

INVESTMENT INCENTIVES PROGRAM

Ministry of Economy

August 2017



Support Measures

| Support Measures | General Investment Incentive Scheme | Regional Investment Incentive Scheme | Priority Investment Incentive Scheme | Large Scale Investment Incentive Scheme | Strategic Investment Incentive Scheme |
|--|--|---|---|--|--|
| VAT Exemption | \checkmark | \checkmark | ✓ X | Ø- ✓ | ✓ |
| Customs Duty Exemption | ✓ | ✓ | . 0 | ✓ | ✓ |
| Tax Deduction | | ✓ | | \checkmark | ✓ |
| Social Security Premium Support (Employer's Share) | | Sall | √ | √ | ✓ |
| Income Tax Withholding Support * | √ × × | 1 | ✓ | ✓ | ✓ |
| Social Security Premium Support (Employee's Share) * | Stiss | √ | ✓ | √ | √ |
| Interest Support | | ✓ | ✓ | | ✓ |
| Land Allocation | | ✓ | ✓ | ✓ | ✓ |
| VAT Refund | | | | | ✓ |

^{*} Investments in Region 6 are eligible for Income Tax Withholding Allowance and Social Security Premium Support (Employee's Share)



Support Measures





- VAT Exemption: VAT exemption for imported and/or locally provided investment machinery and equipment as well as selling and renting of intangible rights and software within the scope of the incentive certificate.
- □ <u>Customs Duty Exemption:</u> Custom duty exemption for investment machinery and equipment imported within the scope of the incentive certificate.
- ☐ Tax Deduction: In terms of tax deduction, contribution rates available from 15 % to 65 %.

 ☐ TA



Support Measures

- Interest Rate Support: For investment loans, a certain portion of the interest share covered by the Ministry.
 - 3-7 percentage points for TL credits,
 - □ 1-2 percentage points for foreign currency credits.
- Land Allocation: Government land allocated

for the investments.



- <u>VAT Refund:</u> VAT collected on the building & construction expenses will be rebated (only for strategic investment projects with a fixed investment cost of least TL 500 million).
 - ➤ Within the year of 2017, VAT collected on the building & construction expenses of manufacturing sector investments with incentive certificate will be rebated.



For the additional employment created by the investment

□ <u>Social Security Premium Employer's Share</u>, certain portions of labor wages corresponding to amount of legal minimum wage covered by the Ministry.

Available up to 12 years



□ <u>Social Security Premium Employee's Share</u>, certain portions of labor wages corresponding to amount of legal minimum wage covered by the Ministry (only for Region 6). **Available for 10 years**

☐ Income Tax Withholding exemption, exemption from income tax withholding. (only for Region 6) Available for 10 years

The New Investment Incentives Program

GENERAL INVESTMENT INCENTIVE SCHEME REGIONAL INVESTMENT INCENTIVE SCHEME PLIORITY INVESTMENT INCENTIVE SCHEME LARGE SCALE
INVESTMENT
INCENTIVE

STRATEGIC INVESTMENT INCENTIVE SCHEME



GENERAL INVESTMENT INCENTIVE SCHEME

Regardless of region where investment is made, the scheme is available for all investment projects provided that:

- > Investment subject is not excluded from the investment incentives programs,
- Requirement of minimum fixed investment amount is met.

The investment projects that are supported from the General Investment Incentives Scheme will benefit only from customs duty and VAT exemptions on their machinery and equipment expenditures.

As a novelty in the new program, additionally income tax withholding allowance will be available on portions of labor wages corresponding to amount of legal minimum wage if investment is made in Region 6.

