

TURKISH CITIZENSHIP BY INVESTMENT 2025

The primary objective of this memorandum is to inform about the modifications made by the Turkish authorities concerning the process of obtaining Turkish citizenship.

A. TURKISH CITIZENSHIP



As specified in Article 5 of the Regulation and the Code, the acquisition of Turkish citizenship can be achieved through two methods:

- natural born citizenship
- citizenship by naturalization

However, Turkish citizenship can also be obtained through three other means as outlined in Article 13 of the Regulation and Article 9 of the Code, which involve the:

- decision of the competent authority
- adoption
- exercising the right of option.

Turkish Citizenship by Investment is a fascinating way to obtain Turkish citizenship, which involves seeking approval from the competent authority as stated in Article 20 of the Regulation and Article 12 of the Code. Article 12 outlines that under exceptional circumstances, Turkish citizenship can be granted upon the proposal of the Ministry and the decision of the Council of Ministers, provided there are no issues related to national security or public order. It's a unique opportunity that can offer great benefits and pave the way for exciting new prospects in Turkey.

The Regulation on The Implementation of Turkish Citizenship Law lists seven exceptional pathways to obtain Turkish citizenship under Article 20. That;

"a) Amount of fixed capital investment approved by Ministry of Industry and Technology; At least 500.000 USD or equivalent foreign currency or TRY

b) Purchasing a real estate property in Turkey with a minimum value of \$400,000 such property shall also have an annotation of no-sale for at least three years at the relevant title registry; or purchase a real estate which has a property ownership or a construction servitude on it, with a preliminary sale contract executed before a notary public and at least \$400,000 or amount of foreign currency or Turkish Liras has been paid in advance and such notarized preliminary sale contract should be recorded at the relevant title registry with the undertaking not to assign or de-register the agreement for a period of three years

c) Number of employed individuals approved by Ministry of Family, Labor and Social Services: At least 50 employees

d) Deposit assets in the amount of at least 500,000 US dollars or equivalent foreign currency or equivalent Turkish lira to banks operating in Turkey approved by the Banking Regulatory and Supervisory Authority, if they hold these assets in Turkey for three (3) years,

e) Purchasing the Government Debt Instruments in exchange of USD 500.000 or foreign currency or equivalent Turkish Lira approved by the Ministry of Treasury and Finance providing that to keep this debt Instruments for a period of at least three (3) years,

f) Purchasing the Turkish Real Estate Participation funds in exchange of USD 500.000 or foreign currency or equivalent Turkish Lira approved by the Capital Markets Board providing that to keep this fund for a period of at least three (3) years."

1. Real Estate Purchase in Turkey

Foreigners who purchase real estate in Turkey valued at a minimum of USD 400,000, subject to a 3-year sales restriction, may be granted Turkish citizenship by exception. **A recent decision made during a Presidential Cabinet meeting on April 12th, 2022, has raised the minimum value of real estate that can be used in citizenship applications. Specifically, the new rule increases the value from USD 250,000 to USD 400,000. The revised rule took effect on June 13th, 2022.**

1.1. Rules

Under the new legislation published on 20.12.2022, foreign investors can now acquire Turkish citizenship by purchasing one or more "ready units" or a single "under-construction unit" for a minimum of 400,000 USD. The investor must hold all the shares of the property, and if multiple properties are purchased, their combined value must be equal to or greater than 400,000 USD. To verify the stated value, the applicant must obtain an evaluation report from a certified evaluation company with certification from the Capital Markets Board. It is essential to note that the annotation stating that the property will not be sold for three years must be added to the title deed simultaneously when receiving it. This new legislation will take effect from 31.01.2023, providing more opportunities for foreign investors to acquire Turkish citizenship.

2. The process for obtaining Turkish citizenship through the exceptional route of purchasing real estate is as follows:

2.1. First, the applicant must choose a property that is eligible for the Turkish citizenship application.

2.2. The next step is to obtain an evaluation report from a certified evaluation company that proves the value of the property or properties is equal to or greater than 400,000.00 USD.

