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COUNTRY-BY-COUNTRY REPORTING (CbCR) NOTIFICATION OBLIGATION SHALL VE 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	
Who are Obligated to Notify	Multinational enterprises with a consolidated group income of EUR 750 million and above for the accounting period preceding 1/1/2021 - 31/12/2021
Content	Information regarding which entity will be the reporting entity - whether it will be the ultimate parent entity or a surrogate entity - and the accounting period
Deadline	The mentioned information shall be notified to the Tax Authority by the end of June.
CbCR for FY 2021	CbCR for FY 2021 shall be notified to the Tax Authority until June 30, 2022.

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

Kind regards.