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Turkey's country-by-country reporting notification deadline is 3 July 2023

- *Multinational entity groups eligible for country-by-country reporting (CbCR) in Turkey must submit their "CbCR Notifications" for FY22 by 3 July 2023.*
- *This Alert highlights the submission requirement.*

The deadline for multinational entity (MNE) groups eligible for country-by-country reporting (CbCR) in Turkey to submit a "CbCR Notification" for FY22 period is 3 July 2023. Turkish subsidiaries of MNE groups must notify the Turkish Revenue Administration (TRA) electronically regarding which MNE is serving as the reporting entity for the MNE group and in what jurisdiction the country-by-country (CbC) report has been filed.

Background

In September 2020, the Turkish Government published The General Communiqué on Disguised Profit Distribution through Transfer Pricing (Series No:4) (the Communiqué) in the *Official Gazette*. The Communiqué provides detailed information regarding transfer pricing documentation requirements, such as CbCR, in accordance with Action 13 of the Base Erosion and Profit Shifting (BEPS) project.

CbCR Notification

The CbCR Notification is mandatory even if no CbC report is required to be filed because the MNE group's parent entity is located in a jurisdiction with which Turkey has an information-sharing agreement for CbCR or with which the CbC Multilateral Competent Authority Agreement is activated. The TRA has a platform for submitting the CbCR Notification in electronic form. Taxpayers can submit the notification form personally or through a local certified public accountant or a sworn-in financial advisor under a tax certification agreement.

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