





PRODUCTS AND INCOME TYPE	RESIDENT TAX PAYER CORPORATIONS	RESIDENT TAX PAYER REAL PERSON	FOREIGN BASED TAXPAYER (**) INSTITUTION(***)	FOREIGN BASED TAXPAYER REAL PERSON (***)
SHARE TRADING (BUYING AND SELLING) GAINS (shares acquired prior to 1.1.2006)	- Not subject to the withholding tax Counted towards corporate earning (If conditions are met, then a corporate tax participation sales earning exemption at a rate of 75% may be applied.)	- Not subject to the withholding tax.  - Gains from the trading of those shares that are acquired without any consideration, that are traded in stock exchanges organized in Turkey and that are held for longer than 3 months as well as those shares that are not traded in stock exchanges organized in Turkey but that belong to resident taxpayer corporations and that are held for longer than 1 year shall not be subject to tax.  - Buying price may be linked to the PPI increase rate except for the month in which shares are disposed of.  - Buying and selling losses shall be set off against buying and selling profits.  - For 2024, a sum of 200.000TL together with other trading gains is exempt from the tax and any excess portion shall be declared.	- Not subject to the withholding tax Subject to the corporate tax but shall be declared by means of a special declaration within 15 days The sum that remains after the corporate tax shall be subject to a 15% income tax withholding FX rate differences shall not be subject to taxation Buying price may be linked to the PPI increase rate except for the month in which the shares are disposed of.	- Not subject to the withholding tax Gains from the trading of those shares that are acquired without any consideration, that are traded in stock exchanges organized in Turkey and that are held for longer than <b>3 months</b> as well as those shares that are not traded in stock exchanges organized in Turkey but that belong to resident taxpayers and that are held for longer than <b>1 year</b> shall not be subject to tax For 2024, a sum of 200.000TL together with other trading gains is exempt from the tax,. The excess portion shall be declared by means of a special declaration within 15 days from the date of acquisition of earnings and revenues - Earnings arising from FX rate differences shall not be subject to taxation - Buying price may be linked to the PPI increase rate except for the month in which shares are disposed of.







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	CORPORATIONS		(**) INSTITUTION(***)	REAL PERSON (***)
SHARE TRADING (BUYING AND SELLING) GAINS (shares acquired after to 1.1.2006)	1) Provided to be traded in BIST (Istanbul Stock Exchange) - gains from trading of shares are subject to a 0% withholding rate pursuant to the Temporary 67th Article of the Income Tax Law Gains from trading equities issued by investment trusts are subject to 0% for stock corporations (*) and 10% withholding tax for other corporate investors. (However, gains shall not be subject to the withholding tax if these stocks are held for longer than one year.) - Equity trading gains shall be included in the corporate earnings. (If conditions are met, then a corporate tax participation sales earning exemption at a rate of 75% may be applied.) - If gains are subject to the withholding tax, then they may be set off in the annual return The withholding tax cut at its source shall be set off against the calculated tax. Such portion that cannot be set off shall be refunded. 2) Gains from the trading of equities that are not traded in BIST: - are not subject to the withholding tax counted towards corporate earning - if those conditions listed in the Corporate Tax Law are met, then 75% of earnings shall be subject to the corporate tax.	1) Provided to be traded in BIST (Istanbul Stock Exchange) - gains from trading of shares are subject to a 0% withholding rate pursuant to the Temporary 67 <sup>th</sup> Article of the Income Tax Law Gains from the trading of investment trust equities are subject to 10 % withholding tax. (However, gains shall not be subject to the withholding tax if these stocks are held for longer than one year.) - The withholding tax is the ultimate tax. It is not declared. 2) Gains from the trading of equities that are not traded in BIST shall be declared according to the provisions of general taxes set out in the Income Tax Law At the time of the calculation of the net amount of earnings, the cost of acquisition shall be linked to the PPI increase rate on the condition that this rate is equal to or above 10% except for the month in which equities are disposed of Trading losses are set off against trading profits They shall be declared together with other trading earnings Gains from equities held for more than 2 years of resident taxpayer corporations shall be exempt from the gains income tax.	1) Provided to be traded in BIST (Istanbul Stock Exchange) - gains from trading of shares are subject to a 0% withholding rate pursuant to the Temporary 67 <sup>th</sup> Article of the Income Tax Law Gains from trading equities issued by investment trusts are subject to 0% for stock corporations (*) and 10% withholding tax for other corporate investors. (However, gains shall not be subject to the withholding tax if these stocks are held for longer than one year.) - Shall not be declared The withholding tax is an ultimate tax. 2) Gains from the trading of equities that are not traded in BIST: - Are not subject to the withholding taxAre subject to the corporate tax and shall be declared by means of a special return within 15 days The sum that remains after the corporate tax shall be subject to 15% profit distribution withholding tax Earnings arising from FX difference are not subject to tax.	1) Provided to be traded in BIST (Istanbul Stock Exchange) - gains from trading of shares are subject to a 0% withholding rate pursuant to the Temporary 67 <sup>th</sup> Article of the Income Tax Law Gains from the trading of investment trust equities are subject to 10 % withholding tax. (However, gains shall not be subject to the withholding tax if these stocks are held for longer than one year.) -The withholding tax is the ultimate tax It is not declared. 2 Gains from the trading of equities that are not traded in BIST shall be declared according to the provisions of general taxes set out in the Income Tax Law Earnings arising from FX difference are not subject to tax At the time of the calculation of the net amount of earnings, the cost of acquisition shall be linked to the PPI increase rate on the condition that this rate is equal to or above 10% except for the month in which equities are disposed of Trading losses are set off against trading profits They shall be declared together with other trading earnings.







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			- Buying price may be linked to the PPI increase rate except for the month in which the shares are disposed of.	- Gains from equities held for more than 2 years of resident taxpayer corporations shall be exempt from the gains income tax.
EQUITY DIVIDENT (PROFIT DISTRIBUTION) INCOME	<ul> <li>Not subject to the withholding tax.</li> <li>Dividends paid by resident taxpayers are exempt from the corporate tax (Article 5/1-a of the Corporate Tax Law).</li> <li>Dividend income from shares of investment trusts may not be eligible to this exemption. They are subject to corporate tax.</li> </ul>	- The dividend distributor shall be subject to 10% withholding tax. (This withholding tax rate is 0% in dividend income from investment trust shares).  - (Pre-dividend) half of the gross dividend income collected from resident taxpayers is exempt from tax.  - The amount following the exception shall be declared in the event that it plus other capital gains from securities and real estates exceed the declaration limit of 230.000TL applicable for 2024 (except for gains described in Temporary Article 62 of the Income Tax Law).  - The entire withholding tax paid shall be set off against the tax calculated on the basis of the declaration.	- The dividend distributor shall be subject to 10% withholding tax. (This withholding tax rate is 0% in dividend income from investment trust shares) Withholding tax is the ultimate tax It is not declared.	- The dividend distributor shall be subject to 10% withholding tax. (This withholding tax rate is 0% in dividend income from investment trust shares) Withholding tax is the ultimate tax It is not declared.



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INCOME FROM WARRANTS TRADED IN BIST	<ul> <li>-Income from warrants traded in BIST are subject to corporate tax.</li> <li>- It is subject to 0% withholding tax for stock corporations (*) and 10% withholding tax for other corporate investors.</li> <li>- Income derived by any corporate investor from warrants linked to equities or equity indexes is subject to 0% withholding tax.</li> <li>- Such withholding tax deducted at source shall be set off against the calculated tax. Such portion that may not set off shall be refunded.</li> </ul>	- No tax return is filed for the income derived from warrants traded in BIST. If a tax return has been filed for other derived income, the income derived from warrants traded in BIST shall not be included in the income in that return.  - Income derived from warrants issued on the basis of equities or equity indexes shall be subject to 0% withholding tax and income from warrants backed by other assets (for instance, currency warrant) are subject to 10% withholding tax.	- No tax return is filed for the income derived from warrants traded in BIST. If a tax return has been filed for other derived income, the income derived from warrants traded in BIST shall not be included in the income in that returnIt is subject to 0% withholding tax for stock corporations (*) and 10% withholding tax for other corporate investors.  - Income derived by any corporate investor from warrants linked to equities or equity indexes is subject to 0% withholding tax.	- No tax return is filed for the income derived from warrants traded in BIST. If a tax return has been filed for other derived income, the income derived from warrants traded in BIST shall not be included in the income in that return Income derived from warrants issued on the basis of equities or equity indexes shall be subject to 0% withholding tax and income from warrants backed by other assets (for instance, currency warrant) are subject to 10% withholding tax.



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INTEREST INCOME (REDEMPTION+COUPON) FROM STATE BONDS, TREASURY BILLS (issued after 1.1.2006)	-Gains from interest on State Bonds and Treasury Bills are subject to 0% withholding tax for stock corporations (*) and 10% withholding tax for other corporate investors.  - Gains from currency-linked government debt securities issued by Turkish Ministry of Treasury and Finance are subject to 0% withholding tax for stock corporations (*) and 10% withholding tax for other corporate investors.  - Gold-backed state bonds are subject to 0% withholding tax for all investors.  - They are included in corporate earnings.  - The withholding tax paid is set off against the corporate tax calculated on the basis of the return.  - 0% withholding tax shall be applicable to income derived from state bonds and treasury bills issued by the Ministry of Treasury and Finance and that are acquired between 22.12.2021 and 30.04.2024 (included).	- Subject to 10% withholding tax.  - Currency-linked government debt securities issued by Turkish Ministry of Treasury and Finance are subject to a 10% withholding tax.  - Gold-backed state bonds are subject to 0% withholding tax for all investors.  - Withholding tax is the ultimate tax It is not declared.  0% withholding tax shall be applicable to income derived from state bonds and treasury bills issued by the Ministry of Treasury and Finance and that are acquired between 22.12.2021 and 30.04.2024 (included).	- Gains from interest on State Bonds and Treasury Bills are subject to 0% withholding tax for stock corporations (*) and 10% withholding tax for other corporate investors Gains from currency-linked government debt securities issued by Turkish Ministry of Treasury and Finance are subject to 0% withholding tax for stock corporations (*) and 10% withholding tax for other corporate investors Gold-backed state bonds are subject to 0% withholding tax for other corporate investors Withholding tax is the ultimate tax It is not declared 0% withholding tax shall be applicable to income derived from state bonds and treasury bills issued inland by the Ministry of Treasury and Finance and that are acquired between 22.12.2021 and 30.04.2024 (included).	- Subject to 10% withholding tax.  - Currency-linked government debt securities by Turkish Ministry of Treasury and Finance are subject to a 10% withholding tax.  - Gold-backed state bonds are subject to 0% withholding tax for all investors.  - Withholding tax is the ultimate tax.  - It is not declared  -0% withholding tax shall be applicable to income derived from state bonds and treasury bills issued inland by the Ministry of Treasury and Finance and that are acquired between 22.12.2021 and 30.04.2024 (included).







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GAINS FROM TRADING ON STATE BONDS AND TREASURY BILLS (issued after 1.1.2006)	- Gains from trading on State Bonds and Treasury Bills are subject to 0% withholding tax for stock corporations (*) and 10% withholding tax for other coporate investors Gains from trading currency-linked government debt securities issued inland by Turkish Ministry of Treasury and Finance are subject to 0% withholding tax for stock corporations (*) and 10% withholding tax for other corporate investors Gold-backed state bonds are subject to 0% withholding tax for all investors They are included in corporate earnings The withholding tax paid is set off against the corporate tax calculated on the basis of the return. Such portion that may not set off shall be refunded  - 0% withholding tax shall be applicable to income derived from state bonds and treasury bills issued by the Ministry of Treasury and Finance and that are acquired between 22.12.2021 and 30.04.2024 (included).	- Subject to 10% withholding tax.  - Currency-linked government debt securities issued by Turkish Ministry of Treasury and Finance are subject to a 10% withholding tax.  - Gold-backed state bonds are subject to 0% withholding tax for all investors.  - Withholding tax is the ultimate tax.  - It is not declared.  -0% withholding tax shall be applicable to income derived from state bonds and treasury bills issued by the Ministry of Treasury and Finance and that are acquired between 22.12.2021 and 30.04.2024 (included).	-Gains from trading on State Bonds and Treasury Bills are subject to 0% withholding tax for stock corporations (*) and 10% withholding tax for other corporate investors.  - Gains from trading currency-linked government debt securities issued by Turkish Ministry of Treasury and Finance are subject to 0% withholding tax for stock corporations (*) and 10% withholding tax for other corporate investors.  - Withholding tax is the ultimate tax  - It is not declared.  - 0% withholding tax shall be applicable to income derived from state bonds and treasury bills issued by the Ministry of Treasury and Finance and that are acquired between 22.12.2021 and 30.04.2024 (included).	- Subject to 10% withholding tax.  - Currency-linked government debt securities issued by Turkish Ministry of Treasury and Finance are subject to a 10% withholding tax.  - Gold-backed state bonds are subject to 0% withholding tax for all investors.  - Withholding tax is the ultimate tax.  - It is not declared  -0% withholding tax shall be applicable to income derived from state bonds and treasury bills issued by the Ministry of Treasury and Finance and that are acquired between 22.12.2021 and 30.04.2024 (included).



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GAINS FROM TRADING OF MINISTRY GOLD CERTIFICATES	- Gains from trading of Ministry gold certificates are subject to 0% withholding tax.	- Gains from trading of Ministry gold certificates are subject to 0% withholding tax.	- Gains from trading of Ministry gold certificates are subject to 0% withholding tax.	- Gains from trading of Ministry gold certificates are subject to 0% withholding tax.
INTEREST (REDEMPTION+COUPON) INCOME FROM EUROBONDS ISSUED BY TURKISH MINISTRY OF TREASURY AND FINANCE	- Subject to 0% withholding tax Included in the corporate earnings.	- Subject to 0% withholding tax Principal sum currency difference shall not be deemed as an income No inflation discount is applied Where collected interest income plus capital gains from other securities and real estates subject to withholding tax exceeds the declaration limit of TL230.000 (for 2024), the entire income shall be declared.	- Subject to 0% withholding tax It is not declared.	- Subject to 0% withholding tax It is not declared.
GAINS FROM TRADING OF EUROBONDS ISSUED BY TURKISH MINISTRY OF TREASURY AND FINANCE (issued prior to 1.1.2006)	- Not subject to withholding tax Shall be included in the corporate earnings.	-Not subject to withholding taxTrading gains shall be calculated in Turkish lira.  - Acquisition cost shall be linked to PPI increase rate (excluding the month in which they are disposed of) Where gains from the trading of Eurobonds plus other trading gains exceed 200.000TL in 2024, such excess portion shall be declared.	- Not subject to withholding taxIt is not declared.	- Not subject to withholding tax It is not declared.