2.3. Before proceeding with the purchase, it is important to check the property's status on the land registry to ensure that the army permission for the property has been obtained.

2.4. As part of the Turkish citizenship application process, foreigners must convert their foreign currency to Turkish Lira and obtain a foreign exchange certificate. This is a requirement under the "Capital Movements Circular" of the Central Bank, which obliges the exchange of foreign currency for transactions involving foreign buyers. As per the regulation, foreigners must sell their foreign currency to the Central Bank through a bank, and then present the Foreign Exchange Purchase Certificate to the land registry office. This regulation has been in effect since January 24, 2022, and foreign currency purchase certificates are required for real estate purchases by foreign individuals. In summary, from January 24, 2022, applicants must convert their money to Turkish Lira and transfer the Turkish Lira to the seller, along with the foreign exchange certificate.

2.5. Transferring the funds from the Buyer's account to the Seller's bank account and presenting the bank receipts to the title registration office as proof of payment.

2.6. Investing in real estate with a minimum value of 400,000.00 USD.

2.7. Adding an annotation to the title deed indicating that the property cannot be sold for a period of three (3) years from the purchase date.

- 2.8. Submitting an application for Turkish Citizenship at the Immigration Office.
- 2.9. Applying for Turkish Citizenship at the Istanbul Development Agency.
- 2.10. Applying for Turkish Citizenship at the General Directorate of Civil Registration and Nationality with all necessary documents.

3. Bank Deposit

Turkish citizenship can be exceptionally granted to foreign individuals who have deposited a minimum of USD 500,000 in cash to banks operating in Turkey for a period of three years, as determined by the Turkish Banking Regulation and Supervision Agency.

As per the "Capital Movements Circular" of the Central Bank and the 13th Article of the Capital Movements Circular, foreigners who are buyers in real estate transactions are required to sell their foreign currency to the Central Bank through a bank, and then submit the Foreign Exchange Purchase Certificate to the land registry office. This regulation is within the scope of the Implementation Instructions on the Sales of Foreign Exchange to the Central Bank of the Republic of Turkey, related to the implementation of the Turkish Citizenship Law. The regulation came into effect on January 24, 2022, making it mandatory for foreign real persons to obtain a foreign currency purchase certificate for real estate acquisitions. Therefore, since that date, applicants are required to convert their money to Turkish Lira and keep this investment amount for 3 years.

The documents required for the acquisition of Turkish citizenship through depositing cash are the same as those needed for property purchase, with the exception of those related to the property.

B. WHO CAN APPLY WITH THE MAIN APPLICANT?



With the investment made, the applicant, the applicant's spouse, children under the age of 18, or dependent children can be eligible to apply for Turkish citizenship. However, children over the age of 18 of the main applicants cannot apply for Turkish citizenship together with the applicant but they can apply for the resident permit.

To acquire Turkish Citizenship, children over the age of 18 of the main applicant must fulfill one of the following requirements:

- Make a new investment.
- Reside in Turkey for 5-years with a residence permit.

C. REQUIRED DOCUMENTS FOR TURKISH CITIZENSHIP WITH INVESTMENT



Required Documents for Turkish Citizenship Application are;

For Main Applicant:

1. Biometric (machine readable) photo of a 50x60 mm white background photo (without any pattern). Get 8 copies.
2. Have your civil status documents in order! Whether you're single or married, divorced, or widowed, you'll need the appropriate certificate to apply for Turkish citizenship.
3. Prove your birthright! Your birth certificate or birth letter issued based on your birth certificate is a must-have document.
4. If you are applying for Turkish citizenship with your child? Then get ready to show the consent of the other parent! This can be taken before the notary public or authorized officer inside Turkey. If you're abroad, you can take consent at the Turkish consulate or competent authority of such country.

5. If you're divorced, make sure you have a court decision that shows you have custody of your children, if you plan to bring them along.
6. Passport picture of ID information page.
7. You'll need to give someone power of attorney to handle your Turkish citizenship application. So, make sure you have this document in order too.

