, the lower and upper limits of earnings subject to premiums to be applied between 01/01/2026 and 31/12/2026, as well as the amounts related to certain transactions, have been determined, and the said amounts have been explained in detail.

You can review our Bulletin for the details.



**BULLETIN:
LABOR LAW AND
SOCIAL SECURITY
2026-004
09/01/2026**

SOCIAL SECURITY INSTITUTION (SSI) CIRCULAR REGARDING THE APPLICATION OF THE 2-POINT EMPLOYER PREMIUM SHARE DISCOUNT APPLICABLE TO PRIVATE SECTOR EMPLOYERS

As is known, 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, an amendment was made to subparagraph (i) of article 81 of the Social Insurance and General Health Insurance Law No. 5510 regarding private sector employers employing insured persons within the scope of subparagraph (a) of the first paragraph of article 4. Accordingly, changes were introduced to the disability, old-age, and survivors’ insurance premiums.

The 4-point insurance premium discount granted to workplaces other than those operating in the manufacturing sector has been reduced to 2 points.

Accordingly, as of January 2026, two points of the employer’s share of the disability, old-age, and survivors’ insurance premiums relating to insured persons employed by private sector employers shall be covered by the Treasury.

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

You can review our Bulletin for the details.

Labor Law & Social Security



**BULLETIN:
LABOR LAW AND
SOCIAL SECURITY
2026-005
16/01/2026**

SSI CIRCULAR NO. 2026/3 REGARDING THE AMENDMENT OF CIRCULAR NO. 2011/13 ON THE CLEARANCE CERTIFICATE

The Social Security Institution Presidency, General Directorate of Insurance Premiums, has published the Circular dated 13/01/2026 and numbered 2026/3 titled “Investigation Procedures for Building; Repair, Renovation, Installation, Reinforcement, and Demolition Works.”

With the said Circular, the amendments made to Circular dated 04/02/2011 and numbered 2011/13, regarding the procedures and processes for issuing clearance certificates, following both the legislative amendments made after the publication of Circular No. 2011/13 dated 04/02/2011 and the uncertainties experienced in practice, are explained below.

You can review our Bulletin for the details.



**BULLETIN:
LABOR LAW AND
SOCIAL SECURITY
2026-006
19/01/2026**

GENERAL LETTER REGARDING THE EXTENSION OF THE DEADLINE FOR PAYMENT OF SSI PREMIUM DEBTS THROUGH OFFSET AGAINST VAT REFUNDS FOR THE YEAR 2026

A General Letter dated 15/01/2026 has been published by the Social Security Institution Presidency, General Directorate of Insurance Premiums.

With the said General Letter, upon the request of the General Directorate of Accounting of the Ministry of Treasury and Finance and the approval of the Social Security Institution Presidency, it has been re-determined that, for employers who employ insured persons and pay wages in return for work performed between the 1st and 30th days of each month, the payment deadlines for insurance premium debts relating to the months from January 2026 to December 2026 shall be the 24th day following the due date (or the first business day following such date if it coincides with a national holiday/public holiday or weekly holiday), provided that such debts are paid by way of offset against value added tax (VAT) refund receivables. If the paid amounts are transferred to the accounts of the Social Security Institution by the specified date, they shall be deemed to have been paid within the statutory period.

Pursuant to Law No. 5510, insurance premiums must be paid by the end of the month following the month to which the premiums relate. However, where employers choose to pay their insurance premium debts by offsetting against VAT refund receivables, an additional period of 20 days from the day following the end of the premium payment period had previously been granted; with the published General Letter, this period has been set as 24 days for the year 2026.

You can review our Bulletin for the details.

Labor Law & Social Security



**BULLETIN:
LABOR LAW AND
SOCIAL SECURITY
2026-007
30/01/2026**

THE MINIMUM WAGE SUPPORT DETERMINED BY THE LAW ON THE AMENDMENT OF CERTAIN LAWS AND DECREE-LAW NO. 375

Regarding benefiting from the Minimum Wage Support, which has been implemented since 2016, also in 2026, a temporary article has been added to Law No. 5510 through Law No. 7573 on the Amendment of Certain Laws and Decree-Law No. 375, which was published in the Official Gazette dated 23/01/2026 and numbered 33152 and entered into force. With this regulation, the support amounts and conditions have been determined.

