



# Transparency Report 2023

KPMG Bağımsız Denetim ve Serbest  
Muhasebeci Mali Müşavirlik A.Ş.

Transparency Report  
1 October 2022-30 September 2023

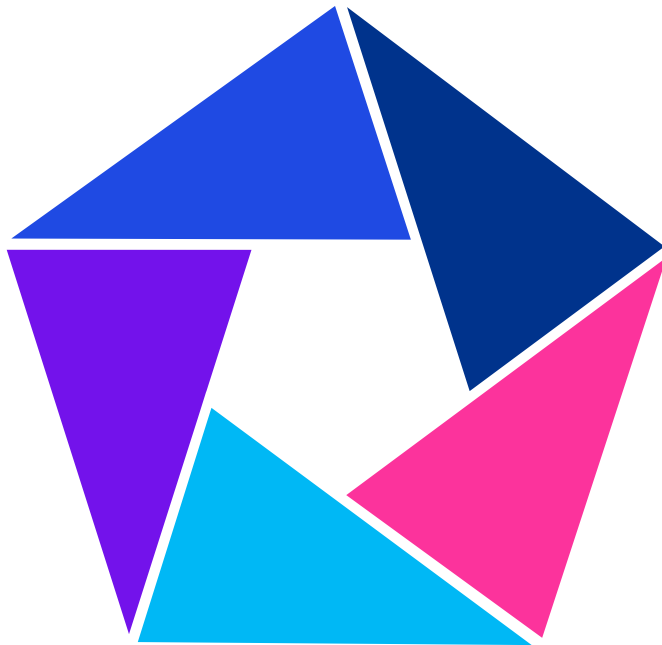
KPMG Türkiye

[kpmg.com.tr](https://kpmg.com.tr)



# KPMG Values

KPMG is committed to quality and service excellence in all that we do, helping to bring our best to clients and earning the public's trust through our actions and behaviors both professionally and personally. Our Values guide our behaviors day-to-day, informing how we act, the decisions we make, and how we work with each other, our clients, companies that we audit, and all of our stakeholders



## Our Values are:



### Integrity

We do what is right.



### Excellence

We never stop learning and improving.



### Courage

We think and act boldly.



### Together

We respect each other and draw strength in our differences.



### For Better

We do what matters.

# Contents

Message from the Country Senior Partner	4	Financial information	37
Our system of quality management is foundational for audit quality	6	Partner remuneration	38
Live our culture and Values	8	Network arrangements	39
Apply expertise and knowledge	14	Statement on the effectiveness of the System of Quality Management of [legal member firm name] as at 30 September 2023	42
Embrace digital technology	16	Appendix	43
Nurture diverse skilled teams	19	Appendix 1. Ownership Structure	
Associate with the right clients and engagements	23	Appendix 2. Details of those charged with governance at KPMG SMMM	
Be independent and ethical	25	Appendix 3. Public-Interest Entities (PIE)	
Perform quality engagements	29		
Assess risks to quality	31		
Monitor and remediate	32		
Communicate effectively	35		

# Message from the Country Senior Partner

## Committed to delivering quality

In 2023, the global economic landscape presented intricate challenges, including the enduring pandemic, supply chain disruptions, the Russia-Ukraine conflict prompting major economies to adopt inflation-fighting measures and interest rate hikes. Türkiye, as part of the globe, went through comparable challenges, though pursued an unconventional path in economy to keep interest rates and FX controlled by introducing “FX-Protected Lira Deposit”. Although managed to fix the acceleration of the increase on FX rates, Turkish economy suffered from a substantial devaluation of the Turkish Lira and soaring inflation, compounded by heavy import reliance by the end of 2023. Not to mention a devastating earthquake in February added an estimated \$100 billion economic burden while leaving an everlasting pain on the hearts of millions. As 2023 concludes, inflation persists as a major concern, with regulatory pressures heightening economic complexity.

KPMG Türkiye has been mostly busy in 2023 with demonstrating resilience and adaptability in the face of the formidable economic challenges as outlined in our “2023 CEO Outlook.” Despite the volatile economic landscape, KPMG Türkiye managed to maintain its commitment to excellence in service delivery and client relationships. Our firm’s strategic approach to navigating the complexities of the Turkish economy; including the currency devaluation, inflationary pressures, and regulatory changes enabled us to provide valuable insights and support to our clients.

Our unwavering dedication to quality and innovation allowed us to continue delivering exceptional services across various sectors, contributing to our clients’ success. As we look back on 2023, KPMG Türkiye’s performance underscores our ability to thrive amidst adversity and reinforces our commitment to being a trusted partner for businesses seeking to navigate challenging economic environments. In addition to our resilient performance, KPMG Türkiye prioritized investing on ESG and technology to stay at the forefront of industry trends and better serve our clients’ evolving needs.

As part of 2023’s strategic priorities, recognizing the pivotal role of innovation and technology in transformative business processes, KPMG Türkiye bolstered its technology offerings, embracing analytics across various facets, including cloud, AI, cybersecurity, and data-driven transformations. The firm also revamped its team structure to align with its service philosophy, emphasizing the importance of staying up-to-date with industry trends. Furthermore, KPMG Türkiye leveraged social media platforms like LinkedIn to enhance its outreach and introduced the “Analitik Rota” client event to showcase its technology solutions and analytical capabilities. The expansion of university collaborations and technology-focused initiatives, such as ESG and OpenX partnerships, emphasized the firm’s commitment to driving technology integration across diverse sectors, thus ensuring its relevance in a rapidly evolving business landscape.



**Murat Alsan**  
Chairman and Senior Partner

KPMG Bağımsız Denetim ve SMMM A.Ş.

In 2023, KPMG Türkiye upheld its core values of integrity, ethics, and independence, serving as the cornerstone of our commitment to trust and quality. These principles were instrumental in guiding our actions in the realm of Quality and Risk Management (QRM). We remained steadfast in our dedication to maintaining the highest standards of professional ethics and independence, ensuring the reliability of our services and the trust of our clients. Our unwavering adherence to these values facilitated sound decision-making, rigorous risk assessment, and the delivery of high-quality solutions while safeguarding the interests of all stakeholders. In this manner, KPMG Türkiye’s values, ethics, and independence continued to be the compass that guided our actions throughout 2023.

Despite challenges, we have emerged stronger and more adaptive. As we look ahead, we remain eager to embrace new opportunities and deliver exceptional results for our clients. Together, we will shape the future with confidence, upholding the highest standards of integrity and quality that define KPMG Türkiye.

Thank you for your trust and partnership.

## Message from the Country Senior Partner

Our system of quality management is foundational for audit quality

Live our culture and Values

Apply expertise and knowledge

Embrace digital technology

Nurture diverse skilled teams

Associate with the right clients and engagements

Be independent and ethical

Perform quality engagements

Assess risks to quality

Monitor and remediate

Communicate effectively

Financial information

Partner remuneration

Network arrangements

Statement on the effectiveness of the System of Quality Management of [legal member firm name] as at 30 September 2023

Appendix

# Audit Quality

Audit Quality is fundamental to maintaining public trust and is the key measure on which our professional reputation stands.

We define “audit quality” as the outcome when audits are executed consistently, in line with the requirements and intent of applicable professional standards, within a strong system of quality management.

All of our related activities are undertaken in an environment of the utmost level of objectivity, independence, ethics and integrity.



## Message from the Country Senior Partner

Our system of quality management is foundational for audit quality

Live our culture and Values

Apply expertise and knowledge

Embrace digital technology

Nurture diverse skilled teams

Associate with the right clients and engagements

Be independent and ethical

Perform quality engagements

Assess risks to quality

Monitor and remediate

Communicate effectively

Financial information

Partner remuneration

Network arrangements

Statement on the effectiveness of the System of Quality Management of [legal member firm name] as at 30 September 2023

Appendix

# 1 Our system of quality management is foundational for audit quality

Audit and assurance quality is foundational to instilling confidence and public trust in the capital markets and it remains our highest priority..

KPMG Bağımsız Denetim ve Serbest Muhasebeci Mali Müşavirlik Anonim Şirketi (here in after “KPMG SMMM”) is required to implement KPMG International policies and procedures and also adopts additional policies and procedures that are designed to address rules and standards issued by Public Oversight Accounting and Auditing Standards Authority (POA), Banking Regulation and Supervision Agency (BRSA), Capital Markets Board (CMB), the US Public Company Accounting Oversight Board (PCAOB), Turkish Insurance And Private Pension Regulation And Supervision Authority (IPRSA), Energy Market Regulatory Authority (EMRA) and other relevant regulators as well as applicable legal and other regulatory requirements. KPMG SMMM is also registered with the Turkish Certified Public Accountant and Chartered Accountant Union of Chambers (TÜRMOB) and the UK FRC (Financial Reporting Council).

Across the global organization, KPMG firms including KPMG Türkiye have strengthened the consistency and robustness of their system of quality management (SoQM) to meet the requirements of the International Standard on Quality Management (ISQM) 1, issued by the International Auditing and Assurance Standards Board (IAASB). Foundational for quality management, our globally consistent approach to ISQM 1 drives compliance with the requirements of the standard and our efforts to strengthen trust and transparency with our clients, the capital markets and the public we serve.

## KPMG International global approach to system of quality management (SoQM) and ISQM 1



Sets **policies and procedures** to support KPMG firms’ effective SoQM in accordance with ISQM 1 issued by the IAASB



Establishes for each SoQM component globally consistent **quality objectives, risks and responses**.



Provides KPMG firms with a **risk assessment framework** that they have agreed to use in identifying incremental KPMG firm specific quality objectives, risks, and controls



Supports KPMG firms with **guidance, tools, and training** to drive consistent and effective firm SoQM operation



Includes **monitoring activities** over KPMG firms’ SoQM to drive global consistency



Message from the Country Senior Partner

Our system of quality management is foundational for audit quality

Live our culture and Values

Apply expertise and knowledge

Embrace digital technology

Nurture diverse skilled teams

Associate with the right clients and engagements

Be independent and ethical

Perform quality engagements

Assess risks to quality

Monitor and remediate

Communicate effectively

Financial information

Partner remuneration

Network arrangements

Statement on the effectiveness of the System of Quality Management of [legal member firm name] as at 30 September 2023

Appendix



Our globally consistent approach to ISQM 1 drives the robustness of our responses to the risks of achieving the quality objectives set out in the standard. For each component in the standard, we have established minimum required quality objectives, quality risks and responses for all KPMG firms.

KPMG International has established a risk assessment process required to be used by KPMG firms in identifying additional firm specific quality objectives, quality risks, and responses and requirements for testing and evaluation of their system of quality management together with guidance, tools and templates to support the consistent implementation of ISQM 1 across KPMG firms.

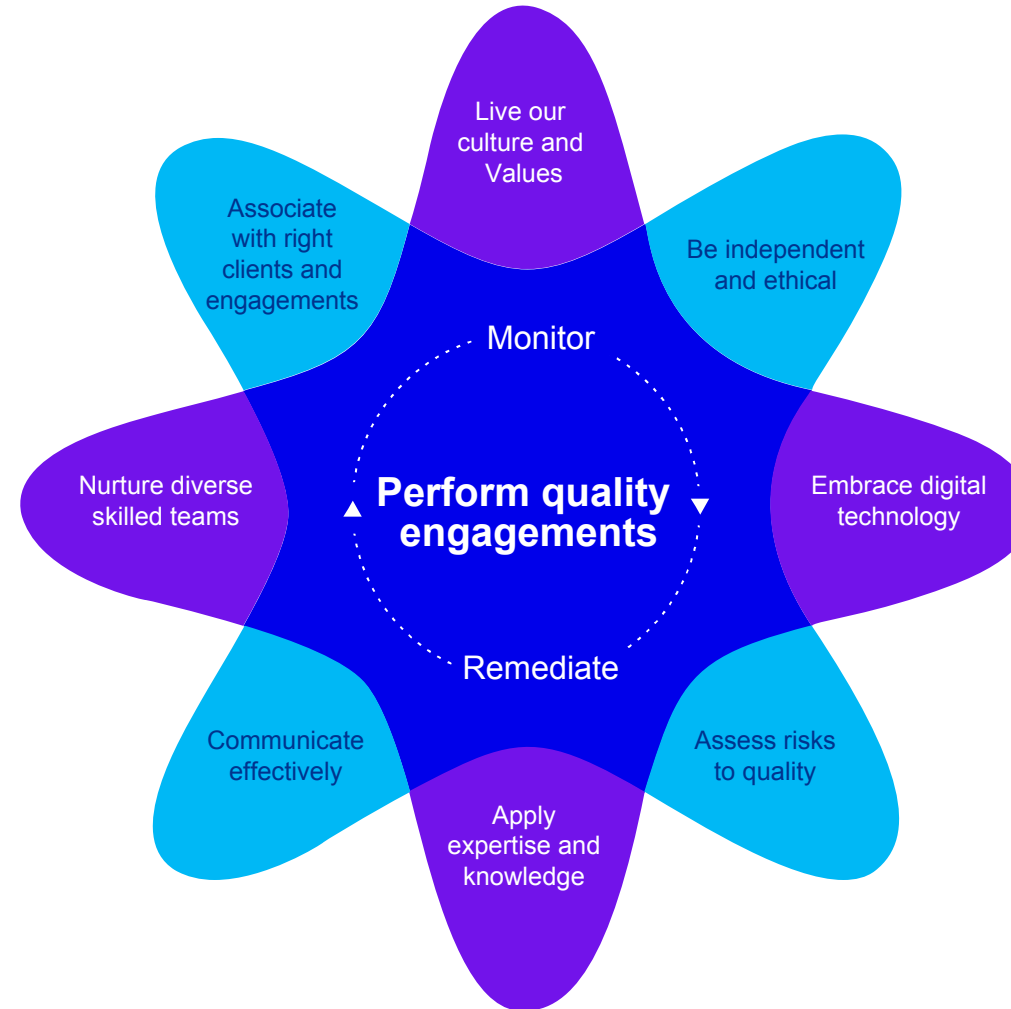
The globally consistent approach is used by all KPMG firms across the global organization. The objective of this centralized approach is to drive consistency, robustness, and accountability of responses within KPMG firms' processes.

To provide more transparency on what drives KPMG audit and assurance quality, this report is structured around the KPMG Global Quality Framework. For KPMG, the Global Quality Framework outlines how we deliver quality and how every KPMG professional contribute to its delivery.

The drivers outlined in the framework are the ten components of our KPMG SoQM. In line with ISQM 1, our SoQM also aligns with the requirements of the International Code of Ethics for Professional Accountants (including International Independence Standards) issued by the International Ethics Standards Board for Accountants (IESBA), which apply to professional services firms that perform audits of financial statements.

