Banking & Finance Bulletin – Q4 2024

Recent Sectoral Developments

September 2024 Banking Sector Data Released

As of September 2024, the Turkish banking sector's consolidated non-financial data indicates a remarkable 29.6% growth in total assets, reaching TRY 30.5 trillion, compared to the end of 2023. Loans amounted to TRY 15 trillion, while securities grew to TRY 4.9 trillion, reflecting increases of 28.6% and 23.3%, respectively. Deposits rose by 20.1%, totaling TRY 17.8 trillion, and equity capital climbed by 22.8% to TRY 2.6 trillion. The sector reported a net profit of TRY 460.4 billion, with a capital adequacy ratio of 18.20% and a non-performing loan ratio of 1.71%.

MKK released its 2024 Mid-Year Indices and Financial Ratios

The Central Securities Depository and Trade Repository of Turkish capital markets ("**MKK**") published its Profit and Revenue Indices for Q2 of 2024, based on financial data disclosed on the Public Disclosure Platform ("**KAP**"). The MKK Profit Index showed a 2.31% decrease compared to the previous quarter, but a 14.74% increase year-on-year. The Revenue Index, on the other hand, increased by 12.44% from the previous period and 88.74% year-on-year.

Technical Guidelines and MKS Reporting Updates for ÜPAK Transactions by TÜRİB

The Turkish Mercantile Exchange ("**TÜRİB**") has published drafts of the Central Custody System ("**MKS**") principles and report formats for settlement transactions that will be conducted through Product Market Intermediary Institutions ("**ÜPAK**") as part of the transition to an intermediary system for the ELÜS Market. Additionally, the "**ÜPAK**-SPAK REST Services Technical Guide" has been shared. At this stage, updates have been made to MKS reporting and the current report format details have been included.

TBA President Meets with International Stakeholders in the U.S.

Alpaslan Çakar, Chairman of the Turkish Banks Association ("**TBA**"), held significant meetings during the annual International Monetary Fund (IMF) and the World Bank meetings in Washington D.C. At TBA's 34th annual reception, discussions focused on global economic trends, Türkiye's economic performance, and technological advancements in the financial sector. Çakar also emphasized the growing interest of international investors in Türkiye, citing its low debt levels as an advantage.

MARS Secures EUR 2.65 Million in Investment

Turkish fintech startup MARS has raised EUR 2.65 million in seed funding to support its expansion into international markets. The investment, led by ICU Venture Capital, Kultura, and Startupfon, aims to help MARS expand its user base, which currently stands at over 1 million.

Energy Markets Members' Currency Exchange Facility

New infrastructure has been introduced for energy market members to conduct currency exchange transactions. Members can perform U.S. Dollar and Euro purchases/sales in exchange for Turkish Lira via the "Currency Transactions" screen under the "Transactions" menu in the Banking Transactions section. Exchange rate information for currency transactions can be viewed in the system with limits of USD 50,000 and EUR 50,000, while transactions exceeding these limits are conducted with exchange rate information from the Treasury team. This service covers same-day value transactions and is offered during specific hours.

Exemption Introduced to TRY Payment Obligation in Medical Device Contracts

An amendment to Communiqué No. 2008-32/34, issued under Decree No. 32 on the Protection of the Value of Turkish Currency, introduced an exception to the obligation to denominate payments in Turkish Lira for medical device contracts. With this amendment, entities designated as approved bodies in Türkiye under the Medical Devices Regulation and the In Vitro Diagnostic Medical Devices Regulation are now permitted to execute service agreements with manufacturers and employment contracts with individuals in Türkiye in foreign currency or foreign currency-indexed terms. This regulation enables businesses operating in the medical device sector to conclude agreements in foreign currency or indexed to foreign currency, providing greater flexibility in their contractual arrangements.

Latest Developments on Fee Schedule for FX Companies

With the announcement published in the FX Company Information System (YMBS) on 9 December 2024, the fees payable for applications of FX Companies for operation license, branch operation license, authorization for address changes to higher activity regions, share transfer authorization, and group conversion authorization from Group A to Group B for FX Companies are determined by taking into consideration the revaluation rate for 2025 which is 43.93%. The new fees would be as follows:

ACTIVITY AREA	GROUP A	GROUB B	BRANCH
1 st Activity Area	TRY 25,907,400	TRY 23,748,450	TRY 14,393,000
2 nd Activity Area	TRY 21,589,500	TRY 19,430,550	TRY 11,514,400
3 rd Activity Area	TRY 17,271,600	TRY 15,112,650	TRY 8,635,800
4 th Activity Area	TRY 12,953,700	TRY 10,794,750	TRY 5,757,200

In a significant ruling dated 9 May 2024, the Constitutional Court struck down a regulation granting the Ministry of Treasury and Finance to set fees for services rendered by FX companies, including applications, permits, and information system services, capped at TRY 6 million per fiscal year. The Court deemed the regulation incompatible with the principles of taxation by law and the non-delegation of legislative authority, further asserting that any restrictions on property rights and freedom of enterprise must be explicitly enshrined in law. The annulment is set to take effect on 22 July 2025. Until then, in the absence of a superseding regulation, the abovementioned fee schedule will remain in force.

