

Anti-Corruption Agency of the Republic of Kazakhstan  
(Anti-Corruption Service)

**NATIONAL  
ANTI-CORRUPTION  
REPORT  
2022**

Astana  
2023

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## **INTRODUCTION**

This report has been prepared pursuant to Article 17 of the Law of the Republic of Kazakhstan “On anti-corruption” in compliance with the requirements of the corresponding Rules.<sup>1</sup>

The Purpose of the document is to inform the public about the results of the anti-corruption policy implementation in Kazakhstan in 2022.

The legislative and practical measures to minimize corruption risks and ensure the inevitability of responsibility for corruption, conclusions and proposals for further improvement of the anti-corruption policy are presented.

The international anti-corruption efforts of Kazakhstan as well as the findings of an independent assessment of perceptions of corruption in the country and the world are reflected.

The document is intended for a wide audience – the public, entrepreneurs, experts, researchers, civil servants, and other stakeholders.

## MAIN PART

### 1. Political modernization and public oversight

The year of 2022 manifested a profound **political transformation**. After the January tragic events, the Head of State K.K. Tokayev accelerated and expanded the democratic reforms.

The main package of the initiatives was announced in the State of the Nation Address on March 16. As an outcome, 56 amendments were made to the Constitution of the Republic of Kazakhstan.<sup>2</sup> [3]

For the first time, the amendments to the fundamental law were proposed to national vote. Through the **referendum** the majority of citizens supported the **course of political modernization** – a final transition from a super-presidential form of governance to a presidential republic with the influential Parliament, demonopolization of power, expansion of public participation in governance and strengthening of mechanisms protecting human rights and freedoms.

The Parliament and local representative bodies have transited to a mixed electoral system (*30% of the deputies of the Mazhilis are elected directly and not by party lists; to regional Maslikhats – 50%*).

A competition among the political parties has increased (*the threshold for establishing a party reduced from 20 to 5 thousand members; requirements for the minimum number of regional representatives reduced from 600 to 200 people and for the initiative group from 1,000 to 700*).

Along with this, the procedures for appointing akims (governors) of regions and cities of national significance have changed considerably (*the President proposes at least two candidates and the deputies of the appropriate Maslikhats choose one*).

On April 26, the Head of State made a decision to terminate his chairmanship and withdraw from the “Amanat” party. Subsequently, the Constitution included a provision that during his office the President of the Republic of Kazakhstan cannot be a member of a political party (*Paragraph 3 of Article 43 of the Constitution*).

Hence, the head of the country became a non-partisan political figure, ensuring the practical implementation of the principle of equality of parties.

Akims and their deputies are also prohibited from holding positions in branches and representative offices of political parties.<sup>3</sup>

In addition, close relatives of the President of the Republic of Kazakhstan cannot hold offices of political civil servants and heads of quasi-public sector entities (*Paragraph 3 of Article 43 of the Constitution*).

Moreover, following the initiative of the Head of State, important democratic changes were made to the Constitution [4], which provide for the election of the President of the Republic of Kazakhstan for one seven-year term without the right to re-election. This norm is not subject to change (*Paragraph 1 of Article 41, Paragraph 5 of Article 42, Paragraph 2 of Article 91 of the Constitution*).<sup>4</sup>

This ensures a regular change in the country’s highest leadership which will help eliminate risks of monopolization of authority at all levels.

On November 20, K.K. Tokayev had a convincing victory in the early presidential election. This renewed his mandate of public confidence to implement the Election Program, which provides for systemic reforms, a thorough reboot of the entire political system and key state institutions as well as the continuation of an uncompromising fight against corruption (*toqayev2022.kz/en/programs*).

One of the first acts of the President, following his inauguration, was a decree targeting **the return of assets** illegally withdrawn from the country as well as the detection of assets obtained illegally.<sup>5</sup>

To implement this act, a draft law pertinent to the issues of assets recovery has been developed and units specializing in this area have been established in law enforcement and special government authorities.

Moreover, prior to this **the Interdepartmental commission on combating illegal concentration of economic resources** was established by the Decree of the President of the Republic of Kazakhstan.<sup>6</sup> Its main purpose is the return of illegally obtained funds and resources to the state.

Another country task is **demonopolization of the economy**. The review of the antimonopoly authority pertinent to the condition of competition in certain commodity markets indicated a high level of concentration of market authority in a number of primary sectors of the country's economy (*low competition*).