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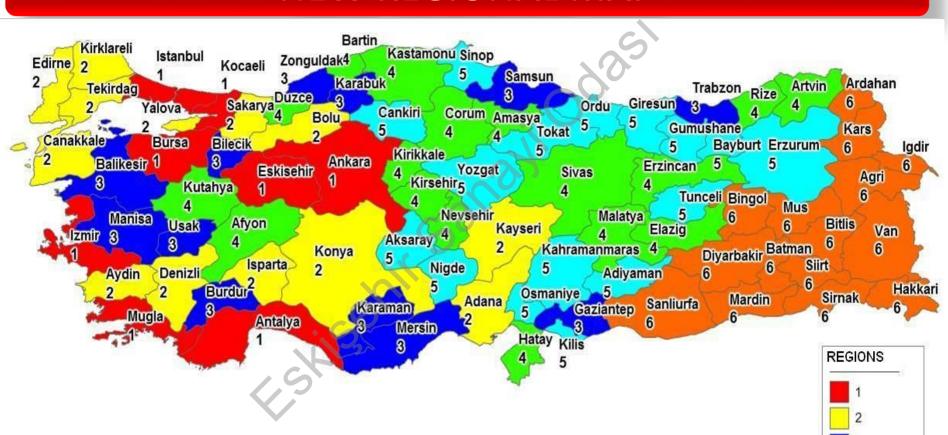


REGIONAL INVESTMENT INCENTIVE SCHEME

- Regional system aims to eliminate inter-regional imbalances by means of encouragement of sectors determined. Rates of support measures have been differentiated according to the level of development of the regions.
- Investment subjects to be supported have been identified by taking into consideration of the economic potentials of provinces and scales of economies.
- Within the scope of regional investment encouragement, minimum investment amounts are determined for certain investment subjects in each region seperately. If there is no defined minimum investment amount, it is;
 - 1 million TL in Regions I and II,
 - 500 thousand Thin Regions III, IV, V and VI.



NEW REGIONAL MAP



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| Region 1 Provinces | Region 2 Provinces | Region 3 Provinces | Region 4 Provinces | Region 5 Provinces | Region 6 Provinces |
|--------------------|--------------------|--------------------|--------------------|--------------------|-----------------------|
| Ankara | Adana | Balıkesir | Afyonkarahisar | Adıyaman | Ağrı |
| Antalya | Aydın | Bilecik | Amasya | Aksaray | Ardahan |
| Bursa | Bolu | Burdur | Artvin | Bayburt | Batman |
| Eskişehir | Çanakkale | Gaziantep | Bartin | Çankırı | Bingöl |
| İstanbul | Denizli | Karabük | Çorum | Erzurum | Bitlis |
| İzmir | Edirne | Karaman | Düzce | Giresun | Diyarbakır |
| Kocaeli | Isparta | Manisa | Elazığ | Gümüşhane | Hakkari |
| Muğla | Kayseri | Mersin | Erzincan | Kahramanmaraş | Iğdır |
| | Kırklareli | Samsun | Hatay | Kilis | Kars |
| | Konya | Trabzon | Kastamonu | Niğde | Mardin |
| | Sakarya | Uşak | Kırıkkale | Ordu | Muş |
| | Tekirdağ | Zonguldak | Kırşehir | Osmaniye | Siirt |
| | Yalova | | Kütahya | Sinop | Şanlıurfa |
| | | | Malatya | Tokat | Şırnak |
| | | | Nevşehir | Tunceli | Van |
| | | | Rize | Yozgat | |
| | | | Sivas | | |
| 8 PROVINCES | 13 PROVINCES | 12 PROVINCES | 17 PROVINCES | 16 PROVINCES | 15 PROVINCES |

| | Rate of Contribution to Investment (%) | | | | | |
|---------|---|--------------------------|---|--------------------------|--|--|
| Regions | Regional Scheme | | Large Sca | le Scheme | | |
| | Rate of Contribution to Investment* (%) | Tax Deduction Rate** (%) | Rate of Contribution to Investment* (%) | Tax Deduction Rate** (%) | | |
| I | 15 | 50 | 25 | 50 | | |
| II | 20 | 55 | 30 | 55 | | |
| III | 25 | 60 | 35 | 60 | | |
| IV | 30 | 70 | 40 | 70 | | |
| V | 40 | 80 | 50 | 80 | | |
| VI | 50 | 90 | 60 | 90 | | |

Within the scope of incentive certificates issued for manufacturing sector (US-97 Code: 15-37), for the investment expenditures that would be realized between the dates of 1/1/2017 and 31/12/2017;

^{*}Rate of contribution to investment for each region shall get 15 points additionaly

^{**}Tax deduction rate for each region shall be applied as 100 per cent.





