

BDO Denet Monthly Report

FINANCIAL DEVELOPMENTS IN THE LAST MONTH

- AMENDMENTS WERE MADE TO THE DECISION ON DISGUISED PROFIT DISTRIBUTION THROUGH TRANSFER PRICING
- COMMUNIQUÉ ON INCOME TAX EXEMPTION FOR SOCIAL CONTENT PRODUCTION AND SERVICES PROVIDED OVER THE INTERNET AND SIMILAR ELECTRONIC MEDIA HAS BEEN PUBLISHED
- PROCEDURES AND PRINCIPLES REGARDING THE WAGE EXEMPTION IN BENEFITS PROVIDED TO EMPLOYEES BY ISSUING SHARE CERTIFICATES WERE DETERMINE
- LIMITED EXTENSION GRANTED FOR THE IMPLEMENTATION OF THE AMENDMENT TO THE DOMESTIC SOLAR PANEL CRITERIA FOR GES INVESTMENTS

September 2024 Financial Agenda

Dear Readers,

Two important tax issues occupied the public in September.

The first one was the discussions and implementation problems regarding the authority used by the Ministry of Treasury and Finance regarding the inflation adjustment with the Tax Procedure Law Communiqué No. 563 published in the Official Gazette dated 31 August 2024.

With this Communiqué, the Ministry has authorised those whose total gross sales in the income statement dated 31/12/2023 is below 50 million TL not to make inflation adjustment in the second and third provisional tax periods of 2024.

Taxpayers who have submitted their declarations for the second period as of the publication date of the Communiqué do not need to correct their legal records for this period, and the correction should be made with the correction declarations to be submitted; it is stated that these taxpayers will declare the difference between the profit or loss records arising from the inflation adjustment and the profit/loss difference arising from the non-inflation adjustment in their correction declarations for the second provisional tax period of 2024 by showing them in the 'Non-Legally Accepted Expenses' or 'Other Discounts' section of the 'Exceptions and Discounts to be Deducted Even If There is a Loss' section, as the case may be.

In summary, it is envisaged that taxpayers who have submitted their declarations will correct their declarations according to the profit or loss situation before inflation adjustment.

In the event that the provisional tax accrual increases according to the correction declarations to be submitted within the declaration period, tax loss penalty and default interest cannot be sought since the correction declarations are submitted within the declaration period, this issue is clearly stated in the Communiqué.

The most controversial part of the Communiqué was this explanation, which is defined as 'correction of correction' in practice.

Subsequently, tax offices received requests for clarification of the correction declarations or correction of the correction declarations (correction of the correction of the correction of the correction). These applications exhausted the taxpayers in September.

September 2024 Financial Agenda

The second important issue that occupied the agenda in this period was the public disclosure of the draft communiqués regarding the tax regulations introduced by the Omnibus Law No. 7524. We had explained the regulations introduced by this Law in the circulars we published in the previous month. In September, the draft communiqués were discussed intensively.

These draft communiqués were published in the Official Gazette in the last days of September without any significant changes. You can find our circulars on these communiqués in this month's bulletin. We wish convenience to taxpayers and professionals.

Erdoğan Sağlam
Partner, Tax
BDO İstanbul Office





We are celebrating the 101st anniversary of the Republic with great enthusiasm! The Republic of Türkiye, founded under the leadership of Atatürk, has taken significant steps towards becoming a modern, contemporary, and democratic society. October 29 is not just a holiday; it symbolizes our determination to walk into the future with more confidence, drawing strength from our past.

On this special day, we once again recognize the importance of upholding the values of our Republic and passing them on to future generations. Together in unity and solidarity, we will continue to march towards brighter tomorrows.

Happy Republic Day!

Tax



ANNOUNCEMENT: GLOBAL AND LOCAL MINIMUM CORPORATE INCOME TAX WEBINAR
TAX 2024-041
09/09/2024

You can access the presentation of our webinar on 'Global and Local Minimum Corporate Income Tax' that we held on 06/08/2024 from the link below:

Please [click here](#) for the presentation.

