

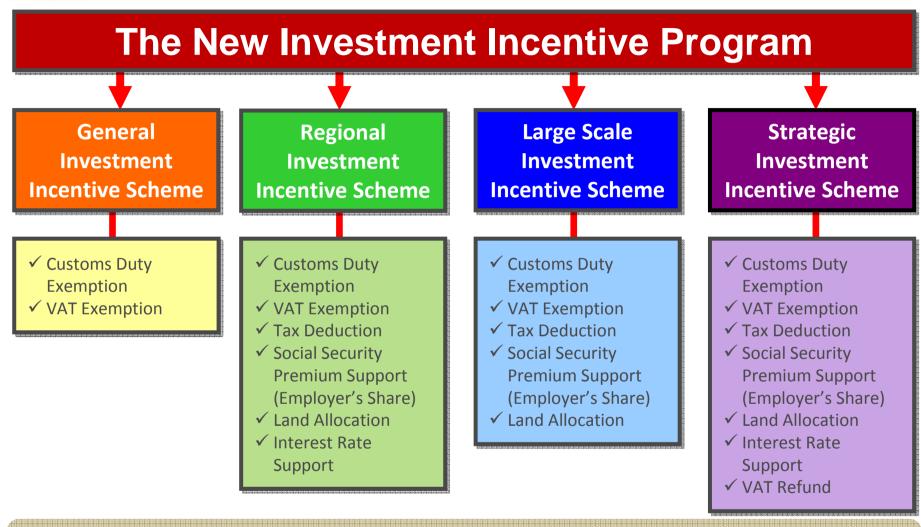
REPUBLIC OF TURKEY MINISTRY OF ECONOMY GENERAL DIRECTORATE OF INCENTIVE IMPLEMENTATION AND FOREIGN INVESTMENT

TURKEY'S NEW INVESTMENT INCENTIVE PROGRAM

November, 2012



New Investment Incentive Program



In addition to above support measures, all investment projects in Region 6 will be eligible for Income Tax Withholding Exemption and Social Security Premium- Employee's Share Support.



The New Investment Incentive Program

GENERAL
INVESTMENT
INCENTIVE SCHEME

REGIONAL INVESTMENT INCENTIVE SCHEME

LARGE SCALE
INVESTMENT
NCENTIVE SCHEME

STRATEGIC
INVESTMENT
INCENTIVE SCHEME



New investment incentive: Diversified regional opportunities







VAT Exemption: Investment machinery and equipment imported and/or locally provided within the scope of the incentive certificate will be VAT exempt. (~18%)

Customs Duty Exemption: Investment machinery and equipment imported within the scope of the incentive certificate will be customs duty exempt. (~2%)

Tax Deduction: Reduced tax rates for investor's income (50-90 %) until the total deduction reaches to the rate of contribution. (15-65 %)

Interest Rate Support: For investment loans, a certain portion of the interest share will be covered by the Ministry. (3-7 percentage points for TL credits, 1-2 percentage points for foreign currency credits) (TL 500K-900K ~ € 215K-386K)

Land Allocation: Government land will be allocated for the investments

VAT Refund: VAT collected on the building & construction expenses will be rebated. (only for strategic investment projects whit a fixed investment cost of least TL 500 Million ~ €215 Million)



for the additional employment created by the investment

Social Security Premium Employer's Share, on portions of labor wages corresponding to amount of legal minimum wage, will be covered by the Ministry. (~ €79 per employee per month)

Social Security Premium Employee's Share, on portions of labor wages corresponding to amount of legal minimum wage, will be covered by the Ministry. (only for Region 6) (~ €58 per employee per month)

Income Tax Withholding exemption will provide exemption from income tax withholding. (only for Region 6) (~ €23 per employee per month)

* A special note for Region VI: The minimum wage will be ~34% less by decreasing from ~€470 to ~€312 with the effect of this new investment incentive program.



