

No : 2026/01

Date : January 2nd, 2026

Subject : Financial/Tax Bulletin (November– December 2025)

We would like to share with you the latest developments in Turkish tax regulations and provide you an update on the regulatory changes along with their effects on your business through our tax bulletins. We summarized the important amendments and changes monthly basis, but this time we preferred for last 2 months of the year. Hope you enjoy reading! Happy New Year!

Major Tax Issues

New Tax Omnibus has been enacted and started to be implemented.

- Consisting of 36 articles, new Law includes narrowing the current tax exemptions for taxpayers and increasing the social security burdens for the firms. Here are the key points:
- Introduction of an upper limit on increases in property tax values,
- Narrowing the withholding tax exemption for long-term fund gains,
- Reintroduction of the fourth provisional tax period which was abolished before,
- Removal of the deduction of interest expenses relating to residential rental properties from gross rental income which will continue for other properties,
- Imposition of a one-fold tax loss penalty for under-declaration in transfers and acquisitions of real estate instead of “reduced tax penalty application”,
- Clarification of the title deed fee base for real estate transfers and registrations.
- Regarding social security applications, the 4-point insurance premium reduction provided to employers in non-manufacturing sectors under Law No. 5510 has been reduced to 2 points.
- The upper limit for earnings subject to premiums has been increased from 7.5 times the minimum wage to 9 times the minimum wage.
- The employer's share of premiums in long-term insurance branches has been increased by 1 point.
- The premium support program for young entrepreneurs, which lasted for one year, will be terminated. Apparently, this program was very popular and used more than expected, and the decision was made to discontinue it.

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Tax Communique for Pillar II has been published by the Tax Administration in Türkiye.

- It is a long document with a Draft form including referred OECD documents. The Administration kept it online for public consultation for a long time. It's a fundamental and complex tax model affecting approximately 8,000 companies worldwide. It's a minimum tax regime, unlike the "domestic minimum corporate tax" introduced by the same law in our country. We will summarize the new draft of secondary corporate tax legislation announced.
- You can find the details by clicking the [link](#).
- Top up tax return deadline is extended till mid-January of 2026.

Postponement of inflation accounting is accepted for 3 years including FY25.

- The firms are not supposed to adjust the financial tables for 3 years.
- The financial firms, including banks, do not have to adjust the financial tables as well according to the recent Decree of the BRSA. (BDDK)

New tax rates, brackets and tariffs are announced by the relevant authorities.

- Some of the tax figures and amounts are defined with the inflation rate, 25,49, and some of those are increased with a discounted rate. (%18,95)

Tax Authority announced a new Communiqué regarding with the “tax compliance report” system.

- With the new regulation, the taxpayers enjoying many of the tax incentives or exemptions should get a “tax compliance services” from sworn-in CPA firms.
- Top up tax, tax incentives for R&D centers, tax exemptions for Technopark firms and free-zone firms are some of the defined company types to get this service.

Deferred interest and delay interest rates are reduced for taxpayers.

Tax exemptions are getting narrowed for small enterprises.

- Income tax exemption and VAT exception has been used for specific types of small businesses in Türkiye for a long time. The President has narrowed the “exempted list” with some amendments. Beginning from 2026 taxis, business working in construction, production and trade of goods, restaurants and similar enterprises shall not be entitled to this exemption.

Numerous double taxation agreements (DTAs) and mutual investment promotion agreements are on the Turkish Grand National Assembly's (TBMM) agenda.

- Those are Azerbaijan, Gabon, Cuba, Burundi and Palestine. We see that the Multilateral Agreement (MLI) has not been submitted to Parliament again.
- Tax Treaty with Hong-Kong is accepted by the Parliament.

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The provisional application period for temporary art. 67 of the Income Tax Law has been extended.

- With the relevant Presidential Decree, the application period for the regulation concerning the taxation of income from securities, deposit interest, and repo income has been extended from December 31, 2025, to December 31, 2030.

Tax rate for the “digital services tax” has been reduced.

