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OECD Updated The List of Countries Which Activated Exchange of Country-By-Country Reporting (CbCR) Information With Turkey

As known, Presidential Decree No. 2151, which was published in the Official Gazette dated 25.02.2020 made significant changes in the transfer pricing legislation. In this scope, Master File and Country-by-Country Reporting ("CbCR") obligations were imposed in addition to the local transfer pricing report ("local file") within the framework of the three-stage transfer pricing documentation adopted within the scope of OECD BEPS. Our explanations on the subject were included in the <u>Guide</u> we prepared in the form of a Question and Answer.

After Presidential Decree No.2151, Presidential Decree no. 3038 was published in the Official Journal dated 10/1/2020, having the effect of the approval of the Multilateral Competent Authority Agreement on the Exchange of Country-by-Country Reports ("Competent Authority Agreement") which was signed by the Republic of Turkey in Ankara on 30.12.2019. Thus, country-by-country reports prepared by the relevant taxpayers and submitted to Turkish Tax Administration can be exchanged with the other countries. (Click here for our International Bulletin on this subject)

Most recently, OECD updated the information on the countries which exchange CbCR information with each other on its official website. Accordingly, Turkey activated CbCR exchange process for 38 countries which will receive information. Besides that, Turkey will receive CbCR information from 48 countries, effective for financial periods starting on 01.01.2019 or later.





The list of the relevant countries can be accessed on this <u>link</u>. Here is the list of 38 countries which will receive CbCR information from Turkey and 48 countries which convey information to Turkey:

38 COUNTRIES WHICH WILL RECEIVE CECR INFORMATION FROM TURKEY	48 COUNTRIES WHICH CONVEY CbCR INFORMATION TO TURKEY
Andorra	Andorra
Argentina	Anguilla
Australia	Argentina
Belgium	Australia
Brazil	Belgium
Chile	Belize
Colombia	Bermuda
Croatia	Brazil
Czech Republic	Bulgaria
Estonia	Cayman Islands
France	Chile
Germany	Colombia
Greece	Costa Rica
Hungary	Croatia
Iceland	Czech Republic
India	Estonia
Indonesia	France
Ireland	Germany
Italy	Greece
Japan	Hungary
Korea	Island
Latvia	India
Luxemburg	Indonesia
Mauritius	Ireland





Mexico	Italy
Netherlands	Japan
New Zealand	Kore
Norway	Latvia
Peru	Luxemburg
Poland	Mauritius
Portugal	Mexico
San Marino	Netherlands
Seychelles	New Zealand
Slovak Republic	Nigeria
Slovenia	Norway
Switzerland	Peru
United Kingdom	Poland
Uruguay	Portugal
	Qatar
	Romania
	San Marino
	Seychelles
	Slovak Republic
	Slovenia
	Switzerland
	Turks and Caicos Islands
	United Kingdom
	Uruguay

Kind regards.