Enerjisa Üretim Secures USD 1 Billion Loan

Enerjisa Üretim has signed a USD 1.012 billion loan agreement to finance a 750-megawatt portion of the Renewable Energy Resource Area 2 (*YEKA-2 in Turkish*,) project. The loan, backed by an export credit guarantee from Euler Hermes, will be utilized to finance Energisa Üretim's ongoing wind power plant investments in Çanakkale, Aydın, and Balıkesir.

ADQ to Acquire 96% Stake in Odeabank

Abu Dhabi-based investment and holding company ADQ has reached a definitive agreement to acquire a 96% stake in Odeabank from the shareholder consortium led by Bank Audi. Under the agreement, Bank Audi will transfer its 76.419% stake, while the European Bank for Reconstruction and Development (EBRD) will transfer 8.009%, the International Finance Corporation (IFC) 6.362%, IFC FIG Investment Company S.a.r.l 3.426%, and Mohammad Hassan Zeidan 1.780% of their

respective shares to ADQ. The deal is subject to approval from the Banking Regulation and Supervision Agency ("BRSA") and the Competition Authority.

QNB Türkiye Issues USD 125 Million in Green and Blue Bonds

In partnership with IFC and EBRD, QNB Türkiye has issued a total of USD 125 million in green and blue bonds. This includes a USD 100 million green bond with equal participation from IFC and EBRD, as well as Türkiye's first USD 25 million blue bond issued in collaboration with IFC.

Akbank Secures USD 1 Billion+ in a Sustainable Syndicated Loan

Akbank has obtained a sustainable syndicated loan consisting of four tranches: USD 272.7 million and EUR 254.1 million with a 367-day maturity, and USD 159.5 million and EUR 43.5 million with a 734-day maturity. According to a written statement by the bank, the transaction attracted participation from 46 banks across 21 countries, including 11 new banks, generating total demand exceeding USD 1 billion.

Regulation on Audit Firm Rotation Comes into Effect

The "Procedures and Principles for the Implementation of Rotation Provisions and Calculation of Periods," which includes rules requiring audit firms to pause services for a company after a certain period of engagement, was opened for public consultation by the Public Oversight Authority ("**KGK**") on 1 October 2024. This regulation came into effect on 20 December 2024. The relevant board decision can be accessed <u>here</u> (*only available in Turkish*).

TFRS 18: A New Standard for Financial Statement Presentation and Disclosure

In April 2024, the International Accounting Standards Board introduced IFRS 18, a new standard for the presentation and disclosure of financial statements. Aimed at ensuring the fair presentation of financial elements such as assets, liabilities, income, and expenses, this standard will replace IAS 1 Presentation of Financial Statements.

In Türkiye, the standard will take effect as *TFRS 18 Presentation and Disclosure in Financial Statements* on 1 January 2027. Key changes include:

- Classification of income and expenses in the statement of profit or loss under operating, investing, and financing activities.
- Addition of subtotals for Operating Profit and Profit before Financing and Tax.
- Disclosure of performance metrics in the notes.
- Guidance on aggregation and disaggregation of items in financial statements.

KGK Mandates Disclosure of Net Monetary Position Gains (Losses)

The KGK's recent decision, published in the Official Gazette on 26 October 2024, requires businesses adjusting their financial statements for inflation to disclose details of "Net Monetary Position Gains (Losses)" in the notes to their financial statements using specific methods. The decision applies to reporting periods ending on or after 31 December 2024. The decision can be accessed <u>here</u> (*only available in Turkish*).

Draft Participation Finance Accounting Standards Released for Public Consultation

To support the development of the Turkish Islamic finance sector, i.e. participation finance sector, draft texts for KFMS 42 (Presentation and Disclosure in Financial Statements of Participation Takaful Institutions) and KFMS 43 (Participation Takaful: Accounting and Measurement) have been released for public consultation under the Accounting and Auditing

Organization for Islamic Financial Institutions (AAOIFI) Participation Finance Accounting Standards. The related announcement can be accessed <u>here</u> (*only available in Turkish*).

