

Turkey

Jurisdiction: Turkey

2015 IMN Survey of National Progress in the Implementation of

G20/FSB Recommendations

- I. <u>Hedge funds</u>
- II. <u>Securitisation</u>
- III. <u>Enhancing supervision</u>
- IV. Building and implementing macroprudential frameworks and tools
- V. Improving oversight of credit rating agencies (CRAs)
- VI. Enhancing and aligning accounting standards
- VII. <u>Enhancing risk management</u>
- VIII. <u>Strengthening deposit insurance</u>
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- X. Enhancing financial consumer protection
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No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
I.	Hedge funds				
		G20/FSB Recommendations We also firmly recommitted to work in an internationally consistent and non- discriminatory manner to strengthen regulation and supervision on hedge funds. (Seoul) Hedge funds or their managers will be registered and will be required to disclose appropriate information on an ongoing basis to supervisors or regulators, including on their leverage, necessary for assessment of the systemic risks they pose individually or collectively. Where appropriate registration should be subject to a	 Jurisdictions should indicate the progress made in implementing the high level principles contained in IOSCO's <u>Report</u> <u>on Hedge Fund Oversight (Jun 2009)</u>. In particular, jurisdictions should specify whether: Hedge Funds (HFs) and/or HF managers are subject to mandatory registration Registered HF managers are subject to appropriate ongoing requirements regarding: Organisational and operational standards; 	 Not applicable Applicable but no action envisaged at the moment Implementation ongoing: Status of progress : Draft in preparation, expected publication by: Draft published as of: Final rule or legislation approved and will come into force on: Final rule (for part of the reform) in force since : Implementation completed as of: 01.07.2014 	Next steps If this recommendation has not yet been fully implemented, please provide reasons for delayed implementation: Planned actions (if any) and expected commencement date: Web-links to relevant documents:
		minimum size. They will be subject to oversight to ensure that they have adequate risk management. (London)	 Conflicts of interest and other conduct of business rules; Disclosure to investors; and Prudential regulation. 	 Primary / Secondary legislation Regulation /Guidelines Other actions (such as supervisory actions), please specify: Short description of the content of the legislation/ regulation/guideline: Capital Market Board (CMB) : Currently hedge funds have to meet organizational, operational, personnel standards. According to communique that came into force on 01.07.2014, hedge funds have to register with CMB and only portfolio management companies are allowed to 	



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				become a founder of all types of funds	
				including hedge funds while in the	
				previous communique, the revoked	
				Serial:VII, No:10, Communique on the	
				Principles Regarding Mutual Funds, only	
				banks and intermediary institutions were	
				allowed to establish a fund. Hedge funds	
				are also subject to portfolio restrictions	
				as well as additional checks and balances	
				requirements over risk management	
				systems in place. They have to report to	
				CMB and their investors periodically. On	
				top of that, there is also minimum public	
				disclosure requirements determined	
				under the context of "Informational Form	
				for Investors", which has to be easily	
				accessible online through fund founder's	
				website. Moreover, they have to make	
				announcements for any change regarding	
				material issues in Public Disclosure	
				Platform, which is easily accessible web	
				site open to any investor without any	
				charge. In other words, the Communique	
				on the Principles Regarding Investment	
				Funds is designed to not only to keep	
				practices specified in the revoked	
				Serial:VII, No:10 but also to expand	
				existing oversight over hedge fund	
				activities. To further ensure the safety of	
				funds' assets, new communique	



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				introduces requirement of segregation of	
				funds' assets from portfolio management	
				companies. To do so, portfolio	
				management companies have to entrust	
				assets in fund's portfolio to the portfolio	
				depository institution as a custodian	
				licensed by CMB. Also, all portfolio	
				management companies have to prepare	
				a "Conflict of Interest Policy Document"	
				which defines sources of conflicts of	
				interest and measures to solve those	
				conflicts.	
				Highlight main developments since last year's survey:	
				CMB: One-year transition period has	
				ended on 01.07.2015 and sponsorship of	
				existing hedge funds has been transferred	
				to portfolio management companies from	
				banks and brokerage houses.	
				Web-links to relevant documents:	
				http://www.cmb.gov.tr/apps/teblig/displa	
				yteblig.aspx?id=498&ct=f&action=displ	
				ayfile	
				Additional questions:	
				1. Please indicate whether Hedge Funds (HFs) are domiciled locally and, if available, the size of the industry in terms of Assets under Management and number of HFs.	
				Around 39 hedge funds domiciled locally	



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				are operating in Turkey with around	
				\$375 million net asset value.	
				2. Please specify the main criteria and numerical thresholds (if applicable) for subjecting HFs and/or HF managers to mandatory registration.	
				All hedge funds are subject to	
				registration with CMB regardless of their	
				size	
				3. Please specify whether registered HF managers are subject to ongoing requirements regarding organisational and operational standards; conflicts of interest and other conduct of business rules; disclosure to investors; and prudential regulation. If any of these requirements are not applicable, please explain.	
				Currently hedge funds have to meet	
				organizational, operational, personnel	
				standards. According to communique	
				that came into force on 01.07.2014, hedge funds have to register with CMB	
				and only portfolio management	
				companies are allowed to become a	
				founder of all types of funds including	
				hedge funds. They have to report to	
				CMB and their investors periodically.	
				4. Please describe the main challenges (where relevant) and any lessons learned in implementing this	



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				reform. Since relatively small number of hedge	
				funds are operating in Turkey, it has been easy to implement reforms	
				5. Are you monitoring the effects of this reform in your jurisdiction? If yes, please share the main findings and any related policy initiatives in response to those findings.	
				As reforms are at quite nascent stage, we have yet to see results of developments.	



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2 (3)	Establishment of international information sharing	We ask the FSB to develop mechanisms for cooperation and information sharing between relevant authorities in order to	Jurisdictions should indicate the progress made in implementing the high level principles in IOSCO's <u>Report on Hedge</u>	 Not applicable Applicable but no action envisaged at the moment 	If this recommendation has not yet been fully implemented, please provide reasons for delayed implementation:
	information sharing framework	between relevant authorities in order to ensure effective oversight is maintained when a fund is located in a different jurisdiction from the manager. We will, cooperating through the FSB, develop measures that implement these principles by the end of 2009. (London)	 principles in IOSCO's <u>Report on Hedge</u> <u>Fund Oversight (Jun 2009)</u> on sharing information to facilitate the oversight of globally active fund managers. In addition, jurisdictions should state whether they are: Signatory to the IOSCO MMoU Signatory to bilateral agreements for supervisory cooperation that cover hedge funds and are aligned to the 2010 IOSCO <u>Principles Regarding</u> <u>Cross-border Supervisory</u> <u>Cooperation.</u> 		reasons for delayed implementation: Planned actions (if any) and expected commencement date: Web-links to relevant documents:



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				CMB has announced MOUs with	
				authorities of 13 European Union	
				countries (Czech Republic, Denmark,	
				Greece, Hungary, Italy, Lithuania,	
				Latvia, Luxembourg, Malta, Romania,	
				Sweden, Netherlands , United Kingdom)	
				as well as Iceland, Norway and	
				Liechtenstein about information sharing	
				on oversight of structured investment	
				funds on 29.08.2013	
				Highlight main developments since last year's survey:	
				Developments mentioned above are still	
				in effect.	
				Web-links to relevant documents:	



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3 (4)	Enhancing counterparty risk management	Supervisors should require that institutions which have hedge funds as their counterparties have effective risk management, including mechanisms to monitor the funds' leverage and set limits for single counterparty exposures. (London) Supervisors will strengthen their existing guidance on the management of exposures to leveraged counterparties. (Rec. II.17, FSF 2008)	 Jurisdictions should indicate specific policy measures taken for enhancing counterparty risk management and strengthening their existing guidance on the management of exposure to leveraged counterparties. In particular, jurisdictions should indicate whether they have implemented principle 2.iii of IOSCO <i>Report on Hedge Fund Oversight (Jun 2009)</i>. Jurisdictions should also indicate the steps they are taking to implement the new standards on equity exposures (<i>Capital requirements for banks' equity investments in funds, Dec 2013)</i> by 1 January 2017. For further reference, see also the following documents : BCBS <i>Sound Practices for Banks' Interactions with Highly Leveraged Institutions (Jan 1999)</i> BCBS <i>Banks' Interactions with Highly Leveraged Institutions (Jan 1999)</i> 	 □ Not applicable □ Applicable but no action envisaged at the moment ☑ Implementation ongoing: Status of progress: ☑ Draft in preparation, expected publication by: 01.08.2015 (BRSA : Updated draft secondary regulation on counterparty credit risk management) □ Draft published as of: □ Final rule or legislation approved and will come into force on: ☑ Final rule (for part of the reform) in force since : 11.09.2014 (BRSA: Risk Management Guideline); 20.06.2014 CMB □ Implementation completed as of: Issue is being addressed through : ☑ Primary / Secondary legislation ☑ Regulation /Guidelines □ Other actions (such as supervisory actions), please specify: Short description of the content of the legislation/regulation/guideline: Banking, Regulation and Supervision Agency (BRSA): BRSA has published guideline on counterparty credit risk management on 11.09.2014. The guideline clearly states the responsibilities of Board of Directors, 	Planned actions (if any) and expected commencement date: The BRSA prepared a secondary regulation on counterparty credit risk management which is in line with CRD IV. This regulation was opened for public consultation in 2014 Q3. However, due to the results of EU RCAP Assessment, the BRSA has decided to update the draft. This new draft is expected to be opened for public consultation in 2015 Q3. Web-links to relevant documents:



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				senior management, the minimum	
				requirements for effective risk	
				management practices and tools, and etc.	
				There is also particular emphasis on	
				additional risk management principles	
				for complicated financial products and	
				highly leveraged institutions. The	
				BRSA prepared an updated draft	
				secondary regulation on counterparty	
				credit risk management which is in line	
				with Basel III. The draft is expected to go	
				for public consultation on 01.08.2015.	
				CMB: Guideline for investment funds	
				which includes hedge funds goes in	
				detail regarding how to calculate	
				counterparty risk, market risk methods	
				such as VAR and risk systems and	
				required and suggested risk calculation	
				methods vary across different investment	
				fund types based on how much leverage	
				a fund is exposed. Furthermore, there are	
				some limits put on place regarding total	
				counterparty risk.	
				Highlight main developments since last year's survey:	
				BRSA: For the secondary legislation on	
				counterparty credit risk management,	
				BRSA had prepared a secondary	
				regulation on counterparty credit risk	



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				management which is in line with CRD	
				IV. This regulation was opened for	
				public consultation in 2014 Q3.	
				However, due to the results of EU RCAP	
				Assessment, the BRSA has decided to	
				update the draft. This new draft is	
				expected to be opened for public	
				consultation in 2015 Q3. CMB:	
				The transfer process of hedge funds to	
				portfolio management companies, thus	
				becoming fully compliant with the new	
				secondary legislation regarding portfolio	
				management companies, investment	
				funds and above mentioned guideline	
				ended on 01.07.2015	
				Web-links to relevant documents:	
				Guideline on counterparty credit risk management: http://www.bddk.org.tr/WebSitesi/turkce/ Mevzuat/Bankacilik Kanununa_Iliskin_ Duzenlemeler/13470karsi_taraf_kredi_ri skinin_yonetimine_iliskin_rehber.pdf	



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Ι	I. Securitisation				
4 (6)	Strengthening of regulatory and capital framework for monolines	Insurance supervisors should strengthen the regulatory and capital framework for monoline insurers in relation to structured credit. (Rec II.8, FSF 2008)	 Jurisdictions should indicate the policy measures taken for strengthening the regulatory and capital framework for monolines. See, for reference, the following principles issued by IAIS: ICP 13 – Reinsurance and Other Forms of Risk Transfer; ICP 15 – Investments; and ICP 17 - Capital Adequacy. Jurisdictions may also refer to: IAIS <u>Guidance paper on enterprise risk management for capital adequacy and solvency purposes (Oct 2008).</u> Joint Forum document on <u>Mortgage insurance: market structure, underwriting cycle and policy implications (Aug2013).</u> 	☑ Not applicable Treasury: There is no monoline insurer in Turkey. □ Applicable but no action envisaged at the moment □ Implementation ongoing: Status of progress: □ Draft in preparation, expected publication by: □ Draft published as of: □ Final rule or legislation approved and will come into force on: □ Final rule (for part of the reform) in force since : □ Implementation completed as of: Issue is being addressed through : □ Primary / Secondary legislation □ Regulation /Guidelines □ Other actions (such as supervisory actions), please specify: Short description of the content of the legislation/regulation/guideline: Treasury: "Proportionality" is considered for small size insurers on some of the Insurance Supervision Manuals. However there is no specific capital requirements for monolines. Highlight main developments since last	Planned actions (if any) and expected commencement date: Web-links to relevant documents:



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Π	II. Securitisation						
				year's survey:			
				Web-links to relevant documents:			



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5 (7)	Strengthening of supervisory requirements or best practices for investment in structured products	Regulators of institutional investors should strengthen the requirements or best practices for firms' processes for investment in structured products. (Rec II.18, FSF 2008)	Jurisdictions should indicate the due diligence policies, procedures and practices applicable for investment managers when investing in structured finance instruments and other policy measures taken for strengthening best practices for investment in structured finance product.	 Not applicable CMB: Since we do not have subprime market, investment managers due diligence when investing in structured instruments traded in that markets is not regulated. Applicable but no action envisaged at the moment 	If this recommendation has not yet been fully implemented, please provide reasons for delayed implementation: Planned actions (if any) and expected commencement date: Web-links to relevant documents:
			Jurisdictions may reference IOSCO's	□ Implementation ongoing:	
			report on <u>Good Practices in Relation to</u> <u>Investment Managers' Due Diligence</u> <u>When Investing in Structured Finance</u> <u>Instruments (Jul 2009).</u> Jurisdictions may also refer to the Joint Forum report on <u>Credit Risk Transfer-</u> <u>Developments from 2005-2007 (Jul</u> <u>2008).</u>	 Status of progress: Draft in preparation, expected publication by: Draft published as of: Final rule or legislation approved and will come into force on: Final rule (for part of the reform) in force since : Implementation completed as of: Issue is being addressed through : 	
				 Primary / Secondary legislation Regulation /Guidelines Other actions (such as supervisory actions), please specify: Short description of the content of the legislation/ regulation/guideline: CMB: Since we do not have subprime market, investment managers due diligence when investing in structured instruments traded in that markets is not 	



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				regulated.	
				Highlight main developments since last year's survey:	
				Web-links to relevant documents:	



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6 (8)	Enhanced disclosure of securitised products	Securities market regulators should work with market participants to expand information on securitised products and	Jurisdictions should indicate the policy measures taken for enhancing disclosure of securitised products.	 Not applicable Applicable but no action envisaged at the moment 	If this recommendation has not yet been fully implemented, please provide reasons for delayed implementation:
		Information on securitised products and their underlying assets. (Rec. III.10- III.13, FSF 2008)	of securitised products. See, for reference, IOSCO's <u>Report on</u> <u>Principles for Ongoing Disclosure for</u> <u>Asset-Backed Securities (Nov 2012)</u> and IOSCO's <u>Disclosure Principles for</u> <u>Public Offerings and Listings of Asset-</u> <u>Backed Securities (Apr 2010)</u> .	 at the moment ☑ Implementation ongoing: Status of progress: ☑ Draft in preparation, expected publication by: End of 2016 □ Draft published as of: □ Final rule or legislation approved and will come into force on: ☑ Final rule (for part of the reform) in force since : 09.01.2014 □ Implementation completed as of: Issue is being addressed through : □ Primary / Secondary legislation □ Regulation /Guidelines □ Other actions (such as supervisory actions), please specify: Short description of the content of the legislation/ regulation/guideline: CMB: In order to ensure the investors are informed, fundamentals relating to disclosure of securitised products are determined specifically by Communique on Asset-Backed and Mortgage-Backed Securities (III-58.1) which was put into effect on 9.1.2014. This communique enforces material disclosures such as announcement of periodic reports, credit 	 CMB: As there has been no ABS public offering in Turkey up to now, objective and qualitative information could not be obtained from the market participants in order to complete ABS prospectus standard. Planned actions (if any) and expected commencement date: CMB: Detailed information about the parties involved in the ABS issuance or ABS itself for public offerings will be featured in the prospectus standard of ABS. CMB plans to issue ABS prospectus standard compatible with international standards/guidelines by the end of 2016 Web-links to relevant documents:



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				ratings for ABS, updated information	
				about the parties involved in the issuance	
				or changes regarding the fund (SPV)	
				statute or management/audit of the fund,	
				irrespective of the issuance type (public	
				offering or sale to qualified investors).	
				Highlight main developments since last year's survey:	
				Capital Markets Board of Turkey	
				declared that they plan to issue ABS	
				prospectus standard compatible with	
				international standards/guidelines by the	
				end of 2016. With this new regulation,	
				detailed information about the parties	
				involved in the ABS issuance or ABS	
				itself for public offerings will be featured	
				in the prospectus standard of ABS.	
				Web-links to relevant documents:	
				Capital Markets Board of Turkey: http://www.cmb.gov.tr/apps/teblig/displa yteblig.aspx?id=494&ct=f&action=displa yfile	