With a view to reducing it, **the Commission on the demonopolization of economy** was established under the Government at the request of the Head of State to develop recommendations addressing demonopolization in telecommunications, railway infrastructure, media assets, etc.<sup>7</sup>

As part of its activity, eleven key companies in industrial, energy, railway and telecommunications services sectors, large real estate in Astana and Almaty, funds equal to USD 100 million and KZT 2.5 billion were returned to the state ownership (*Government Office information dated December 29, 2022*).

In the medium term, Kazakhstan focusses on a transition from a repressive nature of the government policy on protection and development of competition toward a pro-competitive environment in the commodity markets. For this purpose, **the Concept of Protection and Development of Competition** for 2022-2026 establishes specific goals, tasks and activities.<sup>8</sup>

Moreover, in pursuance of the request of the Head of State, the **“Fund for the Support of Educational Infrastructure”** has been created. It receives funding, including from funds confiscated as part of corruption investigations. By the end of 2022, the Fund accumulated c.a. KZT 120 billion intended for construction of schools.<sup>9</sup> [4]

With an aim to strengthening legal guarantees of **constitutional human rights**, the status, mandate, and guarantees of independence of the **Commissioner for Human Rights** are now unprecedentedly enshrined in the constitutional law.<sup>10</sup> **Human rights function of the Prosecutor General** has been strengthened.<sup>11</sup>

**The Constitutional Court** has been revived (*instead of the Constitutional Council*). Any citizen can apply to check the compliance of regulatory legal acts

directly affecting their rights and freedoms with the Constitution of the Republic of Kazakhstan.<sup>12</sup>

A ban on the use of capital punishment in the Constitution served as a logical conclusion of successive steps towards **abolition of the death penalty** (2004 – *a moratorium on the death penalty*; 2020 – *accession to the Second Optional Protocol to the International Covenant on Civil and Political Rights*; 2021 – *relevant amendments to the national legislation*). This demonstrates unconditional commitment of Kazakhstan to protection of fundamental human rights.

As part of the implementation of the **Concept of Legal Policy** until 2030,<sup>13</sup> a phased transition to a new **three-tier model** of the criminal procedure with a clear delineation of areas of responsibility between the investigative body, the prosecutor's office and the court continued.<sup>14</sup> [1; 2]

**The first stage** (starting December 31, 2020) introduced the approval by the prosecutor of key procedural decisions of investigation authorities.

During two years, over 840 thousand decisions went through the prosecutors' filter (2021 – 419,808; 2022 – 422,217). The adoption of more than 81 thousand illegal procedural decisions affecting the rights of suspects and victims was prevented (2021 – 53,270; 2022 – 28,180).

**The second stage** started on January 1, 2022. Prosecutors now exercise new powers in terms of drafting indictments in cases of particularly grave crimes investigated by the internal affairs authorities, the Anti-Corruption Service and the Economic Investigation Service, including those connected with cases of other criminal offenses.

In 2022, prosecutors drafted indictments and sent them to court in relation to 1,185 cases of particularly grave crimes. Complaints from participants of procedural processes decreased and the quality of the investigations improved: the number of returned cases (*from 62 to 24*) and the termination (*from 5 to 0*) of cases by the court decreased.

**Business protection** issues are under special supervision. To this end, measures are taken **to prevent arbitrary interference** in business affairs and **unjustified criminal prosecution of entrepreneurs**.

On September 2, the Prosecutor General's Office issued an instruction to the criminal prosecution authorities with a comprehensive list of grounds when a pre-trial investigation against business entities can be launched.

The Anti-Corruption Agency (*hereinafter referred to as the Agency, Anti-Corruption Service*) approved the Instruction on the organization of pre-trial proceedings, which devotes special attention to the regulation of procedures to protect rights of entrepreneurs.

Notably, the Agency established a systematic algorithm of departmental oversight pertinent to justification of conducting investigative actions involving entrepreneurs and their visits to the premises of the Anti-Corruption Service.

Moreover, the Agency created and constantly operates a special group with the participation of representatives of the "Atameken" NCE to consider complaints of business entities.

Across the country, registration of cases against entrepreneurs decreased by four times and facts of illegal interference in business activities were suppressed in 31 cases with pre-trial investigations terminated by prosecutors.

New approaches are being introduced to prevent illegal actions of **control and supervision authorities as well**. In 2022, registration of more than 257 acts on business inspections was refused and prosecutors canceled illegal fines of KZT 1.3 billion.

They also canceled 1,223 illegal prohibitive and restrictive measures. The activity of mobile business protection groups continued.