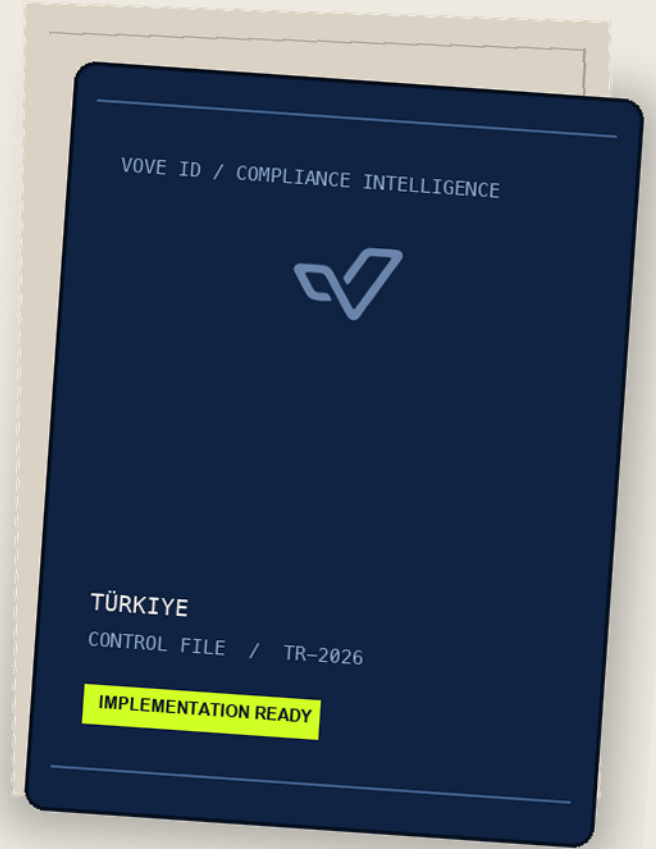


TÜRKIYE



TÜRKIYE / TR



KYC / KYB / AML

COMPLIANCE CHECKLIST

2026 EDITION

IMPLEMENTATION CHECKLIST / NOT LEGAL ADVICE



Türkiye KYC, KYB & AML Compliance Checklist

Implementation checklist for Türkiye customer due diligence, beneficial ownership, suspicious reporting, sanctions, privacy, payments, crypto-assets and digital onboarding controls.

Primary AML law	Law No. 5549
FIU	Financial Crimes Investigation Board (MASAK)
STR timing	Within 10 business days from suspicion; immediately where delay is prejudicial
Records	8 years from the applicable document, record or transaction trigger
Beneficial ownership	Identify the natural person who ultimately owns or controls; apply current Measures Regulation tests
Sanctions	Laws No. 6415 and 7262; Presidential and Official Gazette decisions
Privacy law	Personal Data Protection Law No. 6698, as amended
FATF public lists	Not listed at 19 June 2026

Scope and legal framework

Law No. 5549 on Prevention of Laundering Proceeds of Crime, its Measures Regulation and MASAK communiqués form the core AML framework. Laws No. 6415 and 7262 govern terrorist- and proliferation-financing asset freezes. Sector laws and supervisory rules apply in addition.

FATF context

Türkiye was absent from the FATF increased-monitoring and call-for-action lists dated 19 June 2026. FATF adopted Türkiye's new-round mutual evaluation in June 2026; do not infer unpublished findings or treat absence from a public list as a low-risk classification.

IMPORTANT

General information, not legal advice. Reviewed 8 October 2026. Confirm controlling Turkish text, current monetary thresholds, sector rules, MASAK Online specifications, sanctions decisions, registry and beneficial-owner procedures, KVKK decisions and licensing conditions with the competent authority and qualified Türkiye counsel.

HOW TO USE THIS GUIDE

Turn each requirement into owned evidence

For every row, assign an owner, confirm whether the control applies, link the evidence, record gaps, and set a remediation date. A checked box is not evidence by itself.

01 / SCOPE	02 / DESIGN	03 / EVIDENCE	04 / REVIEW
Confirm institution, supervisor, product, customer and risk scope.	Map each obligation to a policy, system control or human review.	Retain the document, decision, timestamp, owner and rationale.	Test the control and update it when rules or risks change.

Checklist legend

CONTROL tells you what outcome to cover. IMPLEMENTATION ACTION translates that outcome into operational work. EVIDENCE suggests what an auditor or reviewer should be able to inspect. SOURCE points back to the primary rule or regulator guidance.

