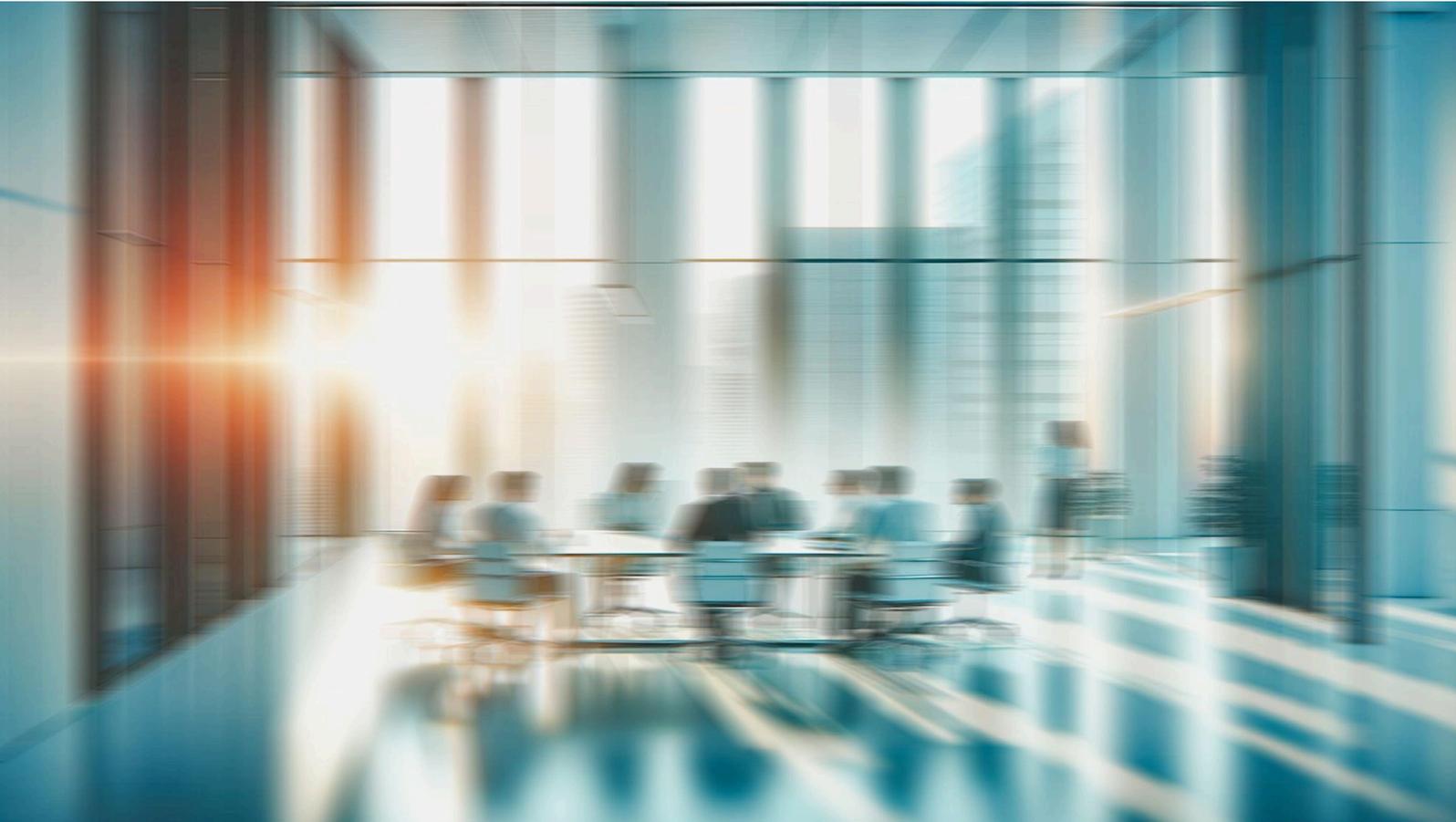


Advisory

March 18, 2026

Client Alert

## The Decision Amending the Decision on the Determination of Companies Subject to Independent Auditing Published in the Official Gazette on 17 March 2026



With the Decision Amending the Decision on the Determination of Companies Subject to Independent Auditing ("**Amending Decision**"), published in the Official Gazette dated 17 March 2026, the Decision on the Determination of Companies Subject to Independent Auditing introduced by Presidential Decision No. 6434 has been amended. The Amending Decision entered into force on the date of its publication and will apply to accounting periods starting on or after 1 January 2026. With the Amending Decision, the threshold values used in determining companies subject to independent audit have been increased; however, with the amendment made to the list numbered (I) attached to the Amending Decision, the scope has been expanded with respect to certain companies affiliated with public economic enterprises.

### **Amendments to the Threshold Values Used in Determining Companies Subject to Independent Auditing**

With the Amending Decision, the threshold values used in determining companies subject to independent audit have been increased for companies other than those for which independent audit criteria are specifically determined, thereby narrowing the scope of companies that will be subject to independent audit.

The threshold values before and after the amendment are presented in the table below:

CRITERIA	BEFORE THE AMENDMENT	AFTER THE AMENDMENT
<b>Total Assets</b>	TRY 300 million	<b>TRY 500 million</b>
<b>Annual Net Sales Revenue</b>	TRY 600 million	<b>TRY 1 billion</b>
<b>Number of Employees</b>	150 employees	<b>150 employees</b>

Within this framework, as a general rule, companies exceeding at least two of the above three criteria for two consecutive financial years will be subject to independent audit in accordance with the provisions of the Turkish Commercial Code No. 6102 and the Decree Law No. 660 dated 16 September 2011 on the Organization and Duties of the Public Oversight, Accounting and Auditing Standards Authority. **Since the Amending Decision applies to accounting periods starting on or after 1 January 2026**, companies exceeding at least two of the newly determined thresholds during the 2024 and 2025 financial years may become subject to independent audit in 2026, subject to the applicable calculation methodology and any category-specific rules.

#### **Amendment Concerning Certain Companies Affiliated with Public Economic Enterprises**

The Amending Decision also amends item 9 of the list numbered (I) attached to Presidential Decision No. 6434.

Prior to the amendment, the relevant provision stipulated an independent audit obligation only for “public economic enterprises and their subsidiaries operating within the scope of the Decree Law No. 233 on Public Economic Enterprises dated 8 June 1984.”

With the Amending Decision, in addition to these entities, companies incorporated in Türkiye within the scope of Additional Article 1 of the Natural Gas Market Law No. 4646 dated 18 April 2001 have also been included among the companies subject to independent audit, provided that more than 50% of their share capital is directly or indirectly owned by public economic enterprises.

While the Amending Decision narrows the scope of companies subject to independent audit by increasing the threshold values, it simultaneously expands the scope for certain groups of companies through the amendment made to the list numbered (I). Accordingly, companies approaching the new thresholds particularly during the 2024 and 2025 financial years, as well as companies having direct or indirect capital connections with public economic enterprises, should reassess whether an independent audit obligation arises as of the 2026 financial year.

The full text of the Amending Decision is available at this [link](#).