S&P Upgrades Türkiye's Credit Rating to BB-

S&P has raised Türkiye's credit rating by one notch, from B+ to BB-. With this upgrade, Türkiye's credit rating has shifted from "Highly Speculative" to "Speculative," marking a return to the BB- level last seen in August 2018.

Istanbul-Based AI Marketing Platform Insider Secures USD 500 Million in Series E Funding

Founded in Istanbul in 2012, the AI-powered global marketing technology platform Insider has raised USD 500 million in a Series E funding round led by General Atlantic and other investors.

Şekerbank Secures USD 160 Million Syndicated Loan

Şekerbank has obtained a five-year syndicated loan of approximately USD 160 million, fully allocated to social and environmental development projects, with participation from six international financial institutions led by the Dutch Development Bank (FMO). Notably, the Japan International Cooperation Agency (JICA) provided its first private sector financing support in Türkiye through this loan, with other participants including Proparco, representing the French Development Agency (AFD), the Southeast Europe Fund (EFSE), the Blue Orchard Microfinance Fund (BOMF), and the ILX Fund (ILX).

Çimsa Secures USD 70 Million Green Loan

Çimsa has obtained a USD 70 million green loan from the IFC to support its sustainability projects in Afyon, Eskişehir, and Mersin. The loan will be utilized for green transformation initiatives at its production facilities in Türkiye.

YapıKredi Secures a USD 1.05 Billion Sustainability-Themed Syndicated Loan

Yapı Kredi has signed a USD 1.05 billion sustainability-themed syndicated loan agreement with a 367-day maturity. The transaction consists of two tranches: USD 605.4 million and EUR 410.1 million. Joint coordinators for the deal were Abu Dhabi Commercial Bank, Bank of America, Emirates NBD, and The Commercial Bank, while sustainability coordinators included First Abu Dhabi Bank, ING, Standard Chartered Bank, and Sumitomo Mitsui Banking Corporation. Emirates NBD acted as the intercreditor agent for the loan.

Denizbank Renews Murabaha Syndication at USD 340 Million

DenizBank has renewed its murabaha syndication loan at USD 340 million, achieving 165% oversubscription. The syndication, which previously won two awards in the "Islamic Syndication of the Year" category at the "Global Banking & Markets: CEE, CIS & Türkiye Awards," was facilitated by Emirates NBD as the agent bank and coordinated by Emirates NBD Capital.

Türk Eximbank Secures USD 796 Million Sustainability-Linked Syndicated Loan

Türk Eximbank has obtained a USD 796 million sustainability-focused syndicated loan, comprising EUR 367.7 million, USD 297 million, and JPY 700 million in tranches with maturities of one-to-two years. This transaction marks the largest syndicated loan in the bank's history.

TFRS 19: Simplified Disclosure Standards for Non-Public Subsidiaries

TFRS 19 aims to ease reporting obligations for non-public subsidiaries by providing simplified disclosure requirements. The standard will come into effect on 1 January 2027, with early adoption permitted. Its application is optional and exclusively available to subsidiaries that are part of a parent entity preparing TFRS-compliant consolidated financial statements.

VakıfBank Secures USD 870 Million Sustainability-Themed Syndicated Loan

VakıfBank has obtained a sustainability-themed syndicated loan totaling USD 870 million, comprising USD 518.5 million and EUR 331.4 million, with participation from 45 banks across 25 countries.

Denizbank Signs USD 850 Million Syndicated Loan

Denizbank has signed a syndicated loan agreement comprising four tranches: USD 228 million and EUR 314,346,666.67 with a 367-day maturity, and USD 289.5 million and EUR 145 million with a 734-day maturity. The facility saw participation from 54 banks across 23 countries.

AKLease Secures EUR 50 Million Green Financing

AKLease has signed a EUR 50 million green financing agreement with the EBRD to support energy efficiency and renewable energy investments. The loan has a four-year maturity.

Turkish Eximbank Secures USD 45 Million Loan

Turkish Eximbank has signed a USD 45 million loan agreement with the Black Sea Trade and Development Bank (BSTDB) to support trade financing. The loan has a two-year maturity.

Garanti BBVA Secures USD 244 million and EUR 162.4 million Syndicated Loan

According to a statement made by Garanti BBVA to the KAP, the bank signed a syndicated loan agreement consisting of two separate tranches amounting to USD 244 million and EUR 162.4 million with a maturity of 367 days on 2 December 2024.

According to the statement, the total cost of the loan, which will be used to finance foreign trade and sustainable projects with the participation of 43 financial institutions from 21 countries, was realized as SOFR + 1.75 percent for the US Dollar tranche and Euribor + 1.5 percent for the Euro tranche.

