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2026 MID-YEAR TAX LEGISLATION PACKAGE

Tax regulations introduced by Laws No. 7582 and 7577 · Asset Amnesty General Communiqué (Serial No. 1) · Qualified Service Centre Wage Exemption (ITL Art. 23/20) · Communiqué Amending the Corporate Tax General Communiqué (Serial No. 1), Serial No. 26

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SECTION A

General Communiqué on Bringing Certain Assets into the Economy (Serial No. 1)

Law No. 7582 | Art. 10 | CTL Provisional Art. 19 | Gazette date: 04.07.2026 | Gazette no: 33300

Purpose and Scope

COMMUNIQUÉ ART.	LAW ART.	RELATED LAW
1	7582/10	CTL Prov. 19

The purpose of the Communiqué is to determine the procedures and principles for the application of Provisional Art. 19 added to the Corporate Tax Law No. 5520 of 13/6/2006 by Art. 10 of Law No. 7582 of 21/5/2026 on Amendments to Certain Laws.

THE COMMUNIQUÉ EXPLAINS FOUR SUB-HEADINGS (ART. 1/2)

(a)

Bringing money, gold, foreign currency, securities and other capital market instruments held abroad by real and legal persons into the national economy, and recording them in the statutory books of income/corporate taxpayers

(b)

Notification and registration of money, gold, foreign currency, securities and other capital market instruments owned by income or corporate taxpayers, located in Türkiye but absent from the statutory books

(c)

Notification of assets within the scope of the article located in Türkiye by persons with no income or corporate tax liability

(ç)

Other matters concerning the application of Provisional Art. 19 of Law No. 5520

LEGAL BASIS (ARTICLE 2)

This Communiqué has been prepared on the basis of the eleventh paragraph of Provisional Art. 19 of Law No. 5520.

Assets Within Scope and Who Is Concerned

ASSET TYPES WITHIN SCOPE

- **Money**
- **Gold**
- **Foreign currency**
- **Securities**
- **Other capital market instruments**

WHO IS CONCERNED (ART. 1/2 AND ART. 6)

- **Real and legal persons** — for assets within scope located abroad (Art. 3)
- **Income/corporate taxpayers** — for assets located in Türkiye but absent from the statutory books (Art. 6/1)
- **Persons with no tax liability / no bookkeeping obligation** — for assets in Türkiye not yet held at a bank or intermediary institution (Art. 6/2)
- **Sole proprietorships and ordinary partnerships** — those with withholding and VAT liability registered in their name (Art. 6/3)

Notification of Assets Held Abroad

COMMUNIQUÉ ART.	DEADLINE	START
3	31.07.2027	04.06.2026

Money, gold, foreign currency, securities and other capital market instruments held abroad may be notified to banks or intermediary institutions in Türkiye until 31/7/2027 (inclusive). **(Art. 3/1)**

Notifications may also be made by authorised proxies or legal representatives. **(Art. 3/2)**

Notifications are made from 4/6/2026 until 31/7/2027 (inclusive), using the form in Annex 1, to banks or (exclusively for securities and other capital market instruments) to intermediary institutions. **(Art. 3/3)**

MULTIPLE NOTIFICATIONS

The principle is that a single notification is filed; however, since **each month** in which a notification is made is treated as a separate taxation period, more than one notification may be filed until 31/7/2027 (inclusive). **(Art. 3/4)**

Rules for Correcting a Notification

COMMUNIQUÉ ART.
3/4 (a-e)

Sub-para	Situation	Application
a	Within the same month	The initial notification must be corrected in order to rectify an error or to decrease/increase the asset. In a downward correction, the portion of the tax paid in advance corresponding to the reduced amount may be refunded by the bank/intermediary institution.
b	In later months (decrease)	Provided the two-month period for bringing assets to Türkiye is not exceeded, the earlier notification is corrected; the correction request is made to the tax office through the bank/intermediary institution with the Annex 3 return.
c	After transfer/deposit	After the assets are transferred to or deposited with the bank/intermediary institution, correcting earlier notifications and refunding the tax paid is NOT POSSIBLE.
ç	In later months (increase)	Correction of the earlier notification does not arise; a NEW notification is made for the additional assets.
d	All other notifications	All notifications filed outside the scope of a correction are treated as a NEW notification and are not associated with the earlier notification.
e	After the deadline	Correction requests made after the notification period (31/7/2027) has expired are disregarded.

EXAMPLE 1

A real person who notified foreign currency equivalent to TRY 15,000,000 on 10 August 2026 and wishes, within the same month, to reduce the amount to TRY 7,500,000 or increase it to TRY 22,500,000 must file a correction of the initial notification; until October a decrease is again made by correction, whereas an increase is made by a new notification (only for the additional amount).

Tax Collected by Banks/Intermediary Institutions and Reduced Rates

COMMUNIQUÉ ART.	STANDARD RATE	FILING
4/4–10	**5%**	**15th of following month**

Standard rate (Art. 4/4): Tax at 5% on the value of the notified asset is collected in advance by the bank/intermediary institution and, in its capacity as tax responsible, declared and paid with the Annex 3 return to the affiliated tax office by the evening of the 15th day of the month following the notification (within the procedures and principles of Tax Procedure Law General Communiqués Serial Nos. 340 and 346).

REDUCED RATE BY COMMITTED HOLDING PERIOD (ART. 4/5 — SUBMISSION OF THE ANNEX 2 UNDERTAKING IS REQUIRED, EXEMPT FROM STAMP DUTY)

0%	1%	2%	3%	4%
At least 5 years	At least 4 years	At least 3 years	At least 2 years	At least 1 year
Sub-para (a)	Sub-para (b)	Sub-para (c)	Sub-para (ç)	Sub-para (d)

Eligible instruments: time deposit accounts, government domestic debt securities within the scope of Law No. 4749, lease certificates, venture capital investment funds.

- Notifications between **01.01.2027 – 31.07.2027** (Art. 4/9) → rates increased by **+0.5 points**
- Where the 31.07.2027 date is extended by authority, notifications after that date (Art. 4/10) → rates increased by **+1 point in total** (a further 0.5 points)

START OF THE COMMITTED PERIOD

The date on which the assets are deposited into time deposit accounts / government domestic debt securities / lease certificates / venture capital funds is taken as the basis (Art. 4/8). Even where a reduced rate (including 0%) is applied, the assets subject to notification are included in the Annex 3 return (Art. 4/7).

Application of the Tax Rate — Examples

	Example 2	Example 3	Example 4
Taxpayer / Date	Real person (A) — 15/9/2026	(K) A.Ş. — 20/11/2026	Real person (B) — 5/2/2027
Notified amount	TRY 10,000,000 (foreign currency)	TRY 25,000,000	TRY 8,000,000
Undertaking	Time deposit of at least 2 years	Time deposit of at least 5 years	Lease certificate of at least 1 year
Rate applied	3%	0%	4.5% (2027 period +0.5 points)
Tax calculated	10,000,000 × 3% = TRY 300,000	No tax is collected (but it is included in the Annex 3 return)	8,000,000 × 4.5% = TRY 360,000

PAYMENT / FILING

In all three examples the tax collected (if any) is declared and paid to the tax office in the capacity of responsible party by the evening of the 15th day of the month following the notification. **Article 4/11:** If the notified assets are not brought to or transferred to Türkiye within the period, this is separately reported by the bank/intermediary institution to the relevant tax office.

Bringing Assets Held Abroad to Türkiye

COMMUNIQUÉ ART.	PERIOD	DEADLINE
5	2 months	31.07.2027

5/1 Assets subject to notification must be transferred to an existing or newly opened account at banks or intermediary institutions in Türkiye within **TWO MONTHS** from the date of notification.

5/2 For assets brought physically: customs procedures must be completed and the assets brought into the country within 2 months from the notification date, and deposited with a bank/intermediary institution by **the end of the first business day** following completion of customs procedures.

5/3 The fact that the account holder making the notification and the person actually transferring the asset from abroad are different persons is immaterial for benefiting from the provision.

5/4 Foreign assets outside the scope (for example immovable property) may be brought to Türkiye by being converted into assets within the scope until 31/7/2027.

5/5 In transfer/deposit transactions, bank receipts or intermediary institution transaction result forms may be used to **evidence** that the assets have been brought to Türkiye.

Customs Administration Procedures

COMMUNIQUÉ ART.
5/6-7

Article 5/6: Provided notification is made to banks or intermediary institutions by 31/7/2027, it is **MANDATORY** for the Customs Administration to require the document evidencing that these assets have been notified to a bank/intermediary institution during the physical entry of assets held abroad into Türkiye. Documents obtained from the Customs Administration may be used to evidence that the assets have been brought to Türkiye. This document must also be presented when the assets are deposited with banks or intermediary institutions.

Article 5/7: The Customs Administration is **OBLIGED** to report the information relating to notifications made within this scope electronically to the Revenue Administration **by the end of the month following the month of receipt**.

CAUTION

Presentation of the customs document is a condition sought separately both during the entry of the asset into the country and during its deposit with the bank/intermediary institution; transactions without the document do not satisfy the evidencing obligation.

Notification of Assets Located in Türkiye

COMMUNIQUÉ ART.	DEADLINE
6	31.07.2027

Article 6/1: Money, gold, foreign currency, securities and other capital market instruments owned by income or corporate taxpayers and located in Türkiye but absent from the statutory books may be notified until 31/7/2027 (inclusive), using the form in Annex 1, to banks or (exclusively for securities and other capital market instruments) to intermediary institutions. Those making a notification **SHALL NOT** file any declaration with the tax offices in relation to such assets.

EXAMPLE 5

It has been established that the foreign currency assets of TRY 15,000,000 held in the bank accounts of (ABC) A.Ş. belong to the company but have not been recorded in the statutory books. In this case, the said foreign currency assets may be made the subject of a notification through the bank and, provided the other conditions are also met, the provisions of the article may be benefited from.

