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## COUNTRY-BY-COUNTRY REPORTING (CBCR) NOTIFICATION OBLIGATION SHALL BE FULFILLED UNTIL END OF JUNE

As mentioned in our Bulletin no. 2020/002, with the [“Decree Regarding the Changes in the Decree about Disguised Profit Distribution through Transfer Pricing”](#) published in the Official Gazette dated 25.02.2020 and numbered 31050, the three-tier reporting obligation regarding the Transfer Pricing stipulated in Action 13 within the scope of the OECD’s Base Erosion and Profit Shifting (BEPS) has been introduced to the Turkish Tax Legislation.

One of the obligations introduced with the Decree is the notification obligation. Accordingly, **even though they are not the parent company**, the group members of a Multinational Enterprise (MNE) that is within the scope of CbCR obligation (consolidated group revenue amounting to EUR 750 million or more) are required to inform the Turkish Finance Administration regularly regarding which company and in which country the CbCR will be made.

It is stated in the Decree that the Notification Obligation must be fulfilled for each year until the end of June of the following year.

The information regarding the Notification Obligation is summarized below.

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CbCR Notification	
<b>Who are Obligated to Notify</b>	Group members of an MNE that is within the scope of CbCR
<b>Content</b>	The information regarding which entity will be the reporting entity - whether it will be the ultimate parent entity or a surrogate entity - as well as the accounting period
<b>Deadline</b>	The mentioned information shall be notified to the Tax Authority by the end of June.
The CbCR for FY 2020	The CbCR for FY 2020 shall be notified to the Tax Authority until June 30, 2021.

Later on, “*Communiqué Series No.4 Regarding the Changes in the General Communiqué on Disguised Profit Distribution Through Transfer Pricing (Series No.1)*” (“*Communiqué*”) has been published in the Official Gazette dated 01.09.2020 and numbered 31231, and the regulations came into force as of the same date.

According to the Communiqué, required information will be submitted by filling out the “*Notification Form Regarding CbCR*” electronically through the Interactive Tax Office in accordance with the content in Appendix-5 of the Communiqué and the explanations in the Interactive Tax Office.

Please [click](#) here for more information regarding the notification obligation.

Kind regards.