

# ReguSense

## Legislative Risk Intelligence Report

11 December 2025

# CONFIDENTIAL

### Executive Summary

22

Total Analyzed

21

Genuine Risks

1

Noise Filtered

2

High Priority

**2 HIGH PRIORITY ALERT(S)**

Immediate attention required for critical legislative risks.



# Sector: CONSTRUCTION

4 risk(s) identified

MEDIUM

Page 15

**Businesses, especially in rural areas, are facing difficulties renewing operating licenses due to new zoning (imar) requirements introduced after a fire incident, rendering previously compliant establishments unable to meet current regulations.**

## ACTIONABLE INSIGHT

Monitor developments regarding zoning regulations, particularly those affecting operating license renewals in rural areas, and assess potential impacts on existing and planned projects. Prepare for possible legal objections or advocacy efforts if the regulations are deemed unreasonable or negatively impact business operations.

Source Evidence:

...işletmelerin ruhsatlariyla ilgili, pek çok ruhsat şu anda iptal, özellikle kırsal kesimde. Daha önce belediyelere harç ödeyerek işletme ruhsatı almış müesseseler teknik sorunlarını çözmüş olsalar b...

MEDIUM

Page 20

**The fire safety regulations are being updated and are expected to be released soon, potentially before or shortly after the new year, impacting construction requirements.**

## ACTIONABLE INSIGHT

Monitor developments regarding the updated fire safety regulations to ensure compliance in future construction projects.

Source Evidence:

...öncelikle alması gereken iş yeri çalışma ruhsatı, bunu da yerel yönetim yani konumuna göre ya belediye ya il özel idaresi verir. Bir tesisin de bir işletmenin de iş yeri çalışma ruhsatı alması deme...

**MEDIUM**

Page 21

**The text indicates that comprehensive administrative and legal regulations are being developed to prevent future disasters, potentially impacting the construction sector due to the mention of "denetim" (oversight) in the context of the "imar" (construction/development) sector.**

**ACTIONABLE INSIGHT**

Monitor developments regarding new administrative and legal regulations related to disaster prevention, particularly those impacting oversight and compliance in the construction sector.

Source Evidence:

kapılar yanın açısından son derece kritik ve önemli ama sezon başlayana kadar bunlar yapılrsa... Çünkü bunların yapıldığı denetim falan olacağı için, filen yıl başındaki süreç sezon başına kadar va...

**LOW**

Page 1

**The text discusses the auditing of the Turizm Tanıtım ve Geliştirme Ajansı's 2024 financial reports according to existing law (7183) and Turkish Financial Reporting Standards, highlighting a need for compliance related to financial transparency which could eventually impact construction firms par...**

**ACTIONABLE INSIGHT**

Monitor developments regarding the auditing process and ensure financial reporting compliance if your company has any involvement with the Tourism Promotion and Development Agency or related projects, especially related to urban development/construction for tourism.

Source Evidence:

...Kanun'un 7'nci maddesine göre  
hazırlanan ve Başkanlığına sunulan, bakanlık tarafından Komisyonumuza havale edilen Turizm Tanıtım ve Geliştirme Ajansı 2024 yılına ait Sayıştay Raporu bulunmaktadır, ...

# Sector: CRYPTO

9 risk(s) identified

HIGH

Page 31

**Article 22 introduces a new article (128/A) to the Criminal Procedure Code (Ceza Muhakemesi Kanunu) allowing for the suspension of accounts used in specified crimes, including those involving crypto asset service providers.**

#### ACTIONABLE INSIGHT

Crypto asset service providers need to immediately prepare to comply with the new account suspension requirements, including establishing internal procedures for identifying and suspending accounts involved in suspected criminal activity and reporting to the Chief Public Prosecutor's Office.

Source Evidence:

...reddedilmiştir.  
21'inci maddeyi oylarınıza sunuyorum: Kabul edenler... Kabul etmeyenler... 21'inci madde kabul edilmiştir.  
Evet, 22'nci maddeyi okutuyorum:  
MADDE 22- 4/12/2004 tarihli ve 5271 sayılı...

MEDIUM

Page 32

**Crypto asset service providers face administrative fines of 50,000 to 300,000 TL for failing to provide requested information to prosecutors, judges, or courts within ten days.**

#### ACTIONABLE INSIGHT

Review internal processes for responding to legal requests to ensure timely and complete information delivery to avoid potential fines and monitor further developments.

Source Evidence:

...gerçek ve tüzel kişiler, hukuki bakımdan sorumlu tutulmaz.  
(7) Yürüttülen bir soruşturma veya kovuşturma kapsamında Cumhuriyet savcısı, hâkim veya mahkeme tarafından banka, ödeme hizmeti sağlayıcısı...

**MEDIUM**

Page 33

**The text suggests a legislative proposal that would grant banks the power to freeze or suspend accounts suspected of illicit activity without prior judicial or prosecutorial oversight, raising concerns about the transfer of judicial authority to private entities.**

**ACTIONABLE INSIGHT**

Monitor developments regarding the proposed amendment granting banks powers to freeze accounts, and assess potential impacts on crypto-related transactions and banking relationships; prepare legal objection if necessary.