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



BULLETIN:
TAX 2024-060
16/09/2024

AMENDMENTS HAVE BEEN MADE TO THE DECISION ON DISGUISED PROFIT DISTRIBUTION THROUGH TRANSFER PRICING

With the [Decree](#) Annexed to the Presidential Decree numbered 8956 published in the Official Gazette dated 14/09/2024 and numbered 32662; some amendments have been made to the Decree on Disguised Profit Distribution through Transfer Pricing, which was put into effect with the Council of Ministers Decree dated 27/11/2007 and numbered 2007/12888. The amendments are summarised as follows:

- The phrases 'to the Large Taxpayer Tax Office Directorate' have been changed as 'to the Istanbul Tax Office Directorate of Large Taxpayers'.
- In the current regulation, the members of the multinational enterprise group covered by the Notification Regarding the Country-by-Country Report are obliged to submit to the Administration until the end of June of each year whether they are the ultimate parent enterprise or the proxy enterprise, which enterprise will report on behalf of the group and information about the accounting period. With the amendment made by the Decree, the phrase 'June of each year' has been changed to 'the sixth month following the end of the accounting period to be reported'.

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



ANNOUNCEMENT: COMPANIES OPERATING IN ISTANBUL FINANCIAL CENTRE WILL BE ABLE BOOKKEEPING IN FOREIGN CURRENCY
TAX 2024-042
26/09/2024

General Communiqué No. 569 on Tax Procedure and Tax Procedure Law No. 569, which was introduced by the first paragraph of Article 7 of the Istanbul Finance Centre Law No. 7412, determining the procedures and principles regarding the books that the participants are obliged to keep and the documents to be issued can be kept and issued in foreign currency, has been published.

[Click here](#) to reach the General Communiqué in question.

[Click here](#) for the explanatory information note.

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

Tax



BULLETIN:
TAX 2024-061
27/09/2024

COMMUNIQUE NO. 325 ON INCOME TAX EXEMPTION FOR SOCIAL CONTENT PRODUCTION AND SERVICES PROVIDED OVER THE INTERNET AND SIMILAR ELECTRONIC MEDIA HAS BEEN PUBLISHED

As it is known, with the repeated Article 20/B added to the Income Tax Law (Income Tax Law) No. 193 with Article 2 of the Law No. 7338, no books will be kept, invoices will not be issued and declarations will not be submitted for the earnings obtained from social content production and application development for mobile devices and the amount does not exceed 3.000.000 Turkish Liras for the year 2024.

With Communiqué No. 325;

- As of 01/01/2022, the earnings of real persons who are social content producers who share content such as text, image, audio, video via social network providers such as Instagram, facebook and real persons who develop applications for mobile devices such as smartphones or tablets,
- The earnings of real persons who are social content producers who share content such as text, image, audio, video over the internet and similar electronic media from 01/01/2024,
- As of 01/01/2024, the earnings of real persons who earn from services such as individual courses, training, data processing and development, product promotion provided over the Internet and similar electronic media are exempt from income tax.

In order to benefit from this exemption, an account must be opened in banks established in Turkey and all revenues related to these activities must be collected exclusively through this account.

[Click here](#) for Income Tax Communiqué No. 318.

[Click here](#) for Income Tax Law Communiqué No. 325.

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



BULLETIN:
TAX 2024-062
27/09/2024

THE PROCEDURES AND PRINCIPLES REGARDING THE WAGE EXEMPTION IN THE BENEFITS PROVIDED TO EMPLOYEES BY ISSUING SHARE CERTIFICATES HAVE BEEN DETERMINED

One of the amendments made by Law No. 7524 published in the Official Gazette dated 02/08/2024 and numbered 32620 is the wage exemption granted to the benefits provided to the service personnel by issuing share certificates. The Ministry of Treasury and Finance is authorised to determine the procedures and principles regarding the implementation of the related amendment. The Ministry has used this authorisation with the [Income Tax General Communiqué numbered 326 serial numbered \(R.G. 27.09.2024 - 32675\)](#).

In our Bulletin, the explanations made in the Communiqué regarding the exemption application in question are included.

