Turkey

A. Progress in the implementation of the minimum standard

Turkey has 87 tax agreements in force as reported in its response to the Peer Review questionnaire. One of those agreements, the agreement with Rwanda*, complies with the minimum standard.

Turkey signed the MLI in 2017 and listed its non-compliant agreements. The agreements modified by the MLI come into compliance with the minimum standard once the provisions of the MLI take effect.

Turkey indicated in its response to the Peer Review questionnaire that steps have been taken (other than under the MLI) to implement the minimum standard in its agreement with Korea.

Turkey is implementing the minimum standard through the inclusion of the preamble statement and the PPT ¹⁷³

B. Conclusion

Recommendation

It is recommended that Turkey completes the steps to have the MLI take effect with respect to its agreements listed under the MLI as those agreements will only be modified by the MLI (and come into compliance with the minimum standard) once the provisions of the MLI take effect.

Summary of the jurisdiction response - Turkey

	1.Treaty partners	2. Compliance with the standard	3. Signature of a complying instrument	4. Minimum standard provision used
1	Albania	No	Yes MLI	PPT
2	Algeria*	No	No	PPT
3	Australia	No	Yes MLI	PPT
4	Austria	No	Yes MLI	PPT
5	Azerbaijan*	No	No	PPT
6	Bahrain	No	Yes MLI	PPT
7	Bangladesh*	No	No	PPT
8	Belarus	No	No	PPT
9	Belgium	No	Yes MLI	PPT
10	Bosnia-Herzegovina	No	Yes MLI	PPT
11	Brazil	No	No	PPT
12	Bulgaria	No	Yes MLI	PPT
13	Canada	No	Yes MLI	PPT
14	China (People's Republic of)	No	Yes MLI	PPT
15	Croatia	No	Yes MLI	PPT

¹⁷³ For its agreements listed under the MLI, Turkey is implementing the preamble statement (Article 6 of the MLI) and the PPT (Article 7 of the MLI).

16	Czech Republic	No	Yes MLI	PPT
17	Denmark	No	Yes MLI	PPT
18	Egypt	No	Yes MLI	PPT
19	Estonia	No	Yes MLI	PPT
20	Ethiopia*	No	No	PPT
21	Finland	No	Yes MLI	PPT
22	France	No	Yes MLI	PPT
23	Gambia*	No	No	PPT
24	Georgia	No	Yes MLI	PPT
25	Germany	No	Yes MLI	PPT
26	Greece	No	Yes MLI	PPT
27	Hungary	No	Yes MLI	PPT
28	India	No	Yes MLI	PPT
29	Indonesia	No	Yes MLI	PPT
30	Iran*	No	No	PPT
31	Ireland	No	Yes MLI	PPT
32	Israel	No	Yes MLI	PPT
33	Italy	No	Yes MLI	PPT
34	Japan	No	Yes MLI	PPT
35	Jordan	No	Yes MLI	PPT
36	Kazakhstan	No	Yes MLI	PPT
37	Korea	No	No	PPT
38	Kosovo*	No	No	PPT
39	Kuwait*	No	Yes MLI	PPT
40	Kyrgyzstan*	No	No	PPT
41	Latvia	No	Yes MLI	PPT
42	Lebanon*	No	No	PPT
43	Lithuania	No	Yes MLI	PPT
44	Luxembourg	No	Yes MLI	PPT
45	Malaysia	No	Yes MLI	PPT
46	Malta	No	Yes MLI	PPT
47	Mexico	No	Yes MLI	PPT
48	Moldova*	No	No	PPT
49		No	No	PPT
50	Mongolia Montenegro	No	No	PPT
51	Morocco	No	Yes MLI	PPT
52		No	Yes MLI	PPT
	Netherlands New Zeeland		Yes MLI	
53 54	New Zealand North Macedonia	No		PPT
		No	Yes MLI	PPT
55	Norway	No	Yes MLI	PPT
56	Oman	No	Yes MLI	PPT
57	Pakistan	No	Yes MLI	PPT
58	Philippines*	No	No	PPT
59	Poland	No	Yes MLI	PPT
60	Portugal	No	Yes MLI	PPT
61	Qatar	No	Yes MLI	PPT
62	Romania	No	Yes MLI	PPT
63	Russian Federation	No	Yes MLI	PPT
64	Rwanda*	Yes other		PPT
65	Saudi Arabia	No	Yes MLI	PPT
66	Serbia	No	Yes MLI	PPT
67	Singapore	No	Yes MLI	PPT
68	Slovak Republic	No	Yes MLI	PPT

69	Slovenia	No	Yes MLI	PPT
70	South Africa	No	Yes MLI	PPT
71	Spain	No	Yes MLI	PPT
72	Sudan*	No	No	PPT
73	Sweden	No	Yes MLI	PPT
74	Switzerland	No	Yes MLI	PPT
75	Syrian Arab Republic*	No	No	PPT
76	Tajikistan*	No	No	PPT
77	Thailand	No	No	PPT
78	Tunisia	No	Yes MLI	PPT
79	Turkish Republic of Northern Cyprus*	No	No	PPT
80	Turkmenistan*	No	No	PPT
81	Ukraine	No	Yes MLI	PPT
82	United Arab Emirates	No	Yes MLI	PPT
83	United Kingdom	No	Yes MLI	PPT
84	United States	No	No	PPT
85	Uzbekistan*	No	No	PPT
86	Viet Nam	No	No	PPT
87	Yemen*	No	No	PPT



From:

Prevention of Tax Treaty Abuse – Fourth Peer Review Report on Treaty Shopping

Inclusive Framework on BEPS: Action 6

Access the complete publication at:

https://doi.org/10.1787/3dc05e6a-en

Please cite this chapter as:

OECD (2022), "Turkey", in *Prevention of Tax Treaty Abuse – Fourth Peer Review Report on Treaty Shopping : Inclusive Framework on BEPS: Action 6*, OECD Publishing, Paris.

DOI: https://doi.org/10.1787/945edba4-en

This work is published under the responsibility of the Secretary-General of the OECD. The opinions expressed and arguments employed herein do not necessarily reflect the official views of OECD member countries.

This document, as well as any data and map included herein, are without prejudice to the status of or sovereignty over any territory, to the delimitation of international frontiers and boundaries and to the name of any territory, city or area. Extracts from publications may be subject to additional disclaimers, which are set out in the complete version of the publication, available at the link provided.

The use of this work, whether digital or print, is governed by the Terms and Conditions to be found at http://www.oecd.org/termsandconditions.

