WEEKLY BULLETIN

Metin & Çiçek Law Firm Weekly Legal Update

IN THIS EDITION

A circular concerning administrative fines to be imposed in 2026 in accordance with the Turkish Commercial Code No. 6102 has been issued.

- *Official Gazette No. 33110, dated December 17, 2025*

Administrative fines to be applied in 2026 under Article 102 of the Turkish Commercial Code have been determined with an increase of 25.49%, which is the revaluation rate for 2025.

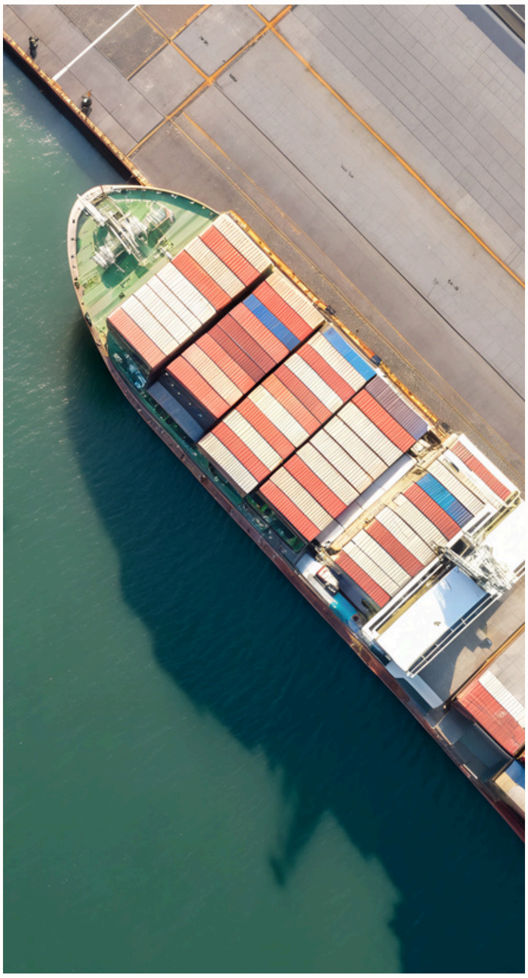
Accordingly, the administrative fine to be imposed if the persons invited to register fail to submit their registration request within the specified period is 22,194 TL.

The penalty for those who make false statements during registration and record-keeping procedures, as well as those who violate their notification obligations, is 44,443 TL.

The administrative fine for violations of obligations related to bookkeeping, inventory taking, document submission, and financial statements has been increased to 88,997 TL.

Failure to fulfill the notification obligation regarding shareholders will result in a penalty of 173,801 TL.

For detailed information, click here.



The communiqué concerning the status of foreign trade capital companies has been published and is now in effect.

- *Official Gazette No. 33112, dated December 19, 2025*

The Communiqué on the Status of Foreign Trade Capital Companies (Export: 2025/7) has been published and is now in effect.

This Communiqué revises the procedures and principles governing the granting, renewal, and revocation of Foreign Trade Capital Company (DTCC) status. The aim is to encourage companies to expand into foreign markets by leveraging economies of scale and specialization, thereby increasing exports and enhancing our nation's share in international trade. According to the communiqué, to attain DTSŞ (Domestic Trade and Investment Support System) status, companies must have achieved exports of at least 100 million USD (FOB) in the preceding calendar year and must be a joint-stock company with a minimum paid-up capital of 10 million TL. Applications must be submitted via the Ministry of Trade Support Management System (DYS) by the end of January each year. Additionally, during the application process, it is essential to provide a letter from the tax office confirming that no misleading documents have been issued or utilized, in accordance with Article 359 of the Tax Procedure Law.

Announcement Concerning the Status of Sectoral Foreign Trade Enterprises

- *Official Gazette No. 33112, dated December 19, 2025*

The Communiqué on the Status of Sectoral Foreign Trade Companies (Export: 2025/8), issued by the Ministry of Trade, seeks to direct companies toward global markets by facilitating their collaboration for export initiatives, thereby enhancing their specialization in foreign trade and operational efficiency. This Communiqué outlines the criteria for granting sectoral foreign trade company status to entities engaged in export services, financing, supply, transportation, insurance, and customs clearance, as well as the procedures for the termination of this status and the associated authority, responsibilities, and auditing processes.

According to the regulation, to attain this status, a minimum of five companies operating in the same or complementary sectors must collaborate to form a joint-stock company with a minimum paid-up capital of 5 million TL. Applications will be submitted to the Ministry of Trade via the Support Management System (DYS); after a review by the Ministry, companies deemed eligible will be awarded the status, and the decision will be published in the Official Gazette.

The scope of activities for Iyzi and Ödeal has been broadened.

- *Official Gazette No. 33111, dated December 18, 2025*

Iyzi Payment and Electronic Money Services Inc.: It is now capable of providing payment services as well as issuing electronic money.