Minimum review record

Keep a compact decision record for each checklist row so a later reviewer can reconstruct what applied, who decided, and what evidence was inspected.

APPLICABILITY	OWNERSHIP	TRACEABILITY
Applicable, not applicable, or pending legal confirmation, with a short rationale.	Named control owner, reviewer, approval date and next review date.	Evidence link, source version, test result, gap status and remediation ticket.

1. SCOPE, AUTHORITIES, AND LICENSING

Scope, authorities, and licensing

Classify the activity, Türkiye nexus and competent supervisor before launch.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Determine whether each activity is an obliged-party activity.	Map services and delivery models to the categories in Law 5549 and the current Measures Regulation, including financial institutions, designated businesses and professions and crypto-asset service providers.	Perimeter memo, service map and authority confirmation.	Law 5549 article 2(d); Measures Regulation article 4
Obtain each activity-specific authorisation before operating.	Classify banking, payments, electronic money, money transfer, capital markets, insurance, exchange and crypto services under the live sector regime.	Licence matrix, approvals and conditions.	Applicable BRSA, CBRT, CMB and Treasury legislation
Use current Turkish legislation and MASAK publications.	Track Official Gazette amendments, MASAK communiqués, sector guides and supervisory decisions; treat English translations as aids only.	Source register, translations and change log.	Law 5549 and implementing legislation

Governance and risk assessment

Controls must be risk-based, documented and effective at entity and financial-group level.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Maintain an enterprise ML/TF/PF risk assessment.	Assess customers, countries, products, delivery channels, transactions, new technologies and group exposure using current national and sector risk information.	Methodology, assessment, approval and updates.	Law 5549 article 5; Compliance Programme Regulation
Operate the required compliance programme.	Where applicable, appoint an authorised compliance officer and maintain policies, risk management, monitoring, training, internal control and audit.	Appointment, programme, reports, testing and remediation.	Law 5549 article 5; Compliance Programme Regulation
Apply group-wide controls without weakening local duties.	Govern permitted intra-group CDD, account and transaction information sharing and apply stricter local restrictions where required.	Group standard, legal analysis and access controls.	Law 5549 article 5(2)

3. NATURAL-PERSON IDENTIFICATION

Natural-person identification

Identify and verify the customer, beneficiary and representative at every applicable trigger.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Complete CDD before the relevant transaction or relationship.	Identify and verify the person conducting the transaction and the person on whose behalf or for whose benefit it is conducted using reliable evidence.	Identity attributes, document provenance and verification result.	Law 5549 article 3; Measures Regulation
Apply the current trigger and monetary threshold rules.	Configure relationship, suspicious-transaction and occasional-transaction triggers from the current Measures Regulation and MASAK amendments; do not hard-code an undated lira amount.	Dated threshold register, configuration and change tests.	Law 5549 article 3(2); Measures Regulation articles 5-6
Verify representatives and authority.	Identify the representative and represented person and authenticate the mandate before accepting instructions.	Representative KYC, mandate and validation.	Measures Regulation customer-identification provisions
Do not establish or continue an inadequately identified relationship.	Apply the current prohibition and termination rules where CDD cannot be completed and assess whether an STR is required without tipping off.	Failure reason, restriction and STR assessment.	Measures Regulation article 22

KYB and beneficial ownership

Verify legal existence, authority, ownership and ultimate control.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Verify the legal person and authorised persons.	Obtain current trade-registry, constitutional, tax, activity, director and signatory evidence and validate authority through the live registry process.	MERSIS or registry extract, documents and discrepancy log.	Measures Regulation ; Turkish Commercial Code ; Trade Registry Regulation
Identify the natural person who ultimately owns or controls.	Trace direct, indirect, layered, nominee and other control arrangements and apply the current ownership, control and senior-managing-official fallback sequence.	Ownership chart, calculations, control rationale and verified identities.	Measures Regulation article 17/A
Do not treat a percentage as a safe harbour.	Use the current regulatory ownership indicator while still testing control by other means and applying the prescribed fallback where no natural person is identified.	Criterion-by-criterion analysis and escalation.	Measures Regulation article 17/A
Reconcile AML CDD with registry and tax beneficial-owner duties.	Capture the applicable MERSIS, trade-registry and Revenue Administration declarations separately from the AML identification conclusion.	Registry evidence, declaration receipts and discrepancy decisions.	Tax Procedure Law General Communiqué 529 ; registry rules