Application by Tax Liability Status

COMMUNIQUÉ ART.
6/2-3

ART. 6/2 — PERSONS WITH NO TAX LIABILITY / NO BOOKKEEPING OBLIGATION

Persons with no income or corporate tax liability, those who have a tax liability but no obligation to keep books under Tax Procedure Law No. 213 of 4/1/1961, and income taxpayers who have a tax liability but wish to benefit from the provision without associating it with their tax liability, may benefit from the provision by filing a notification for their assets located in Türkiye but not currently held at banks and intermediary institutions. It is **MANDATORY** for these persons to deposit such assets into accounts opened at banks or intermediary institutions as of the notification date and to prove this **with supporting documents**.

ART. 6/3 — SOLE PROPRIETORSHIPS AND ORDINARY PARTNERSHIPS

Sole proprietorships and ordinary partnerships do not have income or corporate tax liability; withholding and value added tax liability is established in their name. Within this scope, notifications may also be made in the name of sole proprietorships and ordinary partnerships, and by reason of the notified assets the sole proprietorships and ordinary partnerships may benefit from the possibility of no tax inspection and assessment in respect of **VALUE ADDED TAX**, and the partners in respect of **INCOME OR CORPORATE TAX**.

> **ARTICLE 7 — PROCEDURES BY BANKS/INTERMEDIARY INSTITUTIONS (DOMESTIC ASSETS)**
>
> Tax collected in advance at 5% on the value of the notified assets is declared and paid with the Annex 3 return by the evening of the 15th day of the month following the notification. Where an undertaking is given for a time deposit / government domestic debt securities / lease certificate / venture capital fund, the reduced rates in Article 4 (0%–4%) apply identically.

Assets Appearing in the Name of Legal Representatives, Partners or Proxies of Companies

COMMUNIQUÉ ART.
8

CRITICAL DATE
04.06.2026

8/1 Legal representatives or partners of companies, or those authorised to deal with assets within the scope of the article on behalf of the company or the company's partners on the basis of a power of attorney or representation agreement issued by authorised institutions **BEFORE 4/6/2026**, may make the assets held abroad and owned by them as at that date subject to notification in the company's name and bring/transfer them to Türkiye; or notify in the company's name their assets located in Türkiye but absent from the statutory books as at 4/6/2026.

8/2 Assets belonging to the company or the company's partners but held by persons **OTHER THAN** the legal representatives, partners or proxies of the company may also be made the subject of a notification in the company's name. Assets belonging to real persons but held by companies abroad in which those persons are partners/legal representatives may also be notified in the name of the relevant real persons. **HOWEVER**, during any inspection carried out for reasons other than the notification, it must be **PROVEN** that these assets belong to the company, the partner or the real person.

Notification Value of Assets — Valuation Criteria

COMMUNIQUÉ ART.
9/1

Asset type	Valuation criterion
Turkish lira cash	At nominal (face) value
Gold	At fair market value
Foreign currency	At the CBRT foreign exchange buying rate
Equity shares	Stock exchange value → failing that fair market value → failing that acquisition cost → failing that nominal value
Bonds, notes, eurobonds and similar debt instruments	Stock exchange value → failing that fair market value → failing that acquisition cost → failing that nominal value
Investment fund participation units	At the closing price determined in the relevant market
Futures and option contracts (derivative instruments)	Stock exchange value → failing that fair market value → failing that acquisition cost → failing that nominal value

ART. 9/2 AND ART. 9/3

Art. 9/2: In notifications, the Turkish lira equivalent values of the assets are taken as the basis. | **Art. 9/3:** Fair market value is the purchase-sale value determined as at the notification date that reflects the actual position.

Valuation — Other Provisions

COMMUNIQUÉ ART.	CONVERSION PERIOD
9/4-7	**10 days**

9/4 For assets to be valued at stock exchange value, the values formed on the domestic or foreign exchanges on which they are traded as at the notification date are taken into account.

9/5 For assets denominated in foreign currency, the CBRT foreign exchange buying rate as at the notification date is taken into account.

9/6 In corrections made until 31/7/2027 for the purpose of rectifying errors or decreasing assets after a notification has been filed, the values of the assets **as at the date of the initial notification** are taken as the basis.

9/7 Those giving an undertaking must convert the notified amounts into the assets subject to the undertaking within **TEN DAYS** from the date the assets held abroad are transferred/deposited, and from the date of notification for assets in Türkiye. In the conversion, the value of the assets subject to conversion as at the conversion date (according to the criteria in Article 9) is taken as the basis.

Recording of Notified Assets in the Statutory Books

COMMUNIQUÉ ART.
10

NON-WITHDRAWAL
2 years

10/1 Recording the notified assets in the statutory books is **MANDATORY** for taxpayers keeping books under Law No. 213. Taxpayers with no bookkeeping obligation have no obligation under this article.

10/2 For foreign assets: if notified in the company's name the company, and if notified in the name of individuals the individuals themselves, benefit from the possibilities afforded by the article. Assets notified in the company's name must be recorded in the company's statutory books.

10/3 Taxpayers keeping books on the balance sheet basis shall open a **SPECIAL FUND ACCOUNT ON THE LIABILITIES SIDE** for the values they have notified and recorded in the statutory books.

10/4 Those keeping a self-employment earnings ledger and those keeping books on the business account basis **shall show separately** in their books the values they have notified.

10/5 Assets brought to Türkiye / recorded in the statutory books by taxpayers keeping books under Law No. 213 are included in the business without being taken into account in determining the profit of the period, and may be withdrawn from the business without being taken into account in determining taxable profit / distributable profit, provided **2 YEARS** have elapsed from the notification date.

10/6 Assets located in Türkiye are recorded in the statutory books at the TRY equivalent value determined in accordance with the principles in Article 9 as at the notification date; this value is taken into account in determining the gain on disposal.

REGIME OF THE SPECIAL FUND ACCOUNT (ART. 10/3)

The fund account is deemed a component of capital; it cannot be withdrawn from the business before 2 years have elapsed from the notification date and cannot be used for any purpose other than addition to capital. In the event of liquidation of the business these amounts are not taxed. Amounts in the fund account are also not taxed in transfers and demergers taking place under ITL Art. 81 and CTL Arts. 19 and 20.

! If the money is withdrawn from the time deposit account before the committed year has elapsed, or if the money is not brought to the bank within the two-month period, the bank sends a notification to the tax office through the automatic reporting mechanism (Communiqué example 8). The 5% tax not paid at the outset is collected together with late-payment interest.

Income and Expense Application

COMMUNIQUÉ ART.
11

Article 11/1: LOSSES arising from the subsequent disposal of assets made the subject of a notification and recorded in the statutory books **SHALL NOT BE ACCEPTED AS AN EXPENSE OR DEDUCTION** in determining income/corporate profit for income or corporate tax purposes. By contrast, gains and revenues arising from holding and disposing of such assets shall be taken into account in determining income/corporate profit within the framework of the general principles.

Article 11/2: Taxes paid by reason of the notified assets **SHALL NOT IN ANY WAY BE RECORDED AS AN EXPENSE** and **SHALL NOT BE OFFSET** against any other tax.

Cases Where No Inspection or Assessment Is Made — Conditions

COMMUNIQUÉ ART.
12/1

Pursuant to the provision of the article, **NO** tax inspection and tax assessment shall be made **IN ANY WAY** in respect of amounts corresponding to the notified assets. In order to benefit from this provision:

(A) FOR ASSETS HELD ABROAD

- Being brought to Türkiye and deposited with a bank/intermediary institution or transferred to an account within 2 months from the notification date
- Being recorded in the statutory books by taxpayers keeping books, opening a special fund account on the liabilities side, not withdrawing this fund/the assets from the business before 2 years have elapsed, and not using the fund other than by addition to capital
- Payment of the assessed tax within the period and compliance with the undertaking conditions

(B) FOR ASSETS LOCATED IN TÜRKIYE

- Being evidenced by documents showing deposit into bank/intermediary institution accounts by those who are **NOT** income/corporate taxpayers
- Being recorded in the statutory books by taxpayers keeping books under Law No. 213, opening a special fund account on the liabilities side, not withdrawing this fund/the assets from the business before 2 years have elapsed, and not using the fund other than by addition to capital
- Payment of the assessed tax within the period and compliance with the undertaking conditions

Base Difference Found in an Inspection Commenced for Other Reasons

COMMUNIQUÉ ART.
12/2 (a-b)

	Sub-para (a) — Example 6	Sub-para (b) — Example 7
Rule	It is established that the base difference derives from the notified assets and the notified amount is EQUAL TO or GREATER than the base difference → NO assessment is made.	It is established that the base difference derives from the notified assets but the difference is GREATER than the notified amount → assessment is made ONLY for the DIFFERENCE.
Example	(ABC) A.Ş. notified TRY 10,000,000 to the bank on 15/6/2026 for its unrecorded assets located in Türkiye. In the inspection of the 2024 accounting period a base difference of TRY 5,000,000 in unrecorded sales was found; the taxpayer stated that this difference derived from the notified assets and the inspector confirmed this assertion.	(DEF) Ltd. Şti. notified TRY 50,000,000 for its foreign assets. In the inspection of the 2023 accounting period a base difference of TRY 75,000,000 was found; the taxpayer stated that TRY 50,000,000 derived from the notification, whereas the inspector established that only TRY 40,000,000 derived from the notification (the remainder arising from incorrect depreciation/expense/deduction/exemption accounts).
Result	NO ASSESSMENT is made in respect of the taxpayer.	NO assessment is made for the portion of TRY 40,000,000; the general provisions apply to the remaining portion.

Notifications After Commencement of an Inspection and Breach of Conditions

COMMUNIQUÉ ART.
12/3-6

12/3 Filing a notification **AFTER THE DATE** on which a tax inspection has commenced or a referral to the appraisal commission has been made **DOES NOT** prevent an assessment being made on the base differences found, and the notified amounts cannot be offset. **HOWEVER**, where a notification has been filed **BEFORE** the inspection/referral to the appraisal commission even though the matter has come to the knowledge of the tax office/those authorised to inspect, the provision of the article may be benefited from.

12/4 In cases where the notified assets are not brought to Türkiye and deposited with a bank/intermediary institution or transferred within 2 months, the assessed taxes are not paid within the period, the undertakings are not complied with, or the other conditions are not fulfilled, the provisions on no inspection and assessment **CANNOT BE BENEFITED FROM**.