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GAINS FROM TRADING OF EUROBONDS ISSUED BY TURKISH MINISTRY OF TREASURY AND FINANCE (issued <u>after</u> 1.1.2006)	- Not subject to withholding tax Shall be included in the corporate earnings.	- Not subject to withholding tax Trading gains shall be calculated in Turkish lira On the condition that the PPI increase rate is equal to or above 10%, the acquisition cost shall be linked to the PPI increase rate except for the month in which they are disposed of Trading losses shall be set off against the trading profits Gains shall be declared regardless of its amount.	- Not subject to withholding tax It is not declared.	- Not subject to withholding tax It is not declared.
REPO INCOME	- Subject to 15% withholding tax.  - Shall be included in the corporate earnings.  - The withholding tax may be set off against the corporate tax calculated on the return.	- Subject to 15% withholding tax Withholding tax is the ultimate tax It is not declared.	- Subject to 15% withholding tax. - Withholding tax is the ultimate tax. - It is not declared	- Subject to 15% withholding tax Withholding tax is the ultimate tax It is not declared.
	A) Deposits in TL	A) Deposits in TL	A) Deposits in TL	A) Deposits in TL
DEPOSIT INTERESTS	On the condition that an account was opened or its term was renewed with effect from 01.12.2018:  - demand or call accounts as well as term deposit accounts up to 6 months (6 <sup>th</sup> month included) shall be subject to 15% withholding tax;	On the condition that an account was opened or its term was renewed with effect from 01.12.2018:  - demand or call accounts as well as term deposit accounts up to 6 months (6th month included) shall be subject to 15% withholding tax;	On the condition that an account was opened or its term was renewed with effect from 01.12.2018:  - demand or call accounts as well as term deposit accounts up to 6 months (6th month included) shall be subject to 15% withholding tax;	On the condition that an account was opened or its term was renewed with effect from 01.12.2018:  - demand or call accounts as well as term deposit accounts up to 6 months (6th month included) shall be subject to 15% withholding tax;



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	- term deposit accounts up to 1 year (1 year included) shall be subject to 12% withholding tax;	- term deposit accounts up to 1 year (1 year included) shall be subject to 12% withholding tax;	- term deposit accounts up to 1 year (1 year included) shall be subject to 12% withholding tax;	- term deposit accounts up to 1 year (1 year included) shall be subject to 12% withholding tax;
	- term deposit accounts for longer than one year shall be subject to 10% withholding tax.	- term deposit accounts for longer than one year shall be subject to 10% withholding tax.	- term deposit accounts for longer than one yearshall be subject to 10% withholding tax.	- term deposit accounts for longer than one yearshall be subject to 10% withholding tax.
	For accounts that have been opened as of 01.05.2019:	For accounts that have been opened as of 01.05.2019:	For accounts that have been opened as of 01.05.2019:  - TL accounts for a term longer than	For accounts that have been opened as of 01.05.2019:
	- TL accounts for a term longer than 1 year to which variable interest rate depending on inflation rate is applied shall be subject to 0% withholding tax.	- TL accounts for a term longer than 1 year to which variable interest rate depending on inflation rate is applied shall be subject to 0% withholding tax.	1 year to which variable interest rate depending on inflation rate is applied shall be subject to 0% withholding tax.	- TL accounts for a term longer than 1 year to which variable interest rate depending on inflation rate is applied shall be subject to 0% withholding tax.
	On the condition that an account was opened or its term was renewed between 30.09.2020 and 30.04.2024:	On the condition that an account was opened or its term was renewed between 30.09.2020 and 30.04.2024:	On the condition that an account was opened between 30.09.2020 and 30.04.2024:  - demand or call accounts as well as	On the condition that an account was opened between 30.09.2020 and 30.04.2024:
	- demand or call accounts as well as term deposit accounts up to 6 months (6 <sup>th</sup> month included) shall be subject to 5% withholding tax;	- demand or call accounts as well as term deposit accounts up to 6 months (6 <sup>th</sup> month included) shall be subject to 5% withholding tax;	term deposit accounts up to 6 months (6 <sup>th</sup> months included) shall be subject to 5% withholding tax;	- demand or call accounts as well as term deposit accounts up to 6 months (6 <sup>th</sup> months included) shall be subject to 5% withholding tax;
			<ul> <li>term deposit accounts up to 1 year</li> <li>(1 year included) shall be subject to</li> <li>3% withholding tax;</li> </ul>	



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	<ul> <li>term deposit accounts up to 1 year (1 year included) shall be subject to 3% withholding tax;</li> <li>term deposit accounts for longer than one year shall be subject to 0% withholding tax</li> </ul>	- term deposit accounts up to 1 year (1 year included) shall be subject to 3% withholding tax; - term deposit accounts for longer than one yearshall be subject to 0% withholding tax	- term deposit accounts for longer than one yearshall be subject to 0% withholding tax  - FX-protected term deposit and participation accounts, and Turkish lira deposit and participation	-term deposit accounts up to 1 year (1 year included) shall be subject to 3% withholding tax; - term deposit accounts for longer than one yearshall be subject to 0% withholding tax
	- FX-protected term deposit and participation accounts, and Turkish lira deposit and participation accounts opened with banks under the policy to support the conversion to Turkish lira deposit and participation accounts shall be subject to 0% withholding tax.	- FX-protected term deposit and participation accounts, and Turkish lira deposit and participation accounts opened with banks under the policy to support the conversion to Turkish lira deposit and participation accounts shall be subject to 0% withholding tax.	accounts opened with banks under the policy to support the conversion to Turkish lira deposit and participation accounts shall be subject to 0% withholding tax.  B) Out of kontrol pls interests run on FX deposit accounts and dividends paid by participation	- FX-protected term deposit and participation accounts, and Turkish lira deposit and participation accounts opened with banks under the policy to support the conversion to Turkish lira deposit and participation accounts shall be subject to 0% withholding tax.
	B) Out of interests run on FX deposit accounts and dividends paid by participation banks to currency participation accounts:	B) Out of kontrol pls interests run on FX deposit accounts and dividends paid by participation banks to currency participation accounts:	banks to currency participation accounts:  and on the condition that an account was opened or its term was renewed with effect from 02.01.2013-21.03.2019:	B) Out of interests run on FX deposit accounts and dividends paid by participation banks to currency participation accounts:  and on the condition that an account
	and on the condition that an account was opened or its term was renewed with effect from 02.01.2013-21.03.2019:  - demand or call accounts as well as term deposit accounts up to 6 months (6 <sup>th</sup> month	and on the condition that an account was opened or its term was renewed with effect from 02.01.2013-21.03.2019:  - demand or call accounts as well as term deposit accounts up to 6 months (6 <sup>th</sup> months	- demand or call accounts as well as term deposit accounts up to 6 months (6 <sup>th</sup> month included) shall be subject to 18% withholding tax;	was opened or its term was renewed with effect from 02.01.2013-21.03.2019:  - demand or call accounts as well as term deposit accounts up to 6 months







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	included) shall be subject to 18% withholding	included) shall be subject to 18% withholding	- term deposit accounts up to 1 year	(6 <sup>th</sup> month included) shall be subject
	tax;	tax;	(1 year included) shall be subject to	to 18% withholding tax;
			15% withholding tax;	
	- term deposit accounts up to 1 year (1 year	- term deposit accounts up to 1 year (1 year		- term deposit accounts up to 1 year
	included) shall be subject to 15% withholding	included) shall be subject to 15% withholding	- term deposit accounts for longer	(1 year included) shall be subject to
	tax;	tax;	than one year shall be subject to	15% withholding tax;
			13% withholding tax	_
	- term deposit accounts for longer than one	- term deposit accounts for longer than one		- term deposit accounts for longer
	year shall be subject to 13% withholding tax.	year shall be subject to 13% withholding tax	On the condition that an account	than one year shall be subject to 13%
			was opened or its term was	withholding tax
			renewed between 21.03.2019-	
	On the condition that an account was	On the condition that an account was	<u>27.06.2023;</u>	On the condition that an account was
	opened or its term was renewed between	opened or its term was renewed between	denoted denote the condition of the constant	opened or its term was renewed
	21.03.2019-27.06.2023;	21.03.2019-27.06.2023;	- demand deposit and call accounts	between 21.03.2019-27.06.2023;
	damaged damages and call accounts as well as		as well as term deposit accounts up	
	- demand deposit and call accounts as well as	domand dancest and call accounts as well as	to 1 year (1 year included) shall be	-demand deposit and call accounts as
	term deposit accounts up to 1 year (1 year included) shall be subject to 20% withholding	- demand deposit and call accounts as well as term deposit accounts up to 1 year (1 year	subject to 20% withholding tax;	well as term deposit accounts up to 1
	tax:	included) shall be subject to 20% withholding	- term deposit accounts with a term	year (1 year included) shall be subject
	- term deposit accounts with a term longer	tax;	longer than one year shall be	to 20% withholding tax;
	than one year shall be subject to 18%	tax,	subject to 18% withholding tax.	to 20% withholding tax,
	withholding tax.	- term deposit accounts with a term longer	Sabject to 10/0 Withholding tax.	- term deposit accounts with a term
	withing tax	than one year shall be subject to 18%	For accounts that have been	longer than one year shall be subject
		withholding tax.	opened or whose term has been	to 18% withholding tax.
	For accounts that have been opened or		renewed since 28.06.2023:	
	whose term has been renewed since			For accounts that have been opened
	28.06.2023:	For accounts that have been opened or	- Demand, call or special current	or whose term has been renewed
		whose term has been renewed since	accounts and term deposit accounts	since 28.06.2023:
		28.06.2023:	, '	



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	- Demand, call or special current accounts and term deposit accounts shall be subject to 25% withholding tax  - This shall be included in the corporate earnings.  - Withholding tax shall be set off against the corporate tax calculated on the basis of the tax return.	<ul> <li>Demand, call or special current accounts and term deposit accounts shall be subject to 25% withholding tax</li> <li>Withholding tax is the ultimate tax.</li> <li>It is not declared.</li> </ul>	shall be subject to 25% withholding tax  - Withholding tax is the ultimate tax.  - It is not declared.	- Demand, call or special current accounts and term deposit accounts shall be subject to 25% withholding tax  - Withholding tax is the ultimate tax.  - It is not declared.
OFF-SHORE DEPOSIT INTEREST INCOME	-This shall be included in the corporate earnings (taxes paid abroad may be set off).  - Because deposits are held abroad, there is no withholding tax.  Taxes paid abroad may be deducted from the corporate tax charged in Turkey.(*****)	- If the interest income exceeds the declaration limit of 13.000 TL for 2024, it is declared in full. (taxes paid abroad may be set off)  - Because deposits are held abroad, there is no withholding tax.  Taxes paid abroad may be deducted from the corporate income olmali tax charged in Turkey.(*****)	- It is not declared Not subject to withholding tax	-It is not declared Not subject to withholding tax.







PRODUCTS AND INCOME TYPE	RESIDENT TAX PAYER CORPORATIONS	RESIDENT TAX PAYER REAL PERSON	FOREIGN BASED TAXPAYER (**) INSTITUTION(***)	FOREIGN BASED TAXPAYER REAL PERSON (***)
TRADING GAINS FROM MUTUAL FUND PARTICIPATION SHARE AND EXCHANGE TRADED FUNDS	- Gains collected by stock corporations(*) shall be subject to 0% withholding tax and gains derived by other corporate investors shall be subject to 10% withholding tax.  - Gains from participation units of equity intensive funds in which minimum 80% of the total fund value is continuously invested in equities traded in BIST (except for securities investment trusts) shall be subject to 0%.  - A 0% withholding tax shall be charged to income and gains derived from mutual funds that were acquired between 23.12.2020 and 30.04.2024 (included). This does not extend the income derived from variable, mixed, Eurobond, foreign borrowing, private funds and mutual funds whose title include the word "currency".  Gains derived from Private (Currency) Funds between 03.06.2020 and 31.12.2020 are subject to the 15% withholding tax provided that it is limited to this range of dates.  - Gains derived from other exchange traded funds are subject to 10% withholding tax.  - When participation units of mutual funds held for more than 1 year minimum 51% of	- Gains from participation units of equity intensive funds in which minimum 80% of the total fund value is continuously invested in equities traded in BIST (except for securities investment trusts) shall be subject to 0%.  -A 0% withholding tax shall be charged to income and gains derived from mutual funds that were acquired between 23.12.2020 and 30.04.2024 (included). This does not extend the income derived from variable, mixed, Eurobond, foreign borrowing, private funds and mutual funds whose title include the word "currency".  -Gains derived from Private (Currency) Funds between 03.06. 2020 and 31.12.2020 are subject to the 15% withholding tax provided that it is limited to this range of dates.  - Gains derived from other exchange traded funds are subject to 10% withholding tax.  - Withholding tax is the ultimate tax  - It is not declared.  - When participation units of mutual funds held for more than 1 year minimum 51% of whose portfolio is continuously invested in equities traded in BIST are disposed of, gains	- Gains collected by stock corporations(*) shall be subject to 0% withholding tax and gains derived by other corporate investors shall be subject to 10% withholding tax.  - Gains from participation units of equity intensive funds in which minimum 80% of the total fund value is continuously invested in equities traded in BIST (except for securities investment trusts) shall be subject to 0%.  - A 0% withholding tax shall be charged to income and gains derived from mutual funds that were acquired between 23.12.2020 and 30.04.2024 (included). This does not extend the income derived from variable, mixed, Eurobond, foreign borrowing, private funds and mutual funds whose title include the word "currency".  -Gains derived from Private (Currency) Funds between 03.06. 2020 and 31.12.2020 are subject to the 15% withholding tax provided	- Gains from participation units of equity intensive funds in which minimum 80% of the total fund value is continuously invested in equities traded in BIST (except for securities investment trusts) shall be subject to 0%.  A 0% withholding tax shall be charged to income and gains derived from mutual funds that were acquired between 23.12.2020 and 30.04.2024 (included). This does not extend the income derived from variable, mixed, Eurobond, foreign borrowing, private funds and mutual funds whose title include the word "currency".  -Gains derived from Private (Currency) Funds between 03.06. 2020 and 31.12.2020 are subject to the 15% withholding tax provided that it is limited to this range of dates.  - Gains derived from other exchange traded funds are subject to 10% withholding tax  - Withholding tax is the ultimate tax.