PEPs, EDD, and remote onboarding

Apply enhanced controls to PEPs and higher-risk relationships.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Identify domestic and foreign PEP exposure.	Screen customers, beneficial owners, family members and close associates and apply the approval, source-of-wealth, source-of-funds and monitoring measures required by current MASAK rules.	Screening, classification, approval and corroboration.	MASAK General Communiqué No. 21; Measures Regulation
Apply enhanced measures to higher risk.	Obtain additional identity, purpose, ownership, wealth and funds evidence; increase review and monitoring intensity and document the rationale.	Risk trigger, enhanced CDD and approval.	Measures Regulation enhanced-measures provisions
Control remote identification by sector.	Use only a method permitted by the competent supervisor and retain liveness, authentication, fraud, consent and exception evidence.	Method assessment, session evidence and exceptions.	Applicable BRSA, CBRT, CMB and insurance remote-identification rules

Monitoring and suspicious reporting

Ongoing scrutiny supports timely reporting to MASAK.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Monitor and refresh on a risk basis.	Compare activity with purpose, expected behaviour, customer risk and source of funds; update CDD when events, material changes or doubts arise.	Scenarios, alerts, reviews and refresh history.	Measures Regulation ongoing-monitoring provisions
Escalate suspicion without waiting for proof.	Assess completed and attempted transactions promptly and record the information, suspicion or reasonable grounds and formation time.	Case chronology, facts and decision.	Law 5549 article 4
Report to MASAK within the statutory period.	Submit through the current MASAK Online route within 10 business days from formation of suspicion and immediately where delay is prejudicial.	Suspicion timestamp, submission and acknowledgement.	MASAK General Communiqué No. 13 article 5
Prevent tipping off and protect report information.	Restrict access, communications and disclosure to the statutory exceptions.	Access logs, scripts, training and incidents.	Law 5549 article 4(2)

Payments, wires, thresholds, and crypto-assets

Separate CDD triggers, periodic reporting and activity-specific licensing.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Carry and screen required transfer information.	Apply current originator and beneficiary fields, missing-data procedures, sanctions checks and sector travel-rule requirements.	Field matrix, samples and repair queue.	Measures Regulation wire-transfer provisions; MASAK crypto guidance
Apply current periodic-reporting rules only to covered activity.	Maintain a dated matrix of reportable transaction types, amounts, periods and exemptions issued by the Ministry; do not present a CDD threshold as a universal reporting threshold.	Rule register, reports, receipts and reconciliation.	Law 5549 article 6; current MASAK reporting rules
Obtain payment and electronic-money authorisation.	Map account, wallet, acquiring, transfer, agent and outsourcing features to Law 6493 and current CBRT secondary rules.	Product memo, authorisation and control tests.	Law 6493; CBRT payment-services regulations
Obtain crypto-asset authorisation and apply current AML rules.	Map trading, transfer, custody and key-management services to Capital Markets Law articles 35/B-35/C, CMB communiqués III-35/B.1 and III-35/B.2, and MASAK travel-rule and STR guidance.	CMB status, permissions, product map and AML tests.	Law 6362 as amended by Law 7518; CMB communiqués III-35/B.1 and III-35/B.2

8. TARGETED FINANCIAL SANCTIONS

Targeted financial sanctions

Use current UN-derived and domestic freezing decisions.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Screen designations, ownership and control.	Screen relevant parties at onboarding, transactions and list updates against current UN and Türkiye decisions and resolve potential indirect control.	List versions, screening logs and match decisions.	Laws 6415 and 7262
Implement published freezes without delay.	Block prohibited disposal or availability when a Presidential asset-freezing decision is published and notify or coordinate through the prescribed MASAK route.	Decision, restriction timestamp and notification.	Law 7262 article 3; Law 6415 and implementing regulation
Use licences, exemptions, delisting or release only under written authority.	Apply the designation-specific procedure and preserve every condition and approval.	Legal analysis, permission and release record.	Law 6415; implementing regulations

Records and regulator access

Retention triggers are record-specific.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Retain AML documents and records for eight years.	Run the period from the document date, last record date or last transaction date as applicable and preserve reconstructable evidence.	Schedule, trigger, samples and retrieval test.	Law 5549 article 8
Preserve STR, CDD, monitoring and compliance evidence.	Keep decisions, supporting material, acknowledgements, training, controls and audits subject to statutory and lawful-hold requirements.	Case files, schedule and legal holds.	Law 5549 articles 4, 5 and 8
Produce complete records to competent authorities.	Maintain controlled access and an auditable process for MASAK and supervisory information requests.	Access matrix, production log and integrity checks.	Law 5549 articles 7-8