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III.	Enhancing supervision	1			
7 (9)	Consistent, consolidated supervision and regulation of SIFIs	All firms whose failure could pose a risk to financial stability must be subject to consistent, consolidated supervision and regulation with high standards. (Pittsburgh)	Jurisdictions should indicate: (1) whether they have identified domestic SIFIs and, if so, in which sectors; (2) whether the names of the identified SIFIs have been publicly disclosed; and (3) the types of policy measures taken for implementing consistent, consolidated supervision and regulation of the identified SIFIs. See, for reference, the following documents: BCBS: • <u>Framework for G-SIBs (Jul 2013)</u> • <u>Framework for D-SIBs (Oct 2012)</u> • <u>BCP 12 (Sep 2012)</u> IAIS: • <u>Global Systemically Important Insurers: Policy Measures (Jul 2013)</u> • <u>ICP 23- Group wide supervision</u> FSB: • <u>Framework for addressing SIFIs (Nov 2011)</u>	 □ Not applicable □ Applicable but no action envisaged at the moment ☑ Implementation ongoing: Status of progress: ☑ Draft in preparation, expected publication by: 01.08.2015 □ Draft published as of: □ Final rule or legislation approved and will come into force on: □ Final rule (for part of the reform) in force since : □ Implementation completed as of: Issue is being addressed through : ☑ Primary / Secondary legislation □ Regulation /Guidelines □ Other actions (such as supervisory actions), please specify: Short description of the content of the legislation/ regulation/guideline: BRSA: A draft secondary regulation has been prepared regarding the identification and additional capital requirements for D-SIBs in line with BCBS Framework. The D-SIBs will be identified and disclosed in 2015. On the other hand, according to Regulation on Audits that will be conducted by the BRSA, banks are 	 Planned actions (if any) and expected commencement date: The higher capital requirements will be implemented in line with BCBS timeline starting from 01.01.2016. Web-links to relevant documents:



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				already subject to enhanced/intensified	
				supervision according to their size,	
				complexity and risk profile. CMB: FSB	
				and IOSCO has published for second	
				public consultation Assessment	
				Methodologies for Identifying NBNI G-	
				SIFIs where Turkey does not have any	
				NBNI G-SIFI. The financial system in	
				Turkey is dominated by banks and	
				regarding these, CMB has no action on	
				regulation and supervision of NBNI G-	
				SIFI's.	
				Undersecretariat of Treasury (Treasury):	
				There is no GSII in Turkey. However, we	
				are conducting consolidated supervisions	
				in coordinated with BRSA for some	
				insurers.	
				Highlight main developments since last year's survey:	
				Web-links to relevant documents:	



8 Establishing supervisory colleges of colleges for significant cross-border firms assessments Reporting in this area should be undertaken solely by home jurisdictions of G-SIBs and SCBIs. Ø Not applicable If this recommendation has not yet BRSA: Turkey does not have any GSIFIs. 8 Ke agreed to conduct rigorous risk assessments We agreed to conduct rigorous risk assessment on these firms [G-SIFIs] through international supervisory colleges. (Seoul) BCBS: BCBS: Planet actions (if any) and expected publication hy: 9 Draft in preparation, expected publication hy: Draft in preparation, expected publication hy: We-links to relevant documents: 9 Principle 13 of the BCBS: Draft publication approved and will come into force on: colleges (lan 2011) We-links to relevant documents: 1 Principle 13 of the BCBS Core Principles for Efficience Banking Supervision (Seg 2012) Draft published as of: Principles for Efficience Banking Supervision (Seg 2012) Implementation completed as of: Principles for Efficience Banking Supervision (Seg 2012) Implementation completed as of: Principles for Efficience Banking Supervision (Seg 2012) Implementation completed as of: Principles for Efficience Banking Supervision (Seg 2012) Implementation completed as of: Principles for efficience supervisiony colleges (lan 2014) Implementation completed as of: Principles for efficience supervisiony colleges (lan 2014) Implementation completed as of: Principles for efficience supervisiony colleges (lan 2014) Implementation completed as o
1. Please indicate whether supervisory colleges for all G-SIBs/G-



No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
				2. Please indicate the structure of the supervisory colleges for G-SIBs/G- SIIs in your jurisdiction (core, universal, other) and the reasons why it may differ across firms.	
				3. Please indicate the frequency of meetings over the past year of the supervisory colleges (core, universal, other) for G-SIBs/G-SIIs in your jurisdiction.	
				4. Please describe the main objectives of supervisory colleges for G-SIBs/G-SIIs in your jurisdiction and the types of issues that have been discussed over the past year. (e.g. specific area(s) of risk, coordinated risk assessments, joint supervisory work, coordinated supervisory plans). In your response, please indicate briefly some of the main challenges in conducting joint risk assessments and steps taken to address them.	
				5. Please describe the main challenges in the functioning of supervisory colleges for G-SIBs/G-SIIs in your jurisdiction and any plans to enhance the effectiveness of colleges.	



No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
9 (11)	Supervisory exchange of information and	To quicken supervisory responsiveness to developments that have a common effect	Jurisdictions should include any feedback received from recent FSAPs/ROSC	 Not applicable Applicable but no action envisaged 	Planned actions (if any) and expected commencement date:
	coordination	across a number of institutions, supervisory exchange of information and coordination in the development of best practice benchmarks should be improved at both national and international levels. (Rec V.7, FSF 2008)	assessments on the <u>September 2012</u> BCP 3 (Cooperation and collaboration) and BCP 14 (Home-host relationships). Jurisdictions should also indicate any steps taken since the last assessment in this area, particularly in response to relevant FSAP/ROSC recommendations.	 at the moment Implementation ongoing: Status of progress: Draft in preparation, expected publication by: Draft published as of: 	Web-links to relevant documents:
		Enhance the effectiveness of core	Jurisdictions should describe any recent	 Final rule or legislation approved and will come into force on: Final rule (for part of the reform) in force since : Implementation completed as of: 25.02.2011 (BRSA) 	
		supervisory colleges. (FSB 2012)	or planned regulatory, supervisory or legislative changes that contribute to the sharing of supervisory information (e.g. within supervisory colleges or via bilateral or multilateral MoUs).	 Issue is being addressed through : ☑ Primary / Secondary legislation □ Regulation /Guidelines ☑ Other actions (such as supervisory actions), please specify: 	
				MoUs and IOSCO MMoU CMB: To enhance supervisory exchange of information and coordination, the CMB has been signing MoUs both at the level of international organizations and for the purpose of developing bilateral cooperation opportunities and carrying	
				out cross border supervision and enforcement activities effectively. The CMB is one of the first countries to sign	



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				 the IOSCO Multilateral MoU which has currently 95 signatories today. Additionally, starting from the 1990s, the CMB has signed 32 bilateral MoUs with the regulatory and supervisory authorities of 32 jurisdictions. 	
				Short description of the content of the legislation/ regulation/guideline:	
				BRSA: An amendment in the Banking Law Nr. 5411 concerning the professional secrecy issue is enacted as of 25.02.2011. In this context, the conflict between Turkish legislation and EU Directives has been eliminated through this amendment. This change in the Law enabled BRSA to enter into Memorandum of Understanding with EU Supervisory Authorities which enhanced the cooperation. BRSA has signed bilateral MoUs with the regulatory and supervisory authorities of 34 jurisdictions. (as of June 2015)	
				Treasury: Insurance Law Article No. 29 on information sharing and cooperation among international institutions.	
				Regulation about supervisory exchange of information and coordination akin to ICP 5 and ICP 17. Monitoring and Supervision Regulation (amendment date: R.G. 27.07.2013 – 28720) Article 32 of	



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				this Regulation deals with information	
				sharing and collaboration. It enables the	
				UoT to cooperate with national and	
				international monitoring and supervising	
				authorities, to be a party to agreements on	
				information sharing and joint supervision,	
				and to exchange information within the	
				legal framework of the Insurance	
				Regulation. The UoT is a signatory of	
				IAIS Multilateral Memorandum of	
				Understanding (IAIS MMoU) as of 28th	
				March 2013.	
				Highlight main developments since last year's survey:	
				Web-links to relevant documents:	



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10	Strengthening resources	We agreed that supervisors should have	No information on this recommendation		
(12)	and effective	strong and unambiguous mandates,	will be collected in the current IMN		
(1-)	supervision	sufficient independence to act,	survey due to the recent publication of the		
		appropriate resources, and a full suite of	FSB thematic peer review report on		
		tools and powers to proactively identify	supervisory frameworks and approaches		
		and address risks, including regular stress	to SIBs.		
		testing and early intervention. (Seoul)			
		Supervisors should see that they have the			
		requisite resources and expertise to			
		oversee the risks associated with financial			
		innovation and to ensure that firms they			
		supervise have the capacity to understand			
		and manage the risks. (FSF 2008)			
		Supervisory authorities should			
		continually re-assess their resource needs;			
		for example, interacting with and			
		assessing Boards require particular skills,			
		experience and adequate level of			
		seniority. (Rec. 3, FSB 2012)			



