



CIRCULAR NO: 2026/102eng.

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LAW NO. 7582, CONTAINING SIGNIFICANT TAX INCENTIVE AND EXEMPTION PROVISIONS, HAS BEEN ADOPTED BY THE GRAND NATIONAL ASSEMBLY OF TURKEY

The “Bill on Amendments to Certain Laws” submitted to the Presidency of the Grand National Assembly of Turkey was adopted by the General Assembly on 21.05.2026 and enacted under Law No. “7582”. Law No. 7582 is expected to be published in the Official Gazette within the next few days.

While the Law was still at the bill stage, we had provided information in our Circular No. [2026/087](#). During the legislative process, certain provisions of the bill were amended, and some new provisions were incorporated during the General Assembly stage. This circular sets out information on the provisions introduced by Law No. 7582.

1. The Deferral Period Applicable to Public Receivables Has Been Extended and the Unsecured Deferral Threshold Has Been Increased

For deferrals granted under Article 48 of the Law No. 6183 on the Procedure for the Collection of Public Receivables, the maximum installment period has been increased from 36 months to 72 months, and the unsecured deferral amount has been raised from TRY 50,000 to TRY 1 million.

This provision will enter into force on the date of publication.

2. Amendments Have Been Introduced to Facilitate the Wage Exemption for Shares Granted to Employees of Technostartup Companies

Improvements have been made to the conditions of the wage exemption applicable to shares granted free of charge or at a discount to personnel employed by technostartup companies, as regulated under Article 17 of the Income Tax Law (“ITL”). The upper limit eligible for the exemption has been reset **two times the gross annual remuneration for the relevant year**. In addition, by shortening the required holding periods for such shares, it has been stipulated that if the shares acquired in this manner are disposed of **within 2 years** from the acquisition date, **the entire exempted tax**; if disposed of **between 3 and 4 years, 75% of the exempted tax**; and if disposed of **between 5 and 6 years, 25% of the exempted tax**, shall be collected from the employer together with default interest.

The regulation will enter into force on the date of publication.

3. An Income Tax Exemption Has Been Introduced for Foreign-Sourced Income and Earnings of Individuals Not Resident in Türkiye

With the addition of Article 20/D to the ITL, income and earnings derived outside Türkiye by individuals who satisfy the conditions of not being deemed resident in Türkiye and not having tax liability in Türkiye during the last three calendar years have been exempted from income tax.

It has also been stipulated that the fact that such individuals have derived immovable property income, movable capital income or capital gains in Türkiye in the current year or prior years shall not be deemed a breach of the condition of having no tax liability in Türkiye for the purposes of this Article.

It has been further provided that income and earnings derived by such persons within Türkiye shall remain outside the scope of the exemption and shall be taxed in accordance with the general provisions.

Moreover, under the new regulation, expenses and costs arising from foreign-sourced income and earnings shall not be taken into account in determining taxable income and earnings derived in Türkiye, and taxes paid abroad on such foreign-sourced income and earnings shall not be creditable against income tax assessed in Türkiye.

The regulation will enter into force on the date of publication, to apply to individuals deemed resident in Türkiye as of 01.01.2026.

4. An Inheritance and Transfer Tax Exemption Has Been Granted for Asset Transfers from Non-Residents of Türkiye

A regulation has been introduced whereby, for persons whose foreign-sourced income and earnings are exempt from income tax under the proposed Article 20/D of the ITL, the tax shall be levied at the rate of 1% in the case of inheritance transfers subject to inheritance and transfer tax occurring during the period in which the said exemption is enjoyed.

The regulation will enter into force on the date of publication.

5. The Legal Framework for the Establishment of Qualified Service Centers Has Been Introduced

An additional article titled “Qualified service center” has been inserted into the Foreign Direct Investments Law No. 4875.

A qualified service center is defined as a capital company established to provide services to an affiliated company or group of companies actively operating in at least three different countries and deriving at least **80% of its annual revenue from affiliated companies or the group of companies located abroad**.

It is regulated that these centers may provide services such as financial advisory, strategic management, risk management, cash and liquidity management, international accounting and compliance, audit, digital transformation, technology consultancy, legal advisory, human resources and training.

The statutory text imposes a limitation with respect to “legal advisory” listed among the activities of qualified service centers, stating that legal advisory relating to domestic activities or Turkish law may only be procured from an attorney or attorney partnership authorized to provide services under Attorneyship Law No. 1136.

The regulation will enter into force on the date of publication.

6. A Wage Exemption Has Been Granted to Personnel Employed at Qualified Service Centers

Subparagraph (20) has been added to the first paragraph of Article 23 of the ITL. The portion of the remuneration of **qualified service personnel employed at qualified service centers** as defined under the Foreign Direct Investments Law, up to a specified amount, has been exempted from income tax.

As a general rule, the exemption will apply to the portion **not exceeding three times the gross minimum wage**. For certain **industrial zones** and **qualified service centers operating in the Istanbul Financial Center (IFC)**, this threshold will be applied as **five times the gross minimum wage**.

The regulation will enter into force on the date of publication.