Source Evidence:

...dün itibarıyla buna ilişkin uzun bir hazırlığımız vardı ama dün TCK 158 üzerinden yaptığımız tartışma sonrasında bu maddenin de sanırım 158'den kaynaklı o mağduriyetlerin önüne geçmek için yapılan ...

**MEDIUM**

Page 35

**The text expresses concerns about a proposed regulation granting broad asset seizure powers to administrative actors without sufficient judicial oversight, raising risks of arbitrary action and rights violations, potentially impacting crypto asset ownership.**

**ACTIONABLE INSIGHT**

Monitor developments regarding asset seizure regulations and prepare legal objections if the final legislation lacks adequate judicial safeguards and proportionality measures to protect property rights in the crypto sector.

Source Evidence:

...sağlanabilmektedir. Bu yapısal eksiklikler giderilmeden mal varlığına müdahale yetkisinin idari aktörlerle geniş biçimde devredilmesi koruyucu etki yaratmak yerine hak ihlali riskini artırmaktadır.  
...

**MEDIUM**

Page 36

**Discussion regarding regulating crypto assets related to bank accounts and communication lines to address identified shortcomings in existing regulations.**

**ACTIONABLE INSIGHT**

Monitor developments regarding bank account and communication line regulations in the crypto sector to prepare for potential compliance requirements.

Source Evidence:

**MEDIUM**

Page 38

**The text discusses a new regulation and subsequent regulations related to banks' responsibilities regarding suspicious cryptocurrency transactions, including the authority to suspend such transactions, posing a compliance risk for crypto companies.**

**ACTIONABLE INSIGHT**

Monitor developments regarding the new regulation and subsequent regulations, and prepare for potential changes in compliance requirements related to suspicious transaction reporting and bank interactions.

Source Evidence:

...işlemleri fakat harekete geçmiyorlar.

TURAN TAŞKIN ÖZER (İstanbul) – E, o zaman yani kusura bakmasınlar Başkanım...

ADALET BAKAN YARDIMCISI NİYAZİ ACAR – Şimdi bu düzenlemeden sonra çünkü tek basın...

**MEDIUM**

Page 41

**The discussion focuses on the potential legal liability of banks or crypto asset institutions for potentially arbitrary actions, suggesting a legislative interest in clarifying or establishing liability standards.**

**ACTIONABLE INSIGHT**

Monitor developments regarding the legal liability of crypto asset institutions for arbitrary actions and prepare to adapt compliance procedures based on any new regulations.

Source Evidence:

...oluştuktan sonraki tedbirler kısmında bankaların hesaba ilişkin herhangi bir yetkisi bulunmamaktadır.

TURAN TAŞKIN ÖZER (İstanbul) – Sayın temsilci, biz burada onu konuşmuyoruz. Biz burada bankanın...

**MEDIUM**

Page 42

**The discussion acknowledges that crypto assets are within the scope of regulations being considered, suggesting potential future regulatory impact.**

**ACTIONABLE INSIGHT**

Monitor developments related to BDDK regulations concerning crypto assets and their relationship with banks.

Source Evidence:

...(İstanbul) - Hep kriptoyu konuşuyoruz ama, farkındasınız değil mi?  
BDDK TEMSİLCİSİ RABİA HACİEVLİYAGİL - Ben BDDK temsilcisi olduğum için bankalarımız özelinde söz aldım.  
TURAN TAŞKIN ÖZER (İstanbul)...

**LOW**

Page 39

**The excerpt suggests concern about the use of crypto to move funds out of the country, implying potential future regulations to control or limit this activity.**

**ACTIONABLE INSIGHT**

Monitor developments for potential future regulations targeting cross-border crypto transfers.

Source Evidence:

...ettiğim: Bu kadar altını nasıl taşıyor? Bakın, orada bahsettiğimiz bir tuşla yapılacak bir iş. Ya el bagajıyla taşmış ya da "duty free"den aldı. Nasıl götürmüş parayı?  
TURAN TAŞKIN ÖZER (İstanbul)...

# Sector: FINTECH

8 risk(s) identified

HIGH

Page 91

**A vote is being taken on Article 35 which imposes a 20,000 TL fine per mobile subscription for non-compliance with obligations related to electronic communication network connections, including potential tax implications and exemptions for closed/transferred lines under specific conditions; the e...**

## ACTIONABLE INSIGHT

Monitor developments on Article 35 closely, analyze the full text of the article to understand obligations and potential impact on mobile payment systems or other Fintech services relying on mobile subscriptions, and assess compliance strategies to avoid penalties.

Source Evidence:

...başına Kurum tarafından yirmi bin Türk Lirası idari para cezası verilir.

(7) Bu maddenin beşinci fıkrası hükümlerinin uygulanması nedeniyle mobil haberleşme hatlarının devri veya kapatılması halind...