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

Tax



BULLETIN:
TAX 2024-063
03/10/2024

COMMUNIQUE AMENDING THE GENERAL COMMUNIQUE ON TAX PROCEDURE LAW (NO: 552) REGARDING THE DEFINITION OF SUB-USER IN ORDER TO INCREASE THE USAGE IN THE DIGITAL TAX OFFICE APPLICATION (NO: 567)

In the Official Gazette dated 25/09/2024, the Tax Procedure Law General Communiqué No. 567 amending the Tax Procedure Law General Communiqué No. 552 was published.

With the Communiqué; persons using the Digital Tax Office application, whose procedures and principles are regulated by the General Communiqué on Tax Procedure Law No. 552, can define their employees registered with the Social Security Institution as sub-users and enable them to use certain functions of the application on their behalf.

With the General Communiqué prepared in order to increase the use of the Digital Tax Office application, taxpayers can also authorise the professional members with whom they have signed an electronic declaration intermediation and responsibility agreement or a full certification agreement as sub-users in order to enable them to use certain functions of the application securely.

With this regulation, the users of the Digital Tax Office will be able to define and authorise the professional members with whom they have a valid Electronic Declaration Intermediation and Responsibility Agreement or an agreement regarding the certification of income or corporate tax returns and their annexes as sub-users to use certain functions of the System.

[Click here](#) to access the VUK Communiqué No. 567.

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

Tax



BULLETIN:
TAX 2024-064
03/10/2024

PERSONS AND LEGAL ENTITIES AND UNINCORPORATED ORGANISATIONS IN WHOSE NAME THE REGISTRATION IS MADE IN THE FIRST ACQUISITION OF THE GOODS IN THE LIST NUMBERED (II) ATTACHED TO THE SPECIAL CONSUMPTION TAX LAW, WHICH ARE SUBJECT TO REGISTRATION AND REGISTRATION, THE GENERAL COMMUNIQUÉ ON THE AMENDMENT OF THE TAX PROCEDURE LAW GENERAL COMMUNIQUÉ (NO. 456) ON THE ACQUISITION OF AN ELECTRONIC NOTIFICATION ADDRESS IN THE ABSENCE OF AN ELECTRONIC NOTIFICATION ADDRESS 456) ON THE AMENDMENT OF THE COMMUNIQUÉ

In the Official Gazette dated 25/09/2024, the Tax Procedure Law General Communiqué numbered 568 amending the Tax Procedure Law General Communiqué numbered 456 was published.

With the establishment of the Electronic Notification system, it has been ensured that the notification procedures are carried out faster, more effectively and economically by using the opportunities offered by technology.

Corporate taxpayers and income taxpayers in terms of commercial, agricultural and professional earnings (except for farmers whose earnings are determined in simple procedure and farmers who are not subject to tax in real procedure) are obliged to use the electronic notification system.

With the regulations in the published Communiqué, with the General Communiqué prepared in order to benefit more from the opportunities provided by the electronic notification system, it has been made compulsory for real and legal person buyers to obtain an electronic notification address for the first acquisition of the goods included in the list (II) attached to the Special Consumption Tax Law No. 4760, which are subject to registration and registration.

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

Tax



BULLETIN:
TAX 2024-065
03/10/2024

COMMUNIQUE ON THE AMENDMENT OF THE GENERAL COMMUNIQUE OF THE TAX PROCEDURE LAW (NO: 483) CONTAINING THE ISSUES RELATED TO THE NOTIFICATION OF THE TAXPAYERS EXEMPTED FROM THE USE OF PAYMENT RECORDING DEVICES AND THE SALES MADE FROM E CASH REGISTERS TO THE REVENUE ADMINISTRATION PRESIDENCY

In the Official Gazette dated 25/09/2024, the Tax Procedure Law General Communiqué numbered 566 amending the Tax Procedure Law General Communiqué numbered 483 was published.

With the aforementioned communiqué;

- For those who are exempt from the use of payment recorder devices, to redetermine the sales revenue, asset size, equity and equity capital amounts by taking into account the current conditions and to increase them by the revaluation rate in the following years, and if these conditions cannot be met, to start using payment recorder devices after a certain period of time,
- To send the notifications of the sales made from the payment recorder devices to the Revenue Administration,

related regulations have been made.