For Spouse:

1. Biometric (machine readable) photo of a 50x60 mm white background photo (without any pattern). Get 8 copies.
2. Proof of your current civil status, whether that be a marriage certificate, divorce certificate, or even a death certificate belonging to your late spouse.
3. A birth certificate or birth letter based on your birth certificate.
4. A photo of the ID information page of your passport..
5. A power of attorney to ensure a smooth process for you.
6. If you're applying with your child, we'll need a copy of the other parent's consent..

For Children Under 18:

1. Biometric (machine readable) photo of a 50x60 mm white background photo (without any pattern). Get 8 copies.
2. Make sure to bring your birth certificate or birth letter issued based on the birth certificate.
3. Don't forget to bring your passport picture of the ID information page to complete the process.

Kindly take note of the following important points:

1. If your documents are issued by a non-apostille country like China, you must first obtain approval from the Chinese governmental office. After that, every page of the original document must be approved by the Turkish Consulate.
2. If your documents are issued by an apostille country such as Hong Kong, you have two options:
 - a. You can get your documents approved by the governmental office and then approved by the Turkish Consulate, OR
 - b. You can get your documents notarized by a local notary and then get them apostilled.

3. Civil Status, Marriage, and Divorce certificates must be obtained within the last 6 months.

D. PROXY



Authorized lawyers are in charge of handling real estate acquisition, bank account opening, residence permit application, and citizenship application on behalf of the main applicant and their spouse with a power of attorney. This grants the flexibility to carry out these procedures without having to physically be present in Turkey. The content of the power of attorney is meticulously crafted by our legal team and sent to the applicant and their spouse for their approval and signatures.

To proceed with the power of attorney in all Land Registry directorates in Turkey, the power of attorney must be in the "statutory form of power of attorney" and include a photo of the grantors. There are three ways to issue this power of attorney: through a notary public office in Turkey, a local notary public office in the current country of residence (which must be Apostilled after taking the Ministry of Foreign Affairs approval), or with a sworn translator from the Turkish Consulate.

For clients who choose to issue a power of attorney through the Turkish Consulate, our legal team assists in arranging a sworn translator and consular appointment. Clients can then visit the consulate at the appointed day and time to complete their transactions hassle-free.

E. POTENTIAL TAX IDENTIFICATION NUMBER

Once the lawyers receive the required documents, they kick off the process by applying for a Potential Tax Identification Number on behalf of the main applicant at the Tax Office. This number is essential for completing the necessary formalities of real estate acquisition and bank account opening. With their special authority in the power of attorney, the

lawyers make the application and obtain the Potential Tax Number from the Tax Office. Afterward, they share this number with the main applicant to move forward with the process.

F. THE MOST PREFERRED INVESTMENT TYPES IN ACQUIRING TURKISH CITIZENSHIP THROUGH INVESTMENT



1. REAL ESTATE INVESTMENT

If the main applicant intends to invest in real estate, the investment amount must exceed \$400,000 or the equivalent in Turkish Lira or foreign currency, as per the regulations:

issued as follows "purchase a real estate with a minimum value of \$400.000 or equivalent foreign currency or equivalent amount of Turkish Liras and attached an annotation of no-sale for at least three (3) years at the relevant title registry; or a real estate which has a property ownership or a construction servitude on it, with a preliminary sale contract executed before a notary public and at least \$400,000 or amount of foreign currency or Turkish Liras is paid in advance and such notarized preliminary sale contract shall be recorded at the relevant title registry with the undertaking not to transfer or assign the agreement for a period of three (3) years that is determined by the Ministry of Environment and Urbanization;"

The main applicant is required to fulfill certain conditions in order to make an investment in real estate.

Firstly, the investment amount should be over \$400,000 or equivalent in Turkish Lira or foreign currency.

Secondly, an annotation of no-sale must be attached to the property for a minimum of three years, during which time the property cannot be sold or transferred in any way. This

condition applies to any type of property, such as residential, land, or workplace, and the main applicant is allowed to purchase multiple properties.