7. A Corporate Tax Deduction of up to 100% Has Been Introduced for Income Derived from Transit Trade Activities

Two significant amendments have been introduced to Article 10 of the Corporate Tax Law (“CTL”).

First, with subparagraph (i) added to the first paragraph of Article 10 of the CTL, **95% of the income derived from the sale abroad of goods purchased from abroad without being brought into Türkiye, or from intermediary services in respect of purchase and sale transactions carried out abroad, may be deducted from corporate income.** For industrial zones established under the Industrial Zones Law No. 4737 that are deemed appropriate by the President according to the region's foreign investment intensity, and for corporations operating in the IFC Region upon obtaining a participant certificate under the provisions of Law No. 7412 on the Istanbul Financial Center, this rate will be applied as 100%.

In order to benefit from this deduction, the income must be transferred to Türkiye by the due date for filing the annual corporate tax return for the accounting period in which the income is earned, and, in the case of intermediary activities, both the seller and the buyer of the goods must be located outside Türkiye.

By subparagraph (j) added to the same paragraph, 95% of the income derived abroad exclusively within the scope of the activities of corporations operating as qualified service centers may also be deducted from corporate income. For industrial zones established under Law No. 4737 that are deemed appropriate by the President according to the region's foreign investment intensity, and for corporations operating as qualified service centers in the IFC Region, this rate will be applied as 100%.

This deduction shall apply for twenty accounting periods, starting from the accounting period in which the qualified service center commences operations, provided that the income is transferred to Türkiye by the due date for filing the annual corporate tax return for the accounting period in which the income is earned.

The regulation will enter into force on the date of publication, applicable as from returns required to be filed as of 01.07.2026 and for corporate income relating to taxation periods commencing on or after 01.01.2026 (or, for corporations using a special accounting period, accounting periods commencing on or after 01.01.2026).

8. The Corporate Tax Rate Has Been Reduced to 12.5% for Income Derived by Corporations Exclusively from Manufacturing Activities and Agricultural Production Activities

While the bill was at the proposal stage, it was envisaged that the corporate tax rate would be applied at 9% to export income of manufacturer-exporter corporations and at 14% to export income of non-manufacturer corporations.

With a significant amendment made during the legislative process, it has been enacted that the corporate tax rate shall be applied at **12.5%** to income derived exclusively from manufacturing activities by corporations holding an industrial registry certificate and actually engaged in manufacturing activities, and to income derived exclusively from such production activities by corporations engaged in agricultural production activities. For income benefiting from the 12.5-point reduction, the additional 5-point export income reduction set forth in Article 32/7 of the CTL may not also be applied.

The regulation will enter into force on the date of publication, to apply to income derived in the 2027 taxation period and subsequent taxation periods, and, for corporations subject to a special accounting period, to income derived in the special accounting period commencing in the 2027 calendar year and subsequent taxation periods.

9. Certain Deductions May Now Be Offset Against the Domestic Minimum Corporate Tax Base

A regulation has been introduced allowing the deductions provided for transit trade income and qualified service center income under subparagraphs (i) and (j) of the first paragraph of Article 10 of the CTL, as well as the corporate tax income deduction granted for exports of financial services under the IFC Law, to be deducted from the corporate income forming the basis for the calculation of the domestic minimum corporate tax.

The regulation will enter into force on the date of publication, applicable as from returns required to be filed as of 01.07.2026 and for corporate income relating to taxation periods commencing on or after 01.01.2026 (or, for corporations using a special accounting period, accounting periods commencing on or after 01.01.2026).

10. Regulations Have Been Introduced to Repatriate Overseas Assets into the Economy (Asset Peace)

An “asset peace” arrangement has been introduced through Provisional Article 19 added to the CTL.

For the purpose of increasing voluntary tax compliance, cash, gold, foreign currency, securities and other capital market instruments held abroad by real persons or legal entities may be declared to banks or intermediary institutions until 31.07.2027.

The declared assets must be transferred, within two months from the declaration date, to accounts opened in their names at banks or intermediary institutions in Türkiye, or, if physically brought from abroad, deposited into such accounts. The physical bringing of assets into Türkiye shall be evidenced by documents relating to the declaration made to the Customs Administration.

Cash, gold, foreign currency, securities and other capital market instruments owned by income or corporate tax taxpayers and located in Türkiye but not recorded in the statutory books must also be declared to banks or intermediary institutions until 31.07.2027. It is mandatory that the declared assets be evidenced by being deposited with banks or intermediary institutions as of the declaration date.

Declared assets shall be recorded in the statutory books by taxpayers keeping books under the Tax Procedure Law as of the declaration date. Taxpayers keeping books on the balance sheet basis shall open a special reserve account under liabilities for the assets recorded in their statutory books pursuant to this Article. This reserve account may not be withdrawn from the business until two years have elapsed from the declaration date, may not be used for any purpose other than capitalization, and shall not be taxed if the enterprise is liquidated. Taxpayers keeping a self-employment income book or books

on an operating account basis shall separately show such assets in their books. These assets shall not be taken into account in determining period income and may be withdrawn from the business after two years from the declaration date without being taken into account in determining taxable income and, for corporations, distributable income.