No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
IV.	Building and implemen	nting macroprudential frameworks and	d tools	-	-
IV. 11 (13)	Building and implement Establishing regulatory framework for macro- prudential oversight	Amend our regulatory systems to ensure authorities are able to identify and take account of macro-prudential risks across the financial system including in the case of regulated banks, shadow banks ¹ and private pools of capital to limit the build up of systemic risk. (London) Ensure that national regulators possess the powers for gathering relevant	Please describe major changes in the institutional arrangements for macroprudential policy (structures, mandates, powers, reporting etc.) that have taken place since the financial crisis, including over the past year. Please indicate whether an assessment has been conducted with respect to the	 Not applicable Applicable but no action envisaged at the moment Implementation ongoing: <i>Status of progress :</i> Draft in preparation, expected publication by: Draft published as of: Final rule or legislation approved and will come into force on: 	Planned actions (if any) and expected commencement date: Web-links to relevant documents:
		information on all material financial institutions, markets and instruments in order to assess the potential for failure or severe stress to contribute to systemic risk. This will be done in close coordination at international level in order to achieve as much consistency as possible across jurisdictions. (London)	adequacy of powers to collect and share relevant information among different authorities on financial institutions, markets and instruments to assess the potential for systemic risk. If so, please describe identified gaps in the powers to collect information, and whether any follow-up actions have been taken.	 □ Final rule (for part of the reform) in force since: ☑ Implementation completed as of: 08.06.2011 Issue is being addressed through : ☑ Primary / Secondary legislation □ Regulation /Guidelines □ Other actions (such as supervisory actions), please specify: Short description of the content of the legislation/ regulation/guideline: The Financial Stability Committee (FSC) was established in June 8, 2011 by the decree law no: 637 Financial Stability 	

¹ The recommendation as applicable to shadow banks will be retained until the monitoring framework for shadow banking, which is one of the designated priority areas under the CFIM, is established.



No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
				Committee is composed of the	
				Undersecretary of Treasury and the heads	
				of the Central Bank of Turkey, Banking	
				Regulation and Supervision Agency,	
				Capital Markets Board and Saving	
				Deposit Insurance Fund under the	
				chairmanship of Deputy Prime Minister	
				for economic and financial affairs. The	
				FSC monitors and identifies the systemic	
				risks and determines possible necessary	
				macroprudential measures to mitigate	
				them. Building on the individual	
				institutions' powers pertaining to their	
				specific areas, the decree law empowers	
				the Financial Stability Committee with	
				the mandate to gather the information	
				from all relevant parties, and to	
				coordinate and monitor the policy	
				implementations of them. Also, members	
				of the FSC have the power to reach all	
				available data from their respective	
				bodies. There are also MoUs and bilateral	
				subprotocols between several authorities	
				on information sharing. Current and	
				emerging data needs are shared within the	
				principles of these protocols.	
				Highlight main developments since last year's survey:	
				Web-links to relevant documents:	



No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
				Additional questions:	
				1. Please describe the institutional arrangements for financial stability and macroprudential policy in your jurisdiction, including whether a macroprudential authority has been explicitly identified and the respective roles and responsibilities of the central bank and other authorities.	
				No single authority is identified as responsible for macroprudential policy. Every institution contributes financial stability and macroprudential policy	
				based on their legal mandates. Turkish	
				financial system is governed mainly by five institutions. These institutions are	
				The Treasury, the Central Bank of the Bank	
				Republic of Turkey (CBRT), the BSRA, the CMB, and the Savings Deposit	
				Insurance Fund (SDIF). The role of the	
				Treasury is to assist in the determination	
				of economic policies, and within the	
				framework of these policies, to regulate,	
				implement, and determine principles for	
				monitoring and better implementation of	
				activities. The primary objective of the	
				CBRT is to achieve price stability. The	
				CBRT is also responsible for taking	
				measures to sustain the stability of the	
				financial system in Turkey. The BRSA	



No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
				regulates and supervises banks and	
				financial holding companies, financial	
				leasing companies, factoring companies,	
				consumer financing companies and asset	
				management companies. Main duties of	
				the CMB are to enhance investor	
				protection, adopt the norms of the	
				international capital markets and fully	
				integrate them into regulations, promote	
				and enhance the effectiveness of both the	
				supply and the demand side of the	
				markets, promote transparency and	
				fairness in the capital markets, facilitate	
				modernization of the market structure,	
				enhance the infrastructure of the capital	
				markets, enhance the quality of the work	
				products and staff members of the Board.	
				The SDIF, which is a public legal entity	
				and which has administrative and	
				financial autonomy has been established	
				to insure deposits in order to protect the	
				rights and interests of depositors.	
				2. If a macroprudential authority has been explicitly identified in your jurisdiction, please describe its legal basis, mandate, composition, powers (warnings, recommendations, prudential tools, powers of direction, other) and accountability arrangements. Who provides the resources and analytical support for the authority's activities?	



No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
				N/A3. Is there an inter-agency body on financial stability or macroprudential matters – distinct from the designated macroprudential authority – in your jurisdiction? If so, please describe its legal basis, mandate, composition, powers and accountability arrangements. Who provides the resources and analytical support for its activities?	
				The FSC assesses major threats and coordinates macroprudential policy measures and crisis management arrangements effectively. The FSC meets under the chairmanship of Deputy Prime Minister for Economic and Financial Affairs responsible for the Treasury and is composed of the Undersecretary of Treasury, the Governor of the CBRT, the Chairman of the BRSA, the Chairman of the CMB and the Chairman of the SDIF. Duties of the FSC are (1) to determine and monitor systemic risks that might spread to whole financial system and to identify necessary measures and policy	
				proposals in order to mitigate them. (2) to warn related institutions about systemic risks and to follow the relevant practices regarding policy proposals. (3) to evaluate systemic risk management plans prepared by the related institutions. (4) to	



No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
				coordinate the systemic risk management.	
				(5) to collect all the data and information	
				within the context of its duties, and to	
				coordinate policies and implementations	
				among the institutions. (6) to make	
				decisions related to other subjects within	
				the framework of this law. (7) The results	
				of the meetings and the decisions of the	
				Committee are presented to the Council	
				of Ministers by the Deputy Prime	
				Minister. (8) In cases where a negative	
				development that could spread over to the	
				entire financial system occurs and such	
				development is detected by the FSC, the	
				Council of Ministers shall be in charge to	
				determine the measures to be taken and	
				all the relevant institutions and agencies	
				are competent and responsible for	
				promptly implementation of measures	
				taken. The members of the FSC	
				themselves provide data, resources and	
				analytical support. If other stakeholders'	
				views and/or support is needed, the FSC	
				invites other stakeholders to the FSC	
				meetings accordingly. Ministry of	
				Development and Ministry of Finance are	
				such institutions invited several times to	
				provide additional support and to	
				contribute to works of the FSC.	
				4. Please describe the extent to	



No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
				which the macroprudential authority (or other relevant body) is able to collect information on material financial institutions, markets and instruments in order to assess potential systemic risks. In your response, please indicate whether the authorities involved in systemic risk monitoring have specific legal powers to collect information from financial institutions (whether regulated or not) for financial stability purposes, and whether there exist dedicated information gateways (e.g. Memorandum of Understanding) to share such information among relevant authorities.	
				In Turkey, the data of the financial institutions is collected by the regulatory and supervisory bodies of the related sector. Regulatory bodies and the CBRT collect a very detailed set of data for the financial system in Turkey. The	
				regulatory authorities are authorized to directly request and collect, all statistical information relating to the financial	
				system and other statistical information that shall be deemed necessary for the	
				surveillance of developments in the economy and the balance of payments,	
				from banks, other financial institutions and persons. There are protocols between	
				the BRSA and CBRT, SDIF, the Treasury	
				and CMB that enable the data sharing between those institutions. Current and	