Within this scope, the Minimum Wage Support to be applied between 01/01/2026 and 31/12/2026 shall be calculated as follows:

- The total number of premium payment days of insured persons reported in the monthly premium and service documents or withholding and premium service returns submitted for the current month in 2026, not exceeding the total number of premium payment days of insured persons whose daily earnings subject to premiums were reported as TRY 1,300 (TRY 2,600 for private sector workplaces subject to collective bargaining agreements) or below in the monthly premium and service documents or withholding and premium service returns submitted for the same month of 2025,
- The total number of premium payment days of insured persons reported from workplaces that are included within the scope of Law No. 5510 for the first time in 2026,

shall be multiplied by TRY 42.33 per day, and the resulting amount shall be offset against the insurance premiums payable by employers.

In the month for which the support is to be utilized, if the number of insured persons reported is lower than the number of insured persons reported in the month between January and December 2025 in which the highest number of insured persons was reported through monthly premium and service documents or withholding and premium service returns under long-term insurance branches, the support may not be utilized.

Further information will be provided following the publication of the General Communiqué to be issued by the Social Security Institution regarding the procedures and principles of the Minimum Wage Support.

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

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

Featured News and Publications of the Month



On Tuesday, January 27, we held our 2026 Annual Tax Seminar.

Throughout the seminar, our esteemed partners shared important information and current developments on various topics with the participants.

We would like to thank everyone who attended.



On Saturday, January 17, we took part in the DEİK Business Councils 2025 Electoral Ordinary General Assemblies and Trade Diplomacy Awards Ceremony. We were pleased to come together with distinguished representatives of the business world. We would like to thank everyone who visited our stand at this special ceremony.



Our Tax Department Partner, Erdoğan Sağlam, won the award for the most-read author in his country in the field of Finance and Banking within the scope of the Mondaq Autumn 2025 Thought Leadership Awards.

Featured News and Publications of the Month

EMRAH AKIN**Partner – Tax**

BDO İstanbul Office

- Bloomberg HT Our Tax Department Partner, Emrah Akın, discussed the topic “A New Era in Tax Offices: What Has Changed with the Establishment and Duties Regulation? Has the Era of Duty-Free Shopping from Abroad Ended? According to the OECD, What Is Our Indirect Tax Burden Like?” on Bloomberg HT on January 9.
- Bloomberg HT Our Tax Department Partner, Emrah Akın, discussed the topic “What Do the 2025 Budget Results Tell Us? Is the VAT Issue in the Inward Processing Certificate (IPC) Being Resolved?” on Bloomberg HT on January 16.
- Bloomberg HT Our Tax Department Partner, Emrah Akın, discussed the topic “What Does Revaluation Promise to Taxpayers and Does the Treasury’s Cash Deficit Point to a New Restructuring/Amnesty Regulation?” on Bloomberg HT on January 23.
- Bloomberg HT Our Tax Department Partner, Emrah Akın, discussed the topic “The Ministry of Finance Has Put AI-Supported ‘Kaşif’ into Operation and the Notifications Sent by the Revenue Administration to Thousands of Title Deed Holders” on Bloomberg HT on January 23.

Published Articles & Columns

ERDOĞAN SAĞLAM

Managing Partner - Tax
Sworn Financial Advisor
BDO Istanbul Office

T24 The requirement to submit a sworn financial advisor's certification report for certain exemptions, deductions and applications in the corporate tax return has been introduced

[Read now](#)

T24 The term of the temporary provision enabling VAT-free purchases from within the country under the domestic processing regime is being extended for another five years

[Read now](#)

T24 Can regulations requiring transactions to be conducted based on the actual values of properties in the land registry be implemented?

[Read now](#)

T24 We fell short in property tax; will the increases be limited to twofold or threefold?

[Read now](#)

T24 Controversial issues regarding the full certification requirement introduced for certain exemptions and deductions

[Read now](#)

T24 How will the revaluation practice be applied to inflation gains related to ongoing investments?

[Read now](#)

ERDAL GÜLEÇ

Partner - Tax
Sworn Financial Advisor
BDO Istanbul Office

LinkedIn Some reminders regarding one-time revaluation

[Read now](#)

ENDER İNELİ

Partner – Tax
Sworn Financial Advisor
BDO İzmir Office

T24 Good news regarding the share acquisition date in the event of a change in legal form

[Read now](#)



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