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PRODUCTS AND INCOME TYPE	RESIDENT TAX PAYER CORPORATIONS	RESIDENT TAX PAYER REAL PERSON	FOREIGN BASED TAXPAYER (**) INSTITUTION(***)	FOREIGN BASED TAXPAYER REAL PERSON (***)
	whose portfolio is continuously invested in equities traded in BIST are disposed of, gains derived from such disposal shall not be subject to the withholding tax.  - They shall be included in the corporate earnings.  - The paid withholding tax shall be set off against the corporate tax calculated on the basis of the return.	derived from such disposal shall not be subject to the withholding tax.	that it is limited to this range of dates.  - Gains derived from other exchange traded funds are subject to 10% withholding tax  - Withholding tax is the ultimate tax  - It is not declared.  - When participation units of mutual funds held for more than 1 year minimum 51% of whose portfolio is continuously invested in equities traded in BIST are disposed of, gains derived from such disposal shall not be subject to the withholding tax.	- It is not declared.  -When participation units of mutual funds held for more than 1 year minimum 51% of whose portfolio is continuously invested in equities traded in BIST are disposed of, gains derived from such disposal shall not be subject to the withholding tax.



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PRODUCTS AND INCOME TYPE	RESIDENT TAX PAYER CORPORATIONS	RESIDENT TAX PAYER REAL PERSON	FOREIGN BASED TAXPAYER (**) INSTITUTION(***)	FOREIGN BASED TAXPAYER REAL PERSON (***)
PARTICIPATION UNITS OF VENTURE CAPITAL INVESTMENT FUND AND REAL ESTATE INVESTMENT TRUSTS	-Gains collected by stock corporations(*) shall be subject to 0% withholding tax and gains derived by other corporate investors shall be subject to 10% withholding tax.  - Withholding tax shall be 0% for gains derived from participation units of venture capital investment funds and real estate investment trusts that are held for longer than two years.  - In the event that, regardless of the investment duration, fund participation units are disposed of by returning them to the fund, said gains are exempt from the Corporate Tax. However, gains derived from the sales of fund participation units to third parties without return to the fund shall be subject to the Corporate Tax.	- Shall be subject to 10% withholding tax.  - Withholding tax shall be 0% for gains derived from participation units of venture capital investment funds and real estate investment trusts that are held for longer than two years.	- Gains collected by stock corporations(*) shall be subject to 0% withholding tax and gains derived by other corporate investors shall be subject to 10% withholding tax.  - Withholding tax shall be 0% for gains derived from participation units of venture capital investment funds and real estate investment trusts that are held for longer than two years.	<ul> <li>Shall be subject to 10% withholding tax.</li> <li>Withholding tax shall be 0% for gains derived from participation units of venture capital investment funds and real estate investment trusts that are held for longer than two years.</li> </ul>
INTEREST INCOME FROM PRIVATE SECTOR DEBT INSTRUMENTS (BILLS, ASSET BACKED SECURITIES, COMMERCIAL PAPERS INCLUDED) (issued after 1.1.2006)	A)Issued bonds sold in Turkey  - Interest earnings to be derived from private sector bonds shall be subject to 0% withholding tax for stock corporations (*); and %10 for other corporations.  For other corporations;  - Commercial papers approved by the CMB and acquired after 24.05.2020 shall be subject to 15% withholding tax.	A) Issued bonds sold in Turkey     Commercial papers approved by the CMB and acquired after 24.05.2020 shall be subject to 15% withholding tax.     Interest earnings to be derived from other debt instruments shall be subject to %10 withholding tax.	A) Issued bonds sold in Turkey     Interest earnings to be derived from private sector bonds shall be subject to 0% withholding tax for stock corporations (*); and %10 for other corporations.     For other corporations;     Commercial papers approved by the CMB and acquired after 24.05.2020 shall be subject to 15%	A) Issued bonds sold in Turkey  - Commercial papers approved by the CMB and acquired after 24.05.2020 shall be subject to 15% withholding tax.  -Interest earnings to be derived from other debt instruments shall be subject to %10 withholding tax.







PRODUCTS AND INCOME TYPE	RESIDENT TAX PAYER CORPORATIONS	RESIDENT TAX PAYER REAL PERSON	FOREIGN BASED TAXPAYER (**) INSTITUTION(***)	FOREIGN BASED TAXPAYER REAL PERSON (***)
	- Interest earnings derived from bonds and bills issued by banks that that were acquired between 23.12.2020 and 30.04.2024:  (i) Income from those with a term up to 6 months (6th month included) are subject to 5% withholding tax,  ii) Income from those with a term up to 1 year (1 year included) shall be subject to 3% withholding tax.  iii) Income from those with a term longer than 1 year shall be subject to 0% withholding tax.  Provided that they are acquired between 28.06.2022 and 30.04.2024,	-Interest earnings derived from bonds and bills issued by banks that that were acquired between 23.12.2020 and 30.04.2024:  (i) Income from those with a term up to 6 months (6th month included) are subject to 5% withholding tax,  ii) Income from those with a term up to 1 year (1 year included) shall be subject to 3% withholding tax.  iii) Income from those with a term longer than 1 year shall be subject to 0% withholding tax.  Provided that they are acquired between	withholding tax.  -Interest earnings derived from bonds and bills issued by banks that that were acquired between 23.12.2020 and 30.04.2024:  (i) Income from those with a term up to 6 months (6th month included) are subject to 5% withholding tax,  ii) Income from those with a term up to 1 year (1 year included) shall be subject to 3% withholding tax.  iii) Income from those with a term longer than 1 year shall be subject	- Interest earnings derived from bonds and bills issued by banks that that were acquired between 23.12.2020 and 30.04.2024:  (i) Income from those with a term up to 6 months (6th month included) are subject to 5% withholding tax,  ii) Income from those with a term up to 1 year (1 year included) shall be subject to 3% withholding tax.  iii) Income from those with a term longer than 1 year shall be subject to 0% withholding tax.  Provided that they are acquired
	- Income from asset-backed securities, mortgage-backed securities, mortgage-guaranteed securities and asset-guaranteed securities issued by mortgage financing institutions organized under the law no. 6362 shall be subject to 5% withholding tax.  -Others shall be subject to 10% withholding tax.	28.06.2022 and 30.04.2024,  - Income from asset-backed securities, mortgage-backed securities, mortgage-guaranteed securities and asset-guaranteed securities issued by mortgage financing institutions organized under the law no. 6362 shall be subject to 5% withholding tax.  - Others shall be subject to 10% withholding tax.	to 0% withholding tax.  Provided that they are acquired between 28.06.2022 and 30.04.2024,  - Income from asset-backed securities, mortgage-backed securities, mortgage-guaranteed securities and asset-guaranteed securities issued by mortgage financing institutions organized	between 28.06.2022 and 30.04.2024,  - Income from asset-backed securities, mortgage-backed securities, mortgage-guaranteed securities and asset-guaranteed securities issued by mortgage financing institutions organized under the law no. 6362 shall be subject to 5% withholding tax.







PRODUCTS AND INCOME TYPE	RESIDENT TAX PAYER CORPORATIONS	RESIDENT TAX PAYER REAL PERSON	FOREIGN BASED TAXPAYER (**) INSTITUTION(***)	FOREIGN BASED TAXPAYER REAL PERSON (***)
	B) Bills sold abroad upon issue  Of bills that are issued and sold by resident taxpayers abroad (****), interest derived from those ones with a term up to 1 year shall be subject to 7% withholding tax while interest derived from those ones with a term between 1 year (1 year included) and 3 years shall be subject to a 3% withholding tax and interest derived from those ones with a term of 3 years (3 years included) and longer than 3 years shall be subject to 0% withholding tax.  The said withholding tax shall be deducted by the interest-paying issuer.  It is included in the corporate earning.  The paid withholding tax shall be set off against the corporate tax calculated on the return.	- Withholding tax is the ultimate tax It may not be declared  B) Bills sold abroad upon issue  Of bills that are issued and sold by resident taxpayers abroad (****), interest derived from those ones with a term up to 1 year shall be subject to 7% withholding tax while interest derived from those ones with a term between 1 year (1 year included) and 3 years shall be subject to a 3% withholding tax and interest derived from those ones with a term of 3 years (3 years included) and longer than 3 years shall be subject to 0% withholding tax.  The said withholding tax shall be deducted by the interest-paying issuer.  The principal FX difference shall not be counted income Inflation discount not applicable  - Where the interest income derived plus other securities and real estate capital income subjected to the withholding tax exceeds the declaration limit of 230.000TL (for 2024), the entire income shall be declared.	under the law no. 6362 shall be subject to 5% withholding tax.  Others shall be subject to 10% withholding tax.  Withholding tax is the ultimate tax.  It may not be declared  B) Bills sold abroad upon issue  Of bills that are issued and sold by resident taxpayers abroad (****), interest derived from those ones with a term up to 1 year shall be subject to 7% withholding tax while interest derived from those ones with a term between 1 year (1 year included) and 3 years shall be subject to a 3% withholding tax and interest derived from those ones with a term of 3 years (3 years included) and longer than 3 years shall be subject to 0% withholding tax.  The said withholding tax shall be deducted by the interest-paying issuer.  Withholding tax is the ultimate tax.  It may not be declared.	- Others shall be subject to 10% withholding tax.  - Withholding tax is the ultimate tax It may not be declared.  B) Bills sold abroad upon issue  Of bills that are issued and sold by resident taxpayers abroad (****), interest derived from those ones with a term up to 1 year shall be subject to 7% withholding tax while interest derived from those ones with a term between 1 year (1 year included) and 3 years shall be subject to a 3% withholding tax and interest derived from those ones with a term of 3 years (3 years included) and longer than 3 years shall be subject to 0% withholding tax.  -The said withholding tax shall be deducted by the interest-paying issuer Withholding tax is the ultimate tax It may not be declared





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PRODUCTS AND INCOME TYPE	RESIDENT TAX PAYER	RESIDENT TAX PAYER REAL PERSON	FOREIGN BASED TAXPAYER	FOREIGN BASED TAXPAYER
	CORPORATIONS		(**) INSTITUTION(***)	REAL PERSON (***)
	A)Bonds sold in Turkey	A)Bonds sold in Turkey	A)Bonds sold in Turkey	A)Bonds sold in Turkey
TRADING GAINS FROM PRIVATE SECTOR DEBT INSTRUMENTS (BILLS, ASSET	-Trading gains to be derived from private sector bonds shall be subject to 0% withholding tax for stock corporations (*);	- Commercial papers approved by the CMB and acquired after 24.05.2020 shall be subject to 15% withholding tax.	- Trading gains to be derived from private sector bonds shall be subject to 0% withholding tax for stock	-Commercial papers approved by the CMB and acquired after 24.05.2020 shall be subject to 15% withholding
BACKED SECURITIES, COMMERCIAL PAPERS	-shall be subject to %10 withholding tax for	Trading gains to be derived from other debt	corporations (*);	tax.
<b>INCLUDED)</b> (issued following 1.1.2006)	other corporations.  - For other corporations;	instruments shall be subject to %10 withholding tax .	-shall be subject to %10 withholding tax for other corporations.	-Trading gains to be derived from other debt instruments shall be subject to %10 withholding tax.
	-Commercial papers approved by the CMB	-Trading gains derived from bonds and bills issued by banks that that were acquired	- For other corporations;	-Trading gains derived from bonds and bills issued by banks that that
	and acquired after 24.05.2020 shall be subject to 15% withholding tax.	between 23.12.2020 and 30.04.2024:  - Gains from the disposal of those ones that	-Commercial papers approved by the CMB and acquired after	were acquired between 23.12.2020 and 30.04.2024:
	-Trading gains derived from bonds and bills issued by banks that that were acquired between 23.12.2020 and 30.04.2024:	are held up to 6 months (6 <sup>th</sup> month included) shall be subject to 5% withholding tax.	24.05.2020 shall be subject to 15% withholding tax.	-Gains from the disposal of those ones that are held up to 6 months (6 <sup>th</sup>
	- Gains from the disposal of those ones that	- Gains from the disposal of those ones that are held up to 1 year (1 year included) shall be	-Trading gains derived from bonds and bills issued by banks that that	month included) shall be subject to 5% withholding tax.
	are held up to 6 months (6 <sup>th</sup> month included) shall be subject to 5% withholding tax.	subject to 3% withholding tax.  - Gains derived from the disposal of those	were acquired between 23.12.2020 and 30.04.2024:	-Gains from the disposal of those ones that are held for less than 1 year
	- Gains from the disposal of those ones that are held up to 1 year (1 year included) shall be subject to 3% withholding tax.	ones that are held for longer than 1 year shall be subject to 0% withholding tax.	-Gains from the disposal of those ones that are held up to 6 months (6 <sup>th</sup> month included) shall be subject	(1 year included) shall be subject to 3% withholding tax.
	-Gains derived from the disposal of those	Provided that they are acquired between 28.06.2022 and 30.04.2024,	to 5% withholding tax.	- Gains derived from the disposal of those ones that are held for longer
	ones that are held for longer than 1 year shall be subject to 0% withholding tax.	- gains from asset-backed securities, mortgage-backed securities, mortgage-	-Gains from the disposal of those ones that are held up to 1 year (1 year included) shall be subject to 3%	than 1 year shall be subject to 0% withholding tax.