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 Next steps

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No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
12 (14)	Enhancing system-wide monitoring and the use	Authorities should use quantitative indicators and/or constraints on leverage	Please describe at a high level (including by making reference to financial stability	 Not applicable Applicable but no action envisaged 	Planned actions (if any) and expected commencement date:
	of macro-prudential instruments	and margins as macro-prudential tools for supervisory purposes. Authorities should use quantitative indicators of leverage as guides for policy, both at the institution- specific and at the macro-prudential (system-wide) level(Rec. 3.1, FSF 2009)	or other reports, where available) the types of methodologies, indicators and tools used to assess systemic risks. Please indicate the use of macroprudential tools in the past year, including the objective for their use and the process used to select, calibrate, and	 at the moment Implementation ongoing: Status of progress : Draft in preparation, expected publication by: Draft published as of: Final rule or legislation approved and will come into force on: 	A conceptual framework in the form of heat map is being developed by the subgroup of the FSC to assist the systemic risk assessment and to analyze possible consequences of risks to financial stability. The heat map is built on four channels; financial markets, financial institutions, financial
		We are developing macro-prudential policy frameworks and tools to limit the build-up of risks in the financial sector, building on the ongoing work of the FSB- BIS-IMF on this subject. (Cannes) Authorities should monitor substantial changes in asset prices and their implications for the macro economy and the financial system. (Washington)	 apply them. See, for reference, the following documents: CGFS report on <i>Operationalising the</i> selection and application of macroprudential instruments (Dec 2012) FSB-IMF-BIS progress report to the G20 on <u>Macroprudential policy tools</u> and frameworks (Oct 2011) IMF staff papers on <u>Macroprudential policy</u>, an organizing framework (<u>Mar 2011</u>), <u>Key Aspects of</u> 	 □ Final rule (for part of the reform) in force since: ☑ Implementation completed as of: Implementation of macro-prudential instruments is an ongoing process. Issue is being addressed through : ☑ Primary / Secondary legislation ☑ Regulation /Guidelines □ Other actions (such as supervisory actions), please specify: Short description of the content of the legislation/ regulation/guideline: The FSC was established in June 8, 2011. Since the end of 2010, variety of macro 	infrastructure, real economy. The data/indicator selection process for each main channel has yet to be completed by 2016. For 2015 and 2016, the CBRT is planning to enhance the technical framework of stress test models. In 2015, the CBRT started new project to improve stress testing modules by including new satellite models and risk modules in already used frameworks. In this respect, the CBRT is planning to increase collaboration with ECB and IMF. The CBRT has ongoing projects about early warning indicators and systemic risk.
			<u>Macroprudential policy (Jun 2013)</u> , and <u>Staff Guidance on</u> <u>Macroprudential Policy (Dec 2014)</u>	prudential tools have been used by related authorities. The Treasury: Although insurance companies in Turkey neither is described as systemically important nor pose systemic risk in the financial sector, the Treasury established an Insurance	These projects are planned to be finalized by the end of 2016. Also, the CBRT works on a "Data Project" which has two phases: data stocktaking and data gap analysis. On the October 2014 the first phase of data project was completed. The



No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
				Early Warning System Model (SEUS)	second phase is under way, which takes
				measuring the financial strength of	systemic risks into account as well. The
				companies and the sector. In addition,	data gaps identified to include more
				insurance sector specific stress testing	frequent reporting of banking sector data;
				mechanism has been developing. There is	for example weekly reporting of the data
				also a catastrophic risk monitoring	that is currently reported monthly. When
				mechanism in place.	the data gap identification part of the
				Highlight main developments since last	project is finalized, related authorities
				year's survey:	will send new reporting templates to the
				Web-links to relevant documents:	financial institutions to start reporting.
				http://www.bddk.org.tr/WebSitesi/turkce/	
				Mevzuat/Bankacilik_Kanununa_Iliskin_	Web-links to relevant documents:
				Duzenlemeler/Bankacilik_Kanununa_Ilis	
				kin_Duzenlemeler.aspx	
				Additional questions:	
				1. Please describe, at a high level, the types of methodologies, indicators and reports used in your jurisdiction to identify, analyse, communicate and address systemic risks.	
				Systemic risk is monitored and analysed	
				by the authorities regularly in both	
				aggregate and granular level within the	
				scope of the duties and powers. The	
				FSC's role is to coordinate policy actions	
				and to better integrate micro and	
				macroprudential perspectives among	
				institutions. The CBRT regularly	
				monitors the developments in the global	
				and Turkish economy. The CBRT	



No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
				follows a "guided discretionary	
				approach" considering the systemic	
				threats to financial stability in a proactive	
				manner. CBRT's Financial Stability	
				Report and the BRSA's Annual Report	
				communicate macro prudential	
				instruments.	
				2. Please describe the range of policy tools (prudential and other) currently available to the authorities for macroprudential purposes. ²	
				Related authorities have been using various macro prudential tools.	
				• Loan-to-value (LTV) ceilings on residential mortgage loans, vehicle loans;	
				• High risk weights for consumer loans;	
				•Increased provisions for consumer loans; • Limits to credit card payments;	
				Liquidity requirements	
				• Measures on Extension of the Maturity	
				of Deposits (Withdrawal before maturity,	
				differentiation of withholding according	
				to maturity of deposits, differentiation of	
				Resource Utilization Support Fund	

² An indicative list of such tools can be found in "Macroprudential Policy Tools and Frameworks – Progress Report to the G20" by the FSB, IMF and BIS (October 2011, <u>http://www.financialstabilityboard.org/wp-content/uploads/r 111027b.pdf</u>); "Staff Guidance on Macroprudential Policy" (December 2014, <u>http://www.imf.org/external/np/pp/eng/2014/110614.pdf</u>) by IMF staff; and "Operationalising the selection and application of macroprudential instruments" (December 2012, <u>http://www.bis.org/publ/cgfs48.pdf</u>) by the CGFS.



No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
				(RUSF) based on Maturity)	
				• Differentiation on Deposit Insurance System Premiums (risk based premium system)	
				Reserve requirements	
				Leverage Based Reserve Requirements	
				• Equity financing regulations	
				3. Please indicate which tools have been deployed for macroprudential purposes over the past year, including the objective for their use and the process used to select, calibrate, and apply them.	
				Equity financing regulation: Corporations	
				are allowed to deduct 50% of paid in cash	
				equity financing costs to enhance	
				financing channels for corporates and	
				 prevent excessive leverage. 4. Please describe whether and, if so, how the relevant authorities assess the <i>ex ante</i> cost and benefits of macroprudential policies and their <i>ex post</i> effectiveness. 	
				The CBRT both uses top down and	
				bottom up approaches in terms of the	
				decision making process. Also, stress	
				tests implemented by the regulatory	
				authorities provide the necessary findings	
				for a sound policy need in the financial	
				system. Quantitative Impact Studies	



No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
				(QIS) on the pre- and post-	
				implementation of macroprudential	
				instruments have an important role in	
				assessing the cost and benefits such	
				policies. In general, QIS are made on	
				bank level to have granular information	
				about impacts. Research notes in	
				economics and working papers also	
				establish a ground to analyze the cost and	
				benefits of the policies. On the BRSA	
				side, based on the impact analysis or	
				cost/benefit analysis policies are	
				developed. Cost and benefit analysis is	
				done both on data observation and	
				qualitative assessment. The BRSA	
				reviews regularly the cost and benefit of	
				macroprudential instruments with The	
				Banks Association of Turkey and	
				Interbank Card Center. Thus both	
				quantitative and qualitative approaches	
				are used in this issue.	



No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
V.	Improving oversight of	f credit rating agencies (CRAs)			
13 (16)	Enhancing regulation and supervision of CRAs	All CRAs whose ratings are used for regulatory purposes should be subject to a regulatory oversight regime that includes	Jurisdictions should indicate the policy measures undertaken for enhancing regulation and supervision of CRAs	 Not applicable Applicable but no action envisaged at the moment 	If this recommendation has not yet been fully implemented, please provide reasons for delayed implementation:
		registration. The regulatory oversight regime should be established by end 2009 and should be consistent with the IOSCO Code of Conduct Fundamentals. (London) National authorities will enforce compliance and require changes to a rating agency's practices and procedures for managing conflicts of interest and assuring the transparency and quality of the rating process. CRAs should differentiate ratings for structured products and provide full disclosure of their ratings track record and the information and assumptions that underpin the ratings process. The oversight framework should be consistent across jurisdictions with appropriate sharing of information between national authorities, including through IOSCO. (London) Regulators should work together towards appropriate, globally compatible solutions (to conflicting compliance obligations for CRAs) as early as possible	 including registration, oversight and sharing of information between national authorities. They should also indicate their consistency with the following IOSCO document: Code of Conduct Fundamentals for Credit Rating Agencies (Mar 2015) Jurisdictions may also refer to the following IOSCO documents: Principle 22 of Principles and Objectives of Securities Regulation (Jun 2010) which calls for registration and oversight programs for CRAs Statement of Principles Regarding the Activities of Credit Rating Agencies (Sep 2003) Final Report on Supervisory Colleges for Credit Rating Agencies (Jul 2013) 	 ☐ Implementation ongoing: Status of progress: ☐ Draft in preparation, expected publication by: ☐ Draft published as of: ☐ Final rule or legislation approved and will come into force on: ☐ Final rule (for part of the reform) in force since : ☑ Implementation completed as of: 17.04.2012 Issue is being addressed through : ☑ Primary / Secondary legislation ☑ Regulation /Guidelines ☐ Other actions (such as supervisory actions), please specify: Short description of the content of the legislation/ regulation/guideline: BRSA: "Regulation on the Principles Regarding the Authorization and Activities of Rating Agencies" which mainly incorporates international best practices entered into force on 17.04.2012. CMB: Original regulation in 1997, final amendment on 29.08.2013 	Planned actions (if any) and expected commencement date: CMB: As the final version of IOSCO code of conduct is published, CMB's CRA Communiqué draft that adopts EU rules will be revised to make sure that final version of the CRA regulations by CMB is in compliance with latest IOSCO Code of Conduct in addition to EU Regulations. No specific commencement date is set. Web-links to relevant documents:



No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
		in 2010. (FSB 2009)		Pursuant to paragraph (n) of Article 22	
		We encourage further steps to enhance		and Article 39 of the former Capital	
		transparency and competition among		Market Law the first regulation on credit	
		credit rating agencies. (St Petersburg)		rating activities in capital markets, which	
		creat rating agenetes. (Stretersburg)		required authorization and supervision of	
				rating agencies, was promulgated in	
				1997. Since that first Communiqué, the	
				provisions of the Communiqué have been	
				updated several times (2004, 2007, 2010	
				and 2013) in order to make it in	
				compliance with 2003 IOSCO principles	
				and 2004 IOSCO Code of Conduct as	
				well as to reflect the changes in the	
				financial markets. Rating agencies	
				established in Turkey that are qualified	
				by CMB and international rating agencies	
				recognized by CMB are permitted to	
				provide rating service in Turkey. There	
				are 6 domestic CRAs, which are under	
				oversight of Capital Markets Board of	
				Turkey, and 3 international CRAs	
				authorized to rate Turkish listed	
				companies and capital market institutions.	
				Rating activities within the context of the	
				Communiqué are subject to the	
				surveillance and inspection of CMB;	
				CMB may request any kind of	
				information and document from rating	
				agencies. In addition to several	
				administrative actions that may be taken	



No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
				by CMB, CMB has the authority to delist the rating agency should there be a substantial change in the degree that the agency satisfies the listing criteria or should CMB detect a violation of relevant provisions of rating regulations.	
				Highlight main developments since last year's survey:	
				CMB: Currently, as Turkey is a candidate	
				for full EU membership, the CMB is	
				carrying out a project to have the CRA	
				communique in line with EU 2009/1060	
				Regulation. Draft is not disclosed to	
				public as of yet.	
				Web-links to relevant documents:	
				http://www.bddk.org.tr/WebSitesi/turkce/ Mevzuat/Bankacilik_Kanununa_Iliskin_ Duzenlemeler/10821derecelendirme_kur uluslarinin_yetkilendirilmesine_ve_faaliy etlerine_iliskin_esaslar_hakkinda_yonet melik.pdf http://cmb.gov.tr/displayfile.aspx?action= displayfile&pageid=87&fn=87.pdf⊂ menuheader=null	





Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
	would enhance transparency of and		line with new Basel standards. All banks	
	competition among credit rating agencies.		are obliged to make their own credit	
	(Los Cabos)		assessments before extending credits and	
			not to solely rely on any CRA rating.	
	We call on national authorities and		CRA ratings are not a replacement of	
	standard setting bodies to accelerate		internal risk assessment according to	
	progress in reducing reliance on credit		BRSA regulations. In order to incentivise	
	rating agencies, in accordance with the		market participants to develop internal	
	FSB roadmap. (St Petersburg)		risk management capabilities, BRSA	
			published regulations on IRB and AMA	
			on 06.09.2014. (Currently all banks are	
			using Basel's standard approaches)	
			BRSA has also published a detailed credit	
			risk management guideline on 17.07.2014	
			in order to improve banks' internal risk	
			assessment capabilities.	
			CMB: Debt securities regulation	
			Highlight main developments since last year's survey:	
			Web-links to relevant documents:	
			http://www.bddk.org.tr/WebSitesi/turkce/ Mevzuat/Bankacilik_Kanununa_Iliskin_ Duzenlemeler/13491kredi_riski_icsel_teb lig.pdf (IRB Regulation) http://www.bddk.org.tr/WebSitesi/turkce/ Mevzuat/Bankacilik_Kanununa_Iliskin_ Duzenlemeler/13504operasyonel_risk.pdf (AMA Regulation) http://www.bddk.org.tr/WebSitesi/turkce/ Mevzuat/Bankacilik_Kanununa_Iliskin_ Duzenlemeler/13320kredi_yonetimine_ili skin_rehber_18.07.2014.pdf (Risk	





No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
VI.	Enhancing and alignin	g accounting standards			
15 (18)	Consistent application of high-quality accounting standards	Regulators, supervisors, and accounting standard setters, as appropriate, should work with each other and the private sector on an ongoing basis to ensure consistent application and enforcement of high-quality accounting standards. (Washington)	Jurisdictions should indicate the accounting standards that they follow and whether (and on what basis) they are deemed to be equivalent to IFRSs as published by the IASB or are otherwise of a high and internationally acceptable quality, and provide accurate and relevant information on financial performance. They should also explain the system they have for enforcement of consistent application of those standards. Jurisdictions may want to refer to their jurisdictional profile prepared by the IFRS Foundation, which can be accessed at: http://www.ifrs.org/Use-around-the- world/Pages/Analysis-of-the-G20-IFRS- profiles.aspx.	 □ Not applicable □ Applicable but no action envisaged at the moment □ Implementation ongoing: Status of progress: □ Draft in preparation, expected publication by: □ Draft published as of: □ Final rule or legislation approved and will come into force on: □ Final rule (for part of the reform) in force since : ☑ Implementation completed as of: 01.11.2006 (BRSA) - 21.12.2004 (CMB, for listed companies and capital market institutions) Issue is being addressed through : ☑ Primary / Secondary legislation ☑ Regulation /Guidelines ☑ Other actions (such as supervisory actions), please specify: CMB: Listed companies and capital market institutions as defined in Capital market Law apply Turkish Accounting Standards and Turkish Financial Reporting Standards as set and disclosed by the Public Oversight, Accounting and 	Planned actions (if any) and expected commencement date: Web-links to relevant documents:



No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
				Application of those standards is required	
				to be audited by independent audit firms	
				according to the related CMB regulations.	
				In addition, a team of experts has been	
				assigned to do revision of financial	
				reports on a risk basis and required	
				precautions are taken for those entities	
				which breach standards and related	
				regulations.	
				Short description of the content of the legislation/ regulation/guideline:	
				BRSA: Institutions under the supervision	
				of the BRSA have to comply with TFRSs	
				which are in line with IFRSs. BRSA has	
				the authority to supervise and regularly	
				supervises the full implementation of	
				TFRSs by the related companies. CMB:	
				Following articles 14 and 36 and	
				subparagraph (ğ) of first paragraph of	
				article 128 of the Capital Markets Law	
				no. 6362 dated 6.12.2012, Communiqué	
				on Principles of Financial Reporting In	
				Capital Markets was promulgated on	
				13.06.2013. The purpose of this	
				Communiqué is to set the principles and	
				procedures regarding financial reports to	
				be publicly announced by issuers and	
				capital market institutions other than	
				investment funds and housing finance and	
				asset finance funds. These entities	



No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
				prepare their financial statements on the	
				basis of TAS/TFRS issued and published	
				by POA. Moreover, to ensure that the	
				financial reporting principles and	
				procedures are clear and understandable,	
				or for the sake of unity in implementation	
				thereof, if and when deemed necessary,	
				the Capital Market Board reaches	
				decisions pursuant to article 14 of the	
				Law. Entities are under obligation to	
				comply with these decisions	
				Highlight main developments since last year's survey:	
				Web-links to relevant documents:	
				http://www.bddk.org.tr/WebSitesi/turkce/ Mevzuat/Bankacilik_Kanununa_Iliskin_ Duzenlemeler/1688bankalarin_muhasebe _uygulamalarina_ve_belgelerin_saklanm asina_ilikin_usul_ve_esaslar_hakkinda_y onetmelik.pdf http://www.spk.gov.tr/apps/Mevzuat/?sub menuheader=-1	



No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
No 16 (19)	Description Appropriate application of Fair Value Accounting	G20/FSB Recommendations Accounting standard setters and prudential supervisors should examine the use of valuation reserves or adjustments for fair valued financial instruments when data or modelling needed to support their valuation is weak. (Rec. 3.4, FSF 2009) Accounting standard setters and prudential supervisors should examine possible changes to relevant standards to dampen adverse dynamics potentially	Jurisdictions should indicate the policy measures taken for appropriate application of fair value accounting. Although not an application of fair value accounting, jurisdictions should additionally be mindful of implementation issues arising from the new accounting requirements for expected loan loss provisioning for impaired loans that are being introduced by the IASB and the FASB, and, for those jurisdictions where specific action	 Not applicable Applicable but no action envisaged at the moment Implementation ongoing: <i>Status of progress:</i> Draft in preparation, expected publication by: Draft published as of: Final rule or legislation approved and will come into force on: Final rule (for part of the reform) in force since : 	Next steps If this recommendation has not yet been fully implemented, please provide reasons for delayed implementation: Planned actions (if any) and expected commencement date: Web-links to relevant documents:
		dampen adverse dynamics potentially associated with fair value accounting. Possible ways to reduce this potential impact include the following: (1) Enhancing the accounting model so that the use of fair value accounting is carefully examined for financial instruments of credit intermediaries; (ii) Transfers between financial asset categories; (iii) Simplifying hedge accounting requirements. (Rec 3.5, FSF 2009)	 is needed to foster transparent and consistent implementation, set out any steps they intend to take. See, for reference, the following BCBS documents: <u>Basel 2.5 standards on prudent valuation (Jul 2009)</u> <u>Supervisory guidance for assessing banks' financial instrument fair value practices (Apr 2009)</u> 	 ☑ Implementation completed as of: 01.01.2012 Issue is being addressed through : ☑ Primary / Secondary legislation ☑ Regulation /Guidelines □ Other actions (such as supervisory actions), please specify: Short description of the content of the legislation/ regulation/guideline: BRSA: Annex III of the Regulation on Capital Adequacy Measurement and Evaluation of Capital Adequacy of Banks, which have been in effect since July 2012 includes the provisions of Basel 2.5 standards on prudent valuation (July 2009). In addition, institutions under the supervision of the BRSA have to comply with TFRSs which are in line 	