REGIONAL INVESTMENT INCENTIVE SCHEME

Incentives	Region 1	Region 2	Region 3	Region 4	Region 5	Region 6
VAT Exemption	✓	✓	✓	✓	✓	✓
Customs Duty Exemption	✓	✓	✓	✓	✓	✓
Tax Deduction out of OIZ	15	20	25	30	40	50
"Rate of Contribution to Investment" (%) in OIZ	20	25	30	40	50	55
Social Security out of OIZ	2 years	3 years	5 years	6 years	7 years	10 years
Premium Support (Employer's Share) in OIZ	3 years	5 years	6 years	7 years	10 years	12 years
Land Allocation	✓	✓	✓	✓	✓	✓
Interest Rate Support	N/A	N/A	✓	✓	✓	✓
Income Tax Withholding Exemption	N/A	N/A	N/A	N/A	N/A	10 years
Social Security Premium Support (Employee's Share)	N/A	N/A	N/A	N/A	N/A	10 years



PRIORITY INVESTMENTS

Following priority investments will benefit from terms and rates of the support measures of Region 5 even they take place in Regions 1 to 4.

- Tourism investments in Cultural and Touristic Preservation and Development Regions determined by the Council of Ministers Decree.
- Mining investments
- Railroad and maritime transportation investments
- Specific pharmaceutical investments and Defense Industry investments with minimum investment amount of TL20 Million (~ €8,6 Million)
- Test facilities, wind tunnel and similar investments made for automotive, space or defense industries
- International fairground investments with a minimum covered area of 50.000 m²
- Pre-school, Primary, Middle and High School investments by private sector
- Investments made to produce products developed by an R&D Project which is supported by Ministry of Science, Industry and Technology, TUBITAK and KOSGEB



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Goals of the Scheme:

- ✓ To improve technology and R&D capacity
- ✓ To provide a global competitive advantage

Incentive measures available for Large Scale Investments:

- ✓ VAT Exemption,
- ✓ Customs Duty Exemption,
- √ Tax Deduction,
- ✓ Social Security Premium Support (Employer's Share)
- ✓ Land Allocation



Large Scale Investments

	Investment Subjects	Minimum Investment Amount (Million TL / ~ €)
1	Refined Petroleum Products	1000 / ~ 430
2	Chemical Products	200 / ~ 86
3	Harbours and Harbour Services	200 / ~ 86
4	Automotive OEM and Autoparts	
4-a	Automotive OEM Investments	200 / ~ 86
4-b	Autoparts	50 / ~ 22
5	Railway and Tram Locomotives and/or Railway Cars	50 / ~ 22
6	Transit Pipe Line Transportation Services	50 / ~ 22
7	Electronics	50 / ~ 22
8	Medical, High Precision and Optical Equipment	50 / ~ 22
9	Pharmaceuticals	50 / ~ 22
10	Aircraft and Space Vehicles and/or Parts	50 / ~ 22
11	Machinery (including Electrical Machines And Equipments)	50 / ~ 22
12	Integrated Metal Production	50 / ~ 22





Large Scale Investment Incentives

Support Measures	1	II	III	IV	V	VI
VAT Exemption	✓	✓	✓	✓	✓	✓
Customs Duty Exemption	✓	✓	✓	✓	✓	✓
Tax Deduction out of OIZ Investment Contribution	25	30	35	40	50	60
Rate (%) in OIZ	30	35	40	50	60	65
Social Security out of OIZ	2 years	3 years	5 years	6 years	7 years	10 years
Premium Support (Employer's Share) in OIZ	3 years	5 years	6 years	7 years	10 years	12 years
Land Allocation	✓	✓	✓	✓	✓	✓
Interest Rate Support	N/A	N/A	N/A	N/A	N/A	N/A
Income Tax Withholding Exemption	N/A	N/A	N/A	N/A	N/A	10 years
Social Security Premium Support (Employee Share)	N/A	N/A	N/A	N/A	N/A	10 years





	Tax Deduction Rate of Contribution to Investment (%)					
Regions	Regional	Scheme	Large Scale Scheme			
	For investment projects to be started till Dec. 31th 2013	For investment projects to be started after Jan. 1st 2014	For investment projects to be started till Dec. 31th 2013	For investment projects to be started after Jan. 1st 2014		
Region 1	15	10	25	20		
Region 2	20	15	30	25		
Region 3	25	20	35	30		
Region 4	30	25	40	35		
Region 5	40	30	50	40		
Region 6	50	35	60	45		

For further inquiries: incentives@economy.gov.tr



TAX DEDUCTION

- As a general rule, the support regarding tax deduction will be applied exclusively to the revenues generated from the approved investment project.
- ➤ However, for investment projects in region 2 to region 6, a certain portion of the tax deduction amount can be put in effect for the earnings obtained from the company's operations before the investment project is completed.



