

Turkey

Summary of CbC Reporting and Transfer Pricing Documentation Rules

Country-by-Country Report

- Effective Date: Fiscal years beginning on or after January 1, 2019.
- Filing Threshold: Turkish MNEs with consolidated group revenue of at least €750 million in the previous year.
- Local Filing: A Turkish constituent entity is required to file a CbC report if certain conditions are met (local filing may be prepared in English).
- Information Reported: Generally consistent with OECD guidance.
- Language: Turkish.
- Forms/Filing Instructions:
 - CbC Notification of Reporting Entity: submitted electronically to the Online Tax Office.
 - CbC Report: submitted electronically via the Revenue Administration Information Transfer System (BTRANS).
- Deadline for Filing Notification of Reporting Entity: Within 6 months following the end of the reporting year.
- Deadline for Filing CbC Report: Within 12 months after the end of the reporting year.
- Penalties: Penalties may apply for non-compliance.
- Exchange of Information:
 - MCAA CbC: signed.
 - U.S. CAA CbC: signed.

For a schedule of CbC report and CbC notification deadlines (by country), please see [CbC Reporting Deadlines](#).

Master File

- Effective Date: Fiscal years beginning on or after January 1, 2019.
- Filing Threshold: Turkish entities of an MNE group with (i) an asset value of TL 500 million or more at the end of the prior fiscal year and (ii) revenue of TL 500 million or more.
- Information Reported: Generally consistent with OECD guidance.
- Language: Turkish.
- Deadline for Preparation/Submission: Prepared by the end of the following year and submitted to the tax authority within 15 days of a request.
- Penalties: Penalties may apply for non-compliance.

Local File (Annual Transfer Pricing Report)

- Effective Date: Local file similar to the annual transfer pricing report which has been effective since 2007.

Bloomberg Tax

- Filing Threshold: No monetary threshold. Generally, applies to all taxpayers with cross-border intercompany transactions (for large corporations includes both domestic and cross-border transactions) and companies operating in the free trade zone (domestic intercompany transactions).
- Information Reported: Generally consistent with OECD guidance.
- Language: Turkish.
- Deadline for Preparation/Submission: Prepared by the date of submission of the corporate income tax return and submitted to the tax authority within 15 days of a request.
- Penalties: Penalties may apply for non-compliance.

Transfer Pricing Disclosure

Corporate income taxpayers must complete the Transfer Pricing, Controlled Foreign Corporation and Thin Capitalisation Form which is submitted to the relevant tax office as an attachment to the annual corporate income tax return.