- The digital services tax rate, which is applied at 7.5% will be reduced to 5% for 2026 and 2.5% for 2027. This revision is accepted after the 2 presidents of Türkiye and USA are met.

The list of taxpayers who did not pay taxes has been announced.

The 2026 Central Government Budget was approved by the Turkish Grand National Assembly.

General health insurance premiums have been increased from 3% to 6%.

General health insurance (GSS) contribution debts prior to 2016 have been written off.

Minimum wage is accepted by the Commission.

- As of the beginning of January 2026, the net monthly minimum salary is set as TRY 28,075.50. The gross amount is calculated as TRY 33,030.00.

Banking & Finance

The Capital Markets Board has raised the financial thresholds required for (IPOs).

- These increased thresholds, implemented as part of a revaluation, have made the initial public offerings (IPO) requirements more stringent.

The Circular on Capital Movements has been updated!

The Central Bank of Turkey (TCMB) has updated its list of currencies it "buys and sells".

The "Capital Markets Board Organizational Regulation" has been published in the Official Gazette.

The amount of insured deposits and participation funds has been increased

- The figure has increased from 950,000 TL to 1,200,000 TL.

The Central Bank of Turkey (TCMB) has revised the rediscount and advance interest rates.

Central Bank of Republic of Turkey reduced the interest rates as expected.

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- The Monetary Policy Committee (the Committee) has decided to reduce the policy rate (the one-week repo auction rate) from 39.5 percent to 38 percent. The Committee has also lowered the Central Bank overnight lending rate from 42.5 percent to 41 percent and the overnight borrowing rate from 38 percent to 36.5 percent.

Commercial Regulations

Tariffs for lawyers, CPA's and customs transactions are announced with the Official Gazette.

Regulations and Compliance Process Introduced by the Regulation on Direct Sales

- Companies engaged in "direct sales activities" before the Regulation will be obliged to bring their company structures and activities into compliance with the procedures and principles stipulated in the Regulation and to apply for a direct sales authorization certificate ("Authorization Certificate") no later than 30/01/2026.
- You can see more in our website regarding with the taxation of "direct sale system".

"The Regulation on Business Opening and Operating Licenses" has been amended.

You may need to switch to e-ledger applications for non-commercial ledgers as well; please check.

- Türkiye has made significant strides in electronic documents and e-ledgers.

- As of July 1, 2025, the transition period began for specific types of companies including banks and audit firms. This is also mandatory for companies established from the beginning of 2026.
- Companies that wish to maintain their share ledgers, general assembly discussion ledgers, and board decision ledgers electronically.
- Transition period is extended to the year end. Board decision ledgers are excluded from this new application with an amendment published later.

New international tax transparency for real estate will begin.

- OECD welcomes pledge by 26 jurisdictions to implement new international tax transparency framework for offshore real estate
- Türkiye is not a party yet for this framework yet. It will affect the Turkish taxpayers.

R&D and Incentives

Exporters' obligation to sell the export income to CBRT is extended.

- The foreign exchange conversion support (3%) and export foreign exchange sales obligation (35%) are current until the end of April 2026.

Don't forget your obligation to allocate 3% of your funds to R&D and Technology Parks.

R&D personnel can work remotely for 2026.

- The ratio for IT personnel is %100 and others are %75 for FY2026.

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Türkiye has begun preparations to lead the COP31 summit.

The Regulation on the Certification of Technological Products has been published.

Changes have been made to the "Domestic Components Regulation".

Customs & Foreign Trade

Foreign exchange support program is getting limited to the scope and the Tax Certificate.

- The Central Bank of Turkey (TCMB) is implementing a limited program for foreign exchange conversion support through "tax exemption certificate" (VRHIB.)

Miscellaneous

Special discounted car insurance for people with disabilities will begin on February 1, 2026.

Arrangements have been made for the use and leasing of floating solar power plants.

Statutory interest and default interest were abolished by the Constitutional Court after 41 years.

**Best regards,
Taxademy Partners**