Sections 3-11 of the Transparency Report describe how we effectively operate each SoQM component. Combined with our firm's SoQM Statement of Effectiveness (See section 15), this Transparency Report summarizes how our SoQM effectively supports the consistent performance of quality engagements. This report may also be useful for stakeholders interested in KPMG Türkiye's Tax and Advisory services, as certain aspects of our firm's SoQM are cross-functional and apply equally as the foundation of quality for all services offered.

## KPMG's Global Quality Framework



Message from the Country  
Senior Partner

Our system of quality management  
is foundational for audit quality

Live our culture and Values

Apply expertise and knowledge

Embrace digital technology

Nurture diverse skilled teams

Associate with the right  
clients and engagements

Be independent and ethical

Perform quality engagements

Assess risks to quality

Monitor and remediate

Communicate effectively

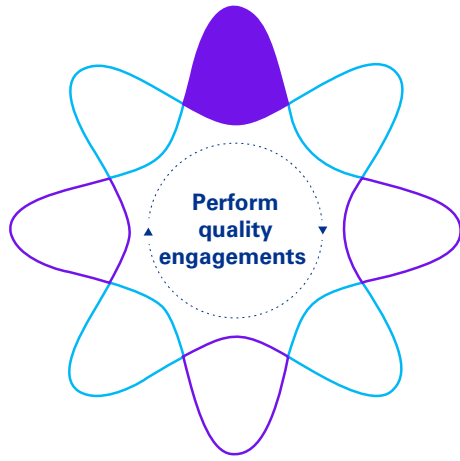
Financial information

Partner remuneration

Network arrangements

Statement on the effectiveness of  
the System of Quality Management  
of [legal member firm name] as at  
30 September 2023

Appendix



# 2 Live our culture and Values

- **Foster the right culture, starting with tone at the top**
- **Clearly articulate strategy focused on quality, consistency, trust and growth**
- **Define accountabilities, roles and responsibilities related to quality and risk management**
- **Robust governance structures**

It's not just what we do at KPMG that matters, we also pay attention to how we do it. Our Values are our core beliefs, guiding and unifying our actions and behaviors. Shared across all personnel and in every country, jurisdiction and territory in which we operate, they are the foundation of our unique culture.

## 2.1 Foster the right culture, starting with tone at the top

### 2.1.1 Foster the right culture, starting with tone at the top

#### Tone at the top

KPMG International's leadership, working with regional and KPMG firm leadership, plays a critical role in establishing our commitment to quality and the highest standards of professional excellence and ethics. A culture based on integrity, accountability, quality, objectivity, independence and ethics is essential in an organization that carries out audits and other professional services on which stakeholders rely.



Message from the Country  
Senior Partner

Our system of quality management  
is foundational for audit quality

Live our culture and Values

Apply expertise and knowledge

Embrace digital technology

Nurture diverse skilled teams

Associate with the right  
clients and engagements

Be independent and ethical

Perform quality engagements

Assess risks to quality

Monitor and remediate

Communicate effectively

Financial information

Partner remuneration

Network arrangements

Statement on the effectiveness of  
the System of Quality Management  
of [legal member firm name] as at  
30 September 2023

Appendix



At KPMG, our [Values](#) lie at the heart of the way we do things. To do the right thing, the right way. They form the foundation of a resilient culture ready to meet challenge with integrity, so we never lose sight of our principal responsibility to serve the public interest. And they propel us forward — through our work and the example we set — as we inspire confidence and empower change throughout the world.

We are committed to the highest standards of personal and professional behaviour in everything we do. Ethics and integrity are core to who we are and within our [Global Code of Conduct](#), we outline the responsibilities all KPMG people have to each other, our clients and the public. It shows how our Values and Purpose inspire our greatest aspirations and guide all of our behaviours and actions. It defines what it means to work at and be part of the KPMG organization, as well as our individual and collective responsibilities.

Everyone at KPMG can expect to be held accountable for their behaviour consistent with the Code and is required to confirm their compliance with it. Individuals are strongly encouraged to speak up if they see something that makes them uncomfortable or that is not in compliance with the Code or our Values. Everyone at KPMG is required to report any activity that could potentially be illegal or in violation of our Values, KPMG policies, applicable laws, regulations or professional standards.

To safeguard this principle of holding each other accountable, each KPMG firm has agreed to establish, communicate and maintain clearly defined channels to allow KPMG personnel and third parties to make inquiries about, raise concerns in relation to provide feedback on and notify reportable matters, without fear of reprisal, in accordance with applicable law or regulation.

The [KPMG International hotline](#) is a mechanism for KPMG personnel, clients and other third parties to confidentially report concerns they have relating to KPMG International, activities of KPMG firms or KPMG personnel.

Reports received by the KPMG International hotline are taken seriously, and for each of them, KPMG International will consider how to respond and where necessary, investigate and take appropriate action.

All KPMG firms and personnel are prohibited from retaliating against individuals who have the courage to speak up in good faith. Retaliation is a serious violation of the Code, and any person who takes retaliatory action will be subject to their firm's disciplinary policy.

In addition to the processes outlined above, the Global People Survey provides KPMG Türkiye leadership and KPMG International leadership with results related to upholding the KPMG Values.

### 2.1.2 The KPMG multidisciplinary model

Today's organizations face complex problems that require the best, most integrated thinking. At KPMG, we firmly believe that our multidisciplinary model is the best way to serve our clients and is essential to delivering the highest levels of quality on the largest and most complex audit, tax and consulting engagements. It allows us to be an agile and resilient from a business perspective and means we can more easily respond to market conditions. And, it makes KPMG a more interesting and exciting place to work.

## 2.2 Clearly articulated strategy focused on quality, consistency, trust and growth

### 2.2.1 Our business

KPMG Türkiye is a professional services firm that offers audit, tax and consultancy services. Our audit services in Turkey are delivered through KPMG SMMM. We operate out of 4 offices across Türkiye and had 856 personnel as at 30 September 2023 (30 September 2022: 946).

Full details of the services offered by KPMG SMMM can be found on our website (<https://home.kpmg.com/tr/en/home.html>).

### 2.2.2 Our strategy

Our strategy is set by the Board of Directors and demonstrates a commitment to quality and trust. Our focus is to invest significantly in priorities that form part of global strategy execution.

## 2.3 Defined accountabilities, roles and responsibilities related to quality and risk management

### 2.3.1 Leadership responsibilities for quality and risk management

Our leadership team is committed to building a culture based on integrity, quality, objectivity, independence and ethics, demonstrated through their actions.

KPMG Türkiye has agreed to seek input from the chair of the relevant Global Steering Group or their delegate on the performance of certain leaders within KPMG Türkiye whose role most closely aligns with the activities of the Global Steering Group. Input is sought as part of the annual performance process and is based on an assessment of the leader's performance, which includes matters of public interest, audit quality and risk management activities.

The following individuals have leadership responsibilities for quality and risk management at KPMG Türkiye.



Message from the Country Senior Partner

Our system of quality management is foundational for audit quality

Live our culture and Values

Apply expertise and knowledge

Embrace digital technology

Nurture diverse skilled teams

Associate with the right clients and engagements

Be independent and ethical

Perform quality engagements

Assess risks to quality

Monitor and remediate

Communicate effectively

Financial information

Partner remuneration

Network arrangements

Statement on the effectiveness of the System of Quality Management of [legal member firm name] as at 30 September 2023

Appendix

## Leadership responsibilities for quality and risk management

### Senior Partner

In accordance with the principles in ISQM 1, our Senior Partner, Murat Alsan is the leader who has ultimate responsibility for our SoQM.

Details of some of the measures that he and the rest of the Board have taken to ensure that a culture of quality prevails within KPMG Türkiye are set out in “Audit Leadership Team”.

### Risk Management Partner

Risk Management Partner (RMP) is responsible for the direction and execution of risk, compliance, and quality in KPMG Türkiye. The RMP is a member of Board of Directors and has a direct reporting line to the Senior Partner. The RMP consults, as appropriate, with the Senior Partner, the Regional Risk Management Partner, Global Quality & Risk Management resources, and the general counsel or external counsel.

The RMP has a seat on the Board of Directors. The fact that the role is a Management Team position, and seniority of the reporting lines, underlines the importance that the firm places on risk and quality issues. The RMP is supported by a team of partners and professionals in each of the functions. .

### Ethics and Independence Partner

The Ethics and Independence Partner (EIP) has primary responsibility for the direction and execution of ethics and independence policies and procedures in KPMG Türkiye. In Türkiye, EIP role is performed by the RMP.

### Audit, Tax (Accounting), Deal Advisory and Consulting functions - Function Heads

The four heads of the client service functions (Audit, Tax (Accounting), Deal Advisory and Consulting) are accountable to the Senior Partner for the quality of service delivered in their respective functions. They are responsible for the execution of the risk management, and quality assurance and monitoring procedures for their specific functions within the framework set by the RMP. These procedures make it clear that, at the engagement level, risk management and quality control is ultimately the responsibility of all professionals in the firm.

KPMG SMMM Head of Audit is responsible for the effective management and control of the Audit Function. This includes:

- Setting a strong tone and culture supporting audit quality through communication, engagement support and commitment to the highest standards of professional excellence, including professional skepticism, objectivity, and ethics and integrity;
- Developing and implementing an audit strategy that is aligned with the firm’s audit quality requirements;
- Working with the RMP to monitor and address audit quality and risk matters as they relate to the Audit practice.

### Audit Leadership Team

The Audit Leadership Team met 24 times during the year (2022: 25) and these meetings included regular discussions to agree actions about current and emerging audit quality issues arising from external and internal quality review processes, queries being raised by engagement teams, root cause analysis procedures and other quality matters identified from a variety of sources. These were debated, other observations collected from client-facing teams were considered and actions agreed.

In addition, the leaders representing the relevant departments were invited to the meetings where problems related to customers and employees, relevant solutions and actions were discussed. In addition to the regular meetings held by the Audit Leadership Team, Audit Department meetings were held 20 (2022:17) times a year at partner and director level, and 6 (2022:3) times at the managers level. In these meetings, the matters related to business plan were discussed, the suggestions and comments of the participants were taken into consideration.

For more complex issues (which might require amendments to KPMG’s global audit methodology or audit tools) these will be raised with the KPMG International Global Audit groups for consideration and potential development of solutions by the KPMG Global Solutions Group (KGSG), Global Audit Methodology Group (GAMG) and the International Standards Group (ISG). For more information about the KGSG, GAMG and the ISG refer to section 8.1.2 of the member firm transparency report.



Message from the Country  
Senior Partner

Our system of quality management  
is foundational for audit quality

Live our culture and Values

Apply expertise and knowledge

Embrace digital technology

Nurture diverse skilled teams

Associate with the right  
clients and engagements

Be independent and ethical

Perform quality engagements

Assess risks to quality

Monitor and remediate

Communicate effectively

Financial information

Partner remuneration

Network arrangements

Statement on the effectiveness of  
the System of Quality Management  
of [legal member firm name] as at  
30 September 2023

Appendix

## Leadership responsibilities for quality and risk management



### Audit Quality Council

Audit Quality Council (Council) has been authorized by the Board of Directors within the framework of its duties and responsibilities stated below. Main responsibilities and duties of the Council are as follows:

- (i) Determining of KPMG SMMM quality strategy in line with the System of Quality Management strategy developed by KPMG Global and establishing policies and procedures to achieve the targeted quality level in this context,
- (ii) Within the scope of ISA 220, KYS1, ISQM1 and Serial: X, No:22 regulations, establishment and operation of quality control systems, creation of quality control processes, establishing and auditing of controls, determining and assigning the duties and responsibilities of the people who will take part in the quality processes,
- (iii) Establishing and monitoring action plans regarding internal and external inspection results,
- (iv) Investigation of any activity under its responsibility or the sub-processes that serve these activities,
- (v) Taking advice or opinion from independent, legal or other professional authorities as needed,
- (vi) Inspection of the assigned persons and work units in the process of making the action plans determined by the Council operative,
- (vii) Publication of works and decisions taken by the Council, if deemed necessary,
- (viii) Other actions to be taken towards quality targets.

During the year, the Audit Quality Council conducted its activities with seven permanent members and an observer. The Audit Quality Council met 13 times in during the year. Main agenda items in the meetings including but not limited to the topics presented below:

- (a) General Audit Quality
- (b) Audit People Management
- (c) Audit Quality and Risk Management
- (d) Audit Quality Performance Ratings
- (e) System of Quality Management
- (f) Audit Learning and Development
- (g) Audit Department of Professional Practices
- (h) Audit Engagement Quality Control
- (i) Information Technologies (IT) Audit
- (j) Audit Root Cause Analysis
- (k) Audit tools
- (l) Second Line of Defense
- (m) Regulatory Compliance
- (n) Other issues related to Audit quality



Message from the Country  
Senior Partner

Our system of quality management  
is foundational for audit quality

### Live our culture and Values

Apply expertise and knowledge

Embrace digital technology

Nurture diverse skilled teams

Associate with the right  
clients and engagements

Be independent and ethical

Perform quality engagements

Assess risks to quality

Monitor and remediate

Communicate effectively

Financial information

Partner remuneration

Network arrangements

Statement on the effectiveness of  
the System of Quality Management  
of [legal member firm name] as at  
30 September 2023

Appendix

2.4 Overseen using robust governance structures

2.4.1 Our legal and governance structure

As at 30 September 2023, KPMG SMMM is affiliated with KPMG International Limited, an English private company limited by guarantee. Further details about KPMG International and its business, including our relationship with it, are available in the “Governance and leadership” section of the [KPMG International Transparency Report](#).

KPMG Türkiye is part of the KPMG global organization of professional services firms providing Audit, Tax and Advisory services to a wide variety of public and private sector organizations. KPMG organization structure is designed to support consistency of service quality and adherence to agreed values wherever the member firms operate.

KPMG SMMM is a joint stock company incorporated under the Turkish Commercial Code. As at 30 September 2023, KPMG SMMM is wholly owned by 26 shareholders who are set out in Appendix 1.

As at 30 September 2023, the Board of Directors are set out in the table below.

Board of Directors	
Chairman of the Board of Directors	Murat Alsan
Vice Chairman of the Board of Directors	Ruşen Fikret Selamet
Member of the Board of Directors	Orhan Akova

Full details of those charged with governance for KPMG SMMM, including their biographies are set out in Appendix 2

Governance structure

KPMG Türkiye applies high standards of corporate governance.

The Board of Directors of KPMG Türkiye (Board)

The Senior Partner chairs the Board of Directors of KPMG Türkiye (Board) ensuring that the Board members receive accurate, timely and clear information and ensuring effective communication and relationships with the members at large.

The principal governance and oversight body of KPMG Türkiye is the Board which provides leadership to the organization and is responsible for our long-term growth and sustainability, setting our strategy and overseeing its implementation, monitoring performance against our business plan and protecting and enhancing the KPMG brand. The Board focuses on strategic management matters and organize shareholders’ meetings four times in a year.

The Board consists of 3 members, including the Senior Partner, the Head of Quality & Risk Management and Head of Audit.

