



For the latest from BDO Turkey, follow us



Bulletin Date : 18/03/2021  
Bulletin No : 2021/004

## THE DEADLINE FOR SUBMISSION OF THE FIRST COUNTRY-BY-COUNTRY REPORTING FOR THE ACCOUNTING PERIOD OF 2019 AND THE SPECIAL ACCOUNTING PERIODS ENDING IN JANUARY 2020 AND FEBRUARY 2020 VIA REVENUE ADMINISTRATION DATA TRANSFER SYSTEM (BTRANS) IS MARCH 31, 2021.

As mentioned in our [Bulletin no.2020/002](#), with the [“Decree Regarding the Changes in the Decree about Disguised Profit Distribution through Transfer Pricing” No.2151](#) published in the Official Gazette dated 25.2.2020 and numbered 31050, the 3-tier reporting obligation regarding the Transfer Pricing has been introduced to the Turkish Tax Legislation.

One of the obligations introduced with the Decree is the Country-by-Country Reporting (CbCR). Accordingly, the relevant report will be submitted to the Administration by the **ultimate Turkish-resident parent entity** of the multinational entity (MNE) group, which is within the scope of the CbCR obligation (consolidated group revenue is EUR 750 million or more). In the event that the ultimate parent entity is not in Turkey and there is no competent authority agreement in force regarding the sharing of CbCR information between the Administration and the country administration of the ultimate parent entity, CbCR must be submitted to the Administration by the **Turkish-resident entity of the MNE group (in case of having more than one entity in Turkey, by one entity on behalf of the others)**.

### BDO Yayıncılık A.Ş.

Eski Büyükdere Cad. No.14  
Park Plaza Kat:4  
34398 Maslak/İstanbul  
Turkey

Tel: +90 212 365 62 00  
Fax: +90 212 365 62 02  
e-mail: [bdo@bdo.com.tr](mailto:bdo@bdo.com.tr)  
[www.bdo.com.tr](http://www.bdo.com.tr)

*BDO Yayıncılık A.Ş., a Turkish joint-stock company and a member of BDO International Limited which is a UK company limited by its guarantee, is part of the BDO network of independent organisations.*

*Total revenues of BDO International’s global network reached USD 10,3 billion in 2020. BDO operates in 1,658 offices in more than 167 countries and employs 91.054 people worldwide, including partners providing audit and consulting services.*

*This Bulletin, prepared with care and meticulousness, contains opinions in a broad sense and should be considered as a general guide. In case of special circumstances, applications should not be made on the basis of this publication without professional advice and assistance. In order to discuss the effects of these issues on your particular situation, you can get in contact with BDO Yayıncılık A.Ş. Due to the damages that may arise because of certain actions or not to act based on the information in this publication, BDO Yayıncılık A.Ş. and its partners, employees and authors do not accept any liability or responsibility.*

On the other hand, as stated in our Bulletin No.2021/002, with the [Circular on Disguised Profit Distribution through Transfer Pricing/3](#) (“Circular”) published on the Revenue Administration website on February 22, 2021, **deadline for submitting the first CbCR of the MNE groups, whose ultimate parent entity or surrogate entity is in Turkey, for the accounting period of 2019 and the special accounting periods ending in January 2020 and February 2020 via BTRANS has been extended until the end of March 31, 2021.**

In this regard, taxpayers who are within this scope must submit their first CbCRs to the Administration via BTRANS until the end of Wednesday, March 31, 2021.

Additionally, deadline for submitting the first CbCR of the MNE groups, whose ultimate parent entity or surrogate entity is not in Turkey (and there is not any active Competent Authority Agreement between the country of ultimate parent entity and Turkey), for the accounting period of 2019 and special accounting periods ending in January, February, March, April, and May 2020 via BTRANS has been extended until the end of June 30, 2021.

[Please click](#) to see the list of countries with whom Competent Authority Agreement has been concluded on the OECD website.

CbCR should be prepared in the “XML Schema 2” format stipulated by the OECD. Please be informed that we (as BDO Turkey) provide services regarding the conversion of the CbCRs prepared in Excel format to XML Schema 2.

Kind regards.