MEDIUM

Page 32

**The excerpt discusses a proposed legislative change regarding the temporary suspension of bank accounts by banks and the role of prosecutors in reviewing these suspensions, raising concerns about potential overreach of prosecutorial powers and the lack of judicial oversight in the initial suspens...**

## ACTIONABLE INSIGHT

Monitor developments in the legislative process, specifically focusing on the final wording regarding the prosecutor's role in account suspensions and the criteria for judicial review, and prepare to assess potential impacts on internal compliance procedures if the proposed changes are enacted.

Source Evidence:

...kişinin üç gün boyunca hesaplarının

askiya alınmasına imkân sağlanmaktadır. Denetimin savcuya bırakılması, soruşturma görevini yürüten savcuya orantısız bir yetki tanınması anlamına gelmektedir. Oy...

**MEDIUM**

Page 33

**The text describes a legislative arrangement where banks could potentially perform actions (like freezing accounts) that resemble judicial powers without prior court or prosecutor involvement, potentially impacting fintech companies that rely on or compete with banks.**

**ACTIONABLE INSIGHT**

Monitor developments regarding the proposed legislation related to TCK 158 and bank powers; assess potential impacts on business models and compliance; prepare for potential lobbying or legal objection if the legislation progresses in a concerning manner.

Source Evidence:

...dün itibarıyla buna ilişkin uzun bir hazırlığımız vardı ama dün TCK 158 üzerinden yaptığımiz tartışma sonrasında bu maddenin de sanırım 158'den kaynaklı o mağduriyetlerin önüne geçmek için yapılan ...

**MEDIUM**

Page 36

**Discussion of regulatory adjustments related to bank accounts concerning specific crime types, potentially impacting fintech companies dealing with fund transfers or digital payments.**

**ACTIONABLE INSIGHT**

Monitor developments and engage with relevant industry associations to understand potential impact on compliance procedures regarding bank account usage and reporting.

Source Evidence:

...yetkili?  
ADALET BAKAN YARDIMCISI NİYAZİ ACAR – Bakan, burada Hazine ve Maliye Bakanına gidiyor bu ibare, hatta sonra 2020'de yapılan düzenlemeyle bu yetkisini bakan yardımcısına devredemeye iliş...

**MEDIUM**

Page 39

**The parliament is discussing a potential regulation to address situations where transaction delays, possibly flagged as suspicious, cause legal deadlines to be missed, indicating a need to reassess transaction monitoring processes.**

**ACTIONABLE INSIGHT**

Monitor developments and prepare to potentially adjust transaction monitoring systems to avoid inadvertently blocking time-sensitive payments related to legal deadlines; assess the impact on existing compliance programs.



MEDIUM

Page 41

**The text discusses the limitations of banks' authority to intervene in fraudulent transactions after the crime has been committed, highlighting a potential regulatory gap that could lead to new regulations impacting Fintech companies regarding fraud prevention and victim compensation.**

**ACTIONABLE INSIGHT**

Monitor developments regarding potential legislative proposals aimed at increasing bank or Fintech accountability after fraudulent transactions occur, and assess potential compliance costs associated with enhanced fraud prevention measures and victim compensation mechanisms.

Source Evidence:

...da önlememiz lazımlı yani bu vatandaş da mağdur etmemek lazımdır. Ona göre bir şey yapın.

SÜLEYMAN BÜLBÜL (Aydın) - Aynı Sayın Bakan gibi düşünüyoruz.

BAŞKAN CÜNEYT YÜKSEL - Evet, Sayın Şahin, buyurun...

MEDIUM

Page 42

**The lack of a legal basis to prevent fund outflows, even with reasonable suspicion of fraud, poses a regulatory risk as it highlights a potential gap in current legislation, and the discussion suggests potential future legislative action.**

**ACTIONABLE INSIGHT**

Monitor developments in TBMM related to amendments to the Banking Law or other regulations concerning the prevention of fraud and fund outflows; assess the potential impact of any such amendments on internal fraud prevention procedures.

Source Evidence:

...tespit

etmesine rağmen mevduat sahiplerini dolandırıldığına ikna edemediği vakaları sıkılıkla görüyoruz.

NURETTİN ALAN (İstanbul) - Bir kere bile ikna edemiyor ya.

BAŞKAN CÜNEYT YÜKSEL - Evet, devam...

**LOW**

Page 40

**The TBMM commission meeting transcript indicates an inquiry from the commission head to BDDK regarding the use of AI in banking operations, suggesting potential future scrutiny and possible regulations on AI usage in the financial sector.**

**ACTIONABLE INSIGHT**

Monitor developments related to AI regulation in the Turkish banking sector and prepare to assess the potential impact on Fintech operations.

Source Evidence:

BAŞKAN CÜNEYT YÜKSEL - BDDK'den yani bu bankaların mesela Sayın Vekilin söylediği gibi yapay zekâyla... Bu işlemler yapay zekâyla mı oluyor şu anda? Mevcut bankaların kapasitesi ya da altyapısı bu işl...