TAX DEDUCTION

- ➤ Tax deduction can be applied up to 80 per cent of contribution to investment by investing companies to their earnings obtained from other operations before investment project is completed and starts generating revenue.
- Within the scope of incentive certificates issued for manufacturing sector (US-97 Code: 15-37); Rate of contribution to investment for each region shall get 15 points additionally and tax deduction rate for each region shall be applied as 100 per cent for the investment expenditures that would be realized between the dates of 1/1/2017 and 31/12/2017.



TAX DEDUCTION IN REGIONAL INVESTMENT INCENTIVE SCHEME

| Regions | Rate of Contribution to Investment (%) | | Rate to be Ap | tment Contribution to be Applied <u>before</u> after investment is completed | |
|----------|--|----|---------------|---|--|
| | (%) | | Before | After | |
| Region 1 | 15 | 50 | 80 | 20 | |
| Region 2 | 20 | 55 | 80 | 20 | |
| Region 3 | 25 | 60 | 80 | 20 | |
| Region 4 | 30 | 70 | 80 | 20 | |
| Region 5 | 40 | 80 | 80 | 20 | |
| Region 6 | 50 | 90 | 80 | 20 | |



TAX DEDUCTION IN LARGE SCALE INVESTMENT INCENTIVE SCHEME

| Regions | Rate of Contribution to Investment (%) | | Rate to be Ap | nvestment Contribution late to be Applied <u>before</u> and <u>after</u> investment is completed | | |
|----------|--|------|---------------|---|--|--|
| | (%) | (70) | Before | After | | |
| Region 1 | 25 | 50 | 80 | 20 | | |
| Region 2 | 30 | 55 | 80 | 20 | | |
| Region 3 | 35 | 60 | 80 | 20 | | |
| Region 4 | 40 | 70 | 80 | 20 | | |
| Region 5 | 50 | 80 | 80 | 20 | | |
| Region 6 | 60 | 90 | 80 | 20 | | |



SOCIAL SECURITY PREMIUM SUPPORT (Employer's Share)

| | | Support Cap (Ratio to Fixed Investment - %) | | | | |
|-----------|----------|--|-----------------------|---------------------|--|--|
| Regions | Duration | Regional Scheme | Large Scale Scheme | Strategic Scheme | | |
| Region 1 | 2 years | 10 | 3 | 15 | | |
| Region 2 | 3 years | 15 | 5 | 15 | | |
| Region 3 | 5 years | 20 | 8 | 15 | | |
| Region 4 | 6 years | 25 | 10 | 15 | | |
| Region 5 | 7 years | 35 | 11 | 15 | | |
| Region 6* | 10 years | - | - | - | | |

^{*} In OIZs and IZs in Region 6, the support will be implemented for 12 years.



INTEREST SUPPORT

| | Suppo | Maximum Amount of | |
|----------|----------|------------------------------|--------------------------|
| Regions | TL Loans | Loans in Foreign Currency | Support (Thousand TL) |
| Region 1 | - | - | |
| Region 2 | - | - | - |
| Region 3 | 3 Points | 1 Point | 500 |
| Region 4 | 4 Points | 1 Point | 600 |
| Region 5 | 5 Points | 2 Points | 700 |
| Region 6 | 7 Points | 2 Points | 900 |