In addition, there are three main bodies that deal with key aspects of governance within the group that report into the Board. These are:

- The Management Team
- The Audit and Risk Committee
- The Nomination and Remuneration Committee

Details about the roles and responsibilities and composition of each of these key bodies are set out below.

The Management Team (MT)

The Management Team is the management and oversight body of KPMG Türkiye. The main responsibilities of the Management Team include the approval of overall strategy, policies and regulations.

Management executive decisions for KPMG Türkiye are taken by the Management Team, which meets regularly (minimum once in a month) and is chaired by the Senior Partner.

As at 30 September 2023, the Management Team consists of Senior Partner; Head of Quality and Risk Management, Head of Audit, Head of Deal Advisory, Head of Consulting, Head of Tax, Head of Clients and Markets and Head of People.



Message from the Country Senior Partner

Our system of quality management is foundational for audit quality

Live our culture and Values

Apply expertise and knowledge

Embrace digital technology

Nurture diverse skilled teams

Associate with the right clients and engagements

Be independent and ethical

Perform quality engagements

Assess risks to quality

Monitor and remediate

Communicate effectively

Financial information

Partner remuneration

Network arrangements

Statement on the effectiveness of the System of Quality Management of [legal member firm name] as at 30 September 2023

Appendix

## The Audit and Risk Committee

The principal role of the Audit and Risk Committee is to provide oversight of quality and risk management matters, identifying and reporting relevant issues to the Board of KPMG Türkiye in a timely manner. Purpose of Audit and Risk Committee is as follows:

- (i) Overseeing the integrity and compliance of the financial reporting system and internal control system regarding the operations carried out by KPMG Türkiye
- (ii) Overseeing the professional and operational risks affecting KPMG Türkiye and the management of these risks
- (iii) Making recommendations on appointment, dismissal and remuneration of the independent auditor of KPMG Türkiye
- (iv) Monitoring compliance with current legislation.

The Audit and Risk Management Committee consists of 3 members being the partners of KPMG Türkiye.

## The Nomination and Remuneration Committee

The Nomination and Remuneration Committee is responsible for identifying and reporting relevant issues to the Board and presenting annually to Annual Partners' Meeting on its work. Purpose of the Nomination and Remuneration Committee is as follows:

- (i) Reviewing the process for determining individual profit allocation and distribution for partners' remuneration
- (ii) Making recommendations on policies for remuneration and profit allocation of the Senior Partner and reviewing the recommendations of Senior Partner on partners' remuneration
- (iii) Establishing and keep under review the framework for Chairman, Vice Chairman and Board member elections
- (iv) Reviewing the criteria for admission of an individual to become a partner.

The Nomination and Remuneration Committee consisted of 3 members being the partners of KPMG Türkiye.

Further information regarding partner remuneration is set out in Section 13.



Message from the Country  
Senior Partner

Our system of quality management  
is foundational for audit quality

Live our culture and Values

Apply expertise and knowledge

Embrace digital technology

Nurture diverse skilled teams

Associate with the right  
clients and engagements

Be independent and ethical

Perform quality engagements

Assess risks to quality

Monitor and remediate

Communicate effectively

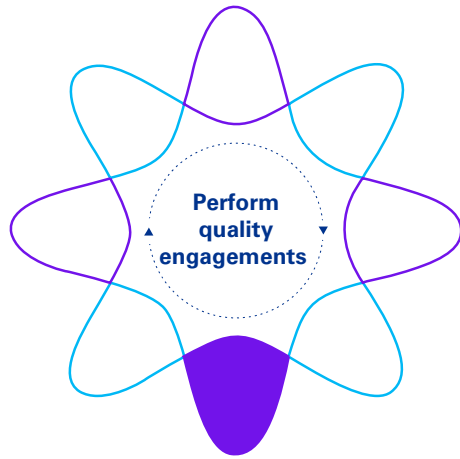
Financial information

Partner remuneration

Network arrangements

Statement on the effectiveness of  
the System of Quality Management  
of [legal member firm name] as at  
30 September 2023

Appendix



# 3 Apply expertise and knowledge

- **Methodology aligned with professional standards, laws and regulations**
- **Standardized methodology and guidance**
- **Deep technical expertise and knowledge**
- **Quality and risk management policies**

We are committed to continuing to build on our technical expertise and knowledge recognizing its fundamental role in delivering quality audits..

## 3.1 Methodology aligned with professional standards, laws and regulations

### 3.1.1 Consistent audit and assurance methodology and tools

We use KPMG International's audit and assurance methodology, tools and guidance to drive a consistent approach to planning, performing and documenting audit procedures over key accounting processes. Key elements include:

- Meeting the applicable standards, including International Standards on Auditing (ISA), Public Company Accounting Oversight Board (PCAOB) and the American Institute of CPAs (AICPA), and are supplemented to comply with local auditing standards and regulatory or statutory requirements by KPMG firms.
- Identifying risks of material misstatements and the necessary audit response.



Message from the Country Senior Partner

Our system of quality management is foundational for audit quality

Live our culture and Values

Apply expertise and knowledge

Embrace digital technology

Nurture diverse skilled teams

Associate with the right clients and engagements

Be independent and ethical

Perform quality engagements

Assess risks to quality

Monitor and remediate

Communicate effectively

Financial information

Partner remuneration

Network arrangements

Statement on the effectiveness of the System of Quality Management of [legal member firm name] as at 30 September 2023

Appendix



- Embedded in the practice of our audit and assurance professionals.
- Alignment to the International Standard on Assurance Engagements (ISAE) s in response to the growth of ESG reporting.
- Consistent interpretation of how to apply ISAs and ISAEs.

Our audit and assurance methodologies emphasize applying appropriate professional skepticism in the execution of procedures and require compliance with relevant ethical requirements, including independence.

## 3.2 Standardized methodology and guidance

The KPMG standardized methodology and guidance are embedded within KPMG Clara, our smart audit platform, and assist our engagement teams in meeting the ever-changing landscape of corporate reporting.

## 3.3 Deep technical expertise and knowledge

### 3.3.1 Access to specialist networks

Specialist expertise is an increasingly important part of the modern audit and is a key feature of our multi-disciplinary model. KPMG Türkiye engagement teams have access to a network of KPMG specialists to consult – either within their firm or in other KPMG firms. These specialists receive the training they need to ensure they have the competencies, capabilities and objectivity to appropriately fulfil their role on our audits. They also receive a global annual update on global quality performance issues.

The need for specialists to be assigned to an audit engagement in areas such as information, technology, tax, treasury, actuarial, forensic and valuations is considered as part of the audit engagement acceptance and continuance process, as well as during the planning and conduct of the engagement.

### 3.3.2 Our commitment to audit quality by responding to significant external events and conditions

Significant external events and conditions, such as the impacts arising from climate change, geopolitical events, volatile interest rates and elevated levels of inflation may have significant financial statement implications, increasing complexity, subjectivity and uncertainty for matters such as management's going concern assessment, asset impairments and asset valuations. KPMG International issues extensive guidance to assist engagement teams in our firm in addressing the financial reporting, auditing and reporting related matters arising from the impacts of these significant external events and conditions.

We also have access to online financial reporting resource center maintained by KPMG International that highlights the potential financial statement implications of matters arising from significant external events to assist financial statement preparers and other stakeholders in understanding the potential accounting and disclosure implications of arising from these significant external events and conditions.

KPMG International's guidance is continually updated as new significant accounting, auditing and reporting issues emerge.

We are a technology-enabled organization, with technical accounting and auditing resources, guidance, platforms and tools available digitally, which enables our engagement teams to effectively operate in office and remote-working environments.

### 3.3.3 ESG Assurance quality

KPMG is committed to fulfilling our public interest role in providing robust assurance that can benefit investors and other stakeholders.

We believe the same level of professionalism, quality, consistency and trust should apply to ESG reporting as to financial data. We are making significant investments in putting ESG at the heart of the organization.

During 2023, as part of the global organization's commitments to serving the public interest, KPMG International:

- Released a revised methodology for ESG assurance designed to be flexible and scalable, while enabling high quality, globally consistent assurance engagement delivery that complies with assurance standards and aligns with our financial statement audit methodology. The scope of the execution guide is broader than ESG assurance and is also applicable for all ISAE 3000 assurance engagements;
- Delivered guidance to be used in conjunction with the methodology that is supported by standardized risks and procedures for Greenhouse gas assurance engagements;
- Released learning curriculum to increase the foundational ESG literacy of KPMG professionals and enable upskilling on the new methodology and KPMG Clara workflow – Assurance.

## 3.4 Quality and risk management manual

KPMG International has global quality and risk management policies that all KPMG firms have agreed to apply to themselves and their personnel and are consistent with ISQM 1, where applicable.



Message from the Country Senior Partner

Our system of quality management is foundational for audit quality

Live our culture and Values

Apply expertise and knowledge

Embrace digital technology

Nurture diverse skilled teams

Associate with the right clients and engagements

Be independent and ethical

Perform quality engagements

Assess risks to quality

Monitor and remediate

Communicate effectively

Financial information

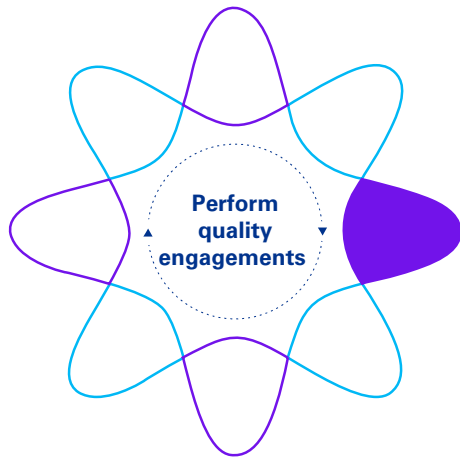
Partner remuneration

Network arrangements

Statement on the effectiveness of the System of Quality Management of [legal member firm name] as at 30 September 2023

Appendix





# 4 Embrace digital technology

- **KPMG Clara**
- **Intelligent, standards-driven audit and assurance workflows**
- **Digital data and emerging technologies**

At KPMG, we are anticipating the technologies that will shape our near future and are driving an ambitious innovation agenda. We have transformed the audit experience for our professionals and clients. The alliances and leading technologies used across the KPMG global organization are enhancing audit quality by increasing our ability to focus on the issues that matter.

## 4.1 KPMG Clara

An intelligent audit and assurance technology platform, KPMG Clara integrates new and emerging technologies, with advanced capabilities that leverage data science, audit automation, and data visualization. It brings new insights by helping auditors to see meaningful patterns across a business, whether conducting risk assessment, tracing transactions through a complex revenue process, or simply adding up the accounts.

A fully digital audit approach is integral to how KPMG firms perform quality audit and assurance engagements and interact with their clients. Policies and guidance are in place to establish and maintain appropriate processes and controls regarding the development, evaluation and testing, deployment and support of technology in our audits.

All KPMG Türkiye professionals are expected to adhere to KPMG International and KPMG Türkiye policies and procedures, including independence policies, and are provided with a range of tools and guidance to support them in meeting these expectations. The KPMG Türkiye policies and procedures set for audit engagements incorporate the relevant requirements of accounting, auditing, ethical and quality control standards, and other relevant laws and regulations mainly audit regulations of the POA.



Message from the Country  
Senior Partner

Our system of quality management  
is foundational for audit quality

Live our culture and Values

Apply expertise and knowledge

Embrace digital technology

Nurture diverse skilled teams

Associate with the right  
clients and engagements

Be independent and ethical

Perform quality engagements

Assess risks to quality

Monitor and remediate

Communicate effectively

Financial information

Partner remuneration

Network arrangements

Statement on the effectiveness of  
the System of Quality Management  
of [legal member firm name] as at  
30 September 2023

Appendix

## 4.2 Intelligent, standards-driven audit and assurance workflows

At our firm, all professionals are expected to adhere to KPMG International and our firm's policies and procedures, including independence policies, and are provided with a range of tools and guidance to support them in meeting these expectations. Our policies and procedures set for audit and assurance engagements incorporate the relevant requirements of accounting, auditing, assurance, ethical and quality management standards, and other relevant laws and regulations.

As a scalable, intuitive cloud-based platform, KPMG Clara is driving globally consistent execution across all KPMG firms. It enables delivery of KPMG audit and assurance methodologies, through data-enabled workflows, that are aligned with the applicable standards, providing an improved experience to auditors.

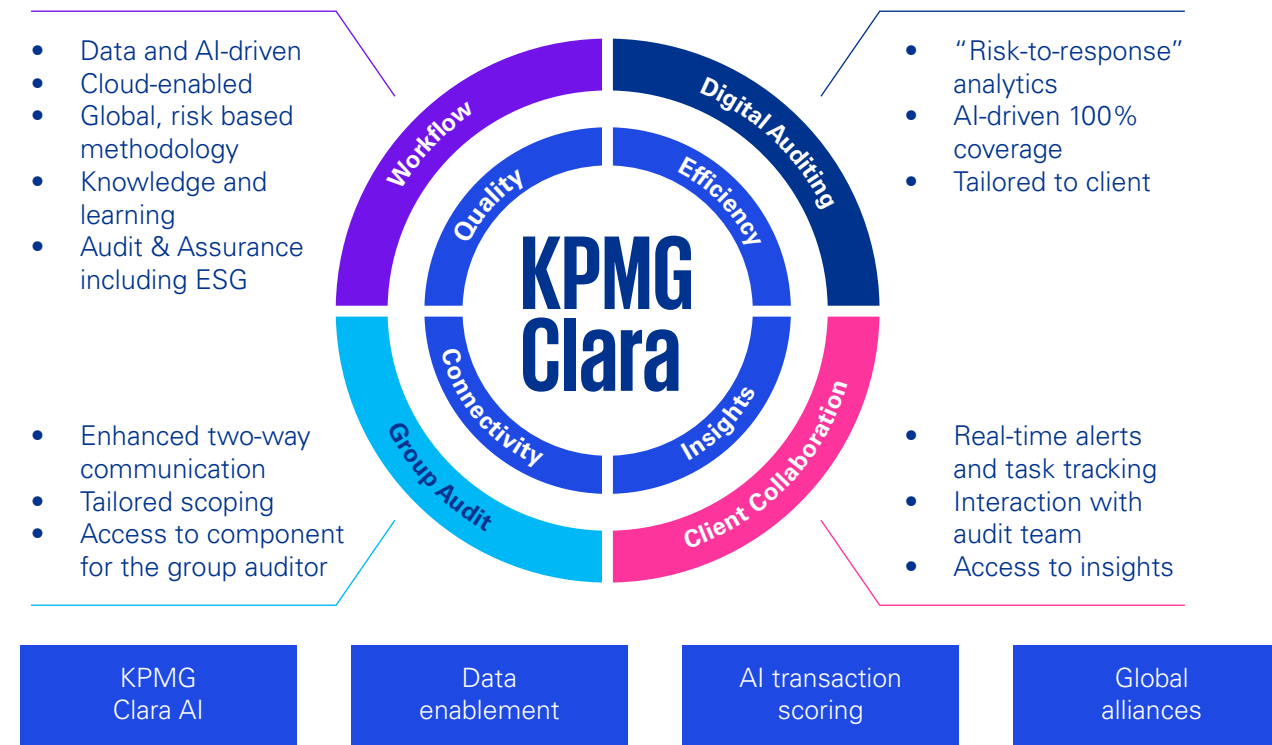
## 4.3 Digital data and emerging technologies

### Our vision of the future

KPMG Clara was developed to be a foundational technology platform to deliver audit quality. It evolves with technologies such as artificial intelligence (AI), data & analytics and cognitive capabilities transforming how audits are delivered.

