

TURKCELL ILETISIM HIZMETLERI A S  
Form SD  
May 30, 2018

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UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
Washington, D.C. 20549

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FORM SD  
Specialized Disclosure Report

TURKCELL ILETISIM HIZMETLERI A.S.  
(Exact name of registrant as specified in its charter)

|   |                          |                                   |
|---|--------------------------|-----------------------------------|
| Republic of Turkey  | 1-15092                  | N/A                               |
| (State or other jurisdiction of<br>incorporation or organization) | (Commission File Number) | (IRS Employer Identification No.) |

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| Turkcell Kucukyali Plaza<br>Aydinevler Mahallesi Inonu Caddesi No:20<br>Kucukyali Ofispark B Blok<br>Maltepe<br>Istanbul, Turkey | N/A        |
| (Address of Principal Executive Offices)   | (Zip Code) |

Mr. Zeynel Korhan Bilek +90 212 313 1888  
(Name and telephone number, including area code, of the person to contact in connection with this report.)

Check the appropriate box to indicate the rule pursuant to which this form is being filed, and provide the period to which the information in this form applies:

Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2017.

Section 1 - Conflict Minerals Disclosure

Item 1.01 Conflict Minerals Disclosure

This disclosure for the year ended December 31, 2017 is presented to comply with Rule 13p-1 under the Securities Exchange Act of 1934 (the "Conflict Minerals Rule").

Turkcell Iletisim Hizmetleri A.S. (the "Company"), together with its subsidiaries (the "Group"), is the leading mobile telecommunications operator in Turkey. It provides high-quality mobile and fixed voice, data, TV and digital services

over its advanced mobile and fixed networks and has developed the premier mobile brand in Turkey. A detailed discussion of the Group's products is contained in its Annual Report on Form 20-F for 2017, which was filed on March 22, 2018.

Although the Company is mainly involved with the telecommunications services which it provides to its subscribers, the Group engages in the sale of electronic devices and also contracts third parties to manufacture products such as mobile phone handsets, to be purchased and sold by authorized distributors in Turkey. For the period from January 1, 2017 to December 31, 2017, the Group has determined that certain conflict materials, which are defined as cassiterite, columbite-tantalite, gold, wolframite, and their derivatives, which are limited to tin, tantalum, tungsten, and gold (collectively, "Conflict Minerals"), are necessary to the functionality or production of certain products contracted by the Group to be manufactured.

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While the Group does not manufacture any products that contain Conflict Minerals, certain products that the Group contracts to manufacture may on occasion contain Conflict Minerals. As a result of this determination, the Company conducted a reasonable country of origin inquiry in good faith that it believes was reasonably designed to determine whether any of the Conflict Minerals contained in the products that were contracted to be manufactured originated in the Democratic Republic of the Congo or an adjoining country that shares an internationally recognized border with the Democratic Republic of the Congo (an “adjoining country”, and together with the Democratic Republic of the Congo, the “Covered Countries”).

The Group is many supply chain tiers removed from mining activities and has no direct business relationship with mines or metal processing facilities. In order to conduct its reasonable country of origin inquiry, the Company developed a questionnaire for its suppliers based on industry best practices and guidance designed to determine whether Conflict Minerals are used in a supplier’s goods, the identification of such goods and the country of origin of such Conflict Minerals and to obtain a general understanding of the policies, procedures and other measures that a supplier has in place to verify whether or not its goods contain any Conflict Minerals that are necessary to the functionality or production of such goods and that originated in the Covered Countries. The Group distributed this questionnaire to the suppliers that contract to manufacture the relevant products, including handsets, communication modules and simcards, and sought representations from such suppliers that their products did not contain any Conflict Minerals or that all Conflict Minerals contained in their products did not originate in the Covered Countries. None of the Group’s suppliers that contract to manufacture the relevant products has indicated that they source any conflict minerals from the Covered Countries.

Based on its reasonable country of origin inquiry, the Company has determined that it has no reason to believe that its necessary Conflict Minerals may have originated in the Covered Countries.

The determination and information described herein is available on the Company’s website.

Item 1.02 Exhibit

N/A

Section 2 - Exhibits

Item 2.01 Exhibits

N/A

SIGNATURES

Pursuant to the requirements of the Securities Exchange Act of 1934, the registrant has duly caused this report to be signed on its behalf by the duly authorized undersigned.

TURKCELL ILETISIM  
HIZMETLERI A.S.

Date: May 30, 2018 By: /s/ Zeynel Korhan Bilek  
Name: Zeynel Korhan Bilek  
Title: Investor Relations  
and Mergers & Acquisitions  
Director

TURKCELL  
ILETISIM  
HIZMETLERI A.S.

Date: May 30, 2018 By: /s/Bulent Aksu  
Name: Bulent  
Aksu  
Title: Chief  
Financial Officer