Privacy, biometrics, breaches, and transfers

Apply Law 6698 as amended and current Personal Data Protection Board instruments.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Map processing conditions, notices and data-subject rights.	Inventory personal and special-category data, identify an Article 5 or 6 condition, provide Article 10 information and support Article 11 rights.	Data map, legal-basis record, notices and rights log.	Law 6698 articles 4-6 and 10-11
Apply enhanced controls to biometric and special-category data.	Document necessity and proportionality, apply current Board adequate measures and implement security appropriate to the sensitivity and onboarding risk.	Assessment, controls, test results and approvals.	Law 6698 article 6; KVKK biometric-data guideline
Notify personal-data breaches without delay.	Escalate, contain, document and notify the Board and affected persons using the current Board decision and form; do not convert the Board's 72-hour interpretation into a statutory text claim.	Incident chronology, assessment and notifications.	Law 6698 article 12(5); Board Decision 2019/10
Use the amended cross-border transfer regime.	Apply adequacy, an Article 9 appropriate safeguard or a limited incidental-transfer exception and file standard-contract notifications within five business days where used.	Transfer map, mechanism, contract and notification receipt.	Law 6698 article 9; 2024 Cross-Border Transfer By-Law

Practical evidence packs

Evidence must reconstruct decisions end to end.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Maintain an onboarding pack.	Bundle identity, authority, KYB, beneficial ownership, PEP, sanctions, purpose, risk, privacy and approvals.	Complete sample and retrieval result.	Operational control supporting Law 5549
Maintain STR and sanctions case packs.	Link activity, suspicion time, report, receipt, confidentiality, restrictions and communications.	Case pack, timeline and access record.	Law 5549 article 4; Laws 6415 and 7262
Maintain a launch and legal-change pack.	Record perimeter, licences, reporting, sanctions, privacy, vendors, current thresholds and tests.	Signed pack, source register and approvals.	Official sources listed below

Verify against current official material

Primary law and regulator guidance control. Contextual VOVE ID reading is included to help teams operationalize the requirements and is not legal authority.

Law No. 5549 on Prevention of Laundering Proceeds of Crime

MASAK · Primary legislation - official English translation

[Open official source](#)

Measures Regulation and consolidated AML legislation register

MASAK · Official legislation register

[Open official source](#)

MASAK General Communiqué No. 13 - suspicious transaction reporting

MASAK · Official binding communiqué

[Open official source](#)

Current sector suspicious transaction reporting guides and MASAK Online route

MASAK · Official filing guidance

[Open official source](#)

Law No. 6415 on Prevention of Financing of Terrorism

MASAK · Primary legislation - official English translation

[Open official source](#)

Law No. 7262 on Prevention of Financing of Proliferation

MASAK · Primary legislation - official English translation

[Open official source](#)

Current asset-freezing decisions and lists

MASAK · Official sanctions register

[Open official source](#)

Company establishment and MERSIS guide

Ministry of Trade · Official registry guidance

[Open official source](#)

Payment Services and Electronic Money Law No. 6493

Central Bank of the Republic of Türkiye · Primary sector legislation and official framework

[Open official source](#)

Crypto-asset service-provider communiqués III-35/B.1 and III-35/B.2

Capital Markets Board · Official supervisory announcement

[Open official source](#)

Capital Markets Board legislation system

Capital Markets Board · Official legislation register

[Open official source](#)

Personal Data Protection Law No. 6698

Personal Data Protection Authority · Primary legislation - official English translation

[Open official source](#)

Cross-border transfer by-law and standard contracts

Personal Data Protection Authority · Official regulation and instruments

[Open official source](#)

Guideline on processing biometric data

Personal Data Protection Authority · Official regulator guidance

[Open official source](#)

FATF Türkiye country assessment page

FATF · Authoritative assessment

[Open official source](#)

FATF Plenary outcomes - 19 June 2026

FATF · Authoritative current assessment status

[Open official source](#)

FATF increased monitoring - 19 June 2026

FATF · Authoritative current public-list status

[Open official source](#)

FATF call for action - 19 June 2026

FATF · Authoritative current public-list status

[Open official source](#)

Document control

Version 1.0 / Published 8 October 2026 / Last reviewed 8 October 2026 / Owner: VOVE ID Compliance Research

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