The KPMG organization's procurement and global alliance relationships with Microsoft were recently renewed and expanded. The multi-year agreement further integrates data, automation and AI enablement into KPMG Clara to develop deeper, increasingly

AI plays an increasingly significant role in delivering audits; the alliances with is helping to better identify high-risk transactions, allowing us to obtain audit evidence and insights into client data.



Message from the Country Senior Partner

Our system of quality management is foundational for audit quality

Live our culture and Values

Apply expertise and knowledge

Embrace digital technology

Nurture diverse skilled teams

Associate with the right clients and engagements

Be independent and ethical

Perform quality engagements

Assess risks to quality

Monitor and remediate

Communicate effectively

Financial information

Partner remuneration

Network arrangements

Statement on the effectiveness of the System of Quality Management of [legal member firm name] as at 30 September 2023

Appendix

4.3.1 Client confidentiality, information security, and data privacy

The importance of maintaining client confidentiality is emphasized through a variety of mechanisms, including the KPMG Global and KPMG Türkiye Code of Conduct.

We have policies on information security, confidentiality, personal information and data privacy.

We have a document retention policy concerning the retention period for audit documentation and other records relevant to an engagement in accordance with applicable laws, regulations, and professional standards.

KPMG provides training on confidentiality, information protection and data privacy requirements to all KPMG Türkiye personnel annually.



Message from the Country Senior Partner

Our system of quality management is foundational for audit quality

Live our culture and Values

Apply expertise and knowledge

Embrace digital technology

Nurture diverse skilled teams

Associate with the right clients and engagements

Be independent and ethical

Perform quality engagements

Assess risks to quality

Monitor and remediate

Communicate effectively

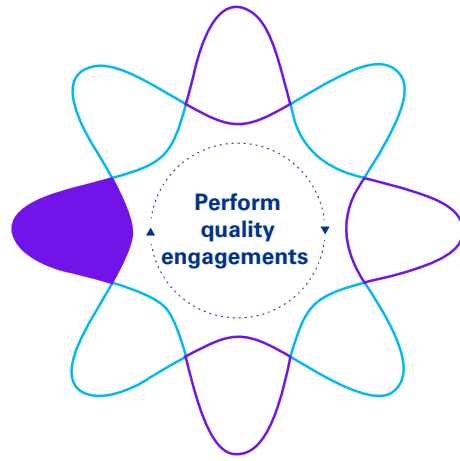
Financial information

Partner remuneration

Network arrangements

Statement on the effectiveness of the System of Quality Management of [legal member firm name] as at 30 September 2023

Appendix



# 5 Nurture diverse skilled teams

- **Recruit appropriately qualified and skilled people with diversity of perspective and experience**
- **Assign appropriately qualified team**
- **Invest in data-centric skills – including data mining, analysis and visualization**
- **Focus learning and development on technical expertise, professional acumen and leadership skill**
- **Recognize quality**

Our people make the real difference and are instrumental in shaping the future of audit at KPMG. We put quality and integrity at the core of our audit practice. Our auditors have diverse skills and capabilities to address complex problems.

## 5.1 Recruit appropriately qualified and skilled people, with diversity of specialist skills, perspective and experience

One of the key drivers of quality is ensuring that KPMG professionals have the appropriate skills and experience, motivation and purpose to deliver high-quality audits. This requires the right recruitment, development, reward, promotion, retention and assignment of professionals.

### 5.1.1 Recruitment

KPMG Türkiye has invested in understanding how we can attract the talent we need now and in the future across our firm. This includes building an extraordinary people experience for all current and prospective partners and employees.



Message from the Country  
Senior Partner

Our system of quality management is foundational for audit quality

Live our culture and Values

Apply expertise and knowledge

Embrace digital technology

Nurture diverse skilled teams

Associate with the right clients and engagements

Be independent and ethical

Perform quality engagements

Assess risks to quality

Monitor and remediate

Communicate effectively

Financial information

Partner remuneration

Network arrangements

Statement on the effectiveness of the System of Quality Management of [legal member firm name] as at 30 September 2023

Appendix

Our recruitment strategy is focused on drawing entry-level talent from a broad talent base, including working with established universities. We also recruit significant numbers at an experienced hire.

All candidates apply and are employed following a variety of selection processes, which may include application screening, competency-based interviews, psychometric and ability testing, and qualification/reference checks. These leverage fair and job-related criteria to ensure that candidates possess the appropriate skills and experience to perform competently, are suitable and best placed for their roles.

Where individuals are recruited for senior grades, a formal independence discussion is conducted with them by the Ethics and Independence Partner or a delegate. KPMG Türkiye does not accept any confidential information belonging to the candidate's former firm/employer.

### 5.1.2 Inclusion, diversity and equity programs

KPMG Türkiye committed to building a diverse and equitable firm that is inclusive to all. Inclusion, diversity and equity (IDE) underpins our Values and is vital to our Purpose.

It leads to better decision-making, drives greater creativity and innovation, and encourages us to stand up, live our Values, and do what is right.

We recognize the KPMG organization's global position working with clients around the world affords us a privileged place. With that comes an opportunity and responsibility to achieve more and push for a fairer, more equitable society.

The KPMG Global Inclusion, Diversity & Equity Collective Action Plan outlines the actions that are necessary to advance inclusion, diversity, and equity KPMG Türkiye and across all KPMG firms.]

For more about Inclusion & Diversity at KPMG read [here](#).

### 5.1.3 Reward and Promotion

#### Reward

KPMG Türkiye compensation and promotion policies that are informed by market data, clear, simple, fair and linked to the performance review process. This helps our partners and employees understand what is expected of them, including audit quality accountabilities outlined in globally consistent audit role profiles and the audit quality goal. The connection between performance and reward is achieved by assessing performance across a peer group to inform reward decisions.

Reward decisions are based on consideration of both personal and individual firm performance.

The extent to which our people feel their performance has been reflected in their reward is measured through the annual Global People Survey, with action plans developed as required.

#### Promotion

The results of performance evaluations directly affect the promotion and remuneration of partners and employees and, in some cases, their continued association with KPMG.

### 5.2 Assign an appropriately qualified team

KPMG Türkiye has policies, procedures and controls in place to assign engagement partners and other professionals to a specific engagement on the basis of their skill sets, relevant professional and industry experience, and the nature of the assignment or engagement. Function heads are responsible for the partner assignment process. Key considerations include partner experience and capacity – based on an annual

partner portfolio review – to perform the engagement taking into account the size, complexity and risk profile of the engagement and the type of support to be provided (i.e. the engagement team composition and specialist involvement).

Audit engagement partners are responsible for determining their engagement teams have appropriate competencies, training and capabilities, including time, to perform audit engagements in accordance with our audit methodology, professional standards, and applicable legal and regulatory requirements. This may include involving specialists from our own firm, other KPMG firms or external experts.

When considering the appropriate competence and capabilities expected of the engagement team as a whole, the engagement partner's considerations may include the following:

- Understanding of, and practical experience with, audit engagements of a similar nature and complexity through appropriate training and participation;
- Understanding of professional standards and legal and regulatory requirements;
- Appropriate technical skills, including those related to relevant information technology and specialized areas of accounting or auditing;
- Knowledge of relevant industries in which the client operates;
- Ability to apply professional skepticism;
- Understanding of KPMG Türkiye's quality control policies and procedures; Quality Performance Review (QPR) results and results of regulatory inspections.



Message from the Country Senior Partner

Our system of quality management is foundational for audit quality

Live our culture and Values

Apply expertise and knowledge

Embrace digital technology

Nurture diverse skilled teams

Associate with the right clients and engagements

Be independent and ethical

Perform quality engagements

Assess risks to quality

Monitor and remediate

Communicate effectively

Financial information

Partner remuneration

Network arrangements

Statement on the effectiveness of the System of Quality Management of [legal member firm name] as at 30 September 2023

Appendix

### 5.3 Invest in data centric skills – including data mining, analysis and visualization

The KPMG organization is strategically investing in prospective talent by partnering with world-class institutions to sustain strong leadership, while also looking forward to cultivating the skills and capabilities that will be needed in the future. In our firm, we are recruiting and training professionals who specialize in software, cloud capabilities and AI and who can bring leading technology capabilities to the smart audit platform that we use. We provide training on a wide range of technologies to help ensure that field professionals not only meet the highest professional standards but are also upskilled in new technology. With this approach we are bringing together the right people with the right skills and the right technology to perform exceptional audits.

### 5.4 Focused learning and development on technical expertise, professional acumen, and leadership skills

#### 5.4.1 Commitment to technical excellence and quality service delivery

All KPMG Türkiye professionals are provided with the technical training and support they need to perform their roles. This includes access to internal specialists and the professional practice department for consultation. Where the right resource is not available within KPMG Türkiye, we access a network of highly skilled KPMG professionals in other KPMG firms.

At the same time, audit policies require all KPMG audit professionals to have the appropriate knowledge and experience for their assigned engagements.

#### 5.4.2 Lifetime learning strategy

##### *Formal training*

Annual training priorities for development and delivery are identified by the Audit Learning and Development groups at global, regional and, where applicable, KPMG firm level.

Minimum mandatory learning requirements for audit professionals across the KPMG organization are established annually. Training is delivered using a blend of learning approaches and performance support.

##### *Mentoring and on-the-job coaching*

Learning is not confined to a single approach — rich learning experiences are available when needed through coaching and just-in-time learning and aligned with job-specific role profiles and learning paths.

Mentoring and on-the-job experience play key roles in developing the personal qualities important for a successful career in auditing, including professional judgment, technical excellence and instinct.

We support a coaching culture as part of enabling KPMG professionals to achieve their full potential and instil that every team member is responsible for building the capacity of the team, coaching other team members and sharing experiences.

### Licensing and mandatory requirements for IFRS® Standards and US GAAP engagements

#### *Licensing*

All KPMG Türkiye professionals are required to comply with applicable professional licence rules and satisfy the Continuing Professional Development requirements in the jurisdiction where they practice. KPMG International and KPMG Türkiye policies and procedures are designed to facilitate compliance with licence requirements. We are responsible for ensuring that audit professionals working on engagements have appropriate audit, accounting and industry knowledge, and experience in the local predominant financial reporting framework IFRS and Turkish Financial Reporting Standards (“TFRS”) published by POA.

#### *Mandatory requirements – IFRS Standards and US GAAP engagements*

In addition, KPMG has specific requirements for partners, managers and Engagement Quality Control (EQC) reviewers working on IFRS Standards engagements in countries where IFRS Standards are not the predominant financial reporting framework.

Similar policies apply to engagements performed outside the US to report on financial statements or financial information prepared in accordance with US GAAP and/or audited in accordance with US auditing standards, including reporting on the effectiveness of the entity’s internal control over financial reporting (ICOFR).



Message from the Country Senior Partner

Our system of quality management is foundational for audit quality

Live our culture and Values

Apply expertise and knowledge

Embrace digital technology

Nurture diverse skilled teams

Associate with the right clients and engagements

Be independent and ethical

Perform quality engagements

Assess risks to quality

Monitor and remediate

Communicate effectively

Financial information

Partner remuneration

Network arrangements

Statement on the effectiveness of the System of Quality Management of [legal member firm name] as at 30 September 2023

Appendix



These require that at a minimum, all partners, managers and, if appointed, the EQC reviewers (and for engagements conducted in accordance with US GAAP and/or US auditing standards engagements, the engagement partner, engagement manager, engagement in-charge and, if appointed the EQCR reviewers) assigned to the engagement have completed relevant training and that the engagement team, collectively, has sufficient experience to perform the engagement or has implemented appropriate safeguards to address any shortfalls.

## 5.5 Recognize quality

### 5.5.1 Personal development

Our approach to performance development, ‘Open Performance Development’, is built around the ‘Everyone a Leader’ performance principles which are supplemented by the ‘global audit technical core competencies’ to provide a holistic view of expectations. The performance development approach includes:

- Globally consistent audit role profiles (including role profiles specific to audit quality accountabilities and responsibilities)
- A goal library (including a mandatory audit quality goal applicable to everyone covered by the globally consistent audit role profiles and additional optional audit quality content)
- Standardized review forms (with provision for audit quality ratings).

Open Performance Development is linked to the KPMG Values and designed to articulate what is required for success — both individually and collectively. We know that by being clear and consistent about the behaviors and competencies we expect and rewarding those who demonstrate them, we will continue to drive a relentless focus on quality.

At the same time, we are driving a shift in our performance-driven culture, supported by and enacted through leading technology made available by KPMG International that allows us to embed audit quality into the assessment of performance and the decisions around reward, as well as drive consistency across the global organization.

We consider quality and compliance metrics in assessing the overall evaluation, promotion and remuneration of partners, directors and managers. These evaluations are conducted by performance managers and partners who are able to assess performance.



Message from the Country Senior Partner

Our system of quality management is foundational for audit quality

Live our culture and Values

Apply expertise and knowledge

Embrace digital technology

Nurture diverse skilled teams

Associate with the right clients and engagements

Be independent and ethical

Perform quality engagements

Assess risks to quality

Monitor and remediate

Communicate effectively

Financial information

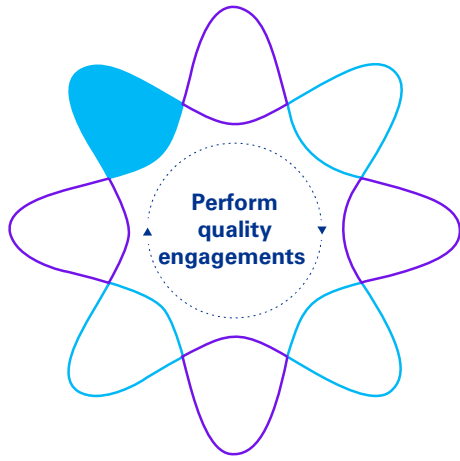
Partner remuneration

Network arrangements

Statement on the effectiveness of the System of Quality Management of [legal member firm name] as at 30 September 2023

Appendix





# 6 Associate with the right clients and engagements

- **Global client acceptance and continuance policies**
- **Accept appropriate clients and engagements**
- **Manage portfolio of clients**

Rigorous global client and engagement acceptance and continuance policies are vital to being able to provide high-quality professional services.