EXAMPLE 8

(GHI) A.Ş. filed a notification for assets of TRY 30,000,000 held abroad, giving an undertaking that they would be held in a time deposit account for at least 4 years and being taxed at 1%. However, it was established that the condition of holding the assets subject to the notification in time deposit accounts was breached after 2 years. In this case, the reduced-rate undertaking condition has been breached and the taxpayer **WILL NOT BE ABLE TO BENEFIT** from the provisions on no tax inspection and tax assessment provided under the article.

ART. 12/5 — FAILURE TO COMPLY WITH THE UNDERTAKING PERIOD

The bank/intermediary institution determines the tax not collected in time on the basis of the notified amount; the tax and late-payment interest corresponding to this amount are collected **BY WITHHOLDING** and paid to the tax office by the evening of the 15th day following the month of collection. A tax loss penalty is **NOT APPLIED**.

ART. 12/6 — FAILURE TO BRING THE ASSETS TO TÜRKIYE

Upon notification of the breach by the bank/intermediary institution, the taxes not collected in time by reason of the undertaking are **SOUGHT** by the tax office together with late-payment interest. A tax loss penalty is **NOT APPLIED** for these taxes.

Other Matters and Entry into Force

COMMUNIQUÉ ART.
13-15

ENTRY INTO FORCE
04.07.2026

Article 13 — Other Matters

The relevant institutions and organisations **ARE OBLIGED** to fulfil the requests of real or legal persons concerning the transactions to be carried out pursuant to the provision of the article.

Article 14 — Entry into Force

This Communiqué enters into force **ON THE DATE OF ITS PUBLICATION** (04.07.2026).

Article 15 — Execution

The provisions of this Communiqué are executed by the Minister of Treasury and Finance.

Section A — Matters Requiring Attention

- ! The notification period runs to 31/7/2027 (inclusive) and is not a one-off; more than one notification is possible on the basis of **MONTHLY** taxation periods.

- ! For foreign assets, if the **TWO-MONTH** period for bringing/transferring to Türkiye is missed, the inspection/assessment protection under Article 12 **IS LOST**.

- ! To benefit from the reduced tax rate, the Annex 2 undertaking must be submitted **AT THE TIME** of the notification; if the undertaking period is breached, the underpaid tax + late-payment interest is sought (without penalty).

- ! The special fund account and the notified assets cannot be withdrawn from the business before **2 YEARS** have elapsed from the notification date; these amounts cannot be used other than by addition to capital.

- ! **LOSSES** arising from the disposal of notified assets are not accepted as an expense/deduction; the taxes paid likewise cannot be recorded as an expense and cannot be offset.

- ! Notifications made **AFTER** an inspection or referral to the appraisal commission do not prevent an assessment on the base difference found (except notifications made before the matter came to the knowledge of the authorities).

SECTION B

Income Tax Exemption on the Wages of Personnel Employed at Qualified Service Centres

Law No. 7582 | Art. 5 | ITL Art. 23/(20) | Direct Foreign Investments Law No. 4875, Additional Art. 1

Purpose and the Legal Provision

COMMUNIQUÉ ART.	LAW ART.	RELATED ARTICLE
1-2	7582/5	ITL 23/(20)

Article 1 — Purpose and Scope: The purpose of the Communiqué is to regulate the procedures and principles for the application of sub-paragraph (20) added to the first paragraph of Art. 23 of the Income Tax Law No. 193 of 31/12/1960 by Art. 5 of Law No. 7582 of 21/5/2026 on Amendments to Certain Laws.

ARTICLE 2 — TEXT OF THE LEGAL PROVISION (ITL ART. 23/(20))

ITL ARTICLE 23, FIRST PARAGRAPH, SUB-PARAGRAPH (20)

"20. The portion of the wages of qualified service personnel employed at qualified service centres as defined in Additional Art. 1 of the Direct Foreign Investments Law No. 4875 of 5/6/2003 that does not exceed three times the gross minimum wage (applied as five times the gross minimum wage for qualified service centres operating in industrial zones established under the Industrial Zones Law No. 4737 of 9/1/2002 that are deemed suitable by the President according to the foreign investment density of the zone, and for qualified service centres operating in the Istanbul Financial Centre having obtained a participant certificate). The President is authorised to determine the three and five multiples in this sub-paragraph, jointly or separately, down to one multiple, and to increase them up to twice their amount."

Scope of the Exemption — Definition of Wage

COMMUNIQUÉ ART.
3/1-2

LAW ART.
ITL 61

Article 3/1 — Definition of wage under ITL Art. 61: In Art. 61 of Law No. 193, a wage is defined as the benefits provided in money and in kind and capable of being represented in money, given to those working in return for services and bound to an employer and a particular workplace. The fact that the wage has been paid under the names of allowance, compensation, cash compensation, appropriation, increment, advance, dues, attendance fee, premium, bonus, expense allowance or other names, or that it has been determined as a certain percentage of profit provided that it is not in the nature of a partnership relationship, does not change the character of the wage.

CONCLUSION

ALL payments made and benefits provided to qualified service personnel employed at qualified service centres under the names of monthly wage, overtime, premium, bonus, expense allowance and other names are also assessed within the scope of wages.

Article 3/2: The portion of the wages of qualified service personnel employed at qualified service centres as defined in Additional Art. 1 of the Direct Foreign Investments Law No. 4875 that does not exceed three times the gross minimum wage **IS EXEMPT FROM INCOME TAX**.

Article 3/4: The President **IS AUTHORISED**, in relation to the wage to which the exemption applies, to determine the three and five multiples in ITL Art. 23/(20) jointly or separately down to one multiple, and to increase them up to twice their amount.

Exemption Amount — Application of Multiples by Zone

COMMUNIQUÉ ART.
3/3, 4

Standard Qualified Service Centres

Centres within the scope of Additional Art. 1 of Law No. 4875

3x

Three times the gross minimum wage

Industrial Zones Deemed Suitable by the President

Zones deemed suitable according to foreign investment density within the scope of the Industrial Zones Law No. 4737

5x

Five times the gross minimum wage

Istanbul Financial Centre Zone

Qualified service centres operating in the Istanbul Financial Centre having obtained a participant certificate

5x

Five times the gross minimum wage

ARTICLE 4/2-3 — LIMIT OF BENEFIT

The portion of the wages received by employees up to the relevant multiple (3 or 5) of the gross minimum wage may be made subject to the exemption. The portion **EXCEEDING** this amount is taxed in accordance with the general provisions.

Conditions for Benefiting from the Exemption

COMMUNIQUÉ ART.
4/1

SINGLE CONDITION

In order to benefit from the exemption in ITL Art. 23/(20), the employees must be **QUALIFIED SERVICE PERSONNEL** employed at **QUALIFIED SERVICE CENTRES** as defined in Additional Art. 1 of Law No. 4875.

ARTICLE 5/3 — CONNECTION WITH THE STAMP DUTY EXEMPTION

A **STAMP DUTY EXEMPTION** shall also apply to the portion of the wages of qualified service personnel working at qualified service centres that is exempt from income tax within the scope of ITL Art. 23/(20); the portion of these wages exceeding the exemption threshold shall be subject to **BOTH INCOME AND STAMP DUTY** within the framework of the general provisions.

COMPARISON — FORMER APPLICATION

Prior to Law No. 7582 there was no special income/stamp duty exemption for the wages of qualified service centre personnel; wages were fully taxed in accordance with the general provisions.

NEW APPLICATION

The portion of the wage of qualified service personnel up to three times the gross minimum wage (five times in certain zones) has been exempted from both income tax and stamp duty; the excess portion is subject to the general provisions.

Application of the Exemption — Examples

COMMUNIQUÉ ART.
5

2026 MINIMUM WAGE (GROSS)
TRY 33,030

	Example 1	Example 2	Example 3
Centre / Zone	(A) QSC — standard (3× limit)	(D) QSC — standard (3× limit)	(F) QSC — Istanbul Financial Centre participant (5× limit)
Personnel / Date	Mr (B) — started work November 2026	Mr (E) — started work July 2026	Mr (G) — August 2026
Gross monthly wage	TRY 90,000	TRY 200,000	TRY 150,000
Exemption limit	33,030 × 3 = TRY 99,090	33,030 × 3 = TRY 99,090	33,030 × 5 = TRY 165,150
Result	Wage (90,000) is below the limit → EXEMPT IN FULL	Wage (200,000) exceeds the limit → the excess is taxed under the general provisions; the income tax corresponding to the minimum wage is offset and the balance is declared and paid with the withholding and premium service return	Wage (150,000) is below the limit → EXEMPT IN FULL

EXAMPLE 2 DETAIL

Of the income tax calculated on the portion of the TRY 200,000 wage income obtained by Mr (E) in July exceeding three times the gross minimum wage, the amount remaining after the offset of the income tax corresponding to the minimum wage will be declared and paid by the employer to the relevant tax office with the withholding and premium service return in the following month.

SECTION C

Communiqué Amending the Corporate Tax General Communiqué (Serial No. 1) — Serial No. 26

Law No. 7577 Arts. 2, 4 | Law No. 7582 Arts. 7, 8, 9 | CTL No. 5520 | Gazette: 04.07.2026 — No. 33300 · Transit trade deduction · Qualified service centre foreign-source profit deduction · Reduced corporate tax rate on export and manufacturing activities

Scope and Legal Basis of the Communiqué

LAW NO.	AMENDED COMMUNIQUÉ	THIS AMENDMENT
7577 / 7582	CTGC Serial No. 1	Serial No. 26

This Communiqué sets out explanations concerning the regulations made in the Corporate Tax Law No. 5520 by Arts. 2 and 4 of Law No. 7577 of 2/4/2026 on Amendments to Certain Laws and Arts. 7, 8 and 9 of Law No. 7582 of 21/5/2026, and amendments have been made to the relevant sections of the Corporate Tax General Communiqué (Serial No. 1) published in the Official Gazette No. 26482 of 3/4/2007.