TAX DEDUCTION IN REGIONAL AND LARGE SCALE INVESTMENT INCENTIVE SCHEMES

Regions	Rate of Contribution to Investment	Tax Deduction Rate	Applicable Rates of Amount before completion of investments.	re and after
	(%)	(70)	Before	After
Region 1	15	50	0	100
Region 2	20	55	10	90
Region 3	25	60	20	80
Region 4	30	70	30	70
Region 5	40	80	50	50
Region 6	50	90	80	20



Hypothetical Investment Project Calculations Valid only with certain <u>assumptions</u> on project characteristics

TAX DEDUCTION

	REGION 2	REGION 3	REGION 4	REGION 5	REGION 6
Investment Amount (Thousands)	TL 5.000				
	~ € 2.100	~ € 2.100	~ € 2.100	~ € 2.100	~ € 2.100
Tax Deduction :	55%	60%	70%	80%	90%
Investment Contribution Rate:	20%	25%	30%	40%	50%
Tax Deductable Amount (Thousands):	TL 1.000	TL 1.250	TL 1.500	TL 2.000	TL 2.500
	~ € 429	~ € 537	~ € 644	~ € 859	~ €1.073
- Investment Period:	(10%)	(20%)	(30%)	(50%)	(80%)
(Thousands TL)	100	250	450	1.000	2.000
- Operation Period:	(90%)	(80%)	(70%)	(50%)	(20%)
(Thousands TL)	900	1.000	1.050	1.000	500
Corporate/income tax rate until it reaches the amount of contribution to investment:	9%	8%	6%	4%	2%
	(reduced tax				
	rate: 11%)	rate : 12%)	rate : 14%)	rate : 16%)	rate : 18%)

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Social Security Premium Support

SOCIAL SECURITY PREMIUM SUPPORT (Employer's Share)

	For investment	For investment (Ratio to Fixed Inv			
Regions	projects to be started till Dec. 31th 2013	projects to be started after Jan. 1st 2014	Regional Scheme	Large Scale Scheme	Strategic Investments**
Region 1	2 years	N/A	10	3	15
Region 2	3 years	N/A	15	5	15
Region 3	5 years	3 years	20	8	15
Region 4	6 years	5 years	25	10	15
Region 5	7 years	6 years	35	11	15
Region 6*	10 years	7 years		Limitless	

^{*} In OIZs in Region 6, Social Security Premium-Employer's Share support will last 12 years.

^{**} For Strategic Investments, Social Security Premium-Employer's Share support will last 10 years in Region 6 and 7 years in the remaining five regions.



INTEREST RATE SUPPORT

Schemes		Suppo	rt Rate	Maximum Amount of	
		TL Loans	Loans in Foreign Currency	Support (Thousand TL /~ €)	
R&D Environ Protection Ir	mental	5 Points	2 Points	500 / ~215	
Strategic In	vestments	5 Points	2 Points	5% of Investment maximum 50.000 /~21.500	
	Region 3	3 Points	1 Points	500 / ~215	
Regional	Region 4	4 Points	1 Points	600 / ~258	
Scheme	Region 5	5 Points	2 Points	700 / ~ 300	
	Region 6	7 Points	2 Points	900 / ~386	

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STRATEGIC INVESTMENT INCENTIVE SCHEME



Strategic Investments

An investment for the production of intermediate or final products for which imports exceed domestic market production capacity.

Eligibility Criteria

- ✓ Imports of product to be produced should be more than domestic market production capacity for this product.
- ✓ Minimum investment amount should be no less than TL 50 Million (~ € 21,5 Million)
- ✓ Projects should generate a minimum 40% local value added.
- ✓ For the product to be produced, imports the previous year should be at least \$50 Million (~ € 38,4 Million) (This condition will not be required for goods with no domestic production)





Strategic Investment Incentive Scheme

Incentives		All Regions	
VAT Exemption		✓	
Customs Duty E	xemption	✓	
Tax Deduction	Rate of Contribution to Investment (%)	50% (50% of Tax Deduction can be used before the investment is completed)	
Social Security Premium Support (Employer's Share)		7 Years (10 years for Region 6)	
Land Allocation		✓	
VAT Refund		For the building and construction expenditures of investment projects of at least 500 Million TL (~€214,6 Million)	
Interest Rate Support		Limited to 5% of total investment amount and suppo cap is 50 Million TL (~ € 21,5 Million)	
Income Tax Withholding Exemption		10 years only for Region 6	
Social Security Premium Support (Employee's Share)		10 years only for Region 6	

For further inquiries: incentives@economy.gov.tr

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