## 6.1 Global client and engagement acceptance and continuance policies

In iaculis nunc sed augue lacus viverra vitae congue. Odio aenean sed adipiscing diam donec adipiscing tristique risus. Volutpat diam ut venenatis tellus in metus vulputate eu.

In iaculis nunc sed augue lacus viverra vitae congue. Odio aenean sed adipiscing diam donec adipiscing tristique risus. Volutpat diam ut venenatis tellus in metus vulputate eu.



Message from the Country Senior Partner

Our system of quality management is foundational for audit quality

Live our culture and Values

Apply expertise and knowledge

Embrace digital technology

Nurture diverse skilled teams

Associate with the right clients and engagements

Be independent and ethical

Perform quality engagements

Assess risks to quality

Monitor and remediate

Communicate effectively

Financial information

Partner remuneration

Network arrangements

Statement on the effectiveness of the System of Quality Management of [legal member firm name] as at 30 September 2023

Appendix

## 6.2 Accept appropriate clients and engagements

### 6.2.1 Client evaluation

Our evaluation of a prospective client includes an assessment of the client's risk profile and background information on the client, its key management, directors and owners. If necessary, the evaluation includes obtaining and assessing additional information required to satisfy applicable legal / regulatory requirements.

### 6.2.2 Engagement evaluation

We consider a range of factors considered when we are evaluating each prospective engagement including:

- Potential independence and conflict of interest issues,
- Intended purpose and use of engagement deliverables,
- Public perception,
- Whether the services would be unethical or inconsistent with our Values.

In addition, the evaluation of an audit engagement includes an assessment of the competence of the client's financial management team and the skills and experience of KPMG professionals. Where we are providing audit services for the first time, additional independence evaluation procedures are performed, including a review of any non-audit services provided to the client and of other relevant business, financial and personal relationships.

Similar independence evaluations are performed when an existing audit client becomes a public interest entity or additional independence restrictions apply following a change in the circumstances of the client.

Any potential independence or conflict of interest issues are required to be documented and resolved prior to acceptance.

A prospective client or engagement will be declined if a potential independence or conflict issue cannot be resolved satisfactorily in accordance with professional standards and our policies, or if there are other quality and risk issues that cannot be appropriately mitigated.

### 6.2.3 Continuance process

We undertake an annual re-evaluation of all audit clients to identify risks in relation to continuing our association and mitigating procedures that need to be put in place.

In addition, clients and engagements are required to be re-evaluated if there is an indication that there may be a change to the risk profile.

### 6.2.4 Withdrawal process

When we come to a preliminary conclusion that indicates we should withdraw from an engagement or client relationship, we must consult internally and identify any required legal, professional and regulatory responsibilities with respect to that relationship. We also consider further communications with those charged with governance and any other appropriate authority as required under its professional obligations.

## 6.3 Manage portfolio of clients

KPMG International and KPMG Türkiye have policies and procedures to enable our firm to monitor the workload and availability of engagement partners, managers and staff and personnel to provide sufficient time to complete their responsibilities.

Our firm's engagement partners are responsible for determining that members of the engagement team collectively have the appropriate competence and capabilities, including sufficient time, to successfully perform the engagement in accordance with professional standards and regulatory and legal requirements. See section 5.2 Assigning an appropriately qualified team.



Message from the Country Senior Partner

Our system of quality management is foundational for audit quality

Live our culture and Values

Apply expertise and knowledge

Embrace digital technology

Nurture diverse skilled teams

Associate with the right clients and engagements

Be independent and ethical

Perform quality engagements

Assess risks to quality

Monitor and remediate

Communicate effectively

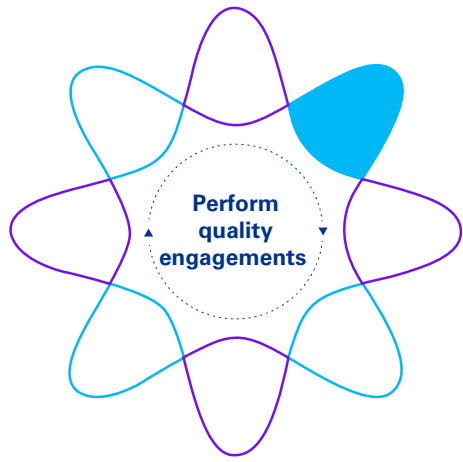
Financial information

Partner remuneration

Network arrangements

Statement on the effectiveness of the System of Quality Management of [legal member firm name] as at 30 September 2023

Appendix



# 7 Be independent and ethical

- **Act with integrity and live our Values**
- **Maintain an objective, independent and ethical mindset, in line with our code of conduct and policies**
- **Have zero tolerance of bribery and corruption**

Auditor independence is a cornerstone of international professional standards and regulatory requirements

## 7.1 Act with integrity and live our Values

We know that trust is earned by doing the right thing. We are committed to the highest standards of personal and professional behavior throughout our firm in everything we do. Ethics and integrity are core to who we are. Within global or our firm Code of Conduct, we outline the responsibilities KPMG people have to each other, our clients and the public. It shows how our Values inspire our greatest aspirations and guide all of our behaviors and actions.



Message from the Country Senior Partner

Our system of quality management is foundational for audit quality

Live our culture and Values

Apply expertise and knowledge

Embrace digital technology

Nurture diverse skilled teams

Associate with the right clients and engagements

Be independent and ethical

Perform quality engagements

Assess risks to quality

Monitor and remediate

Communicate effectively

Financial information

Partner remuneration

Network arrangements

Statement on the effectiveness of the System of Quality Management of [legal member firm name] as at 30 September 2023

Appendix

## 7.2 Maintain an objective, independent and ethical mindset

KPMG International's independence policies and procedures incorporate the IESBA Code of Ethics, covering areas such as firm and personal independence, firm financial relationships, employment relationships, partner rotation and approval of audit and non-audit services.

These policies are supplemented by other policies and processes to ensure compliance with the standards issued by POA and those of other applicable regulatory bodies. These policies and processes cover areas such as firm independence (covering, for example, treasury and procurement functions), personal independence, firm financial relationships, employment relationships, partner rotation and approval of audit and non-audit services.

Our Ethics and Independence Partner (EIP) is responsible for communicating and implementing KPMG policies and procedures and ensuring that any additional local independence policies and procedures are established and effectively implemented.

Automated tools identify potential independence and conflict of interest issues and facilitate compliance with these requirements. KPMG firm compliance with independence requirements is part of the global KPMG Quality & Compliance Evaluation (KQCE) program.

### 7.2.1 Personal financial independence

KPMG firms and KPMG personnel are required to be free from prohibited financial interests in, and prohibited financial relationships with, KPMG firm audit and assurance clients (by definition, 'audit client' includes its related entities or affiliates), their management, directors and, where required, significant owners. All KPMG partners — irrespective of their firm or function — are generally prohibited from owning securities of any audit client of any KPMG firm.

KPMG firms use a web-based independence compliance system to assist KPMG professionals in complying with personal independence investment policies. The system facilitates monitoring by identifying and reporting impermissible investments and other non-compliant activity (i.e. late reporting of an investment acquisition).

We monitor partner and manager compliance with this requirement as part of our program of independence compliance audits of professionals. KPMG International provides guidance and required procedures relating to the audit and inspection by KPMG firms of personal compliance with KPMG independence policies. This includes sample criteria including the minimum number of professionals to be audited annually.

In 2023, over 50 of our partners and employees were subject to these audits (this included approximately 15% of our partners.)

### 7.2.2 Employment relationships

Any KPMG professional providing services to an audit or assurance client irrespective of function is required to notify the firm EIP if they intend to enter into employment negotiations with that client. For partners, this extends to any audit client of any KPMG firm that is a public interest entity. Specific prohibitions, and in some instances, cooling off periods apply to accepting certain roles at audit and assurance clients.

### 7.2.3 Firm financial independence

KPMG firms are required to also be free from prohibited interests in, and prohibited relationships with, audit clients, their management, directors and, where required, significant owners.

KPMG's independence compliance system records direct and material indirect investments in listed entities and funds (or similar investment vehicles) as well as in non-listed entities or funds. This includes investments held in associated pension and employee benefit plans.

All KPMG firms borrowing and capital financing relationships, as well as custodial, trust and brokerage accounts that hold member firm assets must also be recorded.

On an annual basis, we confirm compliance with independence requirements as part of the global KQCE program.



Message from the Country Senior Partner

Our system of quality management is foundational for audit quality

Live our culture and Values

Apply expertise and knowledge

Embrace digital technology

Nurture diverse skilled teams

Associate with the right clients and engagements

Be independent and ethical

Perform quality engagements

Assess risks to quality

Monitor and remediate

Communicate effectively

Financial information

Partner remuneration

Network arrangements

Statement on the effectiveness of the System of Quality Management of [legal member firm name] as at 30 September 2023

Appendix

## 7.2.4 Business relationships/suppliers

KPMG Türkiye has policies and procedures in place that are designed to ensure its business relationships with audit and assurance clients are maintained in accordance with the IESBA Code of Ethics and Code of Ethics of POA and other applicable independence requirements, such as those promulgated by the SEC.

## 7.2.5 Business acquisitions, admissions and investments

Any acquisition of, or investment in, a business requires sufficient due diligence procedures to identify and address any potential independence and risk management issues prior to closing the transaction. Specific consultations with KPMG International are required to enable independence and other issues to be addressed when integrating the business into the wider global organization.

## 7.2.6 Independence training and confirmations

All KPMG partners and client-facing professionals, as well as certain other individuals, are required to complete independence training upon joining KPMG and on an annual basis thereafter and must sign an annual confirmation of compliance.

We also provide all partners and employees with annual training on the KPMG Türkiye's Code of Conduct.

## 7.2.7 Non-audit services

All KPMG firms have agreed, at a minimum, to comply with the IESBA Code of Ethics and applicable laws and regulations related to the scope of services that can be provided to audit clients.

KPMG's mandatory conflicts and independence checking system supports our compliance with independence requirements. Certain information on all prospective engagements, including detailed service descriptions, deliverables and estimated fees, are required to be entered as part of the engagement acceptance process. When the engagement is for an audit client, an evaluation of potential independence threats and safeguards is also required to be included in the submission.

Lead audit engagement partners are required to maintain group structures for their public interest entity and certain other audit clients including their related entities/affiliates. They are also responsible for identifying and evaluating any independence threats that may arise from the provision of a proposed non-audit service and the safeguards available to address those threats.

KPMG firms are prohibited from evaluating or compensating audit partners on selling non-audit services to their audit clients.

## 7.2.8 Fee dependency

KPMG firms have agreed to consult with their Regional Risk Management Partner where total fees from an audit client are expected to exceed 10 percent of the annual fee income of the KPMG firm for two consecutive years. If the total fees from a public interest entity audit client and its related entities were to represent more than 15 percent of the total fees received by a particular

KPMG firm in a single year, this would be disclosed to those charged with governance at the audit client. Where the total fees continued exceed 15 percent for two consecutive years, we would engage a partner from another KPMG firm as the engagement quality control (EQC) reviewer and the fee dependency would be publicly disclosed.

## 7.2.9 Avoiding conflicts of interest

All KPMG firms and personnel are responsible for identifying and managing conflicts of interest, which are circumstances or situations that have, or may be perceived to have, an impact on a firm's and/or its partners' or employees' ability to be objective or otherwise act without bias.

KPMG firms use the mandatory conflicts and independence checking system for potential conflict identification so that these can be addressed in accordance with legal and professional requirements.

KPMG personnel are prohibited from offering or accepting inducements, including gifts and hospitality to or from audit clients, unless the value is trivial and inconsequential.



Message from the Country Senior Partner

Our system of quality management is foundational for audit quality

Live our culture and Values

Apply expertise and knowledge

Embrace digital technology

Nurture diverse skilled teams

Associate with the right clients and engagements

Be independent and ethical

Perform quality engagements

Assess risks to quality

Monitor and remediate

Communicate effectively

Financial information

Partner remuneration

Network arrangements

Statement on the effectiveness of the System of Quality Management of [legal member firm name] as at 30 September 2023

Appendix

## 7.2.10 Independence breaches

All KPMG personnel are required to report an independence breach as soon as they become aware of it. All breaches of independence requirements of the IESBA Code of Ethics or other external independence requirements are required to be reported to those charged with governance as soon as possible, except where alternative timing for less significant breaches has been agreed with those charged with governance.

KPMG Türkiye has a disciplinary policy in relation to breaches of independence policies, incorporating incremental sanctions reflecting the seriousness of any violations.

## 7.2.11 Partner and firm rotation

### Partner rotation

KPMG International partner rotation policies are consistent with the requirements of the IESBA Code of Ethics and require all member firms to comply with any stricter local applicable rotation requirements. POA requires KPMG SMMM to comply with more strict rotation requirements in Türkiye.

KPMG SMMM partners, directors and managers are subject to periodic rotation of their responsibilities for audit clients under applicable laws, regulations, independence rules and KPMG International policy. These requirements place limit on the number of consecutive years that partners in certain roles may provide audit services to a client, followed by a 'time-out' period during which time these partners are restricted in the roles they can perform.

### Firm rotation

In certain jurisdictions, KPMG firms are only permitted to act as an auditor for a specific audit client for a defined period of time and then are not to act as auditor for that client for a specified period of time thereafter. KPMG firms in these jurisdictions are required to have processes in place to track and manage compliance with audit firm rotation requirements.

KPMG SMMM shall not undertake a financial statement audit for any audit client in respect of more than seven years in a period of ten years until a three year "cooling off period" has elapsed. KPMG SMMM has processes in place to track and manage audit firm rotation.

Firm and partner rotation periods are the same time by POA requirement.

## 7.3 Have zero tolerance of bribery and corruption

We have zero tolerance of bribery and corruption.

All KPMG firms' partners and employees are required to take training covering compliance with laws, regulations and professional standards relating to anti-bribery and corruption, including the reporting of suspected or actual non-compliance.

Further information on KPMG International anti-bribery and corruption policies can be found on [the anti-bribery and corruption site](#).



Message from the Country  
Senior Partner

Our system of quality management  
is foundational for audit quality

Live our culture and Values

Apply expertise and knowledge

Embrace digital technology

Nurture diverse skilled teams

Associate with the right  
clients and engagements

Be independent and ethical

Perform quality engagements

Assess risks to quality

Monitor and remediate

Communicate effectively

Financial information

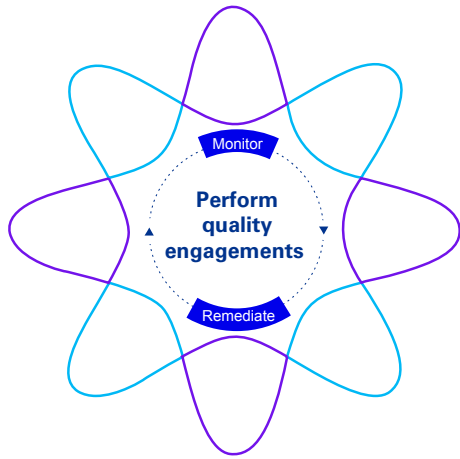
Partner remuneration

Network arrangements

Statement on the effectiveness of  
the System of Quality Management  
of [legal member firm name] as at  
30 September 2023

Appendix





# 8 Perform quality engagements

- **Consult when appropriate**
- **Critically assess audit evidence, using professional judgment and skepticism**
- **Direct, coach, supervise and review**
- **Appropriately support and document conclusions**

How an audit is conducted is as important as the result. Everyone at KPMG is expected to demonstrate behaviors consistent with our Values and follow all policies and procedures in the performance of effective and efficient audits.