No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
				with IFRSs. BRSA has the authority to	
				supervise and regularly supervises the full	
				implementation of TFRSs by the related	
				companies. CMB: Since 2005,	
				application of fair value accounting for	
				companies and institutions subject to	
				Capital Market Law has been compulsory	
				according to capital market regulations	
				that require Turkish Accounting/Financial	
				Reporting Standards (TAS/TFRS) and	
				TAS/TFRS Interpretations, which have	
				been in full compliance with IAS/IFRSs,	
				to be adopted.	
				Highlight main developments since last year's survey:	
				Web-links to relevant documents:	



No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
VII.	Enhancing risk manag	gement			
VII. 17 (20)	Enhancing risk manage Enhancing guidance to strengthen banks' risk management practices, including on liquidity and foreign currency funding risks	Regulators should develop enhanced guidance to strengthen banks' risk management practices, in line with international best practices, and should encourage financial firms to re-examine their internal controls and implement strengthened policies for sound risk management. (Washington) National supervisors should closely check banks' implementation of the updated guidance on the management and supervision of liquidity as part of their regular supervision. If banks' implementation of the guidance is inadequate, supervisors will take more prescriptive action to improve practices. (Rec. II.10, FSF 2008) Regulators and supervisors in emerging markets ³ will enhance their supervision of banks' operation in foreign currency funding markets. (FSB 2009) We commit to conduct robust, transparent stress tests as needed. (Pittsburgh)	Jurisdictions should indicate the policy measures taken to enhance guidance to strengthen banks' risk management practices. Jurisdictions may also refer to FSB's <u>thematic peer review report on risk</u> <u>governance (Feb 2013)</u> and the BCBS <u>Peer review of supervisory authorities'</u> <u>implementation of stress testing</u> <u>principles (Apr 2012) and Principles for</u> <u>sound stress testing practices and</u> <u>supervision (May 2009).</u>	 □ Not applicable □ Applicable but no action envisaged at the moment ☑ Implementation ongoing: Status of progress: □ Draft in preparation, expected publication by: □ Draft published as of: □ Final rule or legislation approved and will come into force on: ☑ Final rule (for part of the reform) in force since : 19.03.2015 (The publication date of most recent risk management guideline.) □ Implementation completed as of: Issue is being addressed through : ☑ Primary / Secondary legislation ☑ Regulation /Guidelines □ Other actions (such as supervisory actions), please specify: Short description of the content of the legislation/regulation/guideline: BRSA: The BRSA published an updated regulation on internal systems and 	Planned actions (if any) and expected commencement date: New risk management guidelines are in the pipeline to be issued during 2015 and 2016. Web-links to relevant documents:

³ Only the emerging market jurisdictions that are members of the FSB may respond to this recommendation.



No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
				Additionally, to address the main	
				G20/FSB recommendations; detailed risk	
				management guidelines on credit risk,	
				market risk, operational risk, counterparty	
				credit risk, liquidity risk (funding and	
				market), interest rate risk in the banking	
				book (yield curve risk, basis risk,	
				optionality risk), concentration risk,	
				country and transfer Risk (indirect	
				country risk, sovereign risk,	
				macroeconomic risk and contagion Risk)	
				have been issued. Moreover, the stress	
				testing framework is regulated more	
				explicitly and the BRSA has also issued	
				the supporting guidelines on stress testing	
				and ICAAP Report preparation.	
				Highlight main developments since last year's survey:	
				After the survey of the IMN 2014, the	
				BRSA declared that "new risk	
				management guidelines" are in the	
				pipeline to be issued during the period of	
				2015/2016.	
				Web-links to relevant documents:	
				http://www.bddk.org.tr/WebSitesi/turkce/ Meyzuat/Bankacilik Kanununa Iliskin	
				http://www.bddk.org.tr/WebSitesi/turkce/ Mevzuat/Bankacilik_Kanununa_Iliskin_ Duzenlemeler/Bankacilik_Kanununa_Ilis	
				kin_Duzenlemeler.aspx	



No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
No 18 (22)	Description Enhanced risk disclosures by financial institutions	G20/FSB Recommendations Financial institutions should provide enhanced risk disclosures in their reporting and disclose all losses on an ongoing basis, consistent with international best practice, as appropriate. (Washington) We encourage further efforts by the public and private sector to enhance financial institutions' disclosures of the risks they face, including the ongoing work of the Enhanced Disclosure Task Force. (St. Petersburg)	Remarks Jurisdictions should indicate the status of implementation of the disclosures requirements of IFRSs (in particular IFRS7 and 13) or equivalent. Jurisdictions may also use as reference the recommendations of the October 2012 report by the Enhanced Disclosure Task Force on <i>Enhancing the Risk Disclosures</i> <i>of Banks</i> and <i>Implementation Progress</i> <i>Report by the EDTF (Aug 2013)</i> , and set out any steps they have taken to foster adoption of the EDTF Principles and Recommendations.	 Not applicable Applicable but no action envisaged at the moment ✓ Implementation ongoing: Status of progress: ✓ Draft in preparation, expected publication by: 01.08.2015 (BRSA) □ Draft published as of: □ Final rule or legislation approved and will come into force on: ✓ Final rule (for part of the reform) in force since : 01.11.2006 (BRSA) □ Implementation completed as of: Issue is being addressed through : ☑ Primary / Secondary legislation ☑ Regulation /Guidelines □ Other actions (such as supervisory actions), please specify: Short description of the content of the legislation/ regulation/guideline: BRSA: According to the "Communiqué on Financial Statements to be Announced to the Public by Banks, and Related 	Next steps Planned actions (if any) and expected commencement date: Web-links to relevant documents:



No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
				supervises the full implementation of	
				these disclosure TFRSs by the related	
				companies. In addition to that, in line	
				with international best practice, the	
				BRSA has prepared a detailed draft	
				regulation on risk management disclosure	
				for banks which is expected to go for	
				public consultation on 01/08/2015.	
				CMB: Investment firms disclosure	
				requirements are regulated under	
				Communique Serial: V, No:77. In	
				addition to regular financial statements'	
				disclosure requirements, investment firms	
				has to disclose their capital adequacy and	
				the events that may cause losses.	
				Treasury: The Undersecretariat of	
				Treasury monitors the information	
				disclosed by insurers in a timely	
				manner. Article 18 Paragraph 2 of	
				Insurance Law No. 5684 stipulates that	
				the Undersecretariat shall cause to be re-	
				announced such financial statements as	
				corrected if any untrue information is	
				discovered in the announced financial	
				statements announced by insurance and	
				reinsurance companies, taking into	
				account generally accepted accounting	
				rules and principles (June 2007).	
				Highlight main developments since last year's survey:	



No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
				After the survey of the IMN 2014, in line	
				with international best practice, the	
				BRSA has prepared a detailed draft	
				regulation on risk management disclosure	
				for banks which is expected to go for	
				public consultation on 01/08/2015.	
				Web-links to relevant documents:	



No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
VIII.	Strengthening deposit	insurance			
19 (23)	Strengthening of national deposit insurance arrangements	National deposit insurance arrangements should be reviewed against the agreed international principles, and authorities	Jurisdictions should describe any revisions made to national deposit insurance system, including steps taken to	 Not applicable Applicable but no action envisaged at the moment 	Planned actions (if any) and expected commencement date:
		should strengthen arrangements where needed. (Rec. VI.9, FSF 2008)	 address the following recommendations of the FSB's February 2012 <u>thematic</u> peer review report on deposit insurance systems: Adoption of an explicit deposit insurance system (for those jurisdictions that do not have one) Addressing the weaknesses and gaps to full implementation of the <u>Core</u> Principles for Effective Deposit <u>Insurance Systems</u> issued by IADI in November 2014 	 ☑ Implementation ongoing: Status of progress: □ Draft in preparation, expected publication by: ☑ Draft published as of: The proposal for bridge bank has been submitted to the Assembly for approval. Before the parliamentary process, the draft was sent to the related institutions and comments were received. The reform about deposit insurance limit has been effective as of Feb 15, 2014 □ Final rule or legislation approved and will come into force on: □ Final rule (for part of the reform) in force since : □ Implementation completed as of: Issue is being addressed through : ☑ Primary / Secondary legislation ☑ Regulation /Guidelines □ Other actions (such as supervisory actions), please specify: Short description of the content of the legislation/ regulation/guideline: Savings Deposit Insurance Fund (SDIF) 	Web-links to relevant documents:
				Proposal is prepared in order to have the	