THIS COMMUNIQUÉ CONSISTS OF 11 ARTICLES IN TOTAL AND COVERS THE FOLLOWING SUBJECTS

Art.	Subject
1	Removal of the exemption for health institutions within foundation universities
2-4	Inclusion within the exemption of sales of products manufactured in free zones within the free zone / to other free zones
5	Deduction for profits derived from the sale of, or brokerage in, goods purchased abroad without being brought to Türkiye (transit trade)
6	Deduction for profits derived from abroad by institutions operating as qualified service centres
7	Reduction of the corporate tax rate on profits derived from export (5 points) and manufacturing (12.5 points) activities
8-9	Exemptions and deductions to be taken/not taken into account in the calculation of the domestic minimum corporate tax
10-11	Entry into force and execution

Deduction for Profits from the Sale of Goods Purchased Abroad Without Being Brought to Türkiye and from Brokerage

COMMUNIQUÉ ART.	LAW ART.	DEDUCTION
5	CTL 10/1-i	95% / 100%

By the regulation made in sub-paragraph (i) of the first paragraph of Art. 10 of the Corporate Tax Law by Law No. 7582, a certain percentage of the profits derived by institutions from the following activities **MAY BE DEDUCTED** from corporate profit:

- Profits derived from selling abroad the goods they have purchased abroad without bringing them to Türkiye
- Profits derived from acting as an intermediary in purchases and sales of goods taking place abroad

DEDUCTION RATES

General rate

95%

For all institutions (the portion of the profit that may be deducted from corporate profit)

Privileged zones

100%

Institutions operating in industrial zones established under the Industrial Zones Law No. 4737 and deemed suitable by the President, and institutions operating in the Istanbul Financial Centre Zone having obtained a participant certificate under the Istanbul Financial Centre Law No. 7412

Conditions for Benefiting from the Deduction

COMMUNIQUÉ ART.
5 (10.7.1)

1. The profit must be derived from selling abroad goods purchased abroad without bringing them to Türkiye, or from acting as an intermediary in purchases and sales of goods taking place abroad
2. The **SELLER** and the **BUYER** of the goods relating to the brokerage activity must not be located in Türkiye
3. The profit must have been **TRANSFERRED** to Türkiye by the date on which the annual corporate tax return for the accounting period in which it was derived must be filed
4. Institutions operating in the Istanbul Financial Centre Zone must hold a **PARTICIPANT CERTIFICATE** within the scope of Law No. 7412
5. For institutions operating in industrial zones, the zone must be an industrial zone **DEEMED SUITABLE** by the President according to the foreign investment density of the zone

CRITICAL RULE

The deduction applies to profits derived from selling abroad, or brokering the sale of, goods purchased abroad without bringing them to Türkiye; it is **NOT POSSIBLE** to benefit from this deduction for profits derived from the sale of goods **BROUGHT TO TÜRKİYE**. The profits must be included in corporate profit in the period in which they are derived, and the deduction cannot be benefited from for the portion not transferred to Türkiye by the end of the period for filing the corporate tax return; profits not transferred within this period cannot benefit from the deduction even if they are transferred in later years.

Transit Trade / Brokerage Profit — Application Examples (I)

	Example 1	Example 2
Event	(B) A.Ş. sold products purchased from a company resident in Germany to another company resident in France without bringing them to Türkiye.	(C) A.Ş. acted as an INTERMEDIARY in a purchase and sale of goods carried out between a company resident in Italy and a company resident in Egypt.
Profit	TRY 1,000,000	TRY 400,000 (brokerage income)
Conditions	The entire profit was transferred to Türkiye by the period for filing the corporate tax return and the other conditions were met	The seller and buyer of the goods are not located in Türkiye and the other conditions are met
Deduction (95%)	TRY 950,000 may be made subject to deduction on the corporate tax return	TRY 380,000 may be deducted from corporate profit
Important note	Should the products purchased from Germany be brought to Türkiye FIRST and sold to France AFTERWARDS, it WILL NOT BE POSSIBLE to benefit from this deduction.	Should either the buyer or the seller company be located in Türkiye, it WILL NOT BE POSSIBLE to benefit from the deduction.

Transit Trade / Brokerage Profit — Application Examples (II)

	Example 3	Example 4 — Bonded warehouse application
Event	(Ç) A.Ş. operates in the Istanbul Financial Centre Zone with a participant certificate. It sold products purchased from a firm resident in Japan to a firm resident in the United Arab Emirates without bringing them to Türkiye.	(K) A.Ş. BROUGHT goods purchased from a firm resident in Germany to Türkiye and stored them IN A BONDED WAREHOUSE; it sold the goods to a firm resident in Bulgaria without releasing them into free circulation and without subjecting them to any processing.
Profit	TRY 2,000,000	TRY 2,000,000
Deduction rate	100% (Istanbul Financial Centre participant)	95% (general rate)
Deduction amount	The ENTIRE TRY 2,000,000 may be deducted from corporate profit	2,000,000 × 95% = TRY 1,900,000 may be deducted
Important note	It is a condition that the entire profit has been transferred to Türkiye by the period for filing the corporate tax return and is shown on the annual corporate tax return.	Should the goods in the bonded warehouse be SOLD to a buyer in Türkiye or RELEASED INTO FREE CIRCULATION, this profit deduction cannot be benefited from.

Customs, Bonded Warehouse and Free Circulation — Concepts and Status Table

Customs

The official authority supervising the entry and exit of goods into and from the country, and the border gate/procedural process where this supervision is carried out. By "customs procedures" we mean official processes such as filing the import/export declaration, calculating taxes and duties, and passing inspection.

Bonded warehouse

A warehouse under the supervision of the customs administration where goods arriving from abroad are temporarily stored before import taxes (customs duty, VAT etc.) are paid. The expression "bonded warehouse" is in fact somewhat tautological — a warehouse is by its nature under customs supervision; in the Communiqué this emphasis is used to state clearly that the goods have not yet entered free circulation. → Goods in a bonded warehouse are not legally regarded as having been "imported" into Türkiye.

Free circulation

The status acquired by goods after customs duty and other obligations have been paid and the official import procedure completed. From this point onwards the goods may be freely bought and sold domestically like goods produced in the country. → If the goods leave the bonded warehouse and are included in the Turkish market upon payment of import tax, they are no longer regarded as "goods not brought to Türkiye" and the transit trade deduction is lost.

Stage	Status of the goods	Tax position
Waiting in the bonded warehouse	Regarded as not having "entered" Türkiye	Tax not paid
Customs procedure completed → free circulation	Regarded as having been "imported" into Türkiye	Tax paid
Sale directly from the bonded warehouse to a third country	Regarded as never having entered Türkiye	No tax arises

Scope of the Deduction for Card/Code Sales and Transfers of Intangible Rights

COMMUNIQUÉ ART.
5

WITHIN THE SCOPE OF THE DEDUCTION — DIGITAL CARD/CODE SALES

The deduction under the article **SHALL APPLY** to profits derived from selling activation codes, e-pin codes, game codes, digital product codes, licence codes, subscription codes and similar cards, passwords and codes purchased from persons or institutions resident abroad whose consideration is a specific product or service, directly to persons or institutions resident abroad in the form in which they were purchased, provided that **THEIR NATURE AND CONTENT ARE NOT ALTERED**, without being subject to any disposal or use in Türkiye and without being sold to persons or institutions in Türkiye, and from acting as an intermediary in the purchase and sale of such cards, passwords and codes abroad.

OUTSIDE THE SCOPE OF THE DEDUCTION — PAYMENT INSTRUMENTS

It is **NOT POSSIBLE** to apply the said deduction to profits derived from the purchase and sale of cards, passwords, codes, balances, wallet codes, gift cards and similar values which **DO NOT** represent a right of access to, use of or benefit from a specific product or service, but which are in the nature of purchasing power or a means of payment for the acquisition of future deliveries or services from their issuers.

INTANGIBLE RIGHTS (COPYRIGHT, TRADEMARK, PATENT ETC.)

The deduction also applies to profits derived from selling copyright, trademarks, patents, utility models, industrial designs, licences, broadcasting rights and similar intangible rights purchased from persons or institutions resident abroad, directly to persons/institutions resident abroad in the form in which they were acquired, without any alteration and without being used by persons or institutions resident in Türkiye including the purchaser itself, or from acting as an intermediary in such transactions. Provided that those benefiting from the deduction must have **NO REMAINING** right or power of disposal in any way over the intangible right subject to the purchase and sale following the sale.

Determination and Declaration of the Deduction, Record-Keeping and Non-Core Income

COMMUNIQUÉ ART.
5 (10.7.2)

10.7.2.1 — DETERMINATION OF THE DEDUCTION AMOUNT

Of the profit found by deducting the expense and cost items borne by reason of these activities from the revenue derived from the activities accepted within the scope of the deduction, **100%** for institutions operating in industrial zones deemed suitable within the scope of Law No. 4737 and in the Istanbul Financial Centre Zone, and **95%** for institutions outside these zones, may be made subject to deduction by being shown in the "Exemptions and Deductions to be Deducted Where Profit Exists" section of the corporate tax return. Any amount that cannot be made subject to deduction by reason of other deductions and exemptions and prior-year losses **SHALL NOT BE CARRIED FORWARD** to subsequent periods. Where the result of the activity is a **LOSS**, no deduction shall arise.

10.7.2.2 — MONITORING OF PROFITS IN THE RECORDS

For the purpose of determining the profit subject to the deduction and, accordingly, the corporate tax base, revenue, cost and expense items within and outside the scope of the deduction must be monitored separately, revenue, cost and expense items relating to activities within the scope of the deduction must not be associated with other activities, and the records must be kept in a manner that ensures this separation.

INCOME OUTSIDE THE CORE FIELD OF ACTIVITY

Section 10.7.2.3. It is **NOT POSSIBLE** to assess within the scope of the deduction other income of companies benefiting from the said deduction outside their activities subject to the deduction (such as interest income arising from the investment of cash on hand, exchange differences arising from the valuation of foreign currencies and income arising from the disposal of economic assets) and their **EXTRAORDINARY** income.

