SGK · CIRCULAR 2026/22

Traffic fines on company vehicles and SGK insurance findings

With Circular No. 2026/22, SGK has reset the procedure for insurance findings based on traffic fine reports and other official reports.

KEY POINTS

9 key points

SWIPE TO CONTINUE →

02 · FRAMEWORK

Official reports reach SGK

To combat unregistered employment, SGK obtains information and documents from public bodies, including reports issued by traffic police, municipal police and other law enforcement officers. If such a report shows that a person was **actually working** at a workplace, the person is treated as an insured employee of that workplace.

Basis: Regulation on Insurance Checks by Banks and Public Bodies and Obtaining Information and Documents from Institutions (OG 6/12/2013, 28843); SGK Circular 2015/25.

03 · INSURANCE CONDITION

Actual work is what counts

Insurance depends on being employed by an employer under a contract of service. Driving a company vehicle **does not by itself** create insured status. A traffic fine report has effect only if it is established that the driver actually worked at that workplace.

Basis: Law No. 5510 Art. 4/1-a; SGK Circular 2026/22.

04 · REVIEW

Traffic reports are reviewed in two stages

Traffic fine reports served on the driver in person are first reviewed by SGK’s Unregistered Employment (KADİM) units. Records where it cannot be established that the driver works at the same workplace are referred to **social security inspectors**.

Basis: SGK Circular 2026/22.

05 · BASIC RULE

Each report, one day of service

For each record where actual work is established, the person is credited with **1 day of service** as of the report date. If there are several reports for the same workplace, the earliest is treated as the start date and the work is treated as part-time.

1 day

For each separate day established

The rule covers traffic, police and municipal police reports and findings of SGK inspection officers. Findings by inspection staff of public bodies are outside this rule.

06 · EXAMPLE

A month without reports starts a new period

MONTH	REPORTS	PERIOD
March	2	**Period 1**
April	1	**Period 1 · 3 days of service**
May	0	—
June	2	**Period 2**
July	1	**Period 2 · 3 days of service**

As there is no report in May, the work starting in March ends on the last day in April. The first report in June counts as a **new start**.

Had reports continued every month, there would be a single start and a single exit. Examples 15 and 16 in the Circular are adapted to traffic fine reports. If it is argued that work continued without a break, the matter is referred for inspection.

07 · PREMIUMS AND FINES

Premiums limited to days, fines per insured person

Premiums are due only for the days of service credited. Where it is established from documents of public bodies that no start-of-employment notice was filed, an administrative fine of **twice the minimum wage** applies for each insured person.

TRY 66,060

Per insured person; twice the 2026 gross minimum wage (TRY 33,030)

If established a second time within a year, the fine is five times the minimum wage (TRY 165,150). Basis: Law No. 5510 Art. 102/1-a-2.

A single finding affects a whole year’s support

If documents from public bodies, such as a traffic fine report, show that someone was employed without being reported in 2026, the workplace loses minimum wage support **for the whole of 2026**. Support already received is recovered with late payment penalties and interest. No threshold based on the number of unregistered employees applies.

TRY 571,455

Example: support received in January–September by a workplace with 50 eligible employees. The amount to be recovered depends on each workplace’s own support.

Calculation: 50 × TRY 1,269.90 × 9 months. Basis: Law No. 5510 Provisional Art. 112; SGK Circular 2026/8.

09 · OTHER INCENTIVES

For other incentives, the ban applies going forward

A workplace found to employ unregistered workers cannot use premium incentives, support and reductions for **one month** after the first finding, and for **one year** for each repeat within three years. If the finding is based on a letter from a public body, the ban starts from the beginning of the month after the letter reaches SGK. The ban does not apply if the number of persons found does not exceed 1% of the workplace’s insured employees and five persons.

The 1% is calculated on the total insured persons in the filings for the month in which the letter reaches SGK. Basis: Law No. 5510 Additional Art. 14; SGK Circular 2017/18.

10 · RECORD KEEPING

Record keeping on vehicle use is decisive

01 **Setting out in writing who may use company vehicles and in what capacity**

02 **Regularly confirming the insurance registrations of employees who actually drive the vehicles**

These steps are not a legal obligation. They make it easier to document whether an employment relationship exists in a possible review.

The topic is covered in outline; for a detailed assessment, please consult your financial adviser.

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