No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
				authority to establish bridge bank. The	
				proposal for bridge bank has been	
				submitted to the Assembly for approval.	
				Before the parliamentary process, the	
				draft was sent to the related institutions	
				and comments were received. The reform	
				about deposit insurance limit has been	
				effective as of Feb 15, 2014. We indicate	
				separate status for reforms in deposit	
				insurance system (REF) and resolution	
				powers (DPD) by the rationale that these	
				two reforms are not components of a	
				same reform. Based on these	
				explanations, we would like to maintain	
				the "REF" position if reforms in	
				resolution powers are not included in	
				"Strengthening deposit insurance" part of	
				the survey.	
				Highlight main developments since last year's survey:	
				After the survey of the IMN 2014, the	
				proposal for bridge bank has been	
				submitted to the Assembly for approval.	
				Before the parliamentary process, the	
				draft was sent to the related institutions	
				and comments were received.	
				Web-links to relevant documents:	
				http://www.tmsf.org.tr/Resource/docume nts/guvence_mevduat_en.pdf http://www.tmsf.org.tr/Resource/docume	



No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
				nts/guvence_katilim_en.pdf	



No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
IX.	Safeguarding the integ	rity and efficiency of financial markets	5		
20 (24)	Enhancing market integrity and efficiency	We must ensure that markets serve efficient allocation of investments and savings in our economies and do not pose risks to financial stability. To this end, we commit to implement initial recommendations by IOSCO on market integrity and efficiency, including measures to address the risks posed by high frequency trading and dark liquidity, and call for further work by mid-2012. (Cannes)	 Jurisdictions should indicate whether high frequency trading and dark pools exist in their national markets. Jurisdictions should indicate the progress made in implementing the recommendation in the following IOSCO reports in their regulatory framework: <u>Regulatory issues raised by changes in market structure (Dec 2013)</u> <u>Report on Regulatory Issues Raised by the Impact of Technological Changes on Market Integrity and Efficiency (Oct 2011)</u> <u>Report on Principles for Dark Liquidity (May 2011)</u>. 	 ☑ Not applicable CMB: High frequency trading and dark pools do not exist in our national markets. ☐ Applicable but no action envisaged at the moment ☐ Implementation ongoing: Status of progress: ☐ Draft in preparation, expected publication by: ☐ Draft published as of: ☐ Final rule or legislation approved and will come into force on: ☐ Final rule (for part of the reform) in force since : ☐ Implementation completed as of: Issue is being addressed through : ☐ Primary / Secondary legislation ☐ Regulation /Guidelines ☐ Other actions (such as supervisory actions), please specify: Short description of the content of the legislation/regulation/guideline: Highlight main developments since last year's survey: Web-links to relevant documents: 	Planned actions (if any) and expected commencement date: Web-links to relevant documents:



21 Regulation (25) commodity	n of transparency, both on cash and financial	Jurisdictions should indicate whether commodity markets of any type exist in their national markets.	 Not applicable Applicable but no action envisaged at the moment 	Planned actions (if any) and expected commencement date:
	 Supervision of participants in these markets. Market regulators and authorities should be granted effective intervention powers to address disorderly markets and prevent market abuses. In particular, market regulators should have, and use formal position management powers, including the power to set ex- ante position limits, particularly in the delivery month where appropriate, among other powers of intervention. We call on IOSCO to report on the implementation of its recommendations by the end of 2012. (Cannes) We also call on Finance ministers to monitor on a regular basis the proper implementation of IOSCO's principles for the regulation and supervision on commodity derivatives markets and encourage broader publishing and unrestricted access to aggregated open	Jurisdictions should indicate the policy measures taken to implement the principles found in IOSCO's report on <i>Principles for the Regulation and</i> <i>Supervision of Commodity Derivatives</i> <i>Markets (Sep 2011).</i> Jurisdictions, in responding to this recommendation, may also make use of the responses contained in the <u>update to</u> <u>the survey</u> published by IOSCO in September 2014 on the principles for the regulation and supervision of commodity derivatives markets.	 ✓ Implementation ongoing: <i>Status of progress:</i> ✓ Draft in preparation, expected publication by: the end of 2017 □ Draft published as of: □ Final rule or legislation approved and will come into force on: □ Final rule (for part of the reform) in force since : □ Implementation completed as of: Issue is being addressed through : □ Primary / Secondary legislation □ Regulation /Guidelines □ Other actions (such as supervisory actions), please specify: Short description of the content of the legislation/ regulation/guideline: CMB: The commodity market hadn't been regulated before the new Capital Markets Law which was enacted on 30.12.2012.Currently, few financial commodity derivative contracts (wheat, cotton and electricity) are traded in 	The project to design a new commodity market in the Borsa Istanbul is ongoing. The market rules are expected to take effect at the end of 2017. Web-links to relevant documents:



No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
				market. Additionally, the project to	
				design a new commodity market in the	
				Borsa İstanbul is ongoing.	
				Highlight main developments since last year's survey:	
				Web-links to relevant documents:	



No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
22	Reform of financial	We support the establishment of the	Collection of information on this		
(26)	benchmarks	FSB's Official Sector Steering Group to	recommendation will continue to be		
(20)		coordinate work on the necessary reforms	deferred given the forthcoming FSB		
		of financial benchmarks. We endorse	progress report on implementation of the		
		IOSCO's Principles for Financial	FSB recommendations in this area, and		
		Benchmarks and look forward to reform	ongoing IOSCO work to review the		
		as necessary of the benchmarks used	implementation of the IOSCO Principles		
		internationally in the banking industry	for Financial Benchmarks.		
		and financial markets, consistent with the			
		IOSCO Principles. (St. Petersburg)			



No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps					
Χ.	X. Enhancing financial consumer protection									
	-		Jurisdictions should describe progress toward implementation of the OECD's <u>G-</u> <u>20 high-level principles on financial</u> <u>consumer protection (Oct 2011)</u> . Jurisdictions may also refer to OECD's <u>September 2013 and September 2014</u> <u>reports</u> on effective approaches to support the implementation of the High-level Principles.	□ Not applicable □ Applicable but no action envisaged at the moment ☑ Implementation ongoing: Status of progress: □ Draft in preparation, expected publication by: □ Draft published as of: □ Final rule or legislation approved and will come into force on: ☑ Final rule (for part of the reform) in force since : 03.10.2014 □ Implementation completed as of: Issue is being addressed through : ☑ Primary / Secondary legislation □ Regulation /Guidelines ☑ Other actions (such as supervisory actions), please specify: Short description of the content of the legislation/regulation/guideline: BRSA: BRSA has issued a regulation on fees that can be charged on financial consumers and principles and procedures regarding contracts, information to be	Planned actions (if any) and expected commencement date: Web-links to relevant documents:					
				regarding contracts, information to be provided, reimbursement of the fees, introduction of new fees, etc. A new web-page has been introduced for financial consumers with a simple and						



No	Description	G20/FSB Recommendations	Remarks	Progress to date	Next steps
				updated content and the online complaint	
				acceptance mechanism has been	
				enhanced.	
				Highlight main developments since last year's survey:	
				Web-links to relevant documents:	
				http://www.bddk.org.tr/WebSitesi/turkce/ Mevzuat/Finansal_Tuketicinin_Korunma sina_Iliskin_Duzenlemeler/13586finansal tuketicilerden_alinacak_ucretlere_iliskin usul_ve_esaslar_hakkinda_yonetmelik.p df_www.finansaltuketici.gov.tr	



Turkey

XI. Source of recommendations:

Brisbane: G20 Leaders' Communique (15-16 November 2014)St Petersburg: The G20 Leaders' Declaration (5-6 September 2013)Los Cabos: The G20 Leaders' Declaration (18-19 June 2012)Cannes: The Cannes Summit Final Declaration (3-4 November 2011)Seoul: The Seoul Summit Document (11-12 November 2010)Toronto: The G-20 Toronto Summit Declaration (26-27 June 2010)Pittsburgh: Leaders' Statement at the Pittsburgh Summit (25 September 2009)London: The London Summit Declaration on Strengthening the Financial System (2 April 2009)Washington: The Washington Summit Action Plan to Implement Principles for Reform (15 November 2008)FSF 2009: The FSF Report on Enhancing Market and Institutional Resilience (7 April 2008)FSF 2009: The FSF Report on Addressing Procyclicality in the Financial System (2 April 2009)FSB 2009: The FSB Report on Improving Financial Regulation (25 September 2009)FSB 2012: The FSB Report on Increasing the Intensity and Effectiveness of SIFI Supervision (1 November 2012)

XII. List of Abbreviations used:

CMB: Capital Markets Board of Turkey CBRT: Central Bank of the Republic of Turkey SDIF: Savings Deposit Insurance Fund BRSA: Banking Regulation and Supervision Authority Treasury: Republic of Turkey Prime Ministry Undersecretariat of Treasury POA: Public Oversight, Accounting and Auditing Standards Authority