Communiqué Amending the General Communiqué on Tax Procedure Law

The obligation for consumers to make payments for the purchase of goods or services through banks and financial institutions was increased from TRY 7,000 to TRY 30,000.

Fees to Be Charged under Law No. 1567 on the Protection of the Value of Turkish Currency

Article 6, paragraph 3 of the Regulation on Fees to Be Charged under Law No. 1567 on the Protection of the Value of Turkish Currency stipulates, "The fees determined by this Regulation shall be applied each year by increasing them by the revaluation rate determined and announced in accordance with the provisions of repeated Article 298 of the Tax Procedure Law No. 213 dated 4/1/1961 for the previous year."

In this context, with the General Communiqué on Tax Procedure Law (Sequence No: 574) published in the Official Gazette, dated 27 November 2024, No. 32735, the revaluation rate for the year 2024 has been determined as 43.93% and as of 1 January 2025, will be applied as:

• The operating permit fee for precious metal intermediary institutions and organizations regulated by the first paragraph of Article 4/B of the Regulation is TRY 28,786,000,

- The operating permit fee for precious metal refineries regulated by the first paragraph of Article 4/A of the Regulation is TRY 40,300,400,
- The annual usage fee for the Precious Metals Intermediary Institutions Information System ("KMAKBS") regulated by the first paragraph of Article 5/A of the Regulation is TRY 503,755,
- The KMAKBS system presentation fee regulated by the fifth paragraph of the provisional Article 2 of the Regulation is TRY 14,393,000.

KGK Implements Amendments to BOBİ FRS on Crypto Assets

On 19 December 2024, the KGK enacted the amendments to the Financial Reporting Standards for Large and Medium-Sized Enterprises (BOBİ FRS), which were proposed for public consultation in March this year. The amendments address the measurement, presentation, and disclosure requirements for crypto assets in financial statements. The relevant KGK decision can be accessed <u>here</u> (*only available in Turkish*).

KGK Decision on the Scope of Mandatory Sustainability Reports

On 16 December 2024, according to the decision published in the Official Gazette, changes were made in the sustainability reporting practice, which was made mandatory for certain businesses with the Turkish Sustainability Reporting Standards (TSRS): 1) Non-publicly traded companies that issue debt securities or receive issuance limits have been removed from the scope of application; 2) Reporting has become optional for the first two years (i.e. the period of scope 3 exemption) for banks and non-bank financial institutions with no more than one branch or 250 employees.

Fintech Sector

MoU Signed with the National Bank of the Kyrgyz Republic on Fintech Cooperation

On 5 November 2024, a memorandum of understanding (MoU) was signed with the National Bank of the Kyrgyz Republic to enhance collaboration in the fintech sector.

Türkiye's Fintech Ecosystem Attracts USD 194 Million Investment

According to data released by the Republic of Türkiye Finance Office, 29 fintech companies received a total investment of USD 194 million as of December 2024. Türkiye's fintech ecosystem, comprising 731 active startups, is primarily driven by the Payments, Banking Technologies, and Blockchain/Crypto Asset verticals.

Local Fintech Sipay Acquires Hesapkurdu and Koalay

Turkish fintech startup Sipay has diversified its product portfolio by acquiring Hesapkurdu and Koalay, two firms specializing in individual banking and insurance brokerage services. With over nine million customers, the merger aims to provide a more streamlined platform for meeting the financial needs of businesses and individuals.

Garanti BBVA Launches New Fintech Brand, TAMI

Garanti BBVA's new fintech brand, TAMI, has started offering payment and electronic money services with its launch in November. TAMI aims to provide businesses with easy payment collection, payment tracking, installment options with bank cards, and special campaigns. It has been announced that TAMI will offer digital payment solutions tailored to different user groups, such as SMEs, students, housewives, and families, as well as provide its customers with fast prepaid cards and electronic wallet services.

Capital Markets

SPK and BİST Raise IPO and Listing Thresholds

On 31 December 2024, the Capital Markets Board ("**CMB**") announced an increase in financial thresholds for initial public offerings (IPO) in line with revaluation rates, through its Bulletin No. 2024/60. On the same date, Borsa Istanbul ("**BİST**") amended its Listing Directive, raising listing thresholds for the Star Market (*Yıldız Pazar*), Main Market (*Ana Pazar*), and Sub-Market (*Alt Pazar*). Key changes include:

New IPO Thresholds

The paid-in capital requirement for companies adopting to the registered capital system (*kayıtlı sermaye sistemi*) was increased from TRY 100 million to TRY 150 million.