## 8.1 Consult when appropriate

### 8.1.1 Encouraging a culture of consultation

KPMG encourages a culture of consultation that supports engagement teams in KPMG firms throughout their decision-making processes and is a fundamental contributor to audit quality. At KPMG, we promote a culture in which consultation is recognized as a strength and that encourages all KPMG professionals to consult on difficult or contentious matters.

To help with this, our firm has established protocols for consultation and documentation of significant matters, including procedures to facilitate resolution of differences of opinion on engagement issues. In addition, KPMG audit, assurance and risk reporting manuals also include required consultations on certain matters.



Message from the Country Senior Partner

Our system of quality management is foundational for audit quality

Live our culture and Values

Apply expertise and knowledge

Embrace digital technology

Nurture diverse skilled teams

Associate with the right clients and engagements

Be independent and ethical

Perform quality engagements

Assess risks to quality

Monitor and remediate

Communicate effectively

Financial information

Partner remuneration

Network arrangements

Statement on the effectiveness of the System of Quality Management of [legal member firm name] as at 30 September 2023

Appendix



## 8.1.2 Technical consultation and global resources

Technical accounting, auditing and assurance support is available to all KPMG firms through a number of subject matter expert global teams.

**Global Audit Methodology Group (GAMG):** Develops KPMG International's audit and assurance methodology based on the requirements of the applicable audit and assurance standards of the IAASB, PCAOB, and AICPA.

**KPMG Global Solutions Group (KGSG):** Develops and deploys global audit and assurance solutions, including new technology and automation innovations.

The GAMG and KGSG teams bring diverse experience and innovative ways of thinking to further evolve KPMG firms' audit and assurance capabilities.

**International Standards Group (ISG):** Promotes consistency of interpretation of IFRS Accounting Standards and IFRS Sustainability Disclosure Standards by KPMG firms and develops global audit guidance in response to emerging issues and to promote global consistency.

**PCAOB Standards Group (PSG):** Promotes consistency in the interpretation of PCAOB auditing standards in KPMG firms' audits of non-US components and foreign private issuers and non-US components of SEC issuers, as defined by SEC regulations. The PSG also provides input into the development of training for auditors who work on PCAOB audit engagements and, where practicable, facilitates delivery of such training.

**Member firm professional practice resources:** Provide consultation support on auditing and technical accounting matters to their audit professionals involving regional or global teams when required.

## 8.2 Critically assess audit evidence using professional judgement and skepticism

On all KPMG audits, the nature and extent of the audit evidence we gather is responsive to the assessed risks. We consider all audit evidence obtained during the course of the audit, including contradictory or inconsistent audit evidence. Each team member needs to exercise professional judgement and maintain professional skepticism throughout the audit engagement. Professional skepticism involves a questioning mind and remaining alert to contradictory, or inconsistencies in, audit evidence. Professional judgment encompasses the need to be aware of and alert to biases that may pose threats to sound judgments.

## 8.3 Direct, coach, supervise and review

### 8.3.1 Embedding ongoing coaching, supervision and review

We promote a coaching culture as part of enabling our professionals to achieve their full potential. We support a continuous learning environment where every team member is responsible for building the capacity of the team, coaching other team members and sharing experiences while directing, supervising and reviewing their work.

### 8.3.2 Engagement quality control (EQC)

The EQC review is an important part of our approach to quality. We have agreed to appoint an EQC reviewer for each audit engagements, including any related review(s) of interim financial information, of all listed entities, non-listed entities with a high public profile, engagements that require an EQC review under applicable laws or regulations, and other engagements, including certain assurance engagements, as designated by our RMP or our Head of Audit.

An EQC review is an objective evaluation of the significant judgments made by the engagement team and its related conclusions, performed by the EQC reviewer, and completed on or before the date of the report. The EQC reviewer's evaluation of significant judgments includes an evaluation of the engagement team's assessment of significant risks, including fraud risks, the related responses and whether the related conclusions are appropriate. The EQC review is completed only after the EQC reviewer is satisfied that all significant matters they raised have been resolved, though the engagement partner is ultimately responsible for the resolution of accounting and auditing matters.

## 8.4 appropriately support and document conclusions

### 8.4.1 Reporting

Engagement leaders form all audit opinions based on the audit performed and evidence obtained. In preparing auditors' reports, engagement leaders have access to extensive reporting guidance and technical support through consultations with our Department of Professional Practice, especially where there are significant matters to be reported to users of the auditors' report (e.g. a modification to the opinion or through the inclusion of an 'emphasis of matter' or 'other matter' paragraph).

### 8.4.2 Engagement documentation

Our firm's audit documentation is completed and assembled in accordance with KPMG International policy and applicable auditing standards. We have implemented safeguards to protect the confidentiality and integrity of client and firm information and we have reduced the time period permitted to assemble audit documentation,



Message from the Country Senior Partner

Our system of quality management is foundational for audit quality

Live our culture and Values

Apply expertise and knowledge

Embrace digital technology

Nurture diverse skilled teams

Associate with the right clients and engagements

Be independent and ethical

Perform quality engagements

Assess risks to quality

Monitor and remediate

Communicate effectively

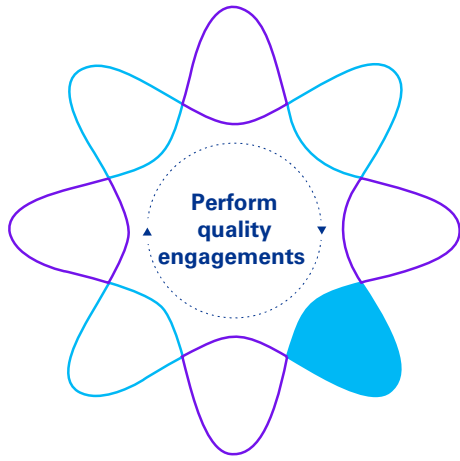
Financial information

Partner remuneration

Network arrangements

Statement on the effectiveness of the System of Quality Management of [legal member firm name] as at 30 September 2023

Appendix



# 9 Assess risks to quality

- **Identify and understand risks to quality and implement effective responses**

## 9.1 Identifying risks to quality and implement effective responses

The quality of a KPMG audit rests on the foundational SoQM and our approach to ISQM 1 emphasizes consistency and robustness of controls within our processes. KPMG International performs an annual iterative risk assessment process (I-RAP) to determine the baseline expected quality objectives, quality risks, process risk points and controls (responses to those risks) that all KPMG firms agree to adopt. KPMG firms also perform their own I-RAP, annually, to identify any additional quality objectives, quality risks or controls specific to their firm's facts and circumstances.

The consistent global approach:

- Sets the minimum controls to be implemented within all KPMG firms' SoQM processes in response to globally identified risks to meeting SoQM quality objectives
- Defines the SoQM methodology used by KPMG firms in their annual evaluation of SoQM to demonstrate the SoQM controls are implemented and operating effectively.



Message from the Country  
Senior Partner

Our system of quality management  
is foundational for audit quality

Live our culture and Values

Apply expertise and knowledge

Embrace digital technology

Nurture diverse skilled teams

Associate with the right  
clients and engagements

Be independent and ethical

Perform quality engagements

Assess risks to quality

Monitor and remediate

Communicate effectively

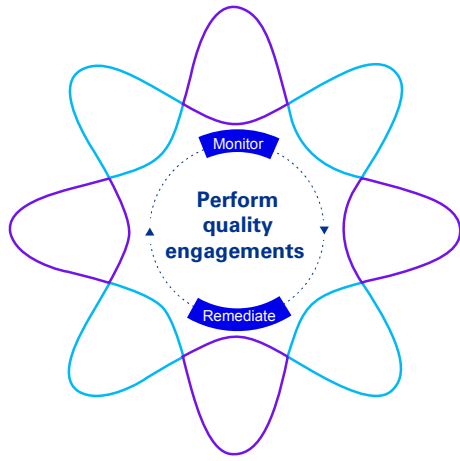
Financial information

Partner remuneration

Network arrangements

Statement on the effectiveness of  
the System of Quality Management  
of [legal member firm name] as at  
30 September 2023

Appendix



# 10 Monitor and remediate

- **Rigorously monitor and measure quality**
- **Obtain evaluations and act on stakeholder feedback**
- **Perform root cause analysis**

Integrated quality monitoring and compliance programs enable KPMG firms to identify quality deficiencies, to perform root cause analysis and develop, implement, and report remedial action plans, both in respect of individual audit engagements and the overall SoQM.

## 10.1 Rigorously monitor and measure quality

### 10.1.1 Commitment to continuous improvement

KPMG firms have committed to continually improving the quality, consistency and efficiency of their audits. The quality monitoring and compliance programs are globally consistent in their approach across all KPMG firms, including the nature and extent of testing and reporting. In our firm, we compare the results of our internal monitoring programs with the results of any external inspection programs and take appropriate action.



Message from the Country Senior Partner

Our system of quality management is foundational for audit quality

Live our culture and Values

Apply expertise and knowledge

Embrace digital technology

Nurture diverse skilled teams

Associate with the right clients and engagements

Be independent and ethical

Perform quality engagements

Assess risks to quality

Monitor and remediate

Communicate effectively

Financial information

Partner remuneration

Network arrangements

Statement on the effectiveness of the System of Quality Management of [legal member firm name] as at 30 September 2023

Appendix

10.1.2 Internal monitoring and compliance programs

Quality monitoring and compliance programs that are created by KPMG International are used by KPMG firms to identify quality issues, perform root cause analysis and develop remedial action plans, both for individual audits and for their overall SoQM.

The programs evaluate:

- Engagement performance in compliance with the applicable professional standards, applicable laws and regulations and key KPMG International policies and procedures;
- Our firm’s compliance with key KPMG International key policies and procedures and the relevance, adequacy and effective operation of key quality control policies and procedures.
- The internal monitoring and compliance programs also contribute to the evaluation of our SoQM operating effectiveness. These programs include:
- Audit Quality Performance Review (QPR)
- The global KPMG Quality & Compliance Evaluation (KQCE)
- Global Quality & Compliance Review (GQCR)

The results and lessons from the integrated monitoring and compliance programs are communicated and we establish action plans to make improvements where needed. Results are also considered by KPMG International.

Audit Quality Performance Reviews (QPRs)

The Audit QPR program assesses engagement-level performance and identifies opportunities to improve engagement quality.

Risk-based approach

Each engagement leader in every KPMG firm is reviewed at least once in a four-year cycle. A risk-based approach is used to select engagements.

We conduct the annual QPR program in accordance with KPMG International QPR instructions which promote consistency across the KPMG organization. Reviews are overseen by an independent experienced lead reviewer from another KPMG firm. QPR results are reported to KPMG International.

Evaluations from Audit QPR

Across the global organization, consistent criteria are used to determine engagement ratings and KPMG firm Audit practice evaluations.

Audit engagements selected for review are rated as ‘Compliant’, ‘Compliant- Improvement Needed’ or ‘Not Compliant’.

KPMG Quality & Compliance Evaluation (KQCE) program

The KQCE program encompasses the testing and evaluation requirements of a KPMG firm’s SoQM which are necessary to support their compliance with ISQM 1, and compliance with quality and risk management policies. KQCE program requirements are to be completed by all KPMG firms.

The 2023 KQCE program covered the period from 1 October 2022 to 30 September 2023 and helps support our conclusion on the operating effectiveness of our SoQM as of 30 September 2023 and compliance with quality and risk management policies.

Global Quality & Compliance Review (GQCR) program

A GQCR is carried out by a KPMG International team and firms are selected for review using a risk-based approach, which considers a number of factors, including financial conditions, country risks, results of monitoring programs and people surveys, with each firm subject to a GQCR at least once in a four-year cycle.

The GQCR team comprises partners and managers who are independent of the firm subject to review. The overall objective of the GQCR programme is to assess the firm’s compliance with selected KPMG International policies, including those related to governance and SoQM.

Internal monitoring and compliance program reporting

Findings from the monitoring and compliance programs are disseminated to our professionals through written communications, internal training tools, and periodic meetings with leadership.

Findings are also emphasized in subsequent monitoring and compliance programs to gauge the extent of continuous improvement.

Lead audit engagement partners are notified of Audit QPR not compliant ratings if relevant to their respective cross-border engagements.

Remediation and monitoring

In our firm, we develop remedial action plans to respond to findings identified through our monitoring and compliance programs. Progress on action plans is monitored and results are reported, as appropriate, to regional and global leadership.



Message from the Country Senior Partner

Our system of quality management is foundational for audit quality

Live our culture and Values

Apply expertise and knowledge

Embrace digital technology

Nurture diverse skilled teams

Associate with the right clients and engagements

Be independent and ethical

Perform quality engagements

Assess risks to quality

Monitor and remediate

Communicate effectively

Financial information

Partner remuneration

Network arrangements

Statement on the effectiveness of the System of Quality Management of [legal member firm name] as at 30 September 2023

Appendix

10.2 Obtain, evaluate and act on stakeholder feedback

10.2.1 Regulators

In November 2021, POA has started the audit file review. POA sent the final findings regarding the inspection in July 2022, in order to make our written statement about these issues and POA sent final report to us in January 2023. Remedial actions have been taken regarding the final report.

In January 2022, POA has started the audit file review. POA sent the final findings regarding the inspection in August 2022, in order to make our written statement about these issues and POA sent final report to us in March 2023. Remedial actions have been taken regarding the final report.

In March 2023, POA has started the audit file review. POA sent the final findings regarding the inspection in October 2023, in order to make our written statement about these issues. No findings were found as a result of the inspection.

In May 2023, POA has started inspection on system of quality control of Firm. POA sent the final findings regarding the inspection in December 2023, in order to make our written statement about these issues. We have not received the final report yet.

Additionally, BRSA has declared the decision regarding the findings of the Independent Auditor’s Report on issued for the audits performed on information systems of banks in October 2023. BRSA sent final report to us in February 2024. Remedial actions have been taken regarding the final report.

In January 2024, POA has started the audit file review. The inspection is ongoing.

10.2.2 Client Feedback

We proactively seek feedback from clients through in-person conversations and third-party surveys to monitor their satisfaction with services delivered..

10.2.3 Monitoring of complaints

We have procedures in place for monitoring and addressing complaints received relating to the quality of our work. These procedures are detailed on our external website and also a mail address is communicated in our general terms of business.