Deduction for Profits Derived from Abroad by Institutions Operating as Qualified Service Centres

COMMUNIQUÉ ART.	LAW ART.	PERIOD
6	CTL 10/1-j	20 accounting periods

By sub-paragraph (j) added to the first paragraph of Art. 10 of the Corporate Tax Law by Law No. 7582, the deduction rate for profits derived from abroad, exclusively within the scope of these activities, by institutions operating as a **QUALIFIED SERVICE CENTRE** within the scope of the Direct Foreign Investments Law No. 4875 of 5/6/2003, has been determined as follows:

General rate

95%

Profits derived exclusively from abroad within the scope of qualified service centre activity

Privileged zones

100%

Institutions operating as qualified service centres in industrial zones deemed suitable by the President within the scope of Law No. 4737 and in the Istanbul Financial Centre Zone having obtained a participant certificate within the scope of the Istanbul Financial Centre Law No. 7412

APPLICATION PERIOD

This deduction shall be applied for **TWENTY ACCOUNTING PERIODS** including the accounting period in which the qualified service centre commenced operations.

Corporate Status of the Qualified Service Centre

LAW ART.	ENTRY INTO FORCE
6 · Law No. 4875 Add. Art. 1	04.06.2026

A Qualified Service Centre is a capital company established in Türkiye to provide services to a group of companies actively operating in at least three different countries, and deriving at least 80% of its annual revenue from these related companies abroad. The status has been defined by Additional Article 1 added to the Direct Foreign Investments Law No. 4875 — note: it is a corporate category placed within direct foreign investment legislation, not within corporate tax legislation. This means that the corporate qualification is acquired first, and the tax regime follows it.

Corporate Form · Three-Country Test · 80% Revenue Test

LAW ART.
6 (Add. Art. 1/1)

TEST FREQUENCY
Each accounting period

Condition	Content	Critical point
Corporate form	Turkish capital company (joint stock or limited liability company)	Branches, liaison offices and sole proprietorships are OUTSIDE the scope
Three-country test	The related group must be in ACTIVE operation in at least 3 different countries outside Türkiye	Registered but dormant subsidiaries do not count; genuine commercial activity is required in each country
80% revenue test	At least 80% of annual revenue must come from related companies abroad	Domestic revenue is limited to a maximum of 20%; the threshold is re-measured at the end of each accounting period

ANNUAL RE-TESTING

These three conditions are re-tested not only at the time of establishment but at the end of each accounting period. The loss of a single condition for one year means the loss of the entire regime for that year and a tax loss penalty within the scope of the Tax Procedure Law — it is not automatically regained the following year.

Activities Within the Scope of Qualified Service — Two Sub-Paragraphs

LAW ART.
6 (Add. Art. 1/2, sub-paras a-b)

The Law enumerates the activities falling within the scope of qualified service in two sub-paragraphs:

(A) MANAGEMENT AND ADVISORY FUNCTIONS

Financial advisory, strategic management advisory, risk management, cash and liquidity management, funding and borrowing transactions, investment and capital structure planning, budgeting, financial reporting and analysis, international accounting and compliance, audit, digital transformation and technology advisory, investment and data analysis, legal advisory (only provided that it is obtained from an attorney/attorney partnership within the scope of the Attorneyship Law and is not directed at Turkish law), promotion, brand management, human resources and training services.

(B) OPERATIONAL COORDINATION FUNCTIONS

Coordination and management of activities such as sales, after-sales support, technical support, research and development, external procurement, testing of newly developed products and laboratory services.

QUALIFIED SERVICE PERSONNEL

Employees who directly perform these services and who are outside the support personnel are regarded as "qualified service personnel" — that is, for example, reception, cleaning and general administrative support personnel are outside the scope of the exemption.

Components of the Incentive and Conditions for Benefiting

Component	Rate / Amount	Legal basis
Corporate tax deduction	95% (standard) / 100% (participant certificate within the IFC or a suitable industrial zone)	CTL Art. 10/1-j
Personnel income tax exemption	Three times the gross minimum wage (standard) / five times (within the IFC or a suitable industrial zone)	ITL Art. 23/(20)
Stamp duty exemption	Papers relating to wages paid to qualified service personnel	Connected with Law No. 7582 Art. 12

The deduction is applied for 20 accounting periods from the accounting period in which the qualified service centre commenced operations. In order to benefit:

- The profit must have been derived exclusively from qualified service activities and from abroad
- The profit must have been transferred to Türkiye by the date for filing the corporate tax return for the relevant accounting period (profit not brought in by that date cannot benefit from the deduction even if brought in later)

NON-CORE INCOME AND CARRY-FORWARD

Non-core income such as interest income arising from the investment of cash on hand, exchange difference income and income from the sale of economic assets does not fall within the scope of the deduction. Any amount that cannot be deducted in that period by reason of other deductions/exemptions and prior-year losses cannot be carried forward to the following period; if the activity closes with a loss the deduction is not applied at all.

Effective Dates and the Domestic Minimum Corporate Tax

Type of date	Date	Meaning
Publication/entry into force date of the Law	04.06.2026	The Law was published in the Official Gazette on this date
First return period	Returns to be filed from 01.07.2026	The corporate tax deduction begins to be applied in returns filed after this date
Taxation period covered	Accounting periods beginning from 01.01.2026	The regime covers, retrospectively, profits derived from the beginning of 2026

PROTECTION AGAINST THE MINIMUM CORPORATE TAX

The domestic minimum corporate tax application in Türkiye provides for a floor tax that disregards certain exemptions/deductions. The Law has expressly added the QSC foreign-source profit deduction (CTL 10/1-j) and the transit trade deduction (CTL 10/1-i) to the list of deductions that may be deducted from the minimum tax base (amendment to Art. 32/C, paragraph 2, sub-paragraph b). This means that the 95%–100% deduction is not eroded at the minimum tax layer, that is, the effective tax burden can genuinely fall to the range of 0% to 1.25%.

Qualified Service Centre and Istanbul Financial Centre Participation Compared

LAW ART.
6, 7, 12, 13 (IFC Law No. 7412)

Feature	QSC (outside the IFC)	QSC (within the IFC, with participant certificate)
Legal basis	Law No. 4875	Law No. 4875 + Law No. 7412
Corporate tax deduction	95%	100%
Personnel income tax exemption	Three times the minimum wage	Five times the minimum wage
Location condition	Anywhere in Türkiye	Within the IFC Zone (Ataşehir)
Qualification test	3 countries + 80% revenue + capital company	Same conditions + IFC participant authorisation
Incentive period	20 accounting periods from commencement of operations	The same

COMPLEMENTARY REGIMES

These two regimes are not alternatives to one another but separate structures that complement each other. QSC status is independent of physical location and does not require a participant certificate; the IFC Participant Certificate comes into play only as a rate-enhancing layer.

ADDITIONAL NOTE — EXTENSION OF PERIOD IN THE IFC LAW (LAW ART. 13)

The period in provisional Art. 1 of the Istanbul Financial Centre Law No. 7412 has been extended from 2031 to 2047, and the duty exemption period from 5 years to 20 years.

Risk Areas and Structures Outside the Scope

Risk	Explanation
Loss of the 80% revenue threshold	If the share of domestic revenue exceeds 20%, the regime is lost entirely for that accounting period
Loss of the three-country test	If the number of active countries falls below 3 following a group restructuring/acquisition, the test collapses
Transfer pricing exposure	Service fees applied to related companies abroad are subject to the rules of CTL Art. 13 (transfer pricing) — arm's length conformity is required
Risk of the President adjusting the rate	The 20-year period is statutory, but the rate itself (within the range of 95%–100% / 50%–100%) may change
Loss of foreign tax credit	Tax paid abroad on the exempted profit cannot be credited in Türkiye

WHICH STRUCTURES FALL OUTSIDE THE SCOPE EVEN WITH HIGH FOREIGN INCOME?

Structures providing services to a related company in a single country fall outside the scope despite high foreign revenue, because what is decisive is not the size of the income but the group's active operations spread across at least three countries. Likewise, a Turkish branch or liaison office of a foreign company cannot qualify for the status even if its customers are abroad, since the regime requires a Turkish capital company with its own legal personality. A third example is the independent Turkish service exporter serving unrelated third parties: this structure may benefit from the service export exemption, but falls outside this status because the Qualified Service Centre regime covers only services to related companies within the group. Finally, registered but dormant subsidiaries established merely to complete the country count to three do not satisfy the geographical test; substantial commercial activity and economic substance are required in each country.

IS THE DEDUCTION THE SAME THING AS AN "EXEMPTION"?

No, technically this is a deduction, not an exemption. The profit is not entirely "exempt" from tax; foreign-source profit derived from qualified activities is deducted from the corporate tax base and shown in the "Exemptions and Deductions to be Deducted Where Profit Exists" section of the return. The distinction matters in practice: the deduction depends on the existence of profit and on the profit being transferred to Türkiye by the date for filing the return for the relevant period. If the qualified activity closes with a loss the deduction is not applied, and an amount that cannot be deducted in that year cannot be carried forward to subsequent years.

Transfer Condition, Company Type, Minimum Tax, Dividends and Carry-Forward

WHY IS THE TRANSFER CONDITION A DECISION PARAMETER FOR A GROUP HOLDING FOREIGN PROFIT IN A GLOBAL CASH POOL?

Because the deduction depends on the profit actually being brought to Türkiye, and this condition conflicts directly with the central cash management strategy of many multinational groups. Qualified foreign-source profit must be transferred to an account in Türkiye by the date on which the corporate tax return for the relevant accounting period must be filed; profit not brought in by that date cannot benefit from the deduction even if transferred later. For structures pooling group cash in a single foreign pool (cash pooling), this means positioning the money in Türkiye at least until the return period. The transfer condition is therefore not merely a compliance detail at the structuring stage but a decision parameter to be assessed together with the group's treasury policy.

WHICH COMPANY TYPE IS REQUIRED FOR A QUALIFIED SERVICE CENTRE?

A Turkish capital company is required; this means a joint stock company or a limited liability company. Branches of foreign companies, liaison offices, partnerships of individuals and structures without legal personality cannot qualify.

DOES THE DOMESTIC MINIMUM CORPORATE TAX AFFECT THE QUALIFIED SERVICE CENTRE DEDUCTION?

No. Law No. 7582 has added the Qualified Service Centre foreign-source profit deduction (CTL Art. 10/1-j) to the exemptions and deductions deducted from corporate profit in Art. 32/C of the Corporate Tax Law governing the domestic minimum corporate tax. For this reason the deduction is not eroded by the minimum corporate tax and the low effective tax burden of the regime is preserved against the minimum tax layer as well.