PRODUCTS AND INCOME TYPE	RESIDENT TAX PAYER CORPORATIONS	RESIDENT TAX PAYER REAL PERSON	FOREIGN BASED TAXPAYER (**) INSTITUTION(***)	FOREIGN BASED TAXPAYER REAL PERSON (***)
	Provided that they are acquired between 28.06.2022 and 30.04.2024,  - gains from asset-backed securities, mortgage-backed securities, mortgage-guaranteed securities and asset-guaranteed securities issued by mortgage financing institutions organized under the law no. 6362 shall be subject to 5% withholding tax.  - Others shall be subject to 10% withholding tax.  - They are subject to corporate tax.  - Paid withholding tax may be set off against the calculated corporate tax.  B) Bills traded abroad - are not subject to the withholding tax are subject to the corporate tax.	guaranteed securities and asset-guaranteed securities issued by mortgage financing institutions organized under the law no. 6362 shall be subject to 5% withholding tax.  - Others shall be subject to 10% withholding tax.  - Withholding tax is the ultimate tax.  - It may not be declared.  B) Bills traded abroad  - are declared together with other trading gains.  - Trading gains are calculated in Turkish lira.  - Purchase price may be linked to the PPI increase rate provided that PPI increase rate is equal to or above 10% except for the month in which bills are disposed of.	- Gains derived from the disposal of those ones that are held for longer than 1 year shall be subject to 0% withholding tax.  Provided that they are acquired between 28.06.2022 and 30.04.2024, - gains from asset-backed securities, mortgage-backed securities and asset-guaranteed securities issued by mortgage financing institutions organized under the law no. 6362 shall be subject to 5% withholding tax Others shall be subject to 10% withholding tax is the ultimate tax It may not be declared.  B)Bills traded abroad - are not subject to the withholding tax It may not be declared.	Provided that they are acquired between 28.06.2022 and 30.04.2024,  - gains from asset-backed securities, mortgage-backed securities and asset-guaranteed securities issued by mortgage financing institutions organized under the law no. 6362 shall be subject to 5% withholding tax.  -Others shall be subject to 10% withholding tax.  -Withholding tax is the ultimate tax.  - It may not be declared.  B) Bills traded abroad  - are not subject to the withholding tax.  - It may not be declared.







PRODUCTS AND INCOME TYPE	RESIDENT TAX PAYER	RESIDENT TAX PAYER REAL PERSON	FOREIGN BASED TAXPAYER	FOREIGN BASED TAXPAYER
	CORPORATIONS		(**) INSTITUTION(***)	REAL PERSON (***)
INCOME FROM BORSA ISTANBUL DERIVATIVES EXCHANGE CONTRACTS	<ul> <li>Gains from the trading to be executed in Derivatives Exchange shall be subject to 0% withholding tax for stock corporations (*) and 10% withholding tax for other corporate investors.</li> <li>This rate is applied as 0% for all resident taxpayers for gains derived from contracts based on equities and equity indexes.</li> <li>They are included in the corporate earnings.</li> <li>Interest that has been derived from guarantees delivered for the said contracts are invested in interest-bearing deposit accounts. Accordingly, withholding tax is deducted from the said income at such withholding taxes rates that were in force during the applicable period pursuant to the Temporary 67/4th paragraph.</li> <li>Paid withholding tax may be set off against the calculated corporate tax.</li> <li>-0% withholding tax shall be applicable to those gains derived from the sales and interest income (redemption+coupon) of those contracts backed by state bonds and treasury bills issued by the Ministry of Treasury and Finance if they were acquired between 15.03.2022 and 30.04.2024 by means of physical delivery at the end of the term.</li> </ul>	<ul> <li>A 10% withholding is applied on the earnings obtained from futures contracts within the Derivatives Exchange.</li> <li>A withholding rate of 0% is applied on earnings from futures and options contracts based on equities or equity indexes.</li> <li>Interest that has been derived from guarantees delivered for the said contracts are invested in interest-bearing deposit accounts. Accordingly, withholding tax rates is deducted from the said income at such withholding taxes that were in force during the applicable period pursuant to the Temporary 67/4th paragraph.</li> <li>Withholding tax is the ultimate tax.</li> <li>It may not be declared.</li> <li>0% withholding tax shall be applicable to those gains derived from the sales and interest income (redemption+coupon) of those contracts backed by state bonds and treasury bills issued by the Ministry of Treasury and Finance if they were acquired between 15.03.2022 and 30.04.2024 by means of physical delivery at the end of the term.</li> </ul>	<ul> <li>Gains from the trading to be executed in Derivatives Exchange shall be subject to 0% withholding tax for stock corporations (*) and 10% withholding tax for other corporate investors.</li> <li>This rate is applied as 0% for all foreign based taxpayers for gains derived from contracts based on equities and equity indexes.</li> <li>Interest that has been derived from guarantees delivered for the said contracts are invested in interest-bearing deposit accounts. Accordingly, withholding tax is deducted from the said income at such withholding taxes rates that were in force during the applicable period pursuant to the Temporary 67/4th paragraph.</li> <li>Withholding tax is the ultimate tax.</li> <li>It may not be declared.</li> <li>0% withholding tax shall be applicable to those gains derived from the sales and interest income (redemption+coupon) of those contracts backed by state bonds and</li> </ul>	<ul> <li>A 10% withholding is applied on the earnings obtained from futures contracts within the Derivatives Exchange.</li> <li>A withholding rate of 0% is applied on earnings from futures and options contracts based on equities or equity indexes.</li> <li>Interest that has been derived from guarantees delivered for the said contracts are invested in interest-bearing deposit accounts. Accordingly, withholding tax is deducted from the said income at such withholding taxes rates that were in force during the applicable period pursuant to the Temporary 67/4th paragraph.</li> <li>Withholding tax is the ultimate tax.</li> <li>It may not be declared.</li> <li>0% withholding tax shall be applicable to those gains derived from the sales and interest income (redemption+coupon) of those contracts backed by state bonds and treasury bills issued by the Ministry of Treasury and Finance if they were acquired between 15.03.2022 and 30.04.2024 by means of physical delivery at the end of the term.</li> </ul>



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PRODUCTS AND INCOME TYPE	RESIDENT TAX PAYER	RESIDENT TAX PAYER REAL PERSON	FOREIGN BASED TAXPAYER	FOREIGN BASED TAXPAYER
	CORPORATIONS		(**) INSTITUTION(***)	REAL PERSON (***)
			treasury bills issued by the Ministry of	
			Treasury and Finance if they were	
			acquired between 15.03.2022 and	
			30.04.2024 by means of physical	
			delivery at the end of the term	
	A) Lease certificates that are issued and sold	A) Lease certificates that are issued and sold	A) Lease certificates that are issued	A) Lease certificates that are issued
LEASE CERTIFICATES DIVIDEND	in Turkey:	in Turkey:	and sold in Turkey:	and sold in Turkey:
INCOME	- Dividend income derived from lease	- The withholding tax rate is set at 10%.	- Dividend income derived from	- The withholding tax rate is set at
	certificates shall be subject to 0% withholding		lease certificates shall be subject to	10%.
	tax for stock corporations (*) and 10% withholding tax for other corporate investors.	- Lease certificates with a term up to 1 year (those acquired with as of 24.05.2020) shall	0% withholding tax for stock corporations (*) and 10% withholding	- Lease certificates with a term up to 1
	withholding tax for other corporate investors.	be subject to 15% withholding tax.	tax for other corporate investors.	year (those acquired with as of
	- For other corporate investors:	be subject to 1370 withholding tax.	taxio, cane, corporate investors.	24.05.2020) shall be subject to 15%
	'		- For other corporate investors	withholding tax.
	- Lease certificates with a term up to 1 year			
	(those acquired with as of 24.05.2020) shall	-Of dividend income from lease certificates	- Lease certificates with a up to 1	- Of dividend income from lease
	be subject to 15% withholding tax.	issued by asset leasing companies which	year (those acquired with as of 24.05.2020) shall be subject to 15%	certificates issued by asset leasing
	- Of dividend income from lease certificates	were acquired between 23.12.2020-	withholding tax.	companies which were acquired
	issued by asset leasing companies which	30.04.2024 and whose fund users are banks	The moral of tank	between 23.12.2020-30.04.2024 and whose fund users are banks;
	were acquired between 23.12.2020-		- Of dividend income from lease	whose fullu users are ballks;
	30.04.2024 and whose fund users are banks:	(i) income from those with a term up to six	certificates issued by asset leasing	(i) income from those with a term up
	(i) income from these with a term in to 6th	months (6 <sup>th</sup> month included) are subject to	companies which were acquired between 23.12.2020-30.04.2024	to six months (6 <sup>th</sup> month included) are
	(i) income from those with a term up to 6 <sup>th</sup> months (6 <sup>th</sup> month included) are subject to	5% withholding tax	and whose fund users are banks	subject to 5% withholding tax
	5% withholding tax.	(ii) income from those with a term up to 1 year	and misserally decision and bulks	
	570 Withholding tax.	(1 year included) shall be subject to 3%	(i) income from those with a term	(ii) income from those with a term up
		withholding tax.	up to six months (6 <sup>th</sup> month	to 1 year (1 year included) shall be
				subject to 3% withholding tax.



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PRODUCTS AND INCOME TYPE	RESIDENT TAX PAYER CORPORATIONS	RESIDENT TAX PAYER REAL PERSON	FOREIGN BASED TAXPAYER (**) INSTITUTION(***)	FOREIGN BASED TAXPAYER REAL PERSON (***)
	(ii) income from those with a term up to 1 year (1 year included) shall be subject to 3% withholding tax. (iii) income from those with a term longer than 1 year shall be subject to 0% withholding tax.  - 0% withholding tax shall be charged to income derived from gold-backed lease certificates issued by Undersecretariat of Treasury of Türkiye Varlık Kiralama A.Ş.  - 0% withholding tax shall be charged to income derived from lease certificates if they were acquired between 22.12.2021 and 30.04.2024 (including this date) issued by Undersecretariat of Treasury of Türkiye Varlık Kiralama A.Ş. (Asset Leasing Companies that are organized pursuant to the Law no. 4749 on Organization of Public Finance and Debt Management).  B) Lease certificates issued and sold abroad -Of lease certificates that are issued and sold by resident taxpayer corporations abroad (****), dividend derived from those ones with a term up to 1 year shall be subject to 7% withholding tax while dividend derived from	(iii) income from those with a term longer than 1 year shall be subject to 0% withholding tax.  - 0% withholding tax shall be charged to income derived from gold-backed lease certificates issued by Undersecretariat of Treasury of Türkiye Varlık Kiralama A.Ş.  0% withholding tax shall be charged to income derived from lease certificates if they were acquired between 22.12.2021 and 30.04.2024 (including this date) issued by Undersecretariat of Treasury of Türkiye Varlık Kiralama A.Ş. (Asset Leasing Companies that are organized pursuant to the Law no. 4749 on Organization of Public Finance and Debt Management).  B) Lease certificates issued and sold abroadOf lease certificates that are issued and sold by resident taxpayer corporations abroad (****), dividend derived from those ones with a term up to 1 year shall be subject to 7% withholding tax while dividend derived from those ones with a term between 1 year (1 year included) and 3 years shall be subject to a 3% withholding tax and dividend derived from those ones with a term of 3 years (3 <sup>rd</sup> year	included) are subject to 5% withholding tax  (ii income from those with a term up to 1 year (1 year included) shall be subject to 3% withholding tax.  (iii) income from those with a term longer than 1 year shall be subject to 0% withholding tax.  - 0% withholding tax shall be charged to income derived from gold-backed lease certificates issued by Undersecretariat of Treasury of Türkiye Varlık Kiralama A.Ş.  0% withholding tax shall be charged to income derived from lease certificates if they were acquired between 22.12.2021 and 30.04.2024 (including this date) issued by Undersecretariat of Treasury of Türkiye Varlık Kiralama A.Ş. (Asset Leasing Companies that are organized pursuant to the Law no. 4749 on Organization of Public Finance and Debt Management).	(iii) income from those with a term longer than 1 year shall be subject to 0% withholding tax.  - 0% withholding tax shall be charged to income derived from gold-backed lease certificates issued by Undersecretariat of Treasury of Türkiye Varlık Kiralama A.Ş.  0% withholding tax shall be charged to income derived from lease certificates if they were acquired between 22.12.2021 and 30.04.2024 (including this date) issued by Undersecretariat of Treasury of Türkiye Varlık Kiralama A.Ş. (Asset Leasing Companies that are organized pursuant to the Law no. 4749 on Organization of Public Finance and Debt Management).  B) Lease certificates issued and sold abroad -Of lease certificates that are issued and sold by resident taxpayer corporations abroad (****), dividend derived from those ones with a term up to 1 year shall be subject to 7% withholding tax while dividend derived from those ones with a term between 1 year (1 year included) and 3 years shall be subject to a 3%







PRODUCTS AND INCOME TYPE	RESIDENT TAX PAYER CORPORATIONS	RESIDENT TAX PAYER REAL PERSON	FOREIGN BASED TAXPAYER (**) INSTITUTION(***)	FOREIGN BASED TAXPAYER REAL PERSON (***)
	those ones with a term between 1 year (1 year included) and 3 years shall be subject to a 3% withholding tax and dividend derived from those ones with a term of 3 years (3rd year included and longer shall be subject to 0% withholding tax.  - The said withholding tax shall be deducted by the dividend-paying issuer It is included in the corporate earningThe paid withholding tax shall be set off against the corporate tax calculated on the return.	included and longer shall be subject to 0% withholding tax.  - The said withholding tax shall be deducted by the dividend-paying issuer.  -Inflation discount not applicable  - Where the dividend income derived plus other securities and real estate capital income subjected to the withholding tax exceeds the declaration limit of 230.000TL (for 2024), the entire income shall be declared	B) Lease certificates issued and sold abroad -Of lease certificates that are issued and sold by resident taxpayer corporations abroad (****), dividend derived from those ones with a term up to 1 year shall be subject to 7% withholding tax while dividend derived from those ones with a term between 1 year (1 year included) and 3 years shall be subject to a 3% withholding tax and dividend derived from those ones with a term of 3 years (3rd year included and longer shall be subject to 0% withholding tax.  - The said withholding tax shall be deducted by the dividend-paying issuer Withholding tax is the ultimate tax.  - It is not declared.	withholding tax and dividend derived from those ones with a term of 3 years (3 <sup>rd</sup> year included and longer shall be subject to 0% withholding tax.  - The said withholding tax shall be deducted by the dividend-paying issuer.  - Withholding tax is the ultimate tax.  - It is not declared.