Ödeal Payment Institution Inc. will obtain authorization to offer payment services.

This decision was published in the Official Gazette in accordance with the Law on Payment and Securities Settlement Systems, Payment Services, and Electronic Money Institutions.

Consequently, the range of operations for both companies has been formally broadened with the endorsement of the Central Bank of Turkey.

The Law Amending Tax Laws and Certain Decree Laws has been published.

- *Official Gazette No. 33112, dated December 19, 2025*

Law No. 7566 implemented extensive modifications to various statutes, particularly those related to tax legislation, social security, fees, property tax, financial markets, health, tourism, and permits for commercial activities. The law seeks to enhance public revenues, diminish the informal economy, bolster tax equity, and guarantee consistency in application across specific sectors.

1.Income Tax and Capital Market Regulations

(Income Tax Law No. 193 – Article 74, Article 120 (Repeated), Provisional Article 67)

1.1. Clarification on Expense Deductions in Rental Income has been provided concerning the deduction of interest on loans associated with rental properties and rights, excluding residential properties.

The 5% discount on the acquisition cost for a single property leased as a residence has been maintained, and the scope of its application has been clarified.

1.2. Provisional Tax Application Technical regulations have been established concerning the calculation of provisional tax for individuals generating commercial income and income from independent professional activities.

The practice of considering deductions and exemptions when calculating period earnings persists.

1.3. Securities Income: The income tax exemption for shares traded on the Istanbul Stock Exchange and held for over one year, along with specific investment funds, has been preserved.

The President has been bestowed with the authority to lower withholding tax rates on capital market instruments to 0% or raise them to 40%.

2. Revisions to the Motor Vehicles, Land Registry, and Fees Law

(Law No. 197 on Motor Vehicle Tax, Article 4; Law No. 492 on Fees, Articles 59, 63, and associated tariffs; Law No. 2918 on Road Traffic, Article 20)

2.1. The scope of tax exemption has been expanded to include the Motor Vehicle Tax (MTV) Investment Monitoring and Coordination Directorates.

2.2. Land Registry and Cadastre Fees The penalty for tax evasion, applicable when it is found that the declared price in land registry transactions is inaccurate, has been raised from 25% to 100% (a twofold increase).

It is explicitly stated that the fee base for real estate transfers must not be lower than the assessed value for real estate tax purposes.

2.3. Vehicle Sale and Transfer Fees A fee of 0.2% of the sale price, with a minimum charge of 1,000 TL, has been established for vehicle sale and transfer transactions.

Sales to authorized second-hand motor vehicle dealers are exempt from this fee.

3. Charges Associated with Commercial Activities, Licenses, and Authorization Certificates

(Law No. 492 on Fees – Tariff No. (8), Tariffs No. VI, XI, and XVI) Annual fees have been established or revised for the licenses and authorization documents necessary for operation across various sectors. Some of these include:

Jewelry trading license: 30,000 TL per year. Second-hand motor vehicle trading license: 20,000 TL per year. Real estate trading license: 20,000 TL per year. Annual license fees for private healthcare institutions, dental clinics, and veterinary clinics vary. Annual tourism establishment fees apply to tourism business licenses. In provinces with metropolitan municipalities, these fees will be doubled in districts with populations exceeding 30,000.

4. Regulations Concerning Property Tax and Capital Gains (Temporary Article 23, Article 29 of the Real Estate Tax Law No. 1319)

Property tax values calculated based on the assessed unit values of land and plots for the year 2026 are restricted to a maximum of twice the value of the preceding year.

Property tax values will be adjusted according to the full revaluation rate, as the previous application of a half-rate has been eliminated.

The President has been granted the authority to differentiate the rate increases according to municipal groupings.

5. Value Added Tax (VAT) and Exemptions (Law No. 3065 on Value Added Tax, Article 17/4-p, Temporary Article 46)

The sale of immovable properties owned by municipalities, provincial special administrations, and investment monitoring and coordination directorates is exempt from VAT.

Deliveries and services associated with the 2026 UEFA Europa League Final, the 2027 UEFA Conference League Final, and the 2032 European Football Championship are exempt from VAT.

6. Modifications Concerning Social Security and Contribution Rates

(Law No. 5510 on Social Security and General Health Insurance, Articles 41, 46, 52, 81, 82; Supplementary Articles 5, 6, 9; Supplementary Article 24) The premium rate for disability, old age, and death insurance has been raised from 20% to 21%.

Voluntary insurance premiums have been raised for agricultural workers and part-time employees.

The 5-point social security premium support allocated to employers has been decreased to 2 points.

The one-year premium support program for emerging entrepreneurs has been discontinued.

The maximum threshold for daily prime earnings has been raised from 7.5 times to 9 times the base amount.