ARE DIVIDEND DISTRIBUTIONS FROM A QUALIFIED SERVICE CENTRE SUBJECT TO TURKISH WITHHOLDING TAX?

Yes. The Qualified Service Centre regime exempts qualified foreign-source profit from corporate tax at the entity level. Dividend distributions to shareholders are subject to the standard Turkish withholding rules; for foreign shareholders these may be reduced under applicable double taxation treaties.

MAY A QUALIFIED SERVICE CENTRE DEDUCTION THAT CANNOT BE USED IN ONE YEAR BE CARRIED FORWARD TO THE FOLLOWING YEAR?

No. An amount that cannot be made subject to deduction in the relevant period by reason of other deductions and exemptions and prior-year losses cannot be carried forward to subsequent periods. Furthermore, where the result of the qualified activity closes with a loss, no deduction is applied for that period.

MAY TAX PAID ABROAD BE CREDITED AGAINST TURKISH TAX ON QUALIFIED SERVICE CENTRE PROFIT?

No. A foreign tax credit is not available for profit exempted under the Qualified Service Centre regime. The implicit cost of the regime is the loss of the right to a foreign tax credit on the exempted profit.

Conditions for Benefiting from the Deduction

COMMUNIQUÉ ART.
6 (10.8.1)

1. Operating as a **QUALIFIED SERVICE CENTRE** within the scope of the Direct Foreign Investments Law No. 4875
2. The profit must have been derived **EXCLUSIVELY** within the scope of these activities and **FROM ABROAD**
3. The profit must have been **TRANSFERRED** to Türkiye by the date on which the annual corporate tax return for the accounting period in which it was derived must be filed
4. Institutions operating in the Istanbul Financial Centre Zone must hold a **PARTICIPANT CERTIFICATE** within the scope of Law No. 7412
5. For institutions operating in industrial zones, the zone must be an industrial zone **DEEMED SUITABLE** by the President according to the foreign investment density of the zone

CRITICAL RULE

It is **NOT POSSIBLE** to benefit from this deduction by reason of profits derived **OUTSIDE** qualified service centre activities. The condition of "being derived exclusively from abroad" is definite and absolute.

Period of Application of the Deduction and the Transfer to Türkiye Condition

COMMUNIQUÉ ART.
6 (10.8.2-3)

PERIOD
20 accounting periods

10.8.2 — Period of application of the deduction: This deduction is applied for **TWENTY ACCOUNTING PERIODS** including the accounting period in which the qualified service centre commenced operations. Where the accounting period in which operations commenced is a **SHORT PERIOD**, that period is taken into account as **ONE ACCOUNTING PERIOD**. It is **NOT POSSIBLE** to apply the deduction to profits derived after the expiry of the twenty accounting periods.

EXAMPLE — (A) A.Ş.

Commenced operations as a qualified service centre on 15/10/2026. The said company will be able to benefit from the deduction for profits derived exclusively from qualified service centre activities between the 2026 and 2045 accounting periods.

EXAMPLE — (B) A.Ş.

Operates as a qualified service centre in the Istanbul Financial Centre Zone having obtained a participant certificate. Provided the company transfers to Türkiye the entirety of the TRY 10,000,000 profit it has derived from abroad exclusively within the scope of this activity by the period for filing the corporate tax return, it **WILL BE ABLE TO DEDUCT 100%** from corporate profit.

10.8.3 — THE TRANSFER TO TÜRKIYE CONDITION

Profits derived within the scope of qualified service centre activities must have been transferred to Türkiye by the date on which the corporate tax return for the accounting period in which they were derived must be filed. It is **NOT POSSIBLE** to benefit from the deduction by reason of profits **NOT TRANSFERRED** to Türkiye within the said period. Profits not transferred to Türkiye within the stated period **SHALL NOT BENEFIT** from this deduction application even if they are transferred to Türkiye in subsequent periods.

Determination of the Deduction Amount, Record-Keeping and Non-Core Income

COMMUNIQUÉ ART.
6 (10.8.4-6)

10.8.4 — Determination of the deduction amount: Of the profit found by deducting the expense and cost items borne by reason of these activities from the revenue derived from the activities accepted within the scope of the deduction, **100%** for institutions operating in zones deemed suitable by the President within the scope of Law No. 4737 and in the Istanbul Financial Centre Zone, and **95%** for those operating outside these zones, may be made subject to deduction by being shown in the "Exemptions and Deductions to be Deducted Where Profit Exists" section of the corporate tax return. Any amount that cannot be made subject to deduction by reason of other deductions and exemptions and prior-year losses **SHALL NOT BE CARRIED FORWARD** to subsequent periods. Where the result of the activity is a **LOSS**, no deduction shall arise.

10.8.5 — Monitoring of profits in the records: For the purpose of determining the profit subject to the deduction and, accordingly, the corporate tax base, revenue, cost and expense items within and outside the scope of the deduction must be monitored separately, revenue, cost and expense items relating to activities within the scope of the deduction must not be associated with other activities, and the records must be kept in a manner that ensures this separation.

10.8.6 — Income outside the core field of activity: It is **NOT POSSIBLE** to assess within the scope of the deduction other income of companies benefiting from the said deduction outside their activities subject to the deduction (such as interest income arising from the investment of cash on hand, exchange differences arising from the valuation of foreign currencies and income arising from the disposal of economic assets) and their extraordinary income.

NOTE

The rules on determination of the deduction amount, record-keeping and non-core income in Section 10.7 (transit trade) and Section 10.8 (qualified service centre) are exactly **PARALLEL** in structure; the two types of deduction require separate account and period tracking.

Corporate Tax Law Article 32 — Amendments to Paragraphs

COMMUNIQUÉ ART.	LAW ART.	ENTRY INTO FORCE
7/a	CTL 32/7-9	01.01.2027

NEW TEXT OF THE SEVENTH, EIGHTH AND NINTH PARAGRAPHS OF CTL ARTICLE 32

(7) The corporate tax rate shall be applied with a 5-point reduction to the profits derived by exporting institutions exclusively from exports. This deduction shall also apply to the profits derived from export activities carried out by manufacturing or supplying institutions through foreign trade capital companies or sectoral foreign trade companies on the basis of an intermediated export agreement.

(8) The corporate tax rate shall be applied as 12.5% to the profits derived exclusively from manufacturing activities by institutions holding an industrial registry certificate and actually engaged in manufacturing activity, and to the profits derived exclusively from such production activities by institutions engaged in agricultural production activity. For profits benefiting from the reduced rate within the scope of this paragraph, the deduction under the seventh paragraph shall not additionally apply.

(9) The reduced rates in the seventh and eighth paragraphs shall be applied to the corporate tax rate remaining after the application of the other deductions within the scope of this article.

> **EFFECTIVE DATES (ARTICLE 8)**
>
> By Art. 8 of Law No. 7582, beginning with returns to be filed from 1/1/2027, to apply to profits derived by institutions in the 2027 and subsequent taxation periods, and for institutions subject to a special accounting period to profits derived in the special accounting period beginning in the 2027 calendar year and subsequent taxation periods, the corporate tax rate shall be applied as 12.5% with a 12.5-point reduction to the profits derived exclusively from manufacturing activities by institutions holding an industrial registry certificate and actually engaged in manufacturing activity and to the profits derived exclusively from such production activities by institutions engaged in agricultural production activity. That said, since the said regulation entered into force to apply to profits derived in the 2027 and subsequent taxation periods, the corporate tax rate shall continue to be applied with a **1-POINT** reduction in respect of profits arising exclusively from manufacturing activities of institutions holding an industrial registry certificate and actually engaged in manufacturing activity, derived in the 2026 taxation period.

Note: By this amendment the previous 1-point manufacturing deduction has been increased to 12.5 points from the 2027 period (see the comparison slide that follows).

5-Point Reduction on Profits Derived from Export Activities

COMMUNIQUÉ ART.	REDUCTION
7/a-b	5 points

GENERAL RULE

The corporate tax rate is applied with a **5-POINT REDUCTION** to the profits derived by exporting institutions exclusively from exports (CTL Art. 32/7). This deduction also applies to the profits derived from export activities carried out by manufacturing or supplying institutions through foreign trade capital companies or sectoral foreign trade companies on the basis of an intermediated export agreement.

ARTICLE 7/B — AMENDMENT TO SECTION 32.1.2.2 "SCOPE AND THOSE WHO WILL BENEFIT"

In the first paragraph of the section, the phrase "of institutions holding an industrial registry certificate, exclusively" has been amended to read "of institutions holding an industrial registry certificate and actually engaged in manufacturing activity, exclusively from their manufacturing activities, and the profits derived by institutions engaged in agricultural production activity exclusively from such"; and in the second paragraph the phrase "1 point" has been amended to read "12.5 points".

ARTICLE 7/Ç — AMENDMENT TO SECTION 32.1.2.3 "CONDITIONS FOR THE REDUCED APPLICATION OF THE CORPORATE TAX RATE"

A sentence has been added to the second paragraph, in the third paragraph the phrase "1 point" has been amended to read "12.5 points", and the following paragraph has been added to the end of the section: "On the other hand, where the 12.5-point deduction is benefited from for profits derived by manufacturing institutions exclusively from manufacturing, the 5-point deduction may not additionally be benefited from for such profits." Furthermore, institutions engaged in agricultural production activity must satisfy together the conditions of holding any one of the farmer registration document, food business registration document and business approval documents (producer certificate) obtained from the Ministry of Agriculture and Forestry, and of being actually engaged in production activity.

12.5-Point Reduction on Profits Derived from Manufacturing Activities

COMMUNIQUÉ ART.	REDUCTION	RATE APPLIED
7/e	12.5 points	12.5%

GENERAL RULE

Institutions holding an industrial registry certificate and actually engaged in manufacturing activity, in respect of profits derived exclusively from manufacturing activities, and institutions engaged in agricultural production activity, in respect of profits derived exclusively from such production activities, **WILL BE ABLE TO APPLY** the corporate tax rate as 12.5% with a **12.5-POINT REDUCTION**.