For instance, the main applicant can buy three apartments from different locations, provided that the sales costs, valuation reports, and sales cost payments for all three apartments add up to over \$400,000. Lawyers authorized by the main applicant can handle all real estate transfer transactions through a special power of attorney. Similarly, lawyers can also carry out bank account opening procedures on behalf of the main applicant.

As of January 24, 2022, a new regulation on the Implementation of the Turkish Citizenship Law has been introduced by the Central Bank. Foreigners who are buyers must exchange their foreign currency through a bank authorized by the Central Bank. The technical details of this process are outlined in the "Capital Movements Circular" and the 13th Article of the Capital Movements Circular and the Implementation Instructions on the Sales of Foreign Exchange to the Central Bank. Foreigners must first sell their foreign currency to the Central Bank through the bank, and then present the Foreign Exchange Purchase Certificate to the land registry office for real estate acquisitions. It is now mandatory for foreign real persons to have the Foreign Exchange Purchase Certificate when buying real estate. Therefore, since January 24, 2022, the main applicant must convert their money to Turkish Lira and send it to the seller in Turkish Lira. Alternatively, the buyer can send the foreign currency, which will then be converted by the seller, who will obtain the Foreign Exchange Purchase Certificate on behalf of the buyer.

1.1. RESTRICTIONS TO FOREIGNERS IN REAL ESTATE ACQUISITION

Foreign citizens who wish to acquire real estate in Turkey are subject to certain restrictions set forth in the relevant legislation. The limitations include:

- The amount of land area that can be acquired by foreign citizens is limited. According to the regulation, the acquisition of 30 hectares (and no more than 60 hectares with the decision of the Council of Ministers) of real estate is allowed.
- Military prohibition and security zones are also closely monitored. The relevant authorities check whether the area where a foreign citizen requests to acquire real estate is within military or security zones or not.

1.2. FOREIGN COUNTRY NATIONALS TO ACQUIRE REAL ESTATE WITHIN TURKEY

All citizens from 183 countries approved by the presidency are allowed to acquire real estate in Turkey, and a complete list of countries that can acquire real estate is not published. However, inquiries can be made from the relevant Land Registry Directorates

upon the intention to acquire property. It should be noted that Syrian citizens are prohibited from acquiring real estate in Turkey.

1.3. SELECTION OF REAL ESTATE

One of the crucial steps in the process is selecting the appropriate real estate. The rental income of the real estate is the most significant factor to consider when making this selection. It is important to note that the main applicant can conduct their own research to find a suitable real estate agent, project, and property. However, lawyers can also provide recommendations to assist with the process.

1.4. EXAMINATION OF REAL ESTATE

- After selecting the real estate, the main applicant must share the current title deed with the lawyer for examination
- The lawyers investigate if there are any liens or restrictions on the title and if the real estate has construction servitude and condominium
- Real estates with liens or restrictions are not eligible for Turkish Citizenship
- Real estates with mortgages, seizures, and similar restrictions are also not eligible for Turkish citizenship
- The contracts that need to be signed are examined by the lawyers to protect all legal rights of the main applicant.

1.5. VALUATION REPORT

A real estate valuation institution that has been approved by the Capital Market Board is required to determine the value of the real estate being sold. This institution must then prepare a valuation report. The valuation report must be submitted to the Land Registry Office prior to the sale transaction for all real estate transactions involving the sale of property to foreigners. Lawyers can organize the Real Estate Valuation Institution and obtain the necessary information such as the contact number and title deed information to prepare the report.

1.6. REAL ESTATE PAYMENT

When paying for the purchase of real estate, it is essential that all payments are made from the buyer's bank account to the seller's bank account, and the land registry information should be included in the receipt statement. This is important because the receipt should clearly state the names of the buyer and seller and the information about

the paid real estate. The Ministry of Environment and Urban Planning requires that all details about the real estate, buyer, and seller are included in the receipt during compliance audits.