PRODUCTS AND INCOME TYPE	RESIDENT TAX PAYER CORPORATIONS	RESIDENT TAX PAYER REAL PERSON	FOREIGN BASED TAXPAYER (**) INSTITUTION(***)	FOREIGN BASED TAXPAYER REAL PERSON (***)
LEASE CERTIFICATES TRADING GAINS	A) Lease certificates sold in Turkey:  - Trading gains from lease certificates shall be subject to 0% withholding tax for stock corporations (*) and 10% withholding tax for other corporate investors.  - For other corporate investors:  - Lease certificates with a term up to 1 year (those acquired with as of 24.05.2020) shall be subject to 15% withholding tax.  - Of trading gains from lease certificates issued by asset leasing companies which were acquired between 23.12.2020-30.04.2024 and whose fund users are banks;  (i) Gains from the disposal of those ones that are held up to 6 months (6th month included) shall be subject to 5% withholding tax.  (ii) Gains from the disposal of those ones that are held for less than 1 year (1 year included) shall be subject to 3% withholding tax.  (iii) Gains derived from the disposal of those ones that are held for longer than 1 year shall be subject to 0% withholding tax.	A) Lease certificates sold in Turkey:  - The withholding tax rate is set at 10%.  - Lease certificates with a term less than one year (those acquired with as of 24.05.2020) shall be subject to 15% withholding tax.  - Of trading gains from lease certificates issued by asset leasing companies which were acquired between 23.12.2020-30.04.2024 and whose fund users are banks  (i) Gains from the disposal of those ones that are held up to 6 months (6th month included) shall be subject to 5% withholding tax.  (ii) Gains from the disposal of those ones that are held for less than 1 year (1 year included) shall be subject to 3% withholding tax.  (iii) Gains from those with a term longer than 1 year shall be subject to 0% withholding tax.  - 0% withholding tax shall be charged to gains derived from gold-backed lease certificates issued by Undersecretariat of Treasury of Türkiye Varlık Kiralama A.Ş.  - The withholding tax is an ultimate tax.	A) Lease certificates sold in Turkey:  - Trading gains from lease certificates shall be subject to 0% withholding tax for stock corporations (*) and 10% withholding tax for other corporate investors.  - For other corporate investors:  - Lease certificates with a term less than one year (those acquired with as of 24.05.2020) shall be subject to 15% withholding tax.  - Of trading gains from lease certificates issued by asset leasing companies which were acquired between 23.12.2020-30.04.2024 and whose fund users are banks  - Gains from the disposal of those ones that are held up to 6 months (6th month included) shall be subject to 5% withholding tax.  ii) Gains from the disposal of those ones that are held for less than 1 year (1 year included) shall be subject to 3% withholding tax.  (iii) Gains from those with a term longer than 1 year shall be subject	A) Lease certificates sold in Turkey:  - The withholding tax rate is set at 10%.  Lease certificates with a term less than one year (those acquired with as of 24.05.2020) shall be subject to 15% withholding tax.  - Of trading gains from lease certificates issued by asset leasing companies which were acquired between 23.12.2020-30.04.2024 and whose fund users are banks  (i) Gains from the disposal of those ones that are held for up to 6 months (6th month included) shall be subject to 5% withholding tax.  (ii) Gains from the disposal of those ones that are held for less than 1 year (1 year included) shall be subject to 3% withholding tax.  (iii) Gains from those with a term longer than 1 year shall be subject to 0% withholding tax.



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PRODUCTS AND INCOME TYPE	RESIDENT TAX PAYER CORPORATIONS	RESIDENT TAX PAYER REAL PERSON	FOREIGN BASED TAXPAYER (**) INSTITUTION(***)	FOREIGN BASED TAXPAYER REAL PERSON (***)
	- 0% withholding tax shall be charged to gains derived from gold-backed lease certificates issued by Undersecretariat of Treasury of Türkiye Varlık Kiralama A.Ş.  - are subject to corporate tax  - Paid withholding tax may be set off against the calculated corporate tax  - 0% withholding tax shall be charged to gains derived from lease certificates if they were acquired between 22.12.2021 and 30.04.2024 (including this date) issued by Undersecretariat of Treasury of Türkiye Varlık Kiralama A.Ş. (Asset Leasing Companies that are organized pursuant to the Law no. 4749 on Organization of Public Finance and Debt Management).  B) Lease certificates sold abroad:  - are not subject to withholding tax.  - are subject to corporate tax.	-shall not be declared  -0% withholding tax shall be charged to gains derived from lease certificates if they were acquired between 22.12.2021 and 30.04.2024 (including this date) issued by Undersecretariat of Treasury of Türkiye Varlık Kiralama A.Ş. (Asset Leasing Companies that are organized pursuant to the Law no. 4749 on Organization of Public Finance and Debt Management).  B) Lease certificates sold abroad:  - are declared together with other trading gains.  - Purchase price may be linked to the PPI increase rate provided that PPI increase rate is equal to or above 10% except for the month in which bills are disposed of.	to 0% withholding tax.  -0% withholding tax shall be charged to gains derived from goldbacked lease certificates issued by Undersecretariat of Treasury of Türkiye Varlık Kiralama A.Ş.  -The withholding tax is an ultimate tax.  -0% withholding tax shall be charged to gains derived from lease certificates if they were acquired between 22.12.2021 and 30.04.2024 (including this date) issued by Undersecretariat of Treasury of Türkiye Varlık Kiralama A.Ş. (Asset Leasing Companies that are organized pursuant to the Law no. 4749 on Organization of Public Finance and Debt Management).  B) Lease certificates sold abroad:  - are not subject to withholding tax.  -shall not be declared	0% withholding tax shall be charged to gains derived from gold-backed lease certificates issued by Undersecretariat of Treasury of Türkiye Varlık Kiralama A.Ş.  The withholding tax is an ultimate tax.  -shall not be declared.  -0% withholding tax shall be charged to gains derived from lease certificates if they were acquired between 22.12.2021 and 30.04.2024 (including this date) issued by Undersecretariat of Treasury of Türkiye Varlık Kiralama A.Ş. (Asset Leasing Companies that are organized pursuant to the Law no. 4749 on Organization of Public Finance and Debt Management).  B) Lease certificates sold abroad:  - are not subject to withholding tax.  - shall not be declared



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PRODUCTS AND INCOME TYPE	RESIDENT TAX PAYER	RESIDENT TAX PAYER REAL PERSON	FOREIGN BASED TAXPAYER	FOREIGN BASED TAXPAYER
	CORPORATIONS		(**) INSTITUTION(***)	REAL PERSON (***)
OVER-THE-COUNTER OPTION CONTRACTS (IN FOREIGN CURRENCY)	- They are not subject to withholding tax subject to Temporary Article 67 of the Income Tax Law Option premium shall be taken into account as income on the date on which the party that sells the right specified in the option contract executes the contract. This right shall be taken into account as expense by the purchaser as of the date on which the option sight is purchased as the contract terminates.	Revenues derived from FX-backed options shall be subject to 10% withholding tax.  The withholding tax is ultimate unless it is related to a commercial organization.  In the event that the call or put option is exercised and an income is derived from it, the withholding tax base shall be equal to the difference between the value of the security	A) Corporate investors that are not banks or similar financial institutions     Their earnings are not subject to withholding tax subject to Temporary Article 67 of the Income Tax Law.	-Revenues derived from FX-backed options shall be subject to 10% withholding tax.  - The withholding tax is ultimate unless it is related to a commercial organization.  - In the event that the call or put option is exercised and an income is derived from it, the withholding tax
	right is exercised or the contract terminates.  - Valuations that are carried out during the period until the exercise date of the option (rediscount transactions) must not be associated with corporate earnings.  - Where the option contract is terminated via cash settlement without any delivery, it will require to include the profit or loss derived as a result of cash settlement shall be included in the corporate earnings.	underlying the contract relative to the fair market price and the value that arises relative to the transaction price minus the paid option premium.	- Gains derived from both the option contract and the option premium shall be treated as commercial gains and no tax deduction shall be made from these gains pursuant to Article 30 of the Corporate Tax Law.  B) Corporate investors that are not banks or similar financial institutions	base shall be equal to the difference between the value of the security underlying the contract relative to the fair market price and the value that arises relative to the transaction price minus the paid option premium.  -Provisions of the double tax treaty agreement are reserved.
	- Where the option contract is terminated upon delivery, assets traded as of the maturity date of the contract are required to be entered with the records at the option exchange rate agreed in the contract: (a) In the case of call option, the sum that is paid by the party purchasing the purchase right pursuant to the contract shall form the cost of the contractual asset and the amount that is collected by the party selling the purchase		<ul> <li>Gains derived from option contracts shall be subject to 0% withholding tax for stock corporations (*) and 10% for other corporate investors</li> <li>In the event that the call or put option is exercised and an income is derived from it, the withholding tax base shall be equal to the difference between the value of the security</li> </ul>	



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PRODUCTS AND INCOME TYPE	RESIDENT TAX PAYER CORPORATIONS	RESIDENT TAX PAYER REAL PERSON	FOREIGN BASED TAXPAYER (**) INSTITUTION(***)	FOREIGN BASED TAXPAYER REAL PERSON (***)
	right for the contractual asset shall constitute the sales price of the contractual asset. (b) In the put option, the amount that is collected by the party purchasing the sales right pursuant to the contract shall constitute the sales price of contractual asset, and the amount that is paid by the party selling the sales right for the contractual asset shall constitute the cost of the contractual asset. In the event that the right granted by the option contract is not exercised, there shall be in no event a profit or loss based on the contract.		underlying the contract relative to the fair market price and the value that arises relative to the transaction price minus the paid option premium.  - Withholding tax is the ultimate tax Provisions of the double tax treaty agreement are reserved.	



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PRODUCTS AND INCOME TYPE	RESIDENT TAX PAYER CORPORATIONS	RESIDENT TAX PAYER REAL PERSON	FOREIGN BASED TAXPAYER (**) INSTITUTION(***)	FOREIGN BASED TAXPAYER REAL PERSON (***)
FULL GUARANTEED OPTION	DCD transactions essentially consist of option trading on deposits and currency. Deposit interest income derived from DCD transactions:  A) deposits in TL:	DCD transactions essentially consist of option trading on deposits and currency. Deposit interest income derived from DCD transactions:  A) deposits in TL:	DCD transactions essentially consist of option trading on deposits and currency. Deposit interest income derived from DCD transactions:  A) deposits in TL:	DCD transactions essentially consist of option trading on deposits and currency. Deposit interest income derived from DCD transactions:  A) deposits in TL:
(DCD –Dual Currency Deposit)	For accounts that were opened or renewed as of 01.12.2018:	For accounts that were opened or renewed as of 01.12.2018:	For accounts that were opened or renewed as of 01.12.2018:	For accounts that were opened or renewed as of 01.12.2018:
	- demand or call accounts as well as term deposit accounts up to 6 months (6 <sup>th</sup> month included) shall be subject to 15% withholding tax;	- demand or call accounts as well as term deposit accounts up to 6 months (6th month included) shall be subject to 15% withholding tax;	- demand or call accounts as well as term deposit accounts up to 6 months (6 <sup>th</sup> month included) shall be subject to 15% withholding tax;	- demand or call accounts as well as term deposit accounts up to 6 months (6 <sup>th</sup> month included) shall be subject to 15% withholding tax;
	- term deposit accounts up to 1 year (1 year included) shall be subject to 12% withholding tax;	- term deposit accounts up to 1 year (1 year included) shall be subject to 12% withholding tax;	- term deposit accounts up to 1 year (1 year included) shall be subject to 12% withholding tax;	- term deposit accounts up to 1 year (1 year included) shall be subject to 12% withholding tax;
	- term deposit accounts for longer than one year shall be subject to 10% withholding tax.	- term deposit accounts for longer than one yearshall be subject to 10% withholding tax.	- term deposit accounts for longer than one yearshall be subject to 10% withholding tax.	- term deposit accounts for longer than one yearshall be subject to 10% withholding tax.
	For accounts that have been opened as of 01.05.2019:	For accounts that have been opened as of 01.05.2019:	For accounts that have been opened as of 01.05.2019:	For accounts that have been opened as of 01.05.2019:
	- TL accounts for a term longer than 1 year to which variable interest rate depending on inflation rate is applied shall be subject to 0% withholding tax.	- TL accounts for a term longer than 1 year to which variable interest rate depending on	- TL accounts for a term longer than 1 year to which variable interest rate depending on inflation rate is	- TL accounts for a term longer than 1 year to which variable interest rate depending on inflation rate is applied shall be subject to 0% withholding tax.