In determining the profit derived from manufacturing by taxpayers engaged in manufacturing activity in more than one field, the profits derived from manufacturing activities (together with any losses arising from manufacturing) shall be assessed **AS A WHOLE**. The corporate tax rate may also be applied with a 12.5-point reduction to profits derived as a result of manufacturing activity carried out in matters such as software, information technology and similar, exclusively within the scope of an industrial registry certificate held.

FORMULA FOR DETERMINING THE BASE TO WHICH THE REDUCED RATE APPLIES (WHERE THERE IS MORE THAN ONE ACTIVITY)

FORMULA

Base to which the reduced rate applies = Tax base × (Profit derived from manufacturing activity / Commercial balance sheet profit)

It goes without saying that the amount of profit so calculated and to which the 12.5-point reduction is to be applied cannot exceed either the profit derived from manufacturing or the net corporate profit of the relevant period. Where the taxpayer's profit derived from manufacturing activity exceeds the commercial balance sheet profit, the 12.5-point reduction may be applied to the entirety of the profit derived from manufacturing activity, provided it does not exceed the net corporate profit.

Application of the Manufacturing Deduction — Example 1

PERIOD
2027

ACTIVITY
Refrigerator manufacturing

Information relating to the 2027 operating results of (F) A.Ş., which manufactures refrigerators and offers them for sale on the domestic market and holds an industrial registry certificate:

Commercial balance sheet profit	TRY 2,000,000
Profit derived from manufacturing activity	TRY 1,400,000
Other profits (outside the scope of the deduction)	TRY 600,000
Non-deductible expenses (KKEG)	TRY 500,000
Prior-year losses	TRY 1,200,000
Tax base	TRY 1,300,000

BASE TO WHICH THE REDUCED RATE APPLIES

1,300,000 × (1,400,000 / 2,000,000)
= 1,300,000 × 70%
= TRY 910,000

RESULT

(F) A.Ş. will apply the corporate tax rate as (25% − 12.5% =) **12.5%** to the TRY 910,000 portion of its 2027 tax base of TRY 1,300,000; the **GENERAL RATE** will be applied to the remaining TRY 390,000 portion of the tax base.

Application of the Manufacturing Deduction — Example 2 (Loss-Making Activity)

PERIOD
2027

(G) A.Ş., which holds an industrial registry certificate, derived a profit of TRY 3,800,000 in 2027 from the sale of agricultural machinery it manufactured; its activity of selling the health products it manufactured resulted in a loss of TRY 1,200,000; and it incurred a loss of TRY 1,800,000 from its other manufacturing activities.

Commercial balance sheet profit	TRY 2,000,000
Profit from the sale of agricultural machinery	TRY 3,800,000
Loss from the sale of health products	TRY 1,200,000
Loss from other manufacturing activity	TRY 1,800,000
Other profits (outside the scope of the deduction)	TRY 1,200,000
Non-deductible expenses (KKEG)	TRY 1,000,000
Prior-year losses	TRY 2,000,000
Tax base	TRY 1,000,000

NET MANUFACTURING PROFIT

3,800,000 + (–1,200,000) + (–1,800,000)
= TRY 800,000

BASE TO WHICH THE REDUCED RATE APPLIES

1,000,000 × (800,000 / 2,000,000)
= 1,000,000 × 40%
= TRY 400,000

RESULT

Taking into account the net profit of TRY 800,000 derived from more than one manufacturing activity, (G) A.Ş. will apply the corporate tax rate as (25% – 12.5% =) 12.5% to the TRY 400,000 portion of its 2027 tax base of TRY 1,000,000, and the general rate to the remaining TRY 600,000 portion. **ON THE OTHER HAND**, it goes without saying that where the manufacturing activities result **IN AN OVERALL LOSS**, the application of the 12.5-point reduction by reason of manufacturing activity **WILL NOT ARISE** even if the taxpayer has commercial balance sheet profit and/or net corporate profit.

Toll Manufacturing in Manufacturing Activities

COMMUNIQUÉ ART.
7/e

For the purposes of applying the corporate tax rate at a reduced level, in determining the profit derived from manufacturing activity, it is a condition that the taxpayer **HOLDS AN INDUSTRIAL REGISTRY CERTIFICATE** and is **ACTUALLY ENGAGED IN MANUFACTURING ACTIVITY**. Within this scope, it is also possible for the corporate tax rate to be applied at a reduced level for profits derived from products manufactured by purchasing toll services from outside at certain stages of the manufacturing activity.

CONDITIONS REQUIRED FOR MANUFACTURING ACTIVITIES CARRIED OUT ON A TOLL BASIS TO BE ASSESSED WITHIN THE SCOPE OF "PROFIT DERIVED FROM MANUFACTURING ACTIVITY"

- The toll manufacturing must be carried out only within the scope of the manufacturing written in the industrial registry certificate or operating licence
- The said manufacturing must consist of the enterprise's own manufacturing rather than toll manufacturing
- The amount of profit to benefit from the exemption in relation to manufacturing activities must be limited to actual capacity utilisation
- The business risk and organisation must be assumed
- Raw materials and auxiliary materials must be procured

WHERE THE ACTIVITY IS NOT REGARDED AS MANUFACTURING

On the other hand, where the manufacturing activity is essentially carried out through toll manufacturers, or where the taxpayer merely engages in commercial activity without assuming the manufacturing organisation and manufacturing risk, the profits derived from these activities **ARE NOT ASSESSED** as profit derived from manufacturing activity.

EXAMPLE

Where (A) A.Ş., which is engaged in furniture manufacturing and holds an industrial registry certificate, has the cutting and painting of certain parts of the furniture it manufactures carried out on a toll basis, but itself carries out the production planning, raw material procurement, quality control and manufacturing activity, the profit derived from the sale of the said products is assessed within the scope of profit derived from manufacturing activity.

Deduction Where Export and Manufacturing Activities Are Carried Out Together

COMMUNIQUÉ ART.
7/f

Taxpayers may sell the products they manufacture both on domestic markets and on foreign markets. For the profits derived exclusively from manufacturing activities by institutions holding an industrial registry certificate and actually engaged in manufacturing activity and by institutions engaged in agricultural production activity, the seventh and eighth paragraphs of CTL Art. 32 will be assessed **AS A WHOLE**, and since the corporate tax rate will be applied as 12.5% with a 12.5-point reduction to the profit derived from the sale of the products manufactured within this scope on both domestic and foreign markets, a further 5-point reduction will not additionally be applied to the portion of that profit corresponding to exports in a manner that would give rise to **A SECOND DEDUCTION**.

EXAMPLE 1 — (H) A.Ş.

(H) A.Ş., which holds an industrial registry certificate and is engaged in bag manufacturing, sells part of the bags it manufactures on the domestic market and exports part of them. (H) A.Ş. derived a profit of TRY 400,000 from the domestic sale of the said bags it manufactured in 2027 and TRY 600,000 from their export, amounting to a total profit of TRY 1,000,000.

RESULT

The corporate tax rate will be applied with a 12.5-point reduction to the **ENTIRETY** of the TRY 1,000,000 profit derived by (H) A.Ş. — whose commercial balance sheet profit and net corporate profit in 2027 were also TRY 1,000,000 — from the domestic and foreign sale of the products it manufactured. Accordingly, a further 5-point reduction **WILL NOT** additionally be applied to the TRY 600,000 portion of the said profit corresponding to exports in a manner that would give rise to a second deduction.

Export and Manufacturing Together — Example 2

PERIOD
2027

ACTIVITY
Heating systems manufacturing

(I) A.Ş., which holds an industrial registry certificate, manufactures heating systems, offering part of them for sale on the domestic market and exporting part of them; its 2027 operating results are as follows:

Commercial balance sheet profit	TRY 3,000,000
Profit derived from domestic sales	TRY 900,000
Profit derived from exported products	TRY 1,500,000
Other profits (outside the scope of the deduction)	TRY 600,000
Non-deductible expenses (KKEG)	TRY 200,000
Prior-year losses	TRY 1,200,000
Tax base	TRY 2,000,000

BASE TO WHICH THE REDUCED RATE APPLIES (TOTAL MANUFACTURING: 900,000 + 1,500,000 = 2,400,000)

2,000,000 × (2,400,000 / 3,000,000)
= 2,000,000 × 80%
= TRY 1,600,000

RESULT

Corporate tax at 12.5% with a 12.5-point reduction will be applied to the entirety of the profit derived from the sale of the heating systems manufactured by (I) A.Ş. A further 5-point reduction on the profit derived from exports, that is a reduction of 17.5 points, **WILL NOT ARISE**. The base to which the 12.5-point reduction is to be applied by reason of the profit derived by (I) A.Ş. in 2027 from the sale of the heating systems it manufactured has been determined as TRY 1,600,000. Accordingly, (I) A.Ş. will apply the corporate tax rate at (25% − 12.5% =) 12.5% with a 12.5-point reduction to the TRY 1,600,000 portion of its 2027 tax base of TRY 2,000,000 by reason of manufacturing activity. The general rate will be applied to the remaining TRY 400,000 portion of the tax base.

Export and Manufacturing Together — Example 3 (Mixed Situation)

PERIOD
2027

(İ) A.Ş., which holds an industrial registry certificate and manufactures construction machinery and hardware materials for sale on domestic and foreign markets, also exports products it purchases from (H) Ltd. Şti., a manufacturer of white goods.

Commercial balance sheet profit	TRY 2,000,000
Profit from the sale of construction machinery (manufacturing)	TRY 800,000
Loss from the export of hardware products (manufacturing)	-TRY 400,000
Profit from the export of white goods (trading/export)	TRY 1,000,000
Other profits (outside the scope of the deduction)	TRY 600,000
Non-deductible expenses (KKEG)	TRY 500,000
Prior-year losses	TRY 1,200,000
Tax base	TRY 1,300,000

MANUFACTURING BASE (12.5 POINTS)

Net profit of 800,000 →
1,300,000 × (400,000 / 2,000,000)
= 20% → **TRY 260,000**

EXPORT BASE (5 POINTS)

1,300,000 × (1,000,000 / 2,000,000)
= 50% → **TRY 650,000**

RESULT

Since (İ) A.Ş. derived a profit of TRY 800,000 in 2027 from the sale of the construction machinery it manufactured and a loss of TRY 400,000 from the export of the hardware products it manufactured, its manufacturing activities resulted in an overall profit of TRY 400,000 (800,000 profit + 400,000 loss). The portion of the base to which the 12.5-point reduction is to be applied for this profit is TRY 260,000. On the other hand, by reason of the profit of TRY 1,000,000 from the export of the white goods it purchased, the portion of the base to which the 5-point reduction is to be applied is TRY 650,000. Accordingly, (İ) A.Ş. will apply the reduced corporate tax rate to a total of (650,000 + 260,000 =) TRY 910,000 of its tax base of TRY 1,300,000 — at (25% – 5% =) 20% for the TRY 650,000 portion by reason of exports, and at (25% – 12.5% =) 12.5% for the TRY 260,000 portion by reason of manufacturing. The general rate will be applied to the remaining TRY 390,000 portion of the tax base.