The procedures and principles regarding the implementation will be determined by technical guidelines to be published on www.ynokc.gib.gov.tr.

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



BULLETIN:
TAX 2024-067
03/10/2024

THE COMMUNIQUE ON COMPETITION AUTHORITY SHARE PAYMENTS TO BE MADE BY JOINT STOCK AND LIMITED LIABILITY COMPANIES HAS BEEN AMENDED

As it is known, pursuant to Article 39 of the Law No. 4054 on the Protection of Competition, among the revenues of the Competition Authority are the payments to be made at the rate of four thirteen thousandths of the capital of all newly established joint stock and limited liability companies and of the increased portion in case of capital increase.

In order to determine the details of the payments to be made to the Competition Authority, the 'Communiqué on the Payments to be made by Joint Stock and Limited Liability Companies in accordance with Law No. 4054' (Communiqué No: 2017/4) (Communiqué) dated 31/03/2017 was issued. The Communiqué regulates the payments to be made during incorporation and capital increase, payments in partnerships subject to the registered capital system, renunciation or incorrect deposit of four per ten thousand, notification obligation and their principles.

Some amendments were made to the Communiqué No: 2017/4 with the Communiqué (Communiqué No: 2024/2) Amending the Communiqué on the Payments to be made by Joint Stock and Limited Liability Companies Pursuant to Law No: 4054 (Communiqué No: 2017/4) (Amendment Communiqué), which was published in the Official Gazette dated 01/10/2024 and numbered 32679 and entered into force on the same day.

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

Tax



BULLETIN:
TAX 2024-068
03/10/2024

COMMUNIQUE REGULATIONS REGARDING THE APPLICATION OF CORPORATE TAX DEDUCTION ON SERVICES PROVIDED FROM TURKEY TO ABROAD (GENERAL COMMUNIQUE ON CORPORATE TAX NO.23)

In the Official Gazette dated 28.09.2024 and numbered 32676, the 'Communiqué (Serial No: 23) Amending the General Communiqué on Corporate Tax (Serial No: 1)' was published and in this Circular, the amendments made in the section titled 'Services Provided from Turkey to Persons and Institutions Residing Abroad' with the Law No: 7491 are discussed.

In 2023, with the amendment made with the Law No. 7491, the exemption rate applied to the earnings obtained from the above-mentioned activities was increased from 50% to 80%, and the condition that all of the earnings must be transferred to Turkey until the date when the declaration for the year / accounting period in which the earnings are obtained must be submitted.

All of the earnings within the scope of the discount must be transferred to Turkey until the date of submission of the annual corporate tax return for the accounting period in which it is obtained. (There is no such requirement if the payment is received in Turkey).

In case a part of the income is transferred to Turkey, the exemption will not be utilised.

If the gain is transferred after the end of the accounting period, the exemption will not be utilised for the related gain in the following periods.

Exchange rate and maturity differences related to receivables arising from the activities within the scope of the discount will also be taken into consideration in determining the discount amount.

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

Tax



BULLETIN:
TAX 2024-069
04/10/2024

THE STATUS OF DIVIDENDS RECEIVED FROM COMPANIES RESIDENT ABROAD IN WHICH AT LEAST FIFTY PERCENT OF THE SHARES ARE PARTICIPATED AGAINST CORPORATE TAX

As we announced in our Circular No. 2024/5, with the regulations that entered into force on 28/12/2023 to be applied to the income and gains obtained as of 01/01/2023 with the Law No. 7491, half of the dividend income obtained from these companies by real persons and institutions that have at least 50% participation in companies whose legal and business centre is not located in Turkey, is exempt from income / corporate tax provided that it is transferred to Turkey until the date when the income / corporate tax return must be submitted.

With the Corporate Tax General Communiqué Serial No. 23 on the Amendment of the Corporate Tax General Communiqué Serial No. 1, some regulations have been made regarding this issue. These regulations are largely a repetition of the regulations in Article 5/b of the KVK.

Accordingly, in order to benefit from this exemption;

- The subsidiary company must have the status of a joint stock or limited liability company resident abroad
- Holding at least 50% of the paid-in capital of these institutions
- All of the dividend income should be transferred to Turkey until the date of filing the annual corporate tax return.