Financial thresholds for companies applying for an IPO in 2025 were raised. For 2023 financial statements, the minimum total assets were increased to TRY 1.5 billion (TRY 450 million for 2022 financial statements), and minimum net sales revenue was set at TRY 750 million (TRY 270 million for 2022 financial statements). For 2024 financial statements, these thresholds were raised to TRY 2.4 billion for total assets and TRY 1.2 billion for net sales revenue.

In a previous decision dated 28 March 2024, the CMB lowered thresholds for priority sectors such as energy, chemicals, agriculture, defense, and high-tech industries. These reduced thresholds remain applicable, with updates: for 2023 financial statements, the minimum total assets were increased to TRY 450 million (previously TRY 300 million), and minimum net sales revenue to TRY 270 million (previously TRY 180 million). For 2024 financial statements, the thresholds were raised to TRY 1.2 billion for total assets and TRY 600 million for net sales revenue.

<u>Additionally</u>

For companies with a pre-IPO market value below TRY 750 million (previously TRY 500 million), 25% of the nominal value of shares must be held in reserve for sale, restricting existing shareholders' preemptive rights.

For companies with pre-IPO market values:

- Below TRY 600 million (previously TRY 400 million), underwriters must commit to purchasing unsold shares.
- Between TRY 600 million and TRY 1.2 billion (previously TRY 400 million to TRY 800 million), underwriters must commit to purchasing unsold shares up to TRY 20 million in full and 50% of the remaining unsold shares.

New Listing Standards

BİST's amendments to the Listing Directive raised the minimum market values for shares to be listed on its markets:

- Star Market: Increased to TRY 2 billion (previously TRY 1 billion).
- Main Market: Set at TRY 500 million to TRY 2 billion (previously TRY 250 million to TRY 1 billion).
- Sub-Market: Minimum value set at TRY 200 million.

For Star Market listings, companies with a market value exceeding TRY 6 billion and nominal share capital ratio above 6% are exempt from the requirement for the nominal value of shares to constitute at least 10% of the capital. Furthermore, for companies not meeting profitability or equity-capital requirements, the minimum market value for shares listed under such exceptional conditions was increased from TRY 1.5 billion to TRY 4 billion.

Lastly, the minimum market value threshold for the initial listing of shares to be issued on BİST through an IPO by special purpose acquisition companies (*SPACs*) has been raised from TRY 200 million to TRY 2 billion.

Sales Gain Exemption for Mutual Fund Units Reduced

Article 5 of the Corporate Tax Law, which regulates applicable exemptions to corporate gains, has been amended with respect to the rate applicable to the gains arising from the sale of investment fund units. According to the Presidential decision

published in the Official Gazette, dated 27 November 2024, the exemption for sales gains on investment fund units was reduced from 75% to 50%.

CMB Publishes Reporting Guide for Stewardship Codes

In February 2024, the CMB introduced Stewardship Codes (*Sorumlu Yönetim İlkeleri in Turkish*) for investment funds established by portfolio management companies and operating under the provisions of Communiqué No. III-52.1 on Investment Funds. The regulation stipulated that portfolio management companies must disclose the implementation of these principles to the public through annual reports standardized by the CMB.

The set of stewardship codes introduced earlier by the CMB consisted of five key areas: "monitoring activities for investee companies," "engagement with investee companies," "collaboration with all relevant stakeholders," "exercise of voting rights for assets in managed portfolios," and "integration of environmental, social, and governance (ESG) factors into the responsible management policy."

Recently, the CMB issued the Guidance on Stewardship Codes specifying the reporting standard to be used by portfolio management companies for documenting their adherence to these principles. The guide can be accessed <u>here</u> (*only available in Turkish*).

CMB Introduces New Regulations for Participation-Based Investment Funds

The CMB has amended its Guidelines on Investment Funds ("Fund Guide"), enabling the purification of impermissible income in participation-based investment funds and introducing a series of new regulations for investment funds:

Key Changes for Participation-Based Investment Funds

By updating Article 1.6 of the Fund Guide, the CMB has established principles for the purification of impermissible income generated within participation-based investment funds that include Sharia-compliant financial instruments (*e.g., stocks, lease certificates*) in their portfolios. Previously the responsibility of investors, this purification process can now be undertaken by intermediary institutions.

Other Significant Amendments to the Fund Guide

- Participation funds can now differentiate investment strategies based on their risk levels.
- The names of funds traded on the Türkiye Electronic Fund Trading Platform ("TEFAS") will no longer include references to their distributors.
- Funds without "Foreign Currency" in their title will limit foreign currency-denominated investments to 80% of their total value.
- A minimum of 10% of the portfolios of money market funds (excluding participation funds) must be allocated to government debt securities (*known as DİBS*).
- Applications for fund promotions will now be managed by the Turkish Capital Markets Association.
- Principles for the daily disclosure of reference prices have been established for investment funds that calculate unit share values periodically.