REGIONAL INVESTMENT INCENTIVE SCHEME

| Incentiv | es | Region 1 | Region 2 | Region 3 | Region 4 | Region 5 | Region 6 |
|---|------------------|----------|----------|----------|----------|----------|----------|
| VAT Exemption | | ✓ | ✓ | 10 | √ | ✓ | ✓ |
| Customs Duty Exemp | tion | ✓ | ✓ | | ✓ | ✓ | ✓ |
| Tax Deduction | out of OIZ or IZ | 15 | 20 | 25 | 30 | 40 | 50 |
| Rate of Contribution to Investment* (%) | in OIZ or IZ | 20 | 25 | 30 | 40 | 50 | 55 |
| Social Security | out of OIZ or IZ | 2 years | 3 years | 5 years | 6 years | 7 years | 10years |
| Premium Support (Employer's Share) | in OIZ or IZ | 3 years | 5 years | 6 years | 7 years | 10years | 12years |
| Land Allocation | | | ✓ | ✓ | ✓ | ✓ | ✓ |
| Interest Support | | S2 - | - | ✓ | ✓ | ✓ | ✓ |
| Income Tax Withholding | | - | - | - | - | - | 10 years |
| Social Security Premi (Employee's Share) | um Support | - - | - | - | - | - | 10 years |

^{*}Within the scope of incentive certificates issued for manufacturing sector (US-97 Code: 15-37); Rate of contribution to investment for each region shall get 15 points additionally and tax deduction rate for each region shall be applied as 100 per cent for the investment expenditures that would be realized between the dates of 1/1/2017 and 31/12/2017.

OIZ: Organized Industrial Zones

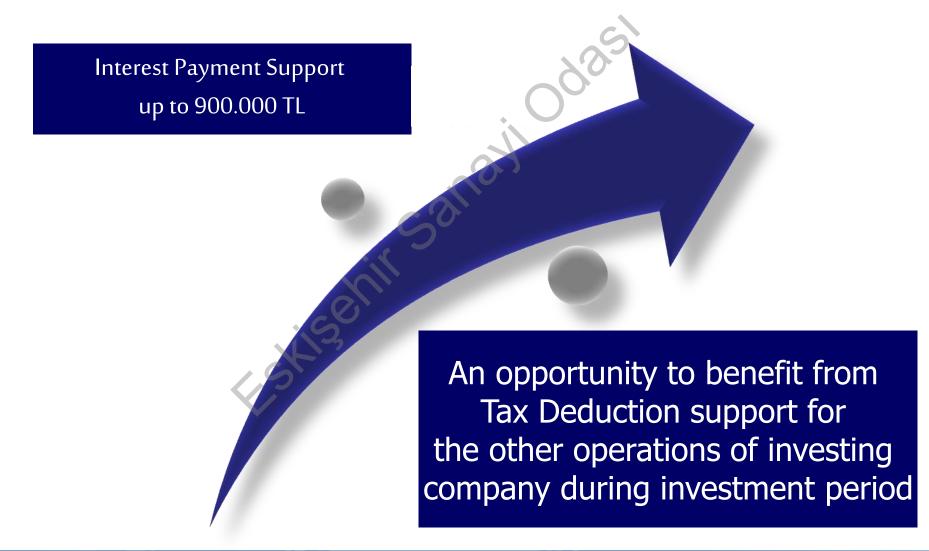
IZ: Manufacturing Investments in Specialized Industrial Zones



| MINIMUM WAGE AND DEDUCTIONS (01.01.2017-31.12.2017) | | | | | |
|--|---|--|--|--|--|
| | Components of Labor Cost (Legal Minimum Wage) | Deductible Amounts with Support Measures | | | |
| Gross Wage | 1.777,50 TL | - | | | |
| Worker's Share of Social Security Premium | 248,85 TL | 248,85 TL | | | |
| Worker's Share of Unemployment Insurance Premium | 17,78 TL | - | | | |
| Income Tax Withholding | 226,63 TL | 226,63 TL | | | |
| Stamp Duty | 13,49 TL | - | | | |
| Total Deductions | 373,44 TL | - | | | |
| Net Wage | 1.404,06 TL | - | | | |
| EMPLOYER'S SHARE IN MIN | IMUM WAGE (01.01.2017-31.12. | 2017) | | | |
| Employer's Share in Social Security Premium (% 20.5) | 364,38 TL | 364,38 TL | | | |
| Employer's Share of Unemployment Insurance Premium (% 2) | 35,55 TL | | | | |
| LABOR COST TO EMPLOYER | 2.088,56 TL | 839,86 TL | | | |



IMPROVED SUPPORT TO INVESTMENT FINANCE IN REGION 6



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Following priority investments will benefit from terms and rates of the support measures of Region 5 even if they are made in Regions 1, 2, 3, 4.