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PRODUCTS AND INCOME TYPE	RESIDENT TAX PAYER	RESIDENT TAX PAYER REAL PERSON	FOREIGN BASED TAXPAYER	FOREIGN BASED TAXPAYER
	CORPORATIONS		(**) INSTITUTION(***)	REAL PERSON (***)
	On the condition that an account was	inflation rate is applied shall be subject to 0%	applied shall be subject to 0%	
	opened or its term was renewed between	withholding tax.	withholding tax.	On the condition that an account was
	30.09.2020 and 30.04.2024:	-	On the condition that an account	opened or its term was renewed
			was opened or its term was	between 30.09.2020 and 30.04.2024:
	- demand or call accounts as well as term	On the condition that an account was	renewed between 30.09.2020 and	
	deposit accounts up to 6 months (6th month	opened or its term was renewed between	<u>30.04.2024:</u>	demand or call accounts as well as
	included) shall be subject to 5% withholding	30.09.2020 and 30.04.2024:		term deposit accounts up to 6 months
	tax;		demand or call accounts as well as	(6 <sup>th</sup> month included) shall be subject
		demand or call accounts as well as term	term deposit accounts up to 6	to 5% withholding tax;
	- term deposit accounts up to 1 year (1 year	deposit accounts up to 6 months (6 <sup>th</sup> month	months (6 <sup>th</sup> month included) shall	
	included) shall be subject to 3% withholding	included) shall be subject to 5% withholding	be subject to 5% withholding tax;	- term deposit accounts up to 1 year
	tax;	tax;		(1 year included) shall be subject to
			- term deposit accounts up to 1 year	3% withholding tax;
	- term deposit accounts for longer than one	- term deposit accounts up to 1 year (1 year	(1 year included) shall be subject to	
	yearshall be subject to 0% withholding tax	included) shall be subject to 3% withholding	3% withholding tax;	- term deposit accounts for longer
		tax;		than one yearshall be subject to 0%
			- term deposit accounts for longer	withholding tax
	- FX-protected term deposit and participation	- term deposit accounts for longer than one	than one yearshall be subject to 0%	
	accounts, and Turkish lira deposit and	yearshall be subject to 0% withholding tax	withholding tax	- FX-protected term deposit and
	participation accounts opened with banks			participation accounts, and Turkish
	under the policy to support the conversion to	- FX-protected term deposit and participation	- FX-protected term deposit and	lira deposit and participation accounts
	Turkish lira deposit and participation accounts	accounts, and Turkish lira deposit and	participation accounts, and Turkish	opened with banks under the policy to
	shall be subject to 0% withholding tax.	participation accounts opened with banks	lira deposit and participation	support the conversion to Turkish lira
		under the policy to support the conversion to	accounts opened with banks under	deposit and participation accounts
	B) Out of interests run on foreign exchange	Turkish lira deposit and participation accounts	the policy to support the conversion	shall be subject to 0% withholding tax.
	deposit accounts and dividends paid by	shall be subject to 0% withholding tax.	to Turkish lira deposit and	B) Out of interests run on foreign
	participation banks to foreign exchange		participation accounts shall be	exchange deposit accounts and
	participation accounts:	B) Out of interests run on foreign exchange	subject to 0% withholding tax.	dividends paid by participation banks
		deposit accounts and dividends paid by		



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PRODUCTS AND INCOME TYPE	RESIDENT TAX PAYER CORPORATIONS	RESIDENT TAX PAYER REAL PERSON	FOREIGN BASED TAXPAYER (**) INSTITUTION(***)	FOREIGN BASED TAXPAYER REAL PERSON (***)
	On the condition that an account was opened or its term was renewed between 02.01.2013 and 21.03.2019;	participation banks to foreign exchange participation accounts.	B) Out of interests run on foreign exchange deposit accounts and dividends paid by participation	to foreign exchange participation accounts
	- demand deposit and call accounts as well as term deposit accounts up to 6 months (6 <sup>th</sup> month included) shall be subject to 18%	On the condition that an account was opened or its term was renewed between 02.01.2013 and 21.03.2019;	banks to foreign exchange participation accounts.  On the condition that an account	On the condition that an account was opened or its term was renewed between 02.01.2013 and 21.03.2019;
	withholding tax;  - term deposit accounts with a term up to 1 year (1 year included) shall be subject to 15%	- demand deposit and call accounts as well as term deposit accounts up to 6 months (6 <sup>th</sup> month included) shall be subject to 18% withholding tax;	was opened or its term was renewed between 02.01.2013 and 21.03.2019; - demand deposit and call accounts	- demand deposit and call accounts as well as term deposit accounts up to 6 months (6 <sup>th</sup> month included) shall be subject to 18% withholding tax;
	withholding tax.  - Accounts with a term for longer than one year shall be subject to 13% withholding rate.	- term deposit accounts with a term up to 1 year (1 year included) shall be subject to 15% withholding tax.	as well as term deposit accounts up to 6 months (6 <sup>th</sup> month included) shall be subject to 18% withholding tax;	- term deposit accounts with a term up to 1 year 1 year (included) shall be subject to 15% withholding tax.
	For accounts that have been opened or whose term has been renewed between 21.03.2019 and 27.06.2023:	- Accounts with a term for longer than one year shall be subject to 13% withholding rate.  For accounts that have been opened or	- term deposit accounts with a term up to 1 year (1 year included) shall be subject to 15% withholding tax.	- Accounts with a term for longer than one year shall be subject to 13% withholding rate.
	- Demand and call accounts as well as term deposit accounts for a term up to 1 year (1 year included) shall be subject to 20% withholding tax.	whose term has been renewed between 21.03.2019 and 27.06.2023:  - Demand and call accounts as well as term	- Accounts with a term for longer than one year shall be subject to 13% withholding rate.	For accounts that have been opened or whose term has been renewed between 21.03.2019 and 27.06.2023:
	- Accounts for a term longer than 1 year shall be subject to 18% withholding tax.	deposit accounts for a term up to 1 year (1 year included) shall be subject to 20% withholding tax.	For accounts that have been opened or whose term has been renewed between 21.03.2019 and 27.06.2023:	- Demand and call accounts as well as term deposit accounts for a term up to 1 year (1 year included) shall be subject to 20% withholding tax.



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RESIDENT TAX PAYER CORPORATIONS	RESIDENT TAX PAYER REAL PERSON	FOREIGN BASED TAXPAYER (**) INSTITUTION(***)	FOREIGN BASED TAXPAYER REAL PERSON (***)
For accounts that have been opened or whose term has been renewed after 28.06.2023:  - Demand, call or special current accounts and term deposit accounts shall be subject to 25% withholding tax.  - This shall be included in the corporate earnings.  - Withholding tax shall be set off against the corporate tax calculated on the basis of the tax return.  - Taxation of option income derived from DCD operations shall be as agreed in the Over-the-Counter Option Contracts.	- Accounts for a term longer than 1 year shall be subject to 18% withholding tax.  For accounts that have been opened or whose term has been renewed after 28.06.2023:  Demand, call or special current accounts and term deposit accounts shall be subject to 25% withholding tax.  - Withholding tax is the ultimate tax.  - It is not declared.  Taxation of option income derived from DCD operations shall be as agreed in the Over-the-Counter Option Contracts.	- Demand and call accounts as well as term deposit accounts for a term up to 1 year (1 year included) shall be subject to 20% withholding tax.  - Accounts for a term longer than 1 year shall be subject to 18% withholding tax.  For accounts that have been opened or whose term has been renewed after 28.06.2023:  Demand, call or special current accounts and term deposit accounts shall be subject to 25% withholding tax.  - Withholding tax is the ultimate tax.  - It is not declared.  Taxation of option income derived from DCD operations shall be as agreed in the Over-the-Counter Option Contracts.	- Accounts for a term longer than 1 year shall be subject to 18% withholding tax.  For accounts that have been opened or whose term has been renewed after 28.06.2023:  Demand, call or special current accounts and term deposit accounts shall be subject to 25% withholding tax.  - Withholding tax is the ultimate tax.  - It is not declared.  Taxation of option income derived from DCD operations shall be as agreed in the Over-the-Counter Option Contracts.







PRODUCTS AND INCOME TYPE	RESIDENT TAX PAYER CORPORATIONS	RESIDENT TAX PAYER REAL PERSON	FOREIGN BASED TAXPAYER (**) INSTITUTION(***)	FOREIGN BASED TAXPAYER REAL PERSON (***)
OVER-THE-COUNTER FORWARD TRANSACTIONS (ON FOREIGN EXCHANGE)	- They are not subject to withholding tax subject to Temporary Article 67 of the Income Tax Law.  - Valuations that are carried out during the period until the exercise date of the option (rediscount transactions) must not be associated with corporate earnings. Profit or loss that shall be included in the corporate earnings should be determined at the end of the term. Where the contract is terminated prior to the maturity, profit or loss arising from forward transaction should be included in the corporate gains on the termination date of the contract. On the other hand, where the forward contract is terminated upon delivery, the value of the currency purchased or sold as of the maturity date of the contract should be posted with records at the unit value.	- In the case of a forward transaction backed by foreign exchange, the difference between the value of the foreign exchange as per the market price and the value based on transaction price (exercise price) shall form the basis of the withholding tax. At the time when the party makes use of the provision in the forward contract, a 10% withholding tax shall be deducted from the difference between the value based on the market price of the security underlying the contract and the value based on its trading price as of the termination date of the contract.  - Unless it is subject to a commercial organization, the withholding tax is the ultimate tax.	A) For corporate investors which are banks or similar financial institutions:  - Gains derived by them are not subject to withholding tax under the Temporary Article 67 of the ITL.  - The nature of the gains is commercial and no tax deduction shall be charged over these gains pursuant to Article 30 of the Corporate Tax Law.  B) For those corporate investors which are not banks or similar financial institutions:  - Gains derived from forward contracts shall be subject to 0% withholding tax for stock corporations (*) and 10% withholding tax for other corporate investors.  - Withholding tax is the ultimate tax.  - Provisions of the double tax treaty agreement are reserved.	- In the case of a forward transaction backed by foreign exchange, the difference between the value of the foreign exchange as per the market price and the value based on transaction price (exercise price) shall form the basis of the withholding tax. At the time when the party makes use of the provision in the forward contract, a 10% withholding tax shall be deducted from the difference between the value based on the market price of the security underlying the contract and the value based on its trading price as of the termination date of the contract.  -Unless it is subject to a commercial organization, the withholding tax is the ultimate tax.  -Provisions of the double tax treaty agreement are reserved.



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PRODUCTS AND INCOME TYPE	RESIDENT TAX PAYER	RESIDENT TAX PAYER REAL PERSON	FOREIGN BASED TAXPAYER	FOREIGN BASED TAXPAYER
	CORPORATIONS Structured swap transactions based on	Structured swap transactions based on	(**) INSTITUTION(***) Structured swap transactions based	REAL PERSON (***) Structured swap transactions based
DEPOSIT-BACKED STRUCTURED	deposit essentially consist of swaps on the basis of deposit and foreign currency.	deposit essentially consist of swaps on the basis of deposit and foreign currency.	on deposit essentially consist of swaps on the basis of deposit and	on deposit essentially consist of swaps on the basis of deposit and foreign
SWAPS	<u>Deposit interest income</u> derived from deposit-backed structured swaps:	<u>Deposit interest income</u> derived from deposit-backed structured swaps:	foreign currency. <u>Deposit interest income</u> derived from deposit-backed structured	currency. <u>Deposit interest income</u> derived from deposit-backed structured swaps:
	A) Deposits in TL;	A) Deposits in TL;	swaps: A) Deposits in TL;	A) Deposits in TL;
	For accounts that were opened or renewed as of 01.12.2018	For accounts that were opened or renewed as of 01.12.2018	For accounts that were opened or renewed as of 01.12.2018	For accounts that were opened or renewed as of 01.12.2018
	- demand or call accounts as well as term deposit accounts up to 6 months (6th month included) shall be subject to 15% withholding tax;	- demand or call accounts as well as term deposit accounts up to 6 months (6th month included) shall be subject to 15% withholding tax;	- demand or call accounts as well as term deposit accounts up to 6 months (6 <sup>th</sup> month included) shall be subject to 15% withholding tax;	- demand or call accounts as well as term deposit accounts up to 6 months (6 <sup>th</sup> month included) shall be subject to 15% withholding tax;
	- term deposit accounts up to 1 year (1 year included) shall be subject to 12% withholding tax;	- term deposit accounts up to 1 year (1 year included) shall be subject to 12% withholding tax;	- term deposit accounts up to 1 year (1 year included) shall be subject to 12% withholding tax;	- term deposit accounts up to 1 year (1 year included) shall be subject to 12% withholding tax;
	- term deposit accounts for longer than one yearshall be subject to 10% withholding tax.	- term deposit accounts for longer than one yearshall be subject to 10% withholding tax	- term deposit accounts for longer than one yearshall be subject to 10% withholding tax	- term deposit accounts for longer than one yearshall be subject to 10% withholding tax
	For accounts that have been opened as of 01.05.2019;	For accounts that have been opened as of 01.05.2019;	For accounts that have been opened as of 01.05.2019;	For accounts that have been opened as of 01.05.2019;
	TL accounts for a term up to 1 year to which variable interest rate depending on inflation	TL accounts for a term up to 1 year to which variable interest rate depending on inflation	TL accounts for a term up to 1 year to which variable interest rate depending on inflation rate is	TL accounts for a term up to 1 year to which variable interest rate



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PRODUCTS AND INCOME TYPE	RESIDENT TAX PAYER CORPORATIONS	RESIDENT TAX PAYER REAL PERSON	FOREIGN BASED TAXPAYER (**) INSTITUTION(***)	FOREIGN BASED TAXPAYER REAL PERSON (***)
	rate is applied shall be subject to 0% withholding tax.	rate is applied shall be subject to 0% withholding tax.	applied shall be subject to 0% withholding tax.	depending on inflation rate is applied shall be subject to 0% withholding tax.
	On the condition that an account was	On the condition that an account was	On the condition that an account	On the condition that an account was
	opened or its term was renewed between 30.09.2020 and 30.04.2024;	opened or its term was renewed between 30.09.2020 and 30.04.2024;	was opened or its term was renewed between 30.09.2020 and 30.04.2024;	opened or its term was renewed between 30.09.2020 and 30.04.2024;
	- demand or call accounts as well as term deposit accounts up to 6 months (6 <sup>th</sup> month included)) shall be subject to 5% withholding tax;	- demand or call accounts as well as term deposit accounts up to 6 months (6th month included) shall be subject to 5% withholding tax;	- demand or call accounts as well as term deposit accounts up to 6 months (6 <sup>th</sup> month included) shall be subject to 5% withholding tax; - term deposit accounts up to 1 year	- demand or call accounts as well as term deposit accounts up to 6 months (6 <sup>th</sup> month included) shall be subject to 5% withholding tax;
	- term deposit accounts up to 1 year (1 year included) shall be subject to 3% withholding tax;	<ul> <li>term deposit accounts up to 1 year (1 year included) shall be subject to 3% withholding tax;</li> </ul>	(1 year included) shall be subject to 3% withholding tax;	<ul> <li>term deposit accounts up to 1 year</li> <li>(1 year included) shall be subject to</li> <li>3% withholding tax;</li> </ul>
	- term deposit accounts for longer than one yearshall be subject to 0% withholding tax.	- term deposit accounts for longer than one yearshall be subject to 0% withholding tax.	- term deposit accounts for longer than one yearshall be subject to 0% withholding tax.	- term deposit accounts for longer than one yearshall be subject to 0% withholding tax.
	- FX-protected term deposit and participation accounts, and Turkish lira deposit and participation accounts opened with banks under the policy to support the conversion to Turkish lira deposit and participation accounts shall be subject to 0% withholding tax.	- FX-protected term deposit and participation accounts, and Turkish lira deposit and participation accounts opened with banks under the policy to support the conversion to Turkish lira deposit and participation accounts shall be subject to 0% withholding tax.	- FX-protected term deposit and participation accounts, and Turkish lira deposit and participation accounts opened with banks under the policy to support the conversion to Turkish lira deposit and participation accounts shall be subject to 0% withholding tax.	- FX-protected term deposit and participation accounts, and Turkish lira deposit and participation accounts opened with banks under the policy to support the conversion to Turkish lira deposit and participation accounts shall be subject to 0% withholding tax.