Record Wave of Fines from CMB to Brokerage Firms

The CMB has imposed administrative fines of TRY 5,833,734 each on 13 brokerage firms for facilitating transactions that violated the short-selling ban in BİST equity markets. Additionally, 53 brokerage firms were fined TRY 1,944,578 each for conducting transactions that breached collateral requirement measures in BİST equity markets.

CMB Blocks Access to Over 100 Global Crypto Exchanges

On 11 December 2024, the CMB announced its decision to initiate legal action to block access to over 100 websites found to be providing unauthorized crypto asset services and facilitating leveraged trading for residents in Türkiye on the internet.

BİST Revises Rules for Order-to-Trade Ratio in High-Frequency Trading

BİST has amended the rules governing the calculation of the order-to-trade ratio used for charging order cancellation and modification activities by High-Frequency Trading (HFT) users. The related announcement can be accessed <u>here</u> (*only available in Turkish*).

BİST Updates Minimum Price Steps in Derivatives Market

BİST has updated the minimum price steps in the Futures and Options Market (*known as* **VİOP**). In a subsequent announcement, BİST postponed the effective date of these changes to 2 December 2024, to allow market participants sufficient time to complete the necessary preparations. The related announcement can be accessed <u>here</u> (*only available in Turkish*).

BİST Amends Procedures for the Precious Metals and Precious Stones Market

BİST has announced the 10th revision to the procedures for the Precious Metals and Precious Stones Market. The related announcement can be accessed <u>here</u> (*only available in Turkish*).

New Eurobond to Sustainable Eurobond Indices in BİST

On 17 October 2024, BİST included the following Eurobond in the BİST Sustainable Eurobond USD Index and the BİST Sustainable Eurobond USD (TRY) Index. The related announcement can be accessed <u>here</u> (only available in Turkish).

ISIN	Issuer	Maturity Start Date	Redemption Date	Nominal Amount
XS2913966318	Türkiye Vakıflar Bankası T.A.O	7 October 2024	2 January 2030	USD 500,000,000.00

BİST to Launch Copper Futures Contracts in VİOP

BİST has announced the launch of Copper Futures Contracts in the VİOP on 6 December 2024. The related announcement can be accessed <u>here</u> (*only available in Turkish*).

BİST Updates Market-Making Rules in VİOP

BİST has revised the market-making rules in the VİOP, defining market maker rights and obligations for equity futures contracts and updating maximum spread values for contracts under the program. The related announcement can be accessed <u>here</u> (*only available in Turkish*).

BİST Raises Technology and Market Access Fees by 43%

BİST has increased the technology service and market access fees charged to institutions and members by an average of 43%, effective from 2025. The related announcement can be accessed <u>here</u> (*only available in Turkish*).

BİST to Launch Spot Silver, Platinum, and Palladium Indices

BİST has decided to begin calculating the BİST Spot Silver, BİST Spot Platinum, and BİST Spot Palladium Indices based on buy and sell quotations from international markets. The related announcement can be accessed <u>here</u> (*only available in Turkish*).

BİST Extends Fee Waiver for ETF Transactions Until End-2025

BİST has announced that it will continue waiving order cancellation, quantity reduction, and price worsening fees for exchange-traded fund (ETF) transactions in the BİST Equity Market, a practice in place since 2017, until the end of 2025. The related announcement can be accessed <u>here</u> (*only available in Turkish*).

CMB Ends Remote Order Acceptance Policy Introduced During COVID-19

On 23 March 2020, the CMB introduced a temporary measure allowing brokerage firms and portfolio management companies to accept orders via mobile applications (e.g., WhatsApp) or personal email addresses assigned to employees, in response to the challenges posed by the COVID-19 pandemic. However, in its bulletin dated 26 December 2024, the CMB announced the termination of this practice.

CMB Updates Revaluation Rates for 2025

In its bulletin dated 31 December 2024, the CMB announced updates to the revaluation rates specified in regulations issued under the Capital Markets Law No. 6362, as well as in regulations issued under the repealed Capital Markets Law No. 2499 that remain in effect. These adjustments, applicable for 2025, are detailed in the accompanying announcement. The full announcement can be accessed <u>here</u> (*only available in Turkish*).

Amendments to Trading Rules in VİOP

The VİOP has introduced various changes to its trading rules, including updates to TLREF futures contracts, criteria for canceling erroneous trades, and price limits for inter-maturity strategy orders. These amendments take effect on 2 January 2025. For detailed information, the announcement can be accessed <u>here</u> (*only available in Turkish*).