1.7. INSTALLMENT SALES

During the citizenship application process, it is possible to make installment sales for real estate purchases, provided that the total payment, whether made in installments or in cash, is at least \$400,000. For instance, if a sale is made in 8 installments, and each installment amounts to \$50,000, then the total payment of \$400,000 will be met at the end of the 8th installment. At this point, the application for citizenship can be made.

1.8. REAL ESTATE PRELIMINARY SALES CONTRACT

An application for citizenship can be made with the Real Estate Preliminary Sales Contract, which must be signed in the presence of a notary public. The real estate must have established construction servitude or condominium, and \$400,000 must be paid. An annotation regarding the contract must also be added in the Land Registry.

Starting from 31.01.2023, the new legislation allows investors to purchase only one property with a preliminary sales contract. It is no longer possible to purchase more than one property with a sales contract in order to apply for citizenship. The investor must have only one property purchased through a sales contract to be eligible for citizenship application.

1.9. CERTIFICATE OF CONFORMITY ISSUED BY THE MINISTRY OF ENVIRONMENT AND URBANIZATION

In order to qualify for Turkish citizenship through investment, the sale price of the property, the value stated in the Valuation Report, and the amount paid must all be equal to or above \$400,000. Once the investment requirement is met, all necessary documents are collected and an application for a Certificate of Investment Eligibility is made to the Ministry of Environment and Urbanization. Once the Certificate is received, the Turkish Citizenship Application process can commence.

2. BANK INVESTMENT

The main applicant can conduct all transactions related to bank investment through their bank account, which can be opened with the assistance of lawyers. By activating internet banking, the applicant can easily manage all transactions and keep track of their investments. It is regulated that;

"deposit a minimum of \$500.000 or equivalent foreign currency or equivalent amount of Turkish Lira to banks that operate in Turkey with the condition to keep such deposit in the relevant bank for at least three (3) years that is determined by the Banking Regulation and Supervision Agency;"

As per the regulations, the main applicant can obtain Turkish citizenship by keeping 500,000 USD or its equivalent in Turkish Lira in their bank account for 3 years. During the 3-year investment period, the main applicant can earn interest or profit share from their bank account.

2.1. BANK ACCOUNT OPENING

With a power of attorney, lawyers are authorized to carry out bank account opening procedures. However, this power of attorney does not grant any authority to withdraw money from the account. The power of attorney only allows lawyers to perform necessary transactions for bank account opening and bank investment. To start the bank account opening procedures, the applicant must provide their passport, address proof document, and Potential Tax Identification Number. Once all required documents are signed, the bank account opening process is completed. After opening the bank account, the main applicant will receive all necessary information for internet banking, including account information and customer number.

2.2. CERTIFICATE OF CONFORMITY ISSUED BY BANKING REGULATION AND SUPERVISION AGENCY

The Banking Regulatory and Supervisory Authority conducts audits to examine the bank account, investment amount, and power of attorney to issue a certificate of investment compliance for the main applicant. It is not important which account the investment amount is transferred from to the main applicant's bank account in Turkey, nor is it controlled by the agency which country the transfer comes from or what account it originates from. The main criterion is whether the \$500,000 or equivalent foreign currency or Turkish lira is present in the main applicant's account on the date of the request for determination.

The main applicant must maintain this investment amount in their bank account in Turkish lira, and after 3 years, they can withdraw it as Turkish lira. The Banking Regulatory and Supervisory Authority only ensures that the investment amount is complete in the account opened on behalf of the main applicant at a Turkish bank at the time of the request for an Investment Compliance Certificate.

G. RESIDENCE PERMIT



In accordance with paragraph 31/J of the law on Foreigners and International Protection number 6458, an application for a residence permit is required for the Turkish Citizenship application process. This type of residence permit is specific to the Main Applicant and is not required for family members. The main applicant can use this residence permit for entering and exiting Turkey at their discretion.

Under the new legislation, the residence permit application requires the applicant to be physically present in Turkey and provide fingerprints to the immigration office. Without providing fingerprints, both the residence permit and citizenship application cannot proceed. The client also has the option to submit the fingerprint in selected Turkish Consulates.