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PRODUCTS AND INCOME TYPE	RESIDENT TAX PAYER CORPORATIONS	RESIDENT TAX PAYER REAL PERSON	FOREIGN BASED TAXPAYER (**) INSTITUTION(***)	FOREIGN BASED TAXPAYER REAL PERSON (***)
	B) Out of interests run on FX deposit accounts	B) Out of interests run on FX deposit accounts	B) Out of interests run on FX deposit	REAL PERSON ( )
	and dividends paid by participation banks to	and dividends paid by participation banks to	accounts and dividends paid by	B) Out of interests run on FX deposit
	currencl participation accounts;	currencl participation accounts;	participation banks to currencl	accounts and dividends paid by
	currenci participation accounts,	currence participation accounts,	participation accounts;	participation banks to currencl
			participation accounts,	participation accounts;
	On the condition that an account was	On the condition that an account was	On the condition that an account	On the condition that an account was
	opened or its term was renewed between	opened or its term was renewed between	was opened or its term was	opened or its term was renewed
	02.01.2013 and 21.03.2019;	02.01.2013 and 21.03.2019;	renewed between 02.01.2013 and	between 02.01.2013 and 21.03.2019;
			<u>21.03.2019;</u>	
	- demand deposit and call accounts as well as	- demand deposit and call accounts as well as		- demand deposit and call accounts as
	term deposit accounts up to 6 months (6 <sup>th</sup>	term deposit accounts up to 6 months (6 <sup>th</sup>	- demand deposit and call accounts	well as term deposit accounts up to 6
	month included) shall be subject to 18%	month included) shall be subject to 18%	as well as term deposit accounts up	months (6 <sup>th</sup> month included) shall be
	withholding tax;	withholding tax;	to 6 months (6 <sup>th</sup> month included)	subject to 18% withholding tax;
			shall be subject to 18% withholding	
	- term deposit accounts with a term up to 1	- term deposit accounts with a term up to 1	tax;	- term deposit accounts with a term
	year (1 year included) shall be subject to 15%	year (1 year included) shall be subject to 15%		up to 1 year (1 year included) ncluded)
	withholding tax.	withholding tax.	- term deposit accounts with a term	shall be subject to 15% withholding
			up to 1 year ((1 year included) shall	tax.
	- Accounts with a term for longer than one	- Accounts with a term for longer than one	be subject to 15% withholding tax.	
	year shall be subject to 13% withholding rate.	year shall be subject to 13% withholding rate.		- Accounts with a term for longer than
			- Accounts with a term for longer	one year shall be subject to 13%
			than one year shall be subject to	withholding rate.
			13% withholding rate.	
	On the condition that an account was	On the condition that an account was	On the condition that an account	On the condition that an account was
	opened or its term was renewed between	opened or its term was renewed between	was opened or its term was	opened or its term was renewed
	21.03.2019 and 27.06.2023;	21.03.2019 and 27.06.2023;	renewed between 21.03.2019 and	between 21.03.2019 and 27.06.2023;
			<u>27.06.2023;</u>	- Demand and call accounts with a
				term up to 1 year (1 year included)



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PRODUCTS AND INCOME TYPE	RESIDENT TAX PAYER CORPORATIONS	RESIDENT TAX PAYER REAL PERSON	FOREIGN BASED TAXPAYER (**) INSTITUTION(***)	FOREIGN BASED TAXPAYER REAL PERSON (***)
	- Demand and call accounts with a term up to	- Demand and call accounts with a term up to	- Demand and call accounts with a	shall be subject to 20% withholding
	1 year (1 year included) shall be subject to	1 year (1 year included) shall be subject to	term up to 1 year (1 year included)	rate,
	20% withholding rate,	20% withholding rate,	shall be subject to 20% withholding rate,	- Accounts for a term longer than one
	- Accounts for a term longer than one year	- Accounts for a term longer than one year	rate,	year shall be subject to 18%
	shall be subject to 18% withholding rate,	shall be subject to 18% withholding rate,	- Accounts for a term longer than	withholding rate,
	shall be subject to 10% withholding rate,	Shall be subject to 10% withholding rate,	one year shall be subject to 18%	withiolanig rate,
			withholding rate,	For accounts that have been opened
	For accounts that have been opened or	For accounts that have been opened or		or whose term has been renewed
	whose term has been renewed since	whose term has been renewed since	For accounts that have been	since 28.06.2023;
	28.06.2023;	28.06.2023;	opened or whose term has been	
			renewed since 28.06.2023;	- Demand, call or special current
	- Demand, call or special current accounts and	- Demand, call or special current accounts and	- Demand, call or special current	accounts and term deposit accounts
	term deposit accounts shall be subject to 25%	term deposit accounts shall be subject to 25%	accounts and term deposit accounts	shall be subject to 25% withholding
	withholding tax,	withholding tax,	shall be subject to 25% withholding	tax,
	- This shall be included in the corporate	- Withholding tax is the ultimate tax.	tax,	- Withholding tax is the ultimate tax.
	earnings.	- Withholding tax is the ditimate tax.	- Withholding tax is the ultimate tax.	- It is not declared.
	currings.	- It is not declared	withholding tax is the altimate tax.	it is not declared.
	- Withholding tax shall be set off against the	it is not decid ear.	- It is not declared.	Swap income derived from deposit-
	corporate tax calculated on the basis of the	Swap income derived from deposit-backed		backed structured swaps;
	tax return.	structured swaps;	Swap income derived from deposit-	1 111 1:
			backed structured swaps;	- shall be subject to 10% withholding tax.
	Swap income derived from deposit-backed	shall be subject to 10% withholding tax.	B) Corporate investors that are not	tax.
	structured swaps;	The income desired from montrel coefficient	banks or similar financial	- The income derived from mutual
	- are not subject to the withholding tax	- The income derived from mutual exchange of different currencies shall constitute the	institutions.	exchange of different currencies shall
	pursuant to Article 67 of the Income Tax Law.	withholding base and this base shall be equal	- are not subject to the withholding	constitute the withholding base and
		to the value calculated as per the currency	tax pursuant to Article 67 of the	this base shall be equal to the value
	- In a swap transaction, valuations made	rate applicable on the first exchange date and	Income Tax Law.	calculated as per the currency rate



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PRODUCTS AND INCOME TYPE	RESIDENT TAX PAYER CORPORATIONS	RESIDENT TAX PAYER REAL PERSON	FOREIGN BASED TAXPAYER (**) INSTITUTION(***)	FOREIGN BASED TAXPAYER REAL PERSON (***)
	during the period until the maturity date (rediscount operations) should not be associated with corporate earnings and such profit or loss to be included in the corporate earnings should be determined at the end of the term. Foreign currency sums posted on the assets side of the balance sheet due to the exchange of currency subject to the spaw contract should be valued in line with general provisions. Where the contract is terminated prior to the maturity, such profit or loss arising from swap transaction should be included in the corporate earnings on the date of early termination of the contract.	the value created according to the currency rate determined for the exchange on the maturity date on the contract.  -The withholding tax is ultimate unless it is related to a commercial organization.	- Gains derived from swap operations are commercial by nature and no tax deduction shall be made from these gains pursuant to Article 30 of the Corporate Tax Law.  B) Corporate investors that are not banks or similar financial institutions - Gains derived from swap contracts shall be subject to 0% withholding tax for stock corporations (*) and 10% for other corporate investors.  - The income derived from mutual exchange of different currencies shall constitute the withholding base and this base shall be equal to the value calculated as per the currency rate applicable on the first exchange date and the value created according to the currency rate determined for the exchange on the maturity date on the contract.  - Withholding tax is the ultimate tax Provisions of the double tax treaty agreement are reserved.	applicable on the first exchange date and the value created according to the currency rate determined for the exchange on the maturity date on the contract.  - The withholding tax is ultimate unless it is related to a commercial organization.  - Provisions of the double tax treaty agreement are reserved.



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PRODUCTS AND INCOME TYPE	RESIDENT TAX PAYER CORPORATIONS	RESIDENT TAX PAYER REAL PERSON	FOREIGN BASED TAXPAYER (**) INSTITUTION(***)	FOREIGN BASED TAXPAYER REAL PERSON (***)
GAINS FROM OFF-SHORE FUTURE TRANSACTIONS AND EQUITY TRADING	- They are not subject to withholding tax They are to be included in the corporate earnings	- They are not subject to withholding tax Trading gains are to be calculated on the basis of Turkish lira On the condition that the PPI increase rate is equal to or above 10%, the acquisition cost shall be linked to the PPI increase rate except for the month in which they are disposed of Trading losses shall be set off against trading profits These shall be declared regardless of the amount of the gains.	- Where gains derived from transactions are not earned in Turkey, they shall not be declared pursuant to Article 7 of the Income Tax Law (*******) -Not subject to the withholding tax.	- Where gains derived from transactions are not earned in Turkey, they shall not be declared pursuant to Article 7 of the Income Tax Law (*******) -Not subject to the withholding tax.
GAINS FROM OFF-SHORE FUTURE TRANSACTIONS AND REDEMPTION INCOME AND DIVIDEND	- They shall be included in the corporate earnings.  - Taxes paid abroad may be deducted from the corporate tax assessed in Turkey.(*****)	- Where the resultant income is above the declaration limit of 13.000TL in 2024, the entire income shall be declared.  -Taxes paid abroad may be deducted from the income tax assessed in Turkey.(******)	- Where gains derived from transactions are not earned in Turkey, they shall not be declared pursuant to Article 7 of the Income Tax Law (********) -Not subject to the withholding tax.	- Where gains derived from transactions are not earned in Turkey, they shall not be declared pursuant to Article 7 of the Income Tax Law (********) -Not subject to the withholding tax.



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PRODUCTS AND INCOME TYPE	RESIDENT TAX PAYER CORPORATIONS	RESIDENT TAX PAYER REAL PERSON	FOREIGN BASED TAXPAYER (**) INSTITUTION(***)	FOREIGN BASED TAXPAYER REAL PERSON (***)
TRADING GAINS DERIVED FROM EQUITIES ISSUED BY ENTITIES BASED ABROAD  Those ones that were acquired PRIOR TO or AFTER 1.1.2006	- They are not subject to withholding tax.  - They are included in the corporate earnings.	- They are not subject to withholding tax Trading gains are to be calculated on the basis of Turkish lira On the condition that the PPI increase rate is equal to or above 10%, the acquisition cost shall be linked to the PPI increase rate except for the month in which they are disposed of Trading losses shall be set off against trading profits In the case of combination with other trading gains, the portion that exceeds 200.000 TL shall be declared. (The exception of 200.000TL shall not be applied for those ones issued after 01.01.2006. They are to be declared regardless of the amount of the gains.)	- Where gains derived from transactions are not earned in Turkey, they shall not be declared pursuant to Article 7 of the Income Tax Law (********) -Not subject to the withholding tax.	- Where gains derived from transactions are not earned in Turkey, they shall not be declared pursuant to Article 7 of the Income Tax Law (********) -Not subject to the withholding tax.
DIVIDEND INCOME DERIVED FROM EQUITIES ISSUED BY ENTITIES BASED ABROAD  Those ones that were acquired PRIOR TO or AFTER 1.1.2006	- They are not subject to withholding tax They are included in the corporate earnings Taxes paid abroad may be deducted from the corporate tax assessed in Turkey.(*****) - They are to be exempt from corporate tax in the event that conditions defined in Article 5/1-b of the Corporate Tax Law are met.	- They are not subject to withholding tax Where the income derived exceeds the declaration limit of 13.000 TL for 2024, the entire sum shall be declared Taxes paid abroad may be deducted from the income tax assessed in Turkey.(*****) - For the purpose of calculating the declaration limit of 13.000TL, one should take into account the aggregate sum of dividend income derived from stockts issued abroad and interest income derived from bills issued abroad as well and the deposit interest derived from foreign banks (******).	- Where gains derived from transactions are not earned in Turkey, they shall not be declared pursuant to Article 7 of the Income Tax Law (********) -Not subject to the withholding tax.	- Where gains derived from transactions are not earned in Turkey, they shall not be declared pursuant to Article 7 of the Income Tax Law (*******) -Not subject to the withholding tax.



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PRODUCTS AND INCOME TYPE	RESIDENT TAX PAYER CORPORATIONS	RESIDENT TAX PAYER REAL PERSON	FOREIGN BASED TAXPAYER (**) INSTITUTION(***)	FOREIGN BASED TAXPAYER REAL PERSON (***)
INTEREST (REDEMPTION+COUPON) INCOME DERIVED FROM BILLS ISSUED BY ENTITIES BASED ABROAD  Those ones that have been issued PRIOR TO or AFTER 1.1.2006	- They are not subject to withholding tax They are to be included in corporate earnings.	-They are not subject to withholding tax -Where the income derived exceeds the declaration limit of 13.000 TL for 2024, the entire sum shall be declared (Taxes paid abroad may be deducted)  - The principal exchange rate difference incurred during redemption is not considered income  - For the purpose of calculating the declaration limit of 13.000TL, one should take into account the aggregate sum of dividend income derived from stockts issued abroad and interest income derived from bills issued abroad as well and the deposit interest derived from foreign banks (******).	- Where gains derived from transactions are not earned in Turkey, they shall not be declared pursuant to Article 7 of the Income Tax Law (*******) -Not subject to the withholding tax.	- Where gains derived from transactions are not earned in Turkey, they shall not be declared pursuant to Article 7 of the Income Tax Law (********) -Not subject to the withholding tax.