Update on Contribution Amounts for Takasbank Guarantee Fund

The fixed contribution amount for the Takasbank Money Market ("**TPP**") guarantee fund will be increased from TRY 10,000 to TRY 100,000 as of 2025 to strengthen default management resources. Any shortfall in fixed and variable contributions must be deposited into the relevant accounts by 2 January 2025. Under the TPP Procedure, guarantee fund contributions consist of a fixed contribution and a variable contribution calculated in proportion to the risks borne by the members.

Notification Regarding Investor Compensation Center Fee Declarations

The Investor Compensation Center (ICC) has requested that investment firms submit the total contract size of over-the-counter derivative transactions conducted on an investor basis in 2024, along with the corresponding fee amounts to be paid for 2025, by no later than 27 January 2025. These declarations must be prepared in an Excel file format, containing investor information and calculations, and submitted through the MEVITAS system in accordance with the specified procedures.

Novelties Announced for the TEFAS

Recent upgrades to the TEFAS include a minimum threshold check for forward-value funds, automation of holiday definitions for foreign currency transactions, and updates to various reporting tools. A test environment was made available for members starting in October 2024 to facilitate necessary preparations. Additionally, TEFAS web service documents have been updated and made accessible to members.

Updates on Capital Requirements for Banks' Qualified Transactions

Takasbank has updated the capital requirement data for its Central Counterparty ("CCP") services in accordance with international standards. Information in terms of the risks arising from banks' transactions in the VİOP, Borrowing Shares Market (ÖPP), BİST Money Market, Debt Instruments Market, and Swap Market, as well as Over-the-Counter Derivatives, has been provided. The updated capital allocations for 30 September 2024, show a CCP capital of TRY 393.7 million, a total guarantee fund of TRY 2.9 billion, and a hypothetical capital requirement for over-the-counter derivatives of TRY 12.67 million, all compliant with international regulations.

Changes in CCP Risk Parameters

Takasbank has announced an update to the risk parameters used in the markets where it provides central counterparty and collateral management services. These updated parameters will take effect on 2 January 2025. The parameters have been reassessed based on market conditions, and any potential changes to members' collateral obligations will be visible on their screens starting from the first risk calculation of the day on 2 January 2025. It is crucial for members to review their collateral obligations and take necessary precautions in line with the updated parameters.

Transition from Pledge Agreements to Assignment Contracts

Takasbank has announced a change in the collateral transfer process for cash credit services. Starting from 20 December 2024, the use of pledge agreements will be replaced with assignment agreements that regulate the transfer of ownership. Members are expected to prepare assignment agreements for both new and existing clients, complete the necessary system entries, and submit them to the Loans Team by the specified date. During the transition period, transactions will continue using pledge agreements; however, as of the transition date, all pledge agreements will be canceled and associated with assignment agreements.

Updates to KFS Business and Transaction Rules

The Crowdfunding System ("**KFS**") has introduced changes in its Business and Transaction Rules, specifically regarding member definitions and settlement processes. A new "Name and Surname Update" field has been added to the Member Update Service to facilitate changes such as marriage or divorce. A new "Platform Project-Based Balance Information Inquiry Service" is now available for viewing project-specific funding amounts.

New Regulations for the Preferred Repo Market

BİST has introduced new regulations for transactions in the Preferred Repo Market, effective 23 December 2024. These include changes in the storage of privately issued debt instruments during repo transactions and the automation of settlement and debt closure processes.

Takasbank Updates on Cheque Clearing and Risk Management Rules

Takasbank has updated its Check Clearing, Settlement, Reconciliation, and Risk Management System Rules by removing the previous limitation of "not exceeding the Producer Price Index ("**PPI**") rate" for its fee increases. Instead, the new regulation states that fees will be increased based on market conditions, with a minimum increase aligned with the PPI rate.

Takasbank Introduces Participation Finance Products for Collateral and Fund Management

Takasbank innovated its collateral management processes by including participation finance products in the evaluation of Turkish Lira cash transaction collateral, membership collateral, and guarantee funds. In this context, a "Profit Share Request" option has been introduced, allowing collateral and funds to be evaluated in participation-based products. With the new

regulation, funds of members requesting profit shares will be directed towards investments in participation finance products, and returns will be distributed as profit share.

Changes to Reporting Method for Crowdfunding System

The MKK announced the sharing of reconciliation reports (Movement Report, Project Report, Project Member Report, and Member Report) under the Crowdfunding System ("**KFS**") via Secure File Transfer Protocol ("**SFTP**") would be discontinued, and these reports would only be made available through the "Platform Report Service" within KFS. Accordingly, as of 23 December 2024, report sharing via SFTP will be completely terminated, and the reports will only be accessible through KFS services.