- HEALTH INSURANCE

A valid health insurance policy is mandatory for a residence permit application, as required by the Provincial Migration Administration. The health insurance policy must include valid expressions necessary for the residence permit, and it is mandatory to present it during the application process. The lawyers are responsible for handling the entire health insurance process required for the main applicant.

- RESIDENCE PERMIT APPLICATION

Once a valid health insurance is obtained, the main applicant can start the residence permit application process. The application is made online initially, and the required fees

are paid to the Provincial Immigration Administration. After the payments are completed, the necessary documents are submitted to the Provincial Directorate of Immigration Administration. Within a few days, the residence permit is approved.

Appointments for regular residence permit applications can take a long time to be scheduled, but this type of residence permit is processed much faster.

H. CITIZENSHIP APPLICATION

After obtaining the Investment Eligibility Certificate and residence permit with the help of lawyers, the main applicant can apply for Turkish citizenship. The main applicant and their family must choose Turkish first and last names for their Republic of Turkey identities and passports. However, there are certain limitations on the choice of name and surname determined by the State and relevant legislation.

The chosen name and surname should be from Turkish language names and surnames. Alternatively, the main applicant and their family can use their names on the passport (only by using Turkish letters/characters) they use in the Turkish citizenship application process in the same way as their Turkish identity and passports.

Moreover, according to the Turkish Civil Code, the family must use a single surname, and it is mandatory for the husband, wife, and children to have a common surname. Once the main applicant decides on the name and surname, the lawyers can make the application to the relevant authorities on their behalf.

I. CITIZENSHIP APPROVAL PROCESS



The General Directorate of Population and Citizenship provides information about the citizenship application process along with the application. Moreover, lawyers regularly monitor the status of the citizenship application and directly inform the family about any updates received from the relevant ministry.

Application for Passport and ID Card after the approval of Citizenship application:

If the main applicant and their family are residing in Turkey, they can apply for their Republic of Turkey ID cards and passports from the relevant Directorate of Population and Citizenship.

On the other hand, if the family is not in Turkey, they can apply for their Republic of Turkey ID cards and passports at the Turkish Consulate in their country of residence. After the application is processed, they can collect their Republic of Turkey ID cards and passports from the relevant authorities.

J. AMENDMENTS IN TURKISH CITIZENSHIP APPLICATION AS OF 2025:



Changes in Turkish Citizenship Applications and Residence Permit Applications through Investment

Since 2024, several amendments have been made in Turkish citizenship and residence permit applications. When applying for Turkish citizenship by investment, firstly, residence permit application is made, and citizenship application is made after the residence permit is approved. With the practice change made in February 2023, it became compulsory for the investor to provide fingerprints in Fatih Immigration Office by visiting Turkey.

With the change in practice made in 2024 and 2025, the investor is obliged to attend the appointments both the residence permit application and the citizenship application in person. For all residence and citizenship applications made after the new change, the investor, and his/her spouse (if married) must provide fingerprints in Turkey and then first submit the residence application file to the Immigration Administration in person. Apart from this changes, criminal record of the applicant and spouse obtained from the country of which the person is a citizen or legally resides, which were not required in previous residence applications but are requested with the new change, are now required in

residence applications. These changes are intended to provide a preliminary check for people who want to live in Turkey and become Turkish citizens.

Amendments to be applicable in residence permit and Turkish citizenship applications as of 2025:

- a) A criminal record obtained from the country where the investor is a citizen or legally resides will be included in the residence permit application file.
- b) Before the residence permit application, the investor and his/her spouse will come to Turkey and provide fingerprints.
- c) The investor and his/her spouse shall be in Turkey during the application for residence permit.
- d) The investor and his/her spouse will be in Turkey during the application for citizenship.
- e) If the criminal record is obtained from countries that are parties to the apostille, it must be apostilled, and its Turkish translation must be notarized. If you are a citizen of a country that is not a party to the apostille agreement, your criminal record document must be certified by the relevant country authorities. (Ministry of Foreign Affairs and Turkish Consulate)

The relevant amendments started to be effective as of 2024.