Investments of manufacturing high-tech products

- Pharmaceuticals,
- Office, accounting and computing machinery,
- Radio, TV and communications equipment,
- Medical, precision and optical instruments,
- Aircraft and spacecraft.







Investments to manufacture products as an outcome of the R&D



Defense Industry Investments



Test facilities, wind tunnel and similar investments



Specific automotive and engine manufacturing investments



Mining and Mine-Exploring Investments



Education Investments







Energy efficiency investments



Investments made to generate electricity through waste heat recovery



Liquefied natural gas (LNG) investments and underground gas storage investments



Investments made to generate electricity from coal



Investments of carbon fiber or the composite materials made from carbon fiber



Railroad transportation investments







Maritime transportation investments



Tourism investments in Cultural and Touristic Preservation and Development Regions and thermal tourism investments



International fairground investments



Investments made to manufacture turbines and generators for renewable energy and wind turbine wings for wind power.



Integrated investments for aluminium flat products using direct chill slab casting and hot rolling methods.



Licensed warehousing investments







Nuclear power plant Investments.



Qualified laboratory investments

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CLUSTERING AND R&D INVESTMENTS

- ☐ Following investments will benefit from more beneficial one level up regional rates and terms for Tax Deduction and support to employer's share of social security premium in any region:
 - ✓ Investments in Organized Industrial Zones and Manufacturing Investments in Specialized Industrial Zones,
 - ✓ Joint Investments by multiple (at least 5) companies operating in the same sector which establish integration to their activities.
- □ Selected medium-high-technology industries will benefit from terms and rates of the support measures of Region 4 even if they are made in Regions 1 (except Istanbul), 2, 3.

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Goals of the Scheme:

- ✓ Improvement of Technology and R&D Capacity,
- ✓ Provide a competitive advantage in the international arena.

Incentive measures available for Large Scale Investments:

- ✓ VAT Exemption,
- Customs Duty Exemption,
- ✓ Tax Deduction,
- ✓ Social Security Premium Support,
- ✓ Land Allocation.

If a large scale investment is made in Region 6, additionally it will benefit from Income Tax Witholding Support and Social Security Premium Employee's Share Support.



LARGE SCALE INVESTMENTS

| Investment Subjects | Minimum Investment Amount (Million TL) |
|--|---|
| Refined Petroleum Products, | 1000 |
| Chemical Products, | |
| Harbors and Harbor Services and Airport Investments, | 200 |
| Automotive OEM Investments, | |
| Automotive Supply Industries Investments, | |
| Railway and Tram Locomotives and/or Railway and Tram Cars, | |
| Transit Pipe Line Transportation Services, | |
| Electronics, | 50 |
| Medical, High Precision and Optical Equipment, | |
| Pharmaceuticals, | |
| Aircraft and Aerospace Vehicles and/or Parts, | |
| Machinery, | |
| Investments for Final Metal Production | |

Large Scale Investment Incentive Scheme

| Incenti | ves | Region 1 | Region 2 | Region 3 | Region 4 | Region 5 | Region 6 |
|---|------------------|----------|----------|----------|----------|----------|----------|
| VAT Exemption | | ✓ | ✓ | XO | ✓ | ✓ | ✓ |
| Customs Duty Exempti | on | ✓ | ✓ | | ✓ | ✓ | ✓ |
| Tax Deduction | out of OIZ or IZ | 25 | 30 | 35 | 40 | 50 | 60 |
| Rate of Contribution to Investment* (%) | in OIZ or IZ | 30 | 35 | 40 | 50 | 60 | 65 |
| Social Security | out of OIZ or IZ | 2 years | 3 years | 5 years | 6 years | 7 years | 10 years |
| Premium Support- Employer's Share (Term of Support-Years) | in OIZ or IZ | 3 years | 5 years | 6 years | 7 years | 10 years | 12 years |
| Land Allocation | ٠.٥ | . V | ✓ | ✓ | ✓ | ✓ | ✓ |
| Interest Support | 1/2 | - | - | - | - | - | - |
| Income Tax Withholding (years) | | - | - | - | - | - | 10 |
| Social Security Premium Support (Employee's Share) (Term Of Support- Years) | | - | - | - | - | - | 10 |