10.3 Perform root cause analysis

In our firm, our SoQM provides the foundation for consistent delivery of quality engagements and our Root Cause Analysis (RCA) program is an integral element of the monitoring and remediation component of the SoQM, driving enhancements to audit quality. Leveraging inputs from internal monitoring programs, external inspections and other activities, we identify audit quality issues and undertake root cause analysis corresponding to the nature and severity of the issues. Firms design their RCA program in accordance with the KPMG International’s RCA guide.

Upon completion of the root cause analysis, we design and implement remedial actions that respond to the underlying cause of the audit quality issues and subsequently monitor the effectiveness of such actions. The RCA remedial action plans and monitoring results are reported to regional and global leadership.

It is the responsibility of all KPMG firms to perform RCA and thereby identify and subsequently develop appropriate remediation plans for the quality issues identified.

Audit Quality Council is responsible for development and implementation of action plans as a result of RCA including identification of solution owners. Audit Quality Council is also responsible for monitoring the implementation of these action plans.



Message from the Country Senior Partner

Our system of quality management is foundational for audit quality

Live our culture and Values

Apply expertise and knowledge

Embrace digital technology

Nurture diverse skilled teams

Associate with the right clients and engagements

Be independent and ethical

Perform quality engagements

Assess risks to quality

Monitor and remediate

Communicate effectively

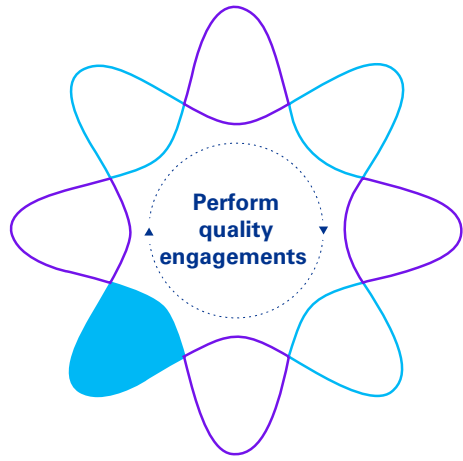
Financial information

Partner remuneration

Network arrangements

Statement on the effectiveness of the System of Quality Management of [legal member firm name] as at 30 September 2023

Appendix



# 11 Communicate effectively

- **Provide insights, and maintain open and honest two-way communications**
- **Conduct and follow-up on the Global People Survey**

We recognize that another important contributor to upholding audit quality is to obtain and promptly act upon feedback from key stakeholders.

## 11.1 Provide insights, and maintain open and honest two-way communication

At KPMG Türkiye, we stress the importance of keeping those charged with governance informed of issues arising throughout the audit through guidance and supporting resources. We achieve this through a combination of reports and presentations, attendance at Audit Committee or board meetings, and ongoing discussions with management and members of the Audit Committee.

The role of Audit Committees is key in supporting quality auditing by overseeing the relationship between company and auditor and challenging what auditors do and how they do it.



Message from the Country Senior Partner

Our system of quality management is foundational for audit quality

Live our culture and Values

Apply expertise and knowledge

Embrace digital technology

Nurture diverse skilled teams

Associate with the right clients and engagements

Be independent and ethical

Perform quality engagements

Assess risks to quality

Monitor and remediate

Communicate effectively

Financial information

Partner remuneration

Network arrangements

Statement on the effectiveness of the System of Quality Management of [legal member firm name] as at 30 September 2023

Appendix



11.2 Conduct and follow-up on the Global People Survey (GPS)

Only with engaged, talented people can we deliver audits in line with our audit quality expectations. Annually, our personnel are invited to participate in KPMG’s Global People Survey (GPS) to share their perception on their experience of working at KPMG. Results can be analyzed by several factors, including functional or geographic area, grade and gender to provide additional focus for action.

Through the GPS, our firm measures our people’s engagement and gains additional insight about what drives engagement for KPMG people. The GPS includes specific audit quality questions for those individuals who participated in an audit in the previous 12 months, giving us a particular data set for audit quality related matters.

The survey also provides our leadership and KPMG International leadership with insights related to quality and risk behaviors, audit quality, upholding the KPMG Values, and employee and partner attitudes to quality, leadership and tone at the top.

We participate in the GPS, monitor results and take appropriate actions to communicate and respond to the findings of the survey. The results of the GPS, and the appropriate follow up actions, are also aggregated for the entire global organization and are presented to the Global Board each year.

Audit-specific analysis of GPS results is also undertaken, with a particular focus on audit quality. Results and key themes are presented to the Global Audit Steering Group on an annual basis for consideration of appropriate remedial action, if needed. A global GPS action plan for audit is also communicated annually.



Message from the Country Senior Partner

Our system of quality management is foundational for audit quality

Live our culture and Values

Apply expertise and knowledge

Embrace digital technology

Nurture diverse skilled teams

Associate with the right clients and engagements

Be independent and ethical

Perform quality engagements

Assess risks to quality

Monitor and remediate

Communicate effectively

Financial information

Partner remuneration

Network arrangements

Statement on the effectiveness of the System of Quality Management of [legal member firm name] as at 30 September 2023

Appendix



# 12 Financial information

KPMG SMMM’s revenue earned from audit services between the periods 1 October 2022 – 30 September 2023 compared to revenue earned from non-audit services are as follows:

	Million TL
Audit services	500.2
Other Audit Related Services	1.7
Bookkeeping Services	84.3
Non-audit services	179.5
<b>Total</b>	<b>765.9</b>



Message from the Country  
Senior Partner

Our system of quality management  
is foundational for audit quality

Live our culture and Values

Apply expertise and knowledge

Embrace digital technology

Nurture diverse skilled teams

Associate with the right  
clients and engagements

Be independent and ethical

Perform quality engagements

Assess risks to quality

Monitor and remediate

Communicate effectively

Financial Information

Partner remuneration

Network arrangements

Statement on the effectiveness of  
the System of Quality Management  
of [legal member firm name] as at  
30 September 2023

Appendix

# 13 Partner remuneration

## Partners' profit share

In addition to monthly gross salaries, partners are remunerated out of the distributable profits of KPMG Türkiye and are personally responsible for funding pensions and most other benefits. The final allocation of partner profit is made by the Senior Partner and the Management Team depending on the Partner Reward Principles agreed by the partners. Partner performance based on quality, financial, people management, leadership and business development, together with market worth and roles are taken into account in the Partner Reward Principles. The Nomination and Remuneration Committee supervises the process and oversees its application.



Message from the Country  
Senior Partner

Our system of quality management  
is foundational for audit quality

Live our culture and Values

Apply expertise and knowledge

Embrace digital technology

Nurture diverse skilled teams

Associate with the right  
clients and engagements

Be independent and ethical

Perform quality engagements

Assess risks to quality

Monitor and remediate

Communicate effectively

Financial information

Partner remuneration

Network arrangements

Statement on the effectiveness of  
the System of Quality Management  
of [legal member firm name] as at  
30 September 2023

Appendix

# 14 Network arrangements

- **Legal structure**
- **Responsibilities and obligations of KPMG firms**
- **Professional Indemnity Insurance**
- **Governance structure**

## 14.1 Legal Structure

In many parts of the world, regulated businesses (such as audit and legal firms) are required by law to be locally owned and independent. KPMG member firms do not, and cannot, operate as a multinational corporate entity. KPMG member firms are generally locally owned and managed. Each KPMG member firm is responsible for its own obligations and liabilities. KPMG International and other member firms are not responsible for a member firm's obligations or liabilities.

Member firms may consist of more than one separate legal entity. If this is the case, each separate legal entity will be responsible only for its own obligations and liabilities, unless it has expressly agreed otherwise.

Our firm and all other KPMG firms are party to membership and associated documents, the key impact of which is that all KPMG member firms in the KPMG global organization are members in, or have other legal connections to, KPMG International Limited, an English private company limited by guarantee.

KPMG International Limited acts as the coordinating entity for the overall benefit of the KPMG member firms. It does not provide professional services to clients, directly or indirectly, to clients. Professional services to clients are exclusively provided by member firms.

KPMG is the registered trademark of KPMG International and is the name by which the member firms are commonly known. The rights of member firms to use the KPMG name and marks are contained within agreements with KPMG International.

KPMG International and the KPMG member firms are not a global partnership, single firm, multinational corporation, joint venture, or in a principal or agent relationship or partnership with each other. No member firm has any authority to obligate or bind KPMG International, any of its related entities or any other member firm vis-à-vis third parties, nor does KPMG International or any of its related entities have any such authority to obligate or bind any member firm.

Further detail on the revised legal and governance arrangements for the KPMG global organization can be found in section 'Governance and leadership' of the [KPMG International Transparency Report](#).



Message from the Country  
Senior Partner

Our system of quality management  
is foundational for audit quality

Live our culture and Values

Apply expertise and knowledge

Embrace digital technology

Nurture diverse skilled teams

Associate with the right  
clients and engagements

Be independent and ethical

Perform quality engagements

Assess risks to quality

Monitor and remediate

Communicate effectively

Financial information

Partner remuneration

Network arrangements

Statement on the effectiveness of  
the System of Quality Management  
of [legal member firm name] as at  
30 September 2023

Appendix

## 14.2 Responsibilities and obligations of KPMG firms

Member firms have agreed with KPMG International to comply with KPMG International’s policies and regulations including quality standards governing how they operate and how they provide services to clients to compete effectively. This includes having a firm structure that ensures continuity and stability and being able to adopt global strategies, share resources (incoming and outgoing), service multi-national clients, manage risk, and deploy global methodologies and tools.

Each KPMG firm takes responsibility for its management and the quality of its work. Member firms commit to a common set of KPMG Values.

KPMG International’s activities are funded by amounts paid by member firms. The basis for calculating such amounts is approved by the KPMG International Global Board and consistently applied to the firms. A firm’s status as a KPMG member firm and its participation in the KPMG global organization may be terminated if, among other things, it has not complied with the policies set by KPMG International or any of its other obligations agreed with KPMG International.

## 14.3 Professional Indemnity Insurance

Insurance cover is maintained in respect of professional negligence claims. The cover provides a territorial coverage on a worldwide basis.

## 14.4 Governance structure

KPMG International’s governance bodies are comprised of the Global Council, the Global Board (including its committees), the Global Management Team and the Global Steering Groups.

### Global Council

The Global Council focuses on high-level governance tasks and provides a forum for open discussion and communication among member firms. Among other things, the Global Council elects the Global Chairman and also approves the appointment of Global Board members. It includes representation from 53 KPMG member firms..

### Global Board

The Global Board is the principal governance and oversight body of KPMG International. The key responsibilities of the Global Board include approving global strategy, protecting and enhancing the KPMG brand and reputation, overseeing the Global Management Team and approving policies with which KPMG firms have agreed to comply. It also approves the admittance or termination of KPMG firms to/from the global organization.

It is led by the Global Chairman, Bill Thomas, and also includes the Chairman of each of the regions (the Americas; Asia Pacific (ASPAC); and Europe, the Middle East, and Africa (EMA)) and a number of members who are also member firm Senior Partners.

The list of current Global Board members, is available on the Leadership page of kpmg.com

Global Board committees:

The Global Board is supported in its oversight and governance responsibilities by several committees, including:

- Executive Committee;
- Governance Committee;
- Global Quality and Risk Management Committee; and
- Global Audit Quality Committee.

Each of these committees is comprised of Global Board members and reports directly to the Global Board.

The overarching responsibility of the Global Audit Quality Committee is to strive for consistent audit quality across all firms and to oversee KPMG International activities which relate to improving and maintaining the consistency and quality of audits, assurance engagements and the system of quality management provided by KPMG firms. The Global Head of Audit and the Global Head of Audit Quality (the latter being responsible for oversight of audit quality across KPMG for KPMG International) report on audit quality matters to this committee.



Message from the Country Senior Partner

Our system of quality management is foundational for audit quality

Live our culture and Values

Apply expertise and knowledge

Embrace digital technology

Nurture diverse skilled teams

Associate with the right clients and engagements

Be independent and ethical

Perform quality engagements

Assess risks to quality

Monitor and remediate

Communicate effectively

Financial information

Partner remuneration

Network arrangements

Statement on the effectiveness of the System of Quality Management of [legal member firm name] as at 30 September 2023

Appendix

## Global Management Team

The Global Board has delegated certain responsibilities to the Global Management Team (GMT). These responsibilities include developing the global strategy by working together with the Executive Committee and jointly recommending the global strategy to the Global Board for its approval. The GMT also supports KPMG firms in their execution of the global strategy and KPMG International decisions and policies by member firms, including holding them accountable against their commitments. The GMT promotes the commitment to KPMG being a multidisciplinary organization. The GMT also oversees the activities of the Global Steering Groups.

It is led by the Global Chairman, Bill Thomas.

The list of current GMT members is available on the [Leadership](#) page of KPMG.com.

## Global Steering Groups

There is a Global Steering Group for each key function and infrastructure area, chaired by the relevant member of the GMT and, together they assist the GMT in discharging its responsibilities. They act under delegated authority from the Global Board and oversight by the GMT.

In particular, the Global Audit Steering Group and Global Quality & Risk Management Steering Group work closely with regional and member firm leadership to:

- Establish, and ensure communication of, appropriate audit, quality and risk management policies;
- Establish and support effective and efficient risk processes to promote audit quality;
- Promote and support strategy implementation in member firms' audit functions, including standards of audit quality; and
- Assess and monitor audit quality issues, including those arising from quality performance and regulatory reviews, and focus on best practices that reduce audit quality findings.
- The roles of the Global Audit Steering Group and the Global Quality & Risk Management Steering Group are detailed in 'Governance and leadership' section of the [KPMG International Transparency Report](#).

Each firm is part of one of three regions (the Americas, ASPAC and EMA). Each region has a Regional Board comprising a regional chairman, regional chief operating officer, representation from any sub-regions, and other members as appropriate. Each Regional Board focuses specifically on the needs of member firms within their region and assists in the implementation of KPMG International's policies and processes within the region.

Further details about KPMG International including the governance arrangements for the year ending 30 September 2023 can be found in the 'Governance and leadership' section of the [KPMG International Transparency Report](#)



Message from the Country Senior Partner

Our system of quality management is foundational for audit quality

Live our culture and Values

Apply expertise and knowledge

Embrace digital technology

Nurture diverse skilled teams

Associate with the right clients and engagements

Be independent and ethical

Perform quality engagements

Assess risks to quality

Monitor and remediate

Communicate effectively

Financial information

Partner remuneration

Network arrangements

Statement on the effectiveness of the System of Quality Management of [legal member firm name] as at 30 September 2023

Appendix

# 15 Statement on the effectiveness of the System of Quality Management of KPMG SMMM as at 30 September 2023

As required by the International Auditing and Assurance Standards Board (IAASB), International Standard on Quality Management (ISQM 1) and policy of KPMG International, KPMG Bağımsız Denetim ve Serbest Muhasebeci Mali Müşavirlik A.Ş. ("KPMG SMMM" or "Firm") has responsibility to design, implement and operate a System of Quality Management for audits or reviews of financial statements, or other assurance or related services engagements performed by the Firm.