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PRODUCTS AND INCOME TYPE	RESIDENT TAX PAYER	RESIDENT TAX PAYER REAL PERSON	FOREIGN BASED TAXPAYER	FOREIGN BASED TAXPAYER
	CORPORATIONS		(**) INSTITUTION(***)	REAL PERSON (***)
TRADING GAINS DERIVED FROM BILLS ISSUED BY ENTITIES BASED ABROAD  Those ones that have been issued PRIOR TO or AFTER 1.1.2006	- They are not subject to withholding tax They are to be included in the corporate earnings.  Taxes paid abroad may be deducted from the corporate tax assessed in Turkey.(*****)	- They are not subject to withholding tax Taxes paid abroad may be deducted from the income tax assessed in Turkey.(*****) - Earnings shall be calculated in TL For the purpose of calculating the net amount of earnings, the acquisition cost may be linked to the PPI increase rate except for the month in which they are disposed of. (In the case of those ones issued after 01.01.2006, if the PPI increase between the purchase date and sales date exceeds 10%, the linking may be done Trading losses shall be set off against the trading profits In the case of combination with other trading gains, the portion that exceeds 200.000 TL shall be declared. (The exception of 200.000TL shall not be applied for those ones issued after 01.01.2006. They are to be declared regardless of the amount of the gains.)	- Where gains derived from transactions are not earned in Turkey, they shall not be declared pursuant to Article 7 of the Income Tax Law (********) - not subject to withholding tax.	- Where gains derived from transactions are not earned in Turkey, they shall not be declared pursuant to Article 7 of the Income Tax Law (********) - not subject to withholding tax.



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PRODUCTS AND INCOME TYPE	RESIDENT TAX PAYER CORPORATIONS	RESIDENT TAX PAYER REAL PERSON	FOREIGN BASED TAXPAYER (**) INSTITUTION(***)	FOREIGN BASED TAXPAYER REAL PERSON (***)
TRADING, ACCESSORIAL/ REDEMPTION INCOME FROM REAL ESTATE CERTIFICATES	- Income collected by stock corporations(*) shall be subject to 0% withholding tax and gains derived by other corporate investors shall be subject to 10% withholding tax.  - They are to be included in the corporate earnings.  Withholding tax shall be set off against the corporate tax calculated on the basis of the tax return.	<ul> <li>- It is subject to 10% withholding tax.</li> <li>- Withholding tax is the ultimate tax.</li> <li>- It is not declared.</li> </ul>	Income collected by stock corporations(*) shall be subject to 0% withholding tax and gains derived by other corporate investors shall be subject to 10% withholding tax.  - Withholding tax is the ultimate tax.  It is not declared.	<ul> <li>- It is subject to 10% withholding tax.</li> <li>- Withholding tax is the ultimate tax.</li> <li>-It is not declared</li> </ul>
LEVERAGED TRADING CONTRACTS AND CONTRACTS RELATED TO CFD OPERATIONS EXECUTED ON FOREIGN CURRENCY, PRECIOUS METALS AND OTHER ASSETS DESIGNATED BY THE CMB	They are subject to 0% withholding tax for stock corporations(*) and are subject to 10% withholding tax for other investors.  (*********)  They are to be included in the corporate earning.  There is not any special provision in the legislation applicable to the cost method to be used to determine the purchase price of the said transactions. For this reason, the cost method applicable to determine the generated income shall be set as FIFO (First In First Out).	<ul> <li>It is subject to 10% withholding tax.</li> <li>Withholding tax is the ultimate tax.</li> <li>It is not declared.</li> <li>There is not any special provision in the legislation applicable to the cost method to be used to determine the purchase price of the said transactions. For this reason, the cost method applicable to determine the generated income shall be set as FIFO (First In First Out).</li> </ul>	- They are subject to 0% withholding tax for stock corporations (*) and are subject to 10% withholding tax for other investors.(*********)  - There is not any special provision in the legislation applicable to the cost method to be used to determine the purchase price of the said transactions. For this reason, the cost method applicable to determine the generated income shall be set as FIFO (First In First Out).	- It is subject to 10% withholding tax. (********)  - Withholding tax is the ultimate tax.  -It is not declared.  - There is not any special provision in the legislation applicable to the cost method to be used to determine the purchase price of the said transactions. For this reason, the cost method applicable to determine the generated income shall be set as FIFO (First In First Out).



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PRODUCTS AND INCOME TYPE	RESIDENT TAX PAYER CORPORATIONS	RESIDENT TAX PAYER REAL PERSON	FOREIGN BASED TAXPAYER (**) INSTITUTION(***)	FOREIGN BASED TAXPAYER REAL PERSON (***)
	- Exchange rate differences shall be taken into account and subjected to tax in order to determine the withholding basis.  -Trading losses shall be set off against trading profits. (********)  - Income derived from SWAP operations executed based on leveraged transactions shall be included in the withholding base while carriage costs (interest payment) shall be taken into account as a deduction in the determination of the basis. Also, in the case of dividends paid under CFD contracts, the positive and negative differences in equity prices shall be taken into account to determine the withholding base.	- Exchange rate differences shall be taken into account and subjected to tax in order to determine the withholding basis.  -Trading losses shall be set off against trading profits. (********)  - Income derived from SWAP operations executed based on leveraged transactions shall be included in the withholding base while carriage costs (interest payment) shall be taken into account as a deduction in the determination of the basis. Also, in the case of dividends paid under CFD contracts, the positive and negative differences in equity prices shall be taken into account to determine the withholding base.	- Exchange rate differences shall be taken into account and subjected to tax in order to determine the withholding basis.  -Trading losses shall be set off against trading profits. (*********)  - Income derived from SWAP operations executed based on leveraged transactions shall be included in the withholding base while carriage costs (interest payment) shall be taken into account as a deduction in the determination of the basis. Also, in the case of dividends paid under CFD contracts, the positive and negative differences in equity prices shall be taken into account to determine the withholding base.	- Exchange rate differences shall be taken into account and subjected to tax in order to determine the withholding basis.  -Trading losses shall be set off against trading profits. (*********)  - Income derived from SWAP operations executed based on leveraged transactions shall be included in the withholding base while carriage costs (interest payment) shall be taken into account as a deduction in the determination of the basis. Also, in the case of dividends paid under CFD contracts, the positive and negative differences in equity prices shall be taken into account to determine the withholding base.



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corporate tax in Turkey.  income tax in Turkey.  Turkey, they shall not be declared pur pursuant to Article 7 of the Income  - On the other hard, following matters should  - On the other hard, following matters should  Tax Law (********)  they shall not be declared pur pursuant to Article 7 of the Income  Article 7 of the Income Tax Law (********)	PRODUCTS AND INCOME TYPE	RESIDENT TAX PAYER	RESIDENT TAX PAYER REAL PERSON	FOREIGN BASED TAXPAYER	FOREIGN BASED TAXPAYER
from these products shall be subject to the corporate tax in Turkey.  from these products shall be subject to the corporate tax in Turkey.  from these products shall be subject to the corporate tax in Turkey.  from these products shall be subject to the income tax in Turkey.  from these products shall be subject to the income tax in Turkey.  from these products shall be subject to the income tax in Turkey.  Turkey, they shall not be declared pur tax Law (********)  Not subject to the withholding tax.  Legal structure of each product  The nature of these products in light  Transactions are not earned in Turkey, they shall not be declared pur to the pursuant to Article 7 of the Income Tax Law (********)  Not subject to the withholding tax.  The nature of these products in light		CORPORATIONS		(**) INSTITUTION(***)	REAL PERSON (***)
that they are usually structured as a trust  Whether or not these products are in the nature of controlled foreign vehicle  that they are usually structured as a trust  Whether or not these products are in the nature of controlled		from these products shall be subject to the corporate tax in Turkey.  - On the other hard, following matters should also be analyzed in order to tax gains derived from these products:  • Legal structure of each product • The nature of these products in light of Turkish Tax Law, given the fact that they are usually structured as a trust Whether or not these products are in the	from these products shall be subject to the income tax in Turkey.  - On the other hard, following matters should also be analyzed in order to tax gains derived from these products:  • Legal structure of each product • The nature of these products in light of Turkish Tax Law, given the fact that they are usually structured as a trust	- Where gains derived from transactions are not earned in Turkey, they shall not be declared pursuant to Article 7 of the Income Tax Law (********)	- Where gains derived from transactions are not earned in Turkey, they shall not be declared pursuant to Article 7 of the Income Tax Law



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Statements in this document are related to the consequences of transactions/ trading in question with respect to income tax and corporate tax. Indirect taxes may be charged in connection with said transactions.

- (\*) This is a joint-stock company, a corporation, a limited liability company or limited partnership organized pursuant to the provisions of Turkish Code of Commerce or any foreign corporation or entity with similar nature. This practice also covers mutual funds and investment trusts, and mutual funds and investment trusts set up pursuant to the Capital Markets Law out of non-resident taxpayers engaged in operations to generate returns solely from securities and other capital market instruments, and to exercise rights associated with them as well as those similar entities designated by the Ministry of Finance.
- (\*\*) Designations in respect of non-resident taxpayers shall also be valid for non-resident taxpayers without any place of business or permanent representative in Turkey.
- (\*\*\*) Provisions of the Double Tax Treaty are reserved.
- (\*\*\*\*) According to the "Debt Instruments Communique" published by the Capital Markets Board ("CMB"), an issue is defined as the issue by the issuers of debt instruments and their public offer or sales without any public offer. Pursuant to the said Communique, it is mandatory for an issue to register those debt instruments to be issued by it with the Central Registry Agency of Turkey. Accordingly, for an evaluation about tax implications of bonds issued abroad, said operations shall be taken into account as the sales of bonds issued by a resident taxpayer and registered with the CRA upon a permission by the CMB.
- (\*\*\*\*\*)Pursuant to Article 33/1 of the Corporate Tax Law, "corporate tax or any similar tax that is paid at source out of the gains that are generated in foreign countries and transferred to general results accounts in Turkey zmay be deducted from the corporate tax charged in Turkey over these gains". According to the same article, a sum to be set off against taxes to be charged in Turkey may in no event be greated than the amount to be calculated by applying the corporate tax rate described in Article 32 of the Law to the gains derived abroad. Accordingly, we would like to remind that taxes payable in a foreign state in order to carry out the said set-off shall be collected from local authorities and should be evidenced by means of certificates that are certified by Turkish embassies or consulates in that state, or if there is none in that state, then similar representatives or agencies defending Turkish interests. Otherwise, taxes paid in a foreign state may not be set off against taxes charged in Turkey.
- (\*\*\*\*\*\*) Pursuant to Article 123 of the Income Tax Law, "similar taxes that are paid by resident taxpayers in the applicable place for gains and income derived in a foreign state shall be deducted from such portion of the Income Tax charged in Turkey that corresponds to such earnings and income generated in the foreign state.

Where the amount to be deducted pursuant to the first paragraph is above such portion of the Income Tax that corresponds to gains and income generated in a foreign state, the difference shall not be taken into account. In order to proceed with the tax deduction written in the first paragraph, it is strictly conditional:

- 1.that taxes paid in a foreign state are personal taxes charged on income;
- 2. that the payment of tax in a foreign state should be evidenced by means of documents issued from local authorities and certified by Turkish embassies or consulates in that locality, or if there is non, then from a representative or agency of the same nature in that state that defends or protects Turkish interests.





(\*\*\*\*\*\*\*) According to the "Debt Instruments Communique" published by the Capital Markets Board ("CMB"), an issue is defined as the issue by the issuers of debt instruments and their public offer or sales without any public offer. Pursuant to the said Communique, it is mandatory for an issue to register those debt instruments to be issued by it with the Central Registry Agency of Turkey. Accordingly, for an evaluation about tax implications of bonds issued abroad, said operations shall be taken into account as the sales of bonds issued by a resident taxpayer and registered with the CRA upon a permission by the CMB. kayda alınmış olan kira sertifikalarının yurtdışında satışı olarak dikkate alınmaktadır.

(\*\*\*\*\*\*\*\*) It is accepted that gains from the results of the transactions have not been generated in Turkey pursuant to Article 7 of the Income Tax Law. Where gains are derived in Turkey, they must be declared. In this respect, monitoring cash transfers for the gains becomes critical.

(\*\*\*\*\*\*\*\*) The opening date of the position shall not be taken into account for the withholding practice, and a withholding shall be applier from over <u>all income</u> derived from leveraged operations with effect from 01.01.2021.

(\*\*\*\*\*\*\*\*\*) A loss set-off is possible only if trading operations are related to securities of the same type. For instance, leveraged operations that can be executed on the basis of foreign currency and precious metals should be considered to fall within the category of "III. Other Securities and Other Capital Market Instruments", and if the CDF is executed on equities, equity indexes or similar securities, then within the category of "II- Securities with Variable Return", or executed on securities other than these ones, then within the category to which the said security is linked, and if they are executed on assets other than securities (commodity etc.) then, it should be considered within the category of "III. Other Securities and Other Capital Market Instruments." Other items to be taken into account for calculating the declaration limit of 13.000-TL:

- TL or currency-backed deposit interests derived from off-shore banking (off-shore banks or their branches)
- Sums derived from the sales of coupons that are not due yet and that belong to bills and equities issued/ acquired prior to 01.01.2006
- Funds and in-kind assets received against the transfer and assignment of dividends that have not yet accrued in the name of the owner of participation shares,
- Discount sums received from discounting of all kinds of notes,
- Other securities income derived from abroad (interest, repo, dividend, etc.)
- All kinds of credit interests (may be treated as income that a person derives and collects in excess above his own income)

"Information on the table for taxation is general information compiled from tax legislation. Is Yatırım does not guarantee or undratek that the information in the table is current and it is suitable for such person who shall use it for the purposes of taxation. It is recommended that a competent financial advisor should be consulted for his opinion and whether or not the information on the table is current and correct should be confirmed in the case of any taxation operation."