^{*}Within the scope of incentive certificates issued for manufacturing sector (US-97 Code: 15-37); Rate of contribution to investment for each region shall get 15 points additionaly and tax deduction rate for each region shall be applied as 100 per cent for the investment expenditures that would be realized between the dates of 1/1/2017 and 31/12/2017.

OIZ: Organized Industrial Zones

IZ: Manufacturing Investments in Specialized Industrial Zones

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What are the Strategic Investments?

■ Investments to be made for production of intermediate or final products of which more than 50% are supplied by imports.

Energy investments to be made for exclusive use of such strategic investments.

What are the goals of the scheme?

- On the basis of the "Input Supply Strategy" this scheme aims at supporting production of intermediate and final products with high import depedence with a view to reduce current account deficit.
- It also targets encouraging high-tech and high value added investments with a potential of strengthening Turkey's international competitiveness.



Eligibility criteria for Strategic Investments

- ✓ to be made for production of intermediate and final products
 - ✓ with high import dependence
 - ✓of which more than 50% are supplied by imports
- ✓ with a minimum investment amount of 50 million TL
- ✓ with a minimum 40% value added (This condition is not applicable to refined petroleum production investments and petrochemicals production investments)
- ✓ With an import of at least 50 million \$ in the last one year period (This condition is not necessary for goods with no domestic production)



Strategic Investment Incentive Scheme

| Inc | entives | All Regions |
|--|---|--|
| VAT Exemption | | |
| Customs Duty Ex | cemption | . 0 |
| Tax Deduction* | Rate of Contribution to | 50% (50% of the contribution can be used |
| lax Deduction. | Investment (%) | before the investment is completed) |
| Social Security Premium Support (Employer's Share) (Term of Support) | | 7 Years (10 years for Region 6) |
| Land Allocation | | ✓ |
| | Local Loans | 5 points |
| Interest Support | Foreign Exchange/ FX denominated loans | 2 points |
| VAT Refund | | The building and construction costs of investments of more than 500 million TL |
| Income Tax Deduction Support | | 10 years only for Region 6 |
| 1 | remium Support re) (Term Of Support) | 10 years only for Region 6 |

^{*}Within the scope of incentive certificates issued for manufacturing sector (US-97 Code: 15-37); Rate of contribution to investment for each region shall get 15 points additionally and tax deduction rate for each region shall be applied as 100 per cent for the investment expenditures that would be realized between the dates of 1/1/2017 and 31/12/2017.



Investment Incentives in the Scope of Attraction Centres Program

Investments deemed eligible to be supported by the Development Bank of Turkey under the «Production Facility Transport Support Package» within the scope of Attraction Centres Program, can be supported with following terms.

- □ In the event that the additional investment is not made for the production facilty which is transported to cities that are in the scope of the Program or the minimum amount of fixed investment and the minimum capacity requirements can not be met with the additional investment;
 - > The facilities transported to the 4th and 5th regions shall benefit from the valid duration and amount of Social Security Premium Employer Support -Employer's Share- of these regions.
 - The facilities transported to the 6th region shall benefit from the valid duration and amount of Social Security Premium Support –Employer's Share- and Income Tax Withholding Support of that region.
- ☐ In the event that the additional investment is made for the transported production facilty and minimum amount of fixed investment and the minimum capacity requirements is met;
 - > Transported facility shall benefit from aforementioned incentives and the additional investment shall benefit from Customs Duty Exemption, VAT Exemption and Tax Deduction incentives.

INVESTMENT INCENTIVES

PROGRAM

Ministry of Economy

General Directorate of Incentives Implementation and

Foreign Direct Investment