Persons without income or corporate tax liability may also benefit from the provisions of this Article without being subject to conditions such as book entry, opening a special reserve account or restrictions on withdrawal from the business, provided that they bring the declared foreign assets into Türkiye within the above period and evidence their domestic assets by depositing them with a bank or intermediary institution as of the declaration date.

Banks and intermediary institutions shall, in respect of the assets declared to them, declare to the tax office to which they are attached, in their capacity as withholding agents, and pay within the same period the tax collected in advance from the declarant at the rate of 5% over the value of the assets, by the evening of the fifteenth day of the month following the declaration. However, if it is undertaken that the declared asset will be maintained for at least five years in time deposit accounts, government domestic debt securities and lease certificates issued under Law No. 4749, or venture capital investment funds, the rate shall apply as 0%; if maintained for at least four years, 1%; if maintained for at least three years, 2%; if maintained for at least two years, 3%; and if maintained for at least one year, 4%. For declarations made from 01.01.2027 until 31.07.2027 (inclusive), these rates shall be increased by half a point. In the event the deadline of 31.07.2027 is extended by authorization, declarations made after that date shall be subject to an additional half-point increase, resulting in a total increase of 1 point. No stamp tax shall be levied on the undertakings to be submitted.

Tax paid under the asset peace arrangement may under no circumstances be treated as an expense or credited against any other tax. Losses arising from the disposal of the declared assets shall not be accepted as an expense or deduction for income or corporate tax purposes.

No tax inspection or tax assessment shall be carried out in respect of the amounts corresponding to the declared assets. However, measures required under other legislation shall not be affected by this regulation. If, in tax inspections initiated for other reasons or as a result of assessment commission decisions, the tax base difference found is determined to have arisen from assets declared under this Article and the amount of the declared assets is equal to or greater than the tax base difference found, no assessment shall be made in respect of such tax base difference. If, although the tax base difference is determined to have arisen from the declared assets, such difference exceeds the amount of the declared assets, tax assessment shall be made only on the amount of the difference. If, as a result of tax inspections or assessment commission decisions, a tax base difference is found for reasons other than the assets subject to declaration, assessment shall be made without offsetting the amounts declared under this Article against the tax base difference found.

If, despite declaration, the declared assets are not brought into Türkiye within two months from the declaration date, are not transferred to an account to be opened at a bank or

intermediary institution in Türkiye, or, if declared pursuant to the third paragraph, are not deposited with a bank or intermediary institution within the period specified therein; or if the taxes assessed in relation to the declared amounts are not paid on time, undertakings are not complied with, or the other conditions set out in this Article are not fulfilled, the protection against tax inspection and tax assessment may not be benefited from. In addition, taxes not assessed in due time shall be collected together with default interest, without the imposition of a tax loss penalty. No immunity from tax inspection and tax assessment shall apply to assessments to be made as a result of inspections or assessment commission decisions where the declaration under this Article is made after the date on which a tax inspection commenced or the matter was referred to the assessment commission. Failure to pay the accrued tax by its due date shall not prevent the follow-up and collection of the principal tax together with default surcharge pursuant to Law No. 6183. Taxes already collected shall not be rejected or refunded.

No correction may be made to declarations after the expiration of the declaration period.

The President is authorized to extend the date of 31.07.2027, by periods not exceeding six months at a time, for up to one year from the expiration date; and the Ministry of Treasury and Finance is authorized to determine the matters regarding the bringing into Türkiye and declaration of the assets falling within the scope of this Article and their inclusion in the business, the form serving as the basis for declaration and notification, the information and documents to be used in the implementation of the Article, and the procedures and principles regarding implementation.

The regulation will enter into force on the date of publication.

11. Support for Technostartups and Easements for Digital Companies Have Been Introduced

It has become easier for non-public companies that have obtained a “technostartup badge” from the Ministry of Industry and Technology to receive investment through “convertible debt agreements”. In capital increases within this scope, certain restrictive provisions of the Turkish Commercial Code will not apply.

In addition, “Digital Companies” to be established by incubator entrepreneurs in Technology Development Zones will be exempt from chamber registration fees at the establishment stage and from chamber dues for up to 3 years during the operating period.

The regulation will enter into force on the date of publication.

12. Expansion of Personnel Incentives in the IFC

The income tax incentive granted to personnel working at financial institutions in the IFC and having foreign experience has been expanded so as to cover all participants, rather than being limited only to financial institutions.

It has been stipulated that personnel employed at qualified service centers and benefiting from this exemption may not simultaneously benefit from the exemption provided under

Article 23/1-20 of the ITL for the portion not exceeding three times the gross minimum wage.

The regulation will enter into force on the date of publication.

13. The Duration of IFC Incentives Is Being Extended

The term of the 100% corporate tax deduction applicable to the income of institutions operating in the IFC under a participant certificate has been extended until 2047.

In addition, the exemption from financial activity charges granted for the licenses and similar transactions of these institutions has been increased from 5 years to 20 years.

The regulation will enter into force on the date of publication.

Yours sincerely,

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(*) 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 to be incurred as a result of transactions to be made solely on the basis of the statements in our circular.

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

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