The objectives of the System of Quality Management are to provide the Firm with reasonable assurance that:

a) The Firm and its personnel fulfill their responsibilities in accordance with professional standards and applicable legal and regulatory requirements, and conduct engagements in accordance with such standards and requirements; and

b) Engagement reports issued by the Firm or engagement partners are appropriate in the circumstances.

KPMG SMMM outlines how its System of Quality Management supports the consistent performance of quality engagements in the Transparency Report 2023.

Integrated quality monitoring and compliance programs enable KPMG SMMM to identify and respond to findings and quality deficiencies both in respect of individual engagements and the overall System of Quality Management.

If deficiencies are identified when the Firm performs its annual evaluation of the System of Quality Management, the Firm evaluates the severity and pervasiveness of the identified deficiencies by investigating the root causes, and by evaluating the effect of the identified deficiencies

individually and in the aggregate, on the System of Quality Management, with consideration of remedial actions taken as of the date of the evaluation.

Based on the annual evaluation of the Firm's System of Quality Management as of 30 September 2023, the System of Quality Management provides the Firm with reasonable assurance that the objectives of the System of Quality Management are being achieved.

Murat Alsan

Chairman

30 November 2023



Message from the Country Senior Partner

Our system of quality management is foundational for audit quality

Live our culture and Values

Apply expertise and knowledge

Embrace digital technology

Nurture diverse skilled teams

Associate with the right clients and engagements

Be independent and ethical

Perform quality engagements

Assess risks to quality

Monitor and remediate

Communicate effectively

Financial information

Partner remuneration

Network arrangements

Statement on the effectiveness of the System of Quality Management of [legal member firm name] as at 30 September 2023

Appendix



# Appendix 1. Ownership Structure

Name Surname	Share TL	Share %
Murat Alsan	6.494,00	12,998
Hatice Nesrin Tuncer	4.500,00	9,000
Ruşen Fikret Selamet	4.500,00	9,000
Erdal Tıkmak	4.500,00	9,000
Gökhan Atılğan	4.500,00	9,000
Orhan Akova	3.250,00	6,500
İsmail Önder Ünal	3.250,00	6,500
Hakkı Özgür Sivacı	3.250,00	6,500
Funda Aslanoğlu	2.750,00	5,500
Şirin Soysal	3.250,00	6,500
Hakan Ölekli	3.250,00	6,500
Alper Güvenç	3.250,00	6,500
Işıl Keser	500,00	1,000
Mustafa Şafak Erdur	500,00	1,000
Aysel Tunç	500,00	1,000
Ali Tuğrul Uzun	500,00	1,000
Gökçe Adıgüzel	500,00	1,000
Ahmet Hamdi Cura	250,00	0,050
Engin Ölmez	250,00	0,050
Erman Durmaz	250,00	0,050
Tuba Sönmez	1	0,002
Ebru Koçak	1	0,002
Gönenç Sönmez	1	0,002
Pelin Ataseven	1	0,002
Nilgün Çallıalp	1	0,002
Aslı Işık	1	0,002
	<b>50.000,00</b>	<b>100,00</b>

(1) After 30 September 2023, Ramazan Yurtvermez became of shareholder and Tuba Sönmez left the firm.



Message from the Country Senior Partner

Our system of quality management is foundational for audit quality

Live our culture and Values

Apply expertise and knowledge

Embrace digital technology

Nurture diverse skilled teams

Associate with the right clients and engagements

Be independent and ethical

Perform quality engagements

Assess risks to quality

Monitor and remediate

Communicate effectively

Financial information

Partner remuneration

Network arrangements

Statement on the effectiveness of the System of Quality Management of [legal member firm name] as at 30 September 2023

Appendix

# Appendix 2. Details of those charged with governance at KPMG SMMM



**Murat Alsan**  
Senior Partner,  
KPMG Turkey  
Chairman

Murat Alsan joined KPMG in 1995. He has been a partner within KPMG for 17 years and has served on our board for 11 years. He was elected as Senior Partner in January 2017.



**RUŞEN FİKRET SELAMET**  
Partner,  
Head of Audit

Fikret Selamet joined KPMG in 1996. He has been a partner within KPMG for 14 years and has served on our board for 1 years. He was appointed Head of Audit in October 2020.



**Orhan Akova**  
Partner,  
Audit

Orhan Akova joined KPMG in 1998. He has been a partner within KPMG for 12 years. He was appointed Quality and Risk Management Partner in January 2017.



Message from the Country  
Senior Partner

Our system of quality management  
is foundational for audit quality

Live our culture and Values

Apply expertise and knowledge

Embrace digital technology

Nurture diverse skilled teams

Associate with the right  
clients and engagements

Be independent and ethical

Perform quality engagements

Assess risks to quality

Monitor and remediate

Communicate effectively

Financial information

Partner remuneration

Network arrangements

Statement on the effectiveness of  
the System of Quality Management  
of [legal member firm name] as at  
30 September 2023

Appendix

# Appendix 3. Public-Interest Entities (PIE)

The list of public interest entity (PIE) audit clients for which KPMG SMMM has signed an independent auditor's report on financial statements of 2023 is given below. The definition of public interest for this purpose is that given under the provisions of the "Public Oversight, Accounting and Auditing Standards Authority's Organization and Responsibilities Decree Law numbered 660", issued by POA. List of PIEs audited by the member firm:

Listed Companies and Bond Issuers		Banks	
1	Akfen Holding A.Ş.	1	Alternatifbank A.Ş.
2	Arzum Elektrikli Ev Aletleri Sanayi ve Ticaret A.Ş.	2	Burgan Bank A.Ş.
3	Aztek Teknoloji Ürünleri Ticaret A.Ş.	3	Citibank A.Ş.
4	Baştaş Başkent Çimento Sanayi ve Ticaret A.Ş.	4	Destek Yatırım Bankası A.Ş.
5	Brisa Bridgestone Sabancı Lastik Sanayi ve Ticaret A.Ş.	5	Fibabanka A.Ş.
6	Carrefoursa Carrefour Sabancı Ticaret Merkezi A.Ş.	6	Habib Bank Limited Merkezi Pakistan-İstanbul Türkiye Merkez Şube
7	Dardanel Önentaş Gıda Sanayi A.Ş.	7	Odea Bank A.Ş.
8	Dyo Boya Fabrikaları Sanayi Ve Ticaret A.Ş.	8	Pasha Yatırım Bankası A.Ş.
9	Enka İnşaat ve Sanayi A.Ş.	9	Türkiye Finans Katılım Bankası A.Ş.
10	Fiba Holding A.Ş.	10	Türkiye Kalkınma ve Yatırım Bankası A.Ş.
11	Kayseri Şeker Fabrikası A.Ş.		
12	Konya Çimento Sanayii A.Ş.		
13	Kordsa Teknik Tekstil A.Ş.	1	Destek Finans Faktoring A.Ş.
14	Martı Technologies Inc.	2	Kapital Faktoring A.Ş.
15	Netaş Telekomünikasyon A.Ş.		
16	Pınar Entegre Et ve Un Sanayii A.Ş.		
17	Pınar Su ve İçecek Sanayi ve Ticaret A.Ş.		
18	Pınar Süt Mamülleri Sanayii A.Ş.	1	Alternatif Finansal Kiralama A.Ş.
19	Sanko Pazarlama İthalat İhracat A.Ş.	2	Burgan Finansal Kiralama A.Ş.
20	Tekfen Holding A.Ş.	3	De Lage Landen Finansal Kiralama A.Ş.
21	Teknosa İç ve Dış Ticaret A.Ş.	4	Mercedes-Benz Finansal Kiralama Türk A.Ş.
22	Viking Kağıt ve Selüloz A.Ş.		
23	Zorlu Enerji Elektrik Üretim A.Ş.		



Message from the Country Senior Partner

Our system of quality management is foundational for audit quality

Live our culture and Values

Apply expertise and knowledge

Embrace digital technology

Nurture diverse skilled teams

Associate with the right clients and engagements

Be independent and ethical

Perform quality engagements

Assess risks to quality

Monitor and remediate

Communicate effectively

Financial information

Partner remuneration

Network arrangements

Statement on the effectiveness of the System of Quality Management of [legal member firm name] as at 30 September 2023

# Appendix 3. Public-Interest Entities (PIE)

Intermediary Institutions		Financing Companies	
1	Alternatif Yatırım Menkul Değerler A.Ş.	1	Mercedes-Benz Finansman Türk A.Ş.
2	Burgan Yatırım Menkul Değerler A.Ş.		
3	Citi Menkul Değerler A.Ş.	Asset Management Companies	
4	GCM Yatırım Menkul Değerler A.Ş.	1	Emir Varlık Yönetim A.Ş.
Portfolio Management Companies			
1	Akfen Gayrimenkul Portföy Yönetimi A.Ş.		
2	Kalkınma Girişim Sermayesi Portföy Yönetimi A.Ş.		
Asset Leasing Companies		Payment and Electronic Money Institutions	
1	Kalkınma Yatırım Varlık Kiralama A.Ş.	1	Star Ödeme Hizmetleri ve Elektronik Para A.Ş.
2	TF Varlık Kiralama A.Ş.	2	Yemekpay Elektronik Para ve Ödeme Hizmetleri A.Ş.
3	TFKB Varlık Kiralama A.Ş.		
Investment Trusts		Insurance, Reinsurance, Life and Pension Companies	
1	Akfen Gayrimenkul Yatırım Ortaklığı A.Ş.	1	Viennalife Emeklilik ve Hayat A.Ş.
2	Doğuş Gayrimenkul Yatırım Ortaklığı A.Ş.		
3	Nurol Gayrimenkul Yatırım Ortaklığı A.Ş.		
4	Özak Gayrimenkul Yatırım Ortaklığı A.Ş.		
5	SNK Girişim Sermayesi Yatırım Ortaklığı A.Ş.		



Message from the Country Senior Partner

Our system of quality management is foundational for audit quality

Live our culture and Values

Apply expertise and knowledge

Embrace digital technology

Nurture diverse skilled teams

Associate with the right clients and engagements

Be independent and ethical

Perform quality engagements

Assess risks to quality

Monitor and remediate

Communicate effectively

Financial information

Partner remuneration

Network arrangements

Statement on the effectiveness of the System of Quality Management of [legal member firm name] as at 30 September 2023

Appendix

# Appendix 3. Public-Interest Entities (PIE)

	Mutual Funds and Pension Funds		
	Akfen Gayrimenkul Portföy Yönetimi A.Ş. Fonlar		
1	Akfen Gayrimenkul Portföy Yönetimi A.Ş. Birinci Gayrimenkul Yatırım Fonu		
	Neo Portföy Yönetimi A.Ş. Fonlar		
1	Neo Portföy Yönetimi A.Ş. Co-Investment 1 Girişim Sermayesi Yatırım Fonu		
2	Neo Portföy Yönetimi A.Ş. Cornerstone Gayrimenkul Yatırım Fonu		
3	Neo Portföy Yönetimi A.Ş. Denge Girişim Sermayesi Yatırım Fonu		
4	Neo Portföy Yönetimi A.Ş. Simya 1 Girişim Sermayesi Yatırım Fonu		
	Pasha Yatırım Bankası A.Ş.		
1	Pasha Yatırım Bankası A.Ş. Birinci Varlık Finansmanı Fonu		
2	Pasha Yatırım Bankası A.Ş. Maygold Varlık Finansmanı Fonu		
3	Pasha Yatırım Bankası A.Ş. Maygold Otomotiv İkinci Varlık Finansmanı Fonu		
4	Pasha Yatırım Bankası A.Ş. Tarfin Üçüncü Varlık Finansmanı Fonu		
5	Pasha Yatırım Bankası A.Ş. Platin Kimya Varlık Finansmanı Fonu		
6	Pasha Yatırım Bankası A.Ş. Tarfin Varlık Finansmanı Fonu		
7	Pasha Yatırım Bankası A.Ş. Cantaş Varlık Finansmanı Fonu		
	Viennalife Emeklilik ve Hayat A.Ş.		
1	Viennalife Emeklilik ve Hayat A.Ş. Para Piyasası Emeklilik Yatırım Fonu		
2	Viennalife Emeklilik ve Hayat A.Ş. Katkı Emeklilik Yatırım Fonu		
3	Viennalife Emeklilik ve Hayat A.Ş. Karma Emeklilik Yatırım Fonu		
4	Viennalife Emeklilik ve Hayat A.Ş. Hisse Senedi Emeklilik Yatırım Fonu		
5	Viennalife Emeklilik ve Hayat A.Ş. Standart Emeklilik Yatırım Fonu		



Message from the Country Senior Partner

Our system of quality management is foundational for audit quality

Live our culture and Values

Apply expertise and knowledge

Embrace digital technology

Nurture diverse skilled teams

Associate with the right clients and engagements

Be independent and ethical

Perform quality engagements

Assess risks to quality

Monitor and remediate

Communicate effectively

Financial information

Partner remuneration

Network arrangements

Statement on the effectiveness of the System of Quality Management of [legal member firm name] as at 30 September 2023

Appendix

# Contact:

## For detailed information:

KPMG Türkiye  
Clients & Markets  
tr-fmmarkets@kpmg.com

### İstanbul

Levent Mah. Meltem Sok.  
İş Bankası Kuleleri Blok No:14  
İç Kapı No:10  
T : +90 212 316 6000

### Ankara

The Paragon İş Merkezi Kızılırmak Mah. Ufuk  
Üniversitesi Cad. 1445 Sok. No:2 Kat:13  
Çukurambar 06550 Ankara  
T: +90 312 491 7231

### İzmir

Folkart Towers Adalet Mah. Manas Bulvarı No:39 B  
Kule Kat: 35 Bayraklı 35530 İzmir T : +90 232 464  
2045

### Bursa

Odunluk Mahallesi, Liman Caddesi,  
Efe Towers, No:11/B, 9-10  
Nilüfer / Bursa  
T : +90 232 464 2045

[kpmg.com.tr](http://kpmg.com.tr)  
[kpmgvergi.com](http://kpmgvergi.com)



The information contained herein is of a general nature and is not intended to address the circumstances of any particular individual or entity. Although we endeavor to provide accurate and timely information, there can be no guarantee that such information is accurate as of the date it is received or that it will continue to be accurate in the future. No one should act on such information without appropriate professional advice after a thorough examination of the particular situation. The KPMG name and logo are trademarks used under license by the independent member firms of the KPMG global organization.

© 2024 KPMG Yönetim Danışmanlığı A.Ş., a Turkish Corporation and a member firm of the KPMG global organization of independent member firms affiliated with KPMG International Limited, a private English company limited by guarantee. All rights reserved.