

MASAK Communiqué Published: A New Era for Compliance Officers

1. Introduction

With the Communiqué of the Financial Crimes Investigation Board (“MASAK”) General Communiqué (Serial No: 30) (“**Communiqué**”), published in the Official Gazette dated September 9, 2025 and numbered 33012, the procedures and principles regarding the licensing processes of compliance officers and assistant compliance officers have been regulated. You can access the relevant Communiqué [here](#).

Previously, with the amending regulation published in the Official Gazette dated December 25, 2024 and numbered 32763, Article 32/B was added to the Regulation on the Compliance Program Regarding Obligations Related to the Prevention of Laundering Proceeds of Crime and Financing of Terrorism (“**Compliance Program Regulation**”), stipulating that the authorization exam, compliance officer registry, and other issues related to the authorization of compliance officers would be determined by the Ministry of Treasury and Finance.

In line with this, the Communiqué introduces regulations concerning the authorization exam, professional training, licensing processes to assess the professional competence of compliance officers, as well as the compliance officer registry (“**Registry**” or “**Compliance Officer Registry**”) in which records regarding these processes will be kept.

2. License and Renewal Training

Under the new regulation, candidates who succeed in the exam will be granted a

Compliance Officer License, and license holders will be obliged to attend renewal training every three years. Licenses of those who lose the licensing conditions or engage in conduct contrary to the honesty and reputation required by the profession may be revoked.

Pursuant to Article 17/2 of the Compliance Program Regulation, a license requirement shall not be sought for those who have actually served as an executive for four years, as Treasury and Finance Experts for twelve years, or as auditors for twelve years.

3. Compliance Officer Registry

The validity of the license will be monitored through electronic Registry records.

Obligated parties are required to verify from the Registry that the individuals to be employed as compliance officers or assistant compliance officers are registered in the Compliance Officer Registry and that their licenses are not suspended. This obligation must be fulfilled before signing the employment contract and throughout the duration of the employment.

In line with this obligation, it has also been stipulated that, although the Registry shall in principle remain confidential, it may be made accessible to obliged parties conducting inquiries.

4. Exam Schedule and Transition Process

Although the date of the first exam has not yet been announced, from the transition schedule mentioned below, it is understood that the first exam is targeted to be held in 2025.

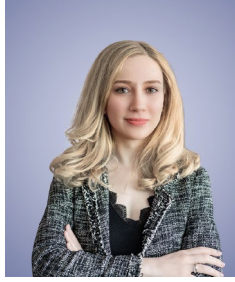
A phased transition process has been foreseen for those currently serving as compliance officers but who do not meet the requirement of a four-year higher education degree. Accordingly:

- (i) Those who have been employed as compliance officers for at least six

months as of December 25, 2025, may sit for the authorization exams until December 25, 2027.

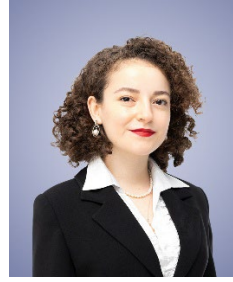
- (ii) Others may participate in the authorization exams to be held until December 25, 2025.

The Communiqué entered into force as of September 9, 2025.



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