



CIRCULAR NO: 2026/024eng

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## IMPORTANT REMINDER REGARDING REPORTING OBLIGATIONS TO THE CENTRAL BANK OF THE REPUBLIC OF TÜRKİYE UNDER THE SYSTEMIC RISK DATA TRACKING SYSTEM

This circular provides important information and reminders regarding reporting obligations to the Central Bank of the Republic of Türkiye (“CBRT”) under the Systemic Risk Data Tracking System (“SRVTS”).

### 1. Systemic Risk Data Tracking System

SRVTS is a comprehensive database established by the CBRT to monitor transactions that affect the foreign exchange (FX) position of companies designated under the *Regulation on the Procedures and Principles Regarding the Monitoring by the Central Bank of Transactions Affecting Foreign Exchange Positions*.

Under the Regulation published in the Official Gazette No. 32363 dated 08.11.2023, the scope of companies subject to FX position reporting was revised. Accordingly, instead of the previous requirement of having USD 15 million or more in FX-denominated loan obligations, companies now fall within the reporting scope if:

- Their total cash loan balance is **TRY 100 million or more** as of the last business day of the respective monthly accounting period, or
- Their **net sales revenue** or **total assets** for the preceding fiscal year are **TRY 500 million or more**.

Details were previously provided in our Circulars [2023/217](#) and [2024/052](#).

Following the amendment published in the Official Gazette No. 32889 dated 03.05.2025, these monetary thresholds were increased, and the reporting frequency was reduced from monthly to **quarterly**.

## 2. Which Companies Are Subject to Reporting?

Companies meeting **any** of the following conditions must submit the required information via the data form and explanatory form to the CBRT on a quarterly basis:

- Companies whose **total domestic and foreign cash loan balance** is **TRY 250 million or more** as of the last business day of the relevant monthly accounting period, or
- Companies whose **net sales revenue** for the preceding fiscal year is **TRY 1.5 billion or more**, or
- Companies whose **total assets** for the preceding fiscal year are **TRY 1.5 billion or more**.

## 3. Reporting Method and Period

Companies within the scope must prepare both SRVTS data forms — **Form-1 (Balance Sheet Data)** and **Form-2 (Fixed Assets and Purchase/Sale Information)** — for each quarterly period and submit them **by the last day of the following month** through the system accessible at: <https://www.tcmbveri.gov.tr/>

Companies with a special accounting period must report based on their own quarterly periods.

The CBRT website contains user manuals and all technical information regarding the system.

## 4. Which Financial Statements Must Be Used to Determine Reporting Liability?

To determine whether a company is obligated to report;

- For calculating **total cash loan balances**:
  - ✓ If available, the **Statement of Financial Position prepared in accordance with Turkish Accounting Standards (TMS)**;
  - ✓ If such TMS-compliant statements are not available, the **statutory balance sheet** prepared under tax legislation for submission to public authorities

shall be used.

- For calculating **net sales revenue** and **total assets**:
  - ✓ The annual corporate income tax return prepared under tax legislation shall be taken into account.

FX-denominated loan balances must be converted into TRY using the **CBRT buying rate** published in the Official Gazette on the last business day of the relevant period.

## 5. How to Submit Delayed Reports

To submit delayed reports, a company must open a “**Correction Request**” under the “Communication” tab in the system for both forms. After selecting the relevant period and month, the correction category should be chosen and the request submitted.

Questions regarding the application may be sent to:  
[kurumsalizleme@tcmb.gov.tr](mailto:kurumsalizleme@tcmb.gov.tr)

## 6. Penalties for Non-Compliance

If reporting requirements are not fulfilled, the CBRT may refer the matter to **judicial authorities** pursuant to Article 68/4 of the CBRT Law, which provides that:

*Individuals or legal persons—and their responsible officers—who fail to provide requested information and documents, provide false information, or provide information contrary to the prescribed procedures and principles may be sentenced to a judicial fine of not less than one thousand days and not more than two thousand days.*

## 7. Important Reminder

Recent CBRT reviews have shown that warning notices have begun to be issued to companies that fall within the reporting scope based on loan balances, net sales revenue, or asset size, but have **not fulfilled their reporting obligations**.

To avoid any administrative or judicial sanctions, we strongly remind taxpayers to complete any **missing past-period reports** and ensure that **current reporting obligations** are fulfilled in accordance with the applicable regulations.

Respectfully,

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

(\*) The remarks in our circulars are for information purposes only. We recommend that the opinion and support of a qualified counsellor be sought before taking final action on questionable matters. Our company shall not be held responsible for any damages incurred as a result of transactions to be made solely based on the statements in our circular.

(\*\*) For opinions, criticism, and questions about our circulars, please contact our experts below.

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