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## **UPDATE ON THE AUTOMATIC EXCHANGE OF COUNTRY-BY-COUNTRY REPORTS (CBCR)**

As known, Country-by-Country Reporting (CbCR) within the scope of OECD's Action Plan 13 to prevent Base Erosion and Profit Shifting (BEPS), has been prepared for the first time in Turkey for 2019 CBCR and has been submitted to the Turkish Revenue Administration by June, 2021.

The deadline for 2020 CbCR is 31 December, 2021.

On October, 2020 Turkey has signed CBC MCAA (CbC Multilateral Competent Authority Agreement), the authority agreement which is required for Turkey to exchange information automatically under the country-by-country reporting. The current number of countries that can exchange information with Turkey has been listed in OECD's website (<https://www.oecd.org/tax/beps/country-by-country-exchange-relationships.htm>).

In this context, if the taxpayer's ultimate parent company is resident in a country that can exchange information automatically to Turkey; as long as the notification form CBCR report clearly indicates the UPE (Ultimate Parent Entity) or SPE (Surrogate Parent Entity) of the MNE and its respective resident country, the resident taxpayer in Turkey will not need to take further action related to CbCR.

Otherwise, if the UPE or SPE is not resident in a country that can exchange information automatically to Turkey; the CbCR will be submitted via BTRANS by the local filing mechanism by the December 31, 2021.

The list of countries Turkey will be able to exchange information automatically to (51 countries) and the list of countries to be able to exchange information automatically from Turkey (60 countries) are given below in separate tables.

In addition to tables below; IRS has announced that the Competent Authority Agreement between the USA and the Turkey has been signed as of 24.11.2021. Therefore, USA will be able to automatically exchange the CbCR with Turkey. The Turkish affiliates of US MNEs will not be required to locally file 2020 CbCRs to Turkish Revenue Administration.

From Turkey to Other Countries			
	Source Country	Destination Country	Legal instrument
1	Turkey	Andorra	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
2	Turkey	Argentina	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
3	Turkey	Australia	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
4	Turkey	Austria	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
5	Turkey	Belgium	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
6	Turkey	Brazil	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
7	Turkey	Chile	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
8	Turkey	China	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
9	Turkey	Colombia	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
10	Turkey	Croatia	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
11	Turkey	Czech Republic	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
12	Turkey	Denmark	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
13	Turkey	Estonia	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
14	Turkey	Finland	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
15	Turkey	France	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
16	Turkey	Germany	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
17	Turkey	Gibraltar	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
18	Turkey	Greece	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
19	Turkey	Hong Kong, China	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
20	Turkey	Iceland	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
21	Turkey	India	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
22	Turkey	Indonesia	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
23	Turkey	Ireland	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019

From Turkey to Other Countries			
	Source Country	Destination Country	Legal instrument
24	Turkey	Isle of Man	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
25	Turkey	Italy	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
26	Turkey	Japan	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
27	Turkey	Jersey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
28	Turkey	Korea	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
29	Turkey	Latvia	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
30	Turkey	Lithuania	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
31	Turkey	Luxembourg	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
32	Turkey	Malaysia	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
33	Turkey	Malta	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
34	Turkey	Mauritius	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
35	Turkey	Mexico	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
36	Turkey	Netherlands	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
37	Turkey	New Zealand	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
38	Turkey	Nigeria	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
39	Turkey	Norway	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
40	Turkey	Peru	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
41	Turkey	Poland	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
42	Turkey	Portugal	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
43	Turkey	San Marino	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
44	Turkey	Seychelles	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
45	Turkey	Slovak Republic	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
46	Turkey	Slovenia	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
47	Turkey	South Africa	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
48	Turkey	Spain	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
49	Turkey	Switzerland	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
50	Turkey	United Kingdom	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
51	Turkey	Uruguay	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019

From Other Countries to Turkey			
	Source Country	Destination Country	Legal instrument
1	Andorra	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
2	Anguilla	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
3	Argentina	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
4	Australia	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
5	Austria	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
6	Belgium	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
7	Belize	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
8	Bermuda	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
9	Brazil	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
10	Bulgaria	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
11	Cayman Islands	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
12	Chile	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
13	China	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
14	Colombia	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
15	Costa Rica	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
16	Croatia	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
17	Czech Republic	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
18	Denmark	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
19	Estonia	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
20	Finland	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
21	France	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
22	Germany	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
23	Gibraltar	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
24	Greece	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
25	Hong Kong, China	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
26	Iceland	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
27	India	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
28	Indonesia	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
29	Ireland	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
30	Isle of Man	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
31	Italy	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
32	Japan	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
33	Korea	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
34	Latvia	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019

From Other Countries to Turkey			
	Source Country	Destination Country	Legal instrument
35	Lithuania	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
36	Luxembourg	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
37	Macau, China	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
38	Malaysia	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
39	Malta	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
40	Mauritius	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
41	Mexico	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
42	Netherlands	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
43	New Zealand	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
44	Nigeria	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
45	Norway	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
46	Peru	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
47	Poland	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
48	Portugal	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
49	Qatar	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2020
50	Romania	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
51	San Marino	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
52	Seychelles	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
53	Slovak Republic	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
54	Slovenia	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
55	South Africa	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
56	Spain	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
57	Switzerland	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
58	Turks and Caicos Islands	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
59	United Kingdom	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019
60	Uruguay	Turkey	CbC MCAA activated - Effective for taxable periods starting on or after 01 January 2019

Best Regards,

**DENGE İSTANBUL YEMİNLİ  
MALİ MÜŞAVİRLİK A.Ş.**

(\*) The explanations in our circulars are for informational purposes only. Before taking a definite action on matters of doubt, we recommend that you seek the opinion and support of an expert consultant; our consultancy will not be liable for any damages that may arise as a result of the actions to be taken only on the basis of the explanations in our circulars.

(\*\*) For your opinions, comments and questions about our circulars, please write to our experts below.

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