Dividends added to earnings are taken into consideration by including taxes such as income and corporate taxes paid abroad on these earnings.

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



BULLETIN:
TAX 2024-070
04/10/2024

TAXATION OF DIVIDENDS RECEIVED FROM INVESTMENT FUNDS AND TRUSTS THAT DO NOT BENEFIT FROM CORPORATE TAX EXEMPTION

As explained in our Circular No. 2024/55, with the amendment made by Law No. 7524, in order to be applied to the earnings obtained as of 1/1/2025, the funds and partnerships (excluding pension funds) regulated in subparagraph (d) of the first paragraph of Article 5 of the Corporate Tax Law (excluding pension funds) are required to distribute 50% of their immovable income until the end of the second month following the month in which the corporate tax return for the accounting period in which it is obtained, in order to benefit from the earnings exemption stipulated in the subparagraph.

On the other hand, as explained in our Circular No. 2024/59, with the Law No. 7524, a minimum corporate tax has been introduced with Article 32/C of the KVK to be applied to the earnings obtained in the special accounting period starting in the calendar year 2025 and the following taxation periods. Pursuant to this regulation, if investment funds and partnerships benefit from the corporate tax exemption by distributing at least 50% of the earnings from immovable properties within the above-mentioned period, the earnings from their immovable properties will be subject to minimum corporate tax at a rate of 10%.

In this circular, detailed analyses and examples regarding taxation are given.

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

Tax



BULLETIN:
TAX 2024-071
04/10/2024

23 SERIAL NUMBERED CORPORATE TAX GENERAL COMMUNIQUÉ ON FREE ZONE EARNINGS EXEMPTION

Communiqué (Serial No: 23) Amending the General Communiqué on Corporate Tax (Serial No: 1) (hereinafter referred to as the 'Communiqué') containing explanations regarding the regulations introduced by Law No: 7524 was published in the Official Gazette dated 28.09.2024 and numbered 32676. In this Circular, the regulations, examinations and examples regarding the exemption of free zone earnings are included.

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



BULLETIN:
TAX 2024-072
04/10/2024

COMMUNIQUÉ REGULATIONS ON THE DEDUCTIBILITY OF FINANCIAL EXPENSES INCURRED FOR THE ACQUISITION OF SHARES IN THE EVENT OF A MERGER OF PARTICIPATING OR ACQUIRED COMPANIES

With the Communiqué (Serial No: 23) Amending the Corporate Tax General Communiqué (Serial No: 1) published in the Official Gazette dated 28/09/2024 and numbered 32676 by the Ministry of Treasury and Finance and entered into force on the same day, explanations regarding the regulations made by Laws No: 7338, 7341, 7440, 7456, 7491 and 7524 have been added to the relevant sections of the Corporate Tax General Communiqué No: 1.

1 Serial No.1 Corporate Tax General Communiqué '5.17. Deduction of Expenses Incurred on Earnings Exempted from Corporate Tax from Other Earnings' added to the last paragraph of the section titled 'Deduction of Financing Expenses Related to the Purchase of Subsidiaries from the Corporate Tax Base' is the subject of this Bulletin.

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



BULLETIN:
TAX 2024-073
04/10/2024

THE COMMUNIQUÉ ON THE EXTENSION OF THE PERIODS WITHIN THE SCOPE OF THE LAW ON THE RESTRUCTURING OF SOME RECEIVABLES NUMBERED 7440 IN THE PLACES WHERE THE STATE OF FORCE MAJEURE IS EXTENDED WITHIN THE SCOPE OF THE EARTHQUAKE (NO.7) HAS BEEN PUBLISHED

As it is known, within the scope of the Announcement made by the Revenue Administration, which is still in force majeure; For the taxpayers in Adiyaman, Hatay, Kahramanmaraş and Malatya provinces and İslahiye and Nurdağı districts of Gaziantep Province, the force majeure situation, which will end on Tuesday 30/04/2024, was extended for the last time and it was found appropriate to end on Saturday 31/08/2024.

04/10/2024 dated and 32682 numbered Official Gazette published in the General Communiqué on Law No. 7440 on the Restructuring of Certain Receivables (No. 7. No. 7), in these places where the force majeure will end on 30/11/2024, it is stated that the application can be made until 28/02/2025 within the scope of Law No. 7440, the first instalment (including advance payment) until 31/03/2025 (until 02/04/2025 due to this date coinciding with the official holiday), the second instalment until 30/04/2025 (including these dates), and the other instalments should be paid in the following months.

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

Tax



BULLETIN:
TAX 2024-074
07/10/2024

THE PROCEDURES AND PRINCIPLES REGARDING THE DAILY REVENUE DETERMINATION APPLICATION IN COMMERCIAL AND PROFESSIONAL EARNINGS HAVE BEEN DETERMINED

With the Law No. 7524 (02/08/2024 - 32620), important amendments were made in tax laws. One of the amendments made is the tax security institution introduced for the determination of the real revenues of those who are taxpayers in terms of commercial or self-employment activities.

Pursuant to the amendment made in Article 69 of the Income Tax Law, the monthly and annual revenue amounts of the taxpayers will be determined by taking the average of the daily revenue amounts determined as a result of the surveys to be carried out before the taxpayers. The revenue amounts determined in this way will be compared with the revenue amounts declared by the taxpayers for the period in which they are operating, and if the difference found as a result of the comparison is more than 20%, the taxpayers will be invited to explain within the scope of the 'invitation to explanation procedure' in the Tax Procedure Law. This regulation will also be applied to corporate taxpayers.

The said regulation will enter into force as of 01/01/2025 and the Ministry of Treasury and Finance is authorised to determine the procedures and principles regarding the implementation of the regulation. The Ministry has used this authority with the Income Tax General Communiqué (27/09/2024 - 32675) with serial number 326.

In our circular, the explanations made in the Communiqué regarding the said regulation are included.

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

Tax



BULLETIN:
TAX 2024-075
07/10/2024

EXPLANATIONS ON THE UTILISATION OF THE ELIGIBLE INVESTMENT CONTRIBUTION AMOUNT THROUGH CANCELLATION OF OTHER TAX DEBTS (GENERAL COMMUNIQUÉ ON CORPORATE TAX NO. 23 SERIES)

The explanations made on the basis of the Communiqué within the scope of the 8th paragraph added to Article 32/A of the Corporate Tax Law with the 60th article of the Law No. 7338 constitute the subject of this Circular.

According to the Communiqué

- Provided that it is requested until the end of the second month following the month in which the corporate tax return should be submitted at the beginning of the relevant accounting period, it is possible to benefit from 10% of the investment contribution amount that is entitled as of the relevant period by canceling other accrued tax debts, excluding Special Consumption Tax (SCT) and Value Added Tax (VAT).
- The amount that can be requested for cancellation cannot be more than half of the amount found after deducting the investment contribution amount used through discounted corporate tax from the investment contribution amount.

Please [click here](#) for explanatory examples and Corporate Tax General Communiqué numbered 23.

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



BULLETIN:
TAX 2024-076
07/10/2024

COMMUNIQUÉ REGULATION REGARDING THE CONDITION OF DISTRIBUTION OF IMMOVABLE PROPERTY GAINS FOR INVESTMENT FUNDS AND TRUSTS TO BENEFIT FROM CORPORATE TAX EXEMPTION

With Article 32 of the Law No. 7524, important amendments have been made regarding the taxation of investment funds and partnerships. These amendments, which entered into force on the date of publication (02/08/2024) to be applied to the earnings obtained as of 01/01/2025, were explained in the Corporate Tax General Communiqué No.23 on the Amendment of the Corporate Tax General Communiqué No.1. The purpose of this Circular is to explain the paragraphs added to the end of the section titled '5.5. Exemption for the earnings of funds and investment trusts established in Turkey' of the Corporate Tax Communiqué with Article 4 of Communiqué No. 23.

Previously, our Circulars numbered 2024/55 and 2024/70 were published on the subject.

The explanations made to Article 4 of Communiqué Serial No. 23, which is the subject of this Circular, are mostly a repetition of the justification of the Law.

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

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Labor Law & Social Security



BULLETIN:
LABOR LAW AND
SOCIAL SECURITY
2024-053
04/09/2024

ANNOUNCEMENT REGARDING THE EXTENSION OF THE STATE OF FORCE MAJEURE FOR SOME PLACES AFFECTED BY THE EARTHQUAKES IN KAHRAMANMARAŞ

An Announcement dated 03/09/2024 was published by the General Directorate of Insurance Premiums of the Social Security Institution.

With the said Announcement; The state of force majeure in Adiyaman, Hatay, Kahramanmaraş and Malatya provinces and İslâhiye and Nurdağı districts of Gaziantep province, which expired at the end of 31/08/2024, has been extended until 30/11/2024.

Please [click here](#) to access the Announcement.

You can review our Bulletin for the details.



BULLETIN:
LABOR LAW AND
SOCIAL SECURITY
2024-054
16/09/2024

COMMUNIQUÉ ON NEW NATIONAL OCCUPATIONAL STANDARDS AND COMMUNIQUÉS AMENDING THE COMMUNIQUÉ ON NATIONAL OCCUPATIONAL STANDARDS

Some occupational standards have been added and amended with the 'Communiqués No. 2024/25, 2024/26 and 2024/27 on the Amendment of the Communiqué on National Occupational Standards and Communiqué on National Occupational Standards (2024/28) (2024/30)' published by the Vocational Qualifications Authority in the Official Gazette dated 15/09/2024 and numbered 32663.

[Click here](#) to see the content of the occupational standard in the Communiqué numbered 2024/25.

[Click here](#) to see the content of the occupational standard in the Communiqué numbered 2024/26.

[Click here](#) to see the content of the occupational standard in the Communiqué numbered 2024/27.

[Click here](#) to see the content of the occupational standards added with the Communiqué numbered 2024/28.

[Click here](#) to see the content of the occupational standards added with the Communiqué numbered 2024/30.

You can review our Bulletin for the details.

Labor Law & Social Security



**BULLETIN:
LABOR LAW AND
SOCIAL SECURITY
2024-057
25/09/2024**

SSI CIRCULAR ON THE AMENDMENT OF CIRCULAR NO. 2008/93

The Circular dated 13/08/2024 and numbered 2024/11 'Amendment to Circular No. 2008/93' was published by the General Directorate of Insurance Premiums of the Social Security Institution.

As it is known, in the section titled '9- Procedures Regarding Workplaces with Subcontractors and Subcontractors' of the Circular No. 2008/93, it is stated that in order for private sector employers to benefit from the five-point discount on the employer's share of the premium rate for disability, old age and death insurance premiums, both the private sector employers and their subcontractors should not have any outstanding insurance premium, unemployment insurance premium, administrative fine and related late payment penalty and late payment increase debts to the Institution.

With the cancellation decision of the Council of State and the Circular issued by the SSI, the administrative fines of the sub-employers will not be an obstacle for the main company to benefit from the five-point insurance premium discount.

[Click here](#) to access the Circular.

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



**BULLETIN:
LABOR LAW AND
SOCIAL SECURITY
2024-059
30/09/2024**

COMMUNIQUÉ AMENDING THE COMMUNIQUÉ ON NATIONAL OCCUPATIONAL STANDARDS (2024/29)

Some occupational standards have been amended with the 'Communiqué (2024/29) Amending the Communiqué on National Occupational Standards' published in the Official Gazette dated 29/09/2024 and numbered 32677 by the Vocational Qualifications Authority.

[Click here](#) to see the content of the occupational standard in the Communiqué numbered 2024/29.

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

Incentives & Government Supports



**BULLETIN:
INCENTIVES AND
GOVERNMENT
SUPPORTS 2024-010
25/09/2024**

IN THE IMPLEMENTATION OF THE AMENDMENT TO THE DOMESTIC SOLAR PANEL CRITERIA FOR GES INVESTMENTS, A LIMITED ADDITIONAL PERIOD OF TIME WAS GRANTED FOR ONGOING INVESTMENTS OR INVESTMENTS THAT WILL START IN A SHORT PERIOD OF TIME

With the Communiqué (Communiqué No: 2024/3) Amending the Communiqué on the Implementation of the Decree on State Aids in Investments (Communiqué No: 2012/1) published in the Official Gazette dated 25/09/2024 and numbered 32673 and published in the Official Gazette dated 20/06/2012 and numbered 28329, subparagraph (e) of the second paragraph of Article 8 of the Communiqué on the Implementation of the Decree on State Aids in Investments (Communiqué No: 2012/1) published in the Official Gazette dated 20/06/2012 and numbered 28329 has been amended as follows.

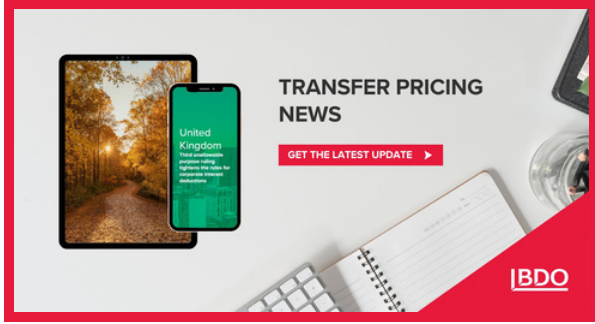
As it is known, it is mandatory to use domestic solar panels in SPP investments with incentive certificates, and with the regulation made on 24/08/2024, the criterion for solar panels to be accepted as domestic was solidified. With this communiqué, it is understood that it is aimed to give additional time for investments and manufacturers to adapt.

On the other hand, it is noteworthy that the additional period is granted until 28/02/2025, which can be considered quite short, and that it is linked to the application for investment completion visa, not to the application for investment incentive certificate.

Investors should carefully consider whether the investment will reach the stage of completion visa until 28/02/2025 when applying for the document and especially when procuring the panel.

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

Featured News and Publications of the Month



In this issue of BDO Transfer Pricing News, we report on Germany's sweeping changes to its intercompany financing rules; recent judicial decisions in the UK, Israel and India; the UK's new Transfer Pricing Guidelines; Singapore's new Transfer Pricing Guidelines; and the United Arab Emirates' Transfer Pricing regime. [Click here](#) to read the full article.



Erdogan Sağlam, Partner of BDO Turkey Tax Department, participated as a speaker in the seminar on 'Amendments to Tax Laws in 2024 and VAT Carried Forward Application' held at Istanbul Chamber of Commerce.

Erdoğan Sağlam touched on important points within the scope of Domestic Minimum Corporate Tax and shared his valuable comments in the question and answer session.

We would like to thank everyone who attended the seminar.



We took our place in the conference specially organised for T24's 15th anniversary!

Under the moderation of BDO Turkey Tax Partner Erdoğan Sağlam, BDO Turkey Tax Partner Emrah AKIN and Former Undersecretary of Treasury, Economist Dr. Mahfi Eğilmez came together as speakers on Thursday, 3 October.

In the panel, 'Predictions for Turkey on the Brink of the Global Crisis: An Overview of Monetary and Fiscal Policies' was discussed.

Featured News and Publications of the Month



BDO's 'Global Natural Resources & Energy 2024' meeting took place in Lisbon!

We came together in Lisbon with more than 35 colleagues from 18 different countries within BDO's global network. BDO Turkey was represented by Cemalettin Turan, CPA, one of our partners, at the event held within the scope of 'Green Transformation and Sustainability in Energy'.



BDO Turkey Tax Partner İdris Şenyurt attended the conference on 'Global and Local Minimum Corporate Tax Introduced by Law No. 7524' at Istanbul Chamber of Certified Public Accountants as a speaker.

The conference was completed efficiently with the intense interest of the participants accompanied by a question and answer session.

We would like to thank all participants.

Published Articles & Columns

ERDOĞAN SAĞLAM

Partner - Tax
Sworn Financial Advisor
BDO İstanbul Office

T24

Amending the communiqué on the application of 5 and 1 point tax reduction for corporations

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T24

Ministry of Finance's stance on inflation adjustment discourages financial advisors from the profession

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