Where the Total of Export and Manufacturing Profit Exceeds the Commercial Balance Sheet Profit

COMMUNIQUÉ ART.	APPLICATION
7/g-ğ	**2027 and subsequent periods**

Section 32.1.2.8 (Amendment): It goes without saying that the profit to which the corporate tax rate is to be applied at a reduced level, comprising the profits derived exclusively from manufacturing activities by institutions holding an industrial registry certificate and actually engaged in manufacturing activity and the profits derived exclusively from such production activities by institutions engaged in agricultural production activity, together with the profits derived from export activity, **CANNOT EXCEED THE NET CORPORATE PROFIT**. In the section, the references to "2023" have been amended to read "2027", and the references to "1 and 5 points" to read "12.5 and 5 points".

Section 32.1.2.9.2 (Amendment): In the section headed "Application where the profit derived from manufacturing or export activity is made subject to a corporate tax exemption", the references to "2023" have been amended to read "2027", the reference to "1 point" to read "12.5 points", and the reference to "(25% – 1% =) 24%" to read "(25% – 12.5% =) 12.5%".

Section 32.1.2.11 (Amendment): In the third paragraph of the section headed "Application where reduced corporate tax is benefited from", the reference to "1 or 5 points" has been amended to read "12.5 or 5 points".

REPEAL

Section 32.1.2.5 "Example 6" **HAS BEEN REPEALED** (the former 1-point example, now invalid under the new rate).

Joint Application of the Manufacturing/Export Deduction in Publicly Offered Institutions

COMMUNIQUÉ ART.	PUBLIC OFFERING DEDUCTION	PERIOD
7/h	**2 points**	**5 accounting periods**

For institutions whose shares are offered to the public at a rate of at least 20% in order to be traded for the first time on the Borsa İstanbul Equity Market, the corporate tax rate is applied with a **2-POINT REDUCTION** to the entirety of the corporate profits of **FIVE ACCOUNTING PERIODS** beginning with the accounting period in which the shares are first offered to the public.

ORDER OF APPLICATION

The rate reduction for profit arising from manufacturing or export activity is applied to the corporate tax rate determined after the application of the other deductions in Art. 32 of the Law. For this reason, where taxpayers are able to benefit from the sixth, seventh and eighth paragraphs of Art. 32 of the Law in the same period, the provision of the sixth paragraph of Art. 32 (2-point reduction) will be applied **FIRST**, and the 12.5 or 5-point reduction in the seventh and eighth paragraphs will be calculated **THEREAFTER**.

EXAMPLE — (N) A.Ş.

(N) A.Ş., whose shares were offered to the public at a rate of 30% in 2025 in order to be traded for the first time on the Borsa İstanbul Equity Market, holds an industrial registry certificate and manufactures and sells construction machinery. The 2027 operating results of (N) A.Ş. are: commercial balance sheet profit TRY 2,000,000, profit derived from the sale of construction machinery TRY 1,400,000, other profits (outside the scope of the deduction) TRY 600,000, non-deductible expenses (KKEG) TRY 500,000, prior-year losses TRY 2,000,000, **TAX BASE TRY 500,000**.

RESULT

By reason of the public offering carried out on 10/2/2025, (N) A.Ş. will take the corporate tax rate into account in 2027 with a 2-point reduction as (25% − 2% =) 23% pursuant to CTL Art. 32/6. Since this 2-point reduction will be applied to the entirety of its tax base in the 2025–2029 accounting periods, the 12.5-point reduction arising from manufacturing activity will be applied **AFTER** this 2-point reduction: base to which the reduced rate applies = 500,000 × (1,400,000 / 2,000,000) = 70% = TRY 350,000. Accordingly, corporate tax will be applied at (23% − 12.5% =) **10.5%** to the TRY 350,000 portion of the TRY 500,000 tax base, and at 23% to the remaining TRY 150,000 portion.

Exemptions and Deductions in the Domestic Minimum Corporate Tax Calculation

COMMUNIQUÉ ART.	SECTION
8-9	32.5.5 – 32.5.6

ARTICLE 8 — ADDITIONS TO THE EXEMPTIONS AND DEDUCTIONS DEDUCTED FROM CORPORATE PROFIT IN THE DOMESTIC MINIMUM CORPORATE TAX CALCULATION (SECTION 32.5.5, PARAGRAPH 2)

Sub-para	Exemption / deduction added
ç	Deduction for profits derived by institutions from selling abroad goods purchased abroad without bringing them to Türkiye, or from acting as an intermediary in purchases and sales of goods taking place abroad (Law No. 5520 Art. 10/1-i)
d	Deduction for profits derived from abroad by institutions operating as qualified service centres (Law No. 5520 Art. 10/1-j)
e	Deduction for profits derived from activities within the scope of the export of financial services carried out in the Istanbul Financial Centre Zone (Law No. 7412 Art. 6/1-a)

ARTICLE 9 — EXEMPTIONS AND DEDUCTIONS NOT DEDUCTED FROM CORPORATE PROFIT (SECTION 32.5.6, PARAGRAPH 5)

Sub-paragraph (ğ) in the fifth paragraph of the same section **HAS BEEN REPEALED**.

ARTICLES 10-11 — ENTRY INTO FORCE AND EXECUTION

This Communiqué enters into force **ON THE DATE OF ITS PUBLICATION** (04.07.2026); its provisions are executed by the Minister of Treasury and Finance.

Comparison — Former Application / New Application

Subject	Former application	New application
Health institutions of foundation universities	Benefited from the exemption in CTL Art. 4/1-b	The exemption is REMOVED from 1/1/2027; corporate tax liability will be established
Free zone manufacturing profit	Only the profit from sales abroad was exempt	Sales abroad + within the free zone + to other free zones are exempt (from 1/1/2026)
Transit trade / brokerage profit	There was no special deduction regulation	95% of the profit (100% in privileged zones) may be deducted (CTL Art. 10/1-i)
Qualified service centre foreign-source profit	There was no special deduction regulation	95% (100% in privileged zones) deduction, for 20 accounting periods (CTL Art. 10/1-j)
Qualified service centre wage	There was no special income/stamp duty exemption	Income tax + stamp duty exemption up to three times the minimum wage (five times in certain zones) (ITL 23/20)
Corporate tax rate reduction on manufacturing activity	1-point reduction (24%)	12.5-point reduction (12.5%) from the 2027 period; the 1-point reduction continues for the 2026 period
Corporate tax rate reduction on export activity	5-point reduction	5-point reduction (unchanged; not applied a second time when combined with manufacturing)
Asset amnesty	The previous regulations (Laws No. 5811, 6486, 6736, 7143, 7186, 7256, 7417) had expired	New asset amnesty: graduated rate of 0%–5%, notification until 31/7/2027 (CTL Provisional Art. 19)

Section C — Matters Requiring Attention

- ! In the transit trade deduction, profits derived from the sale of goods brought to Türkiye are **OUTSIDE** the scope of the deduction; if goods held in a bonded warehouse are released into free circulation the deduction is lost.

- ! In the transit trade and qualified service centre deductions it is **MANDATORY** that the profit be transferred to Türkiye by the period for filing the corporate tax return; profit not transferred within the period cannot benefit from the deduction even if transferred later.

- ! For profits benefiting from the manufacturing deduction (12.5 points), the export deduction (5 points) is **NOT** additionally applied — the prohibition on a second deduction is fundamental.

- ! The 12.5-point reduced manufacturing tax rate is valid for the 2027 taxation period and thereafter; in the 2026 period the **FORMER** 1-point reduction continues to apply for manufacturers holding an industrial registry certificate.

- ! When the public offering deduction (2 points) and the manufacturing/export deduction are applied together the order matters: **FIRST** the 2-point public offering deduction, **THEN** the manufacturing/export deduction is calculated.

- ! For toll manufacturing to be regarded as manufacturing activity, the five conditions (scope of the industrial registry certificate, the principal manufacturing being within the enterprise's own structure, the actual capacity limit, business risk/organisation, raw material procurement) must be satisfied **TOGETHER**.

Conclusion

Laws No. 7577 and 7582, which entered into force in mid-2026, together with the three Communiqués published in connection with them, have introduced fundamental changes in the following areas:

Asset amnesty

Registration of unrecorded domestic/foreign assets at a graduated rate of 0%–5% and until 31/7/2027

Qualified service centre wage

Income tax and stamp duty exemption up to three to five times the minimum wage

Transit trade

Corporate tax deduction of 95%–100% on profits from the sale of, or brokerage in, goods not brought to Türkiye

Manufacturing and export

12.5 points in manufacturing, 5 points in export; 95%–100% foreign-source profit deduction at qualified service centres

RECOMMENDATION

It is important that professionals inform their clients fully as to the periods, rates, conditions and exemptions in these regulations; in particular, undertaking periods, transfer periods and the conditions for benefiting from the deductions should be followed meticulously.

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THANK YOU

Sources

• General Communiqué on Bringing Certain Assets into the Economy (Serial No. 1) — Official Gazette 04.07.2026/33300
• Communiqué on the Exemption for Wages of Personnel Employed at Qualified Service Centres — Official Gazette 04.07.2026/33300
• Communiqué Amending the Corporate Tax General Communiqué (Serial No. 1), Serial No. 26 — Official Gazette 04.07.2026/33300
• Law No. 7582 on Amendments to Certain Laws (Official Gazette 21.05.2026)
• Law No. 7577 on Amendments to Certain Laws (Official Gazette 02.04.2026)

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