Amendments to MASAK Legislation on Crypto Asset Service Providers

A number of important amendments were made to the Financial Crimes Investigation Board ("MASAK") legislation. Crypto Asset Service Providers ("CASPs") were added to the scope of obligations to establish a compliance program; the establishment of a business relationship was subject to a more qualified approval mechanism; an obligation to open an account in the electronic notification system was introduced; the information that the sender must be included in the messages regarding the crypto asset transfer transaction exceeding TRY 15,000 was specified; and an identity verification obligation was introduced for KVHSs.

Banks and Other Financial Institutions

Latest Developments on Reserve Requirements

<u>On 22 November 2024</u>, the Central Bank of the Republic of Türkiye ("**CBRT**"), considering the rising share of Turkish Lira deposits, implemented the following simplification measures regarding reserve requirement ratios. It has revised the required reserve ratios applied to Turkish Lira deposit accounts and the TRY-denominated reserve requirement ratio for foreign currency (FX) deposits as follows, with these reserves to be established on 6 December 2024:

	Previous Ratio	New Ratio
Short-term TRY deposits	15%	17%
Maintenance of TRY for FX deposits	5%	4%

Simultaneously, the CBRT has removed the corporate TRY deposit share target and reduced the overall target for the transition and renewal of FX-hedged deposits (KKM) into TRY from 75% to 70%.

<u>In a regulatory update on 19 December 2024</u>, the CBRT refined the temporary framework governing foreign currency liabilities under the Communiqué on Reserve Requirements. The exemption scope was tightened to exclude all liabilities except deposits and participation funds (with the exception of those held by foreign banks). The maturity condition was extended from six months to one year, while the exemption period was prolonged through 19 December 2025.

<u>On 20 December 2024</u>, the CBRT announced adjustments to support the reduction in FX-Protected Deposit (KKM) balances. The overall conversion and renewal target for KKM accounts was lowered from 70% to 60%, while the minimum interest rate requirement for KKM accounts was reduced from 70% to 50% of the policy rate. Additionally, the CBRT eliminated interest or compensation payments on reserve requirements for newly opened and renewed KKM accounts,

Digital Banking Activity Permits Are Increasing

With the Banking Regulation and Supervision Board decisions published in the Official Gazette, Ziraat Dinamik Banka A.Ş., FUPS Bank A.Ş. and Colendi Bank A.Ş. were granted digital banking operating licenses under the Regulation on the Operating Principles of Digital Banks and Service Model Banking.

BRSA Decision on Inflation Accounting

The BRSA has announced that financial leasing, factoring, financing, savings financing, and asset management companies will not apply inflation accounting in 2025.

Updated Terms for Mobile Phone Loans

The BRSA has updated the term limits for consumer loans used for purchasing mobile phones. According to the new regulations, the repayment term for mobile phones priced up to TRY 20,000 is set at 12 months, while the term for phones priced above TRY 20,000 is limited to three months. Additionally, for mobile phones classified as "refurbished products," the term limit is 12 months for phones priced up to TRY 25,000 and three months for those priced above TRY 25,000.

New Regulation on Risk Weight Applications in Capital Adequacy Calculations

The BRSA has resolved to terminate, effective as of 19 December 2024, the application of high-risk weight ratios applied to commercial cash loans under the Regulation on the Measurement and Evaluation of Capital Adequacy of Banks. These include a 200% risk weight under the standard approach and the increase rate applied in approaches based on internal ratings under the standard approach. Instead, the risk weights specified in the Regulation will be applied to such loans. Additionally, for the calculation of credit risk exposure amounts, the CBRT's exchange rate as of 28 June 2024, will be used to determine the exchange rate for monetary assets and foreign currency items not measured at historical cost. This practice will be effective starting 1 January 2025, unless a contrary decision is made.

Banking Sector Risk Center Report Updates

The TBA Risk Center has updated its Risk Center Report and application conditions as of 16 October 2024. New data under the "Current/Active Period" heading includes Individual Credit Application Data, Delayed Telephone and Internet Bill Information, Blacklist Information, and Check Banning Data.

New Guide for Managing Climate Risks in the Banking Sector

In light of the growing impact of climate change, the management of climate-related financial risks has become a priority for financial regulatory authorities. The creation of heat maps illustrating the sensitivity of banks' credit portfolios to climate risks has become a common methodology for measuring and managing these risks. The "Guide to Developing Heat Map Methodologies," prepared by the Climate Risks Working Group of the TBA, serves as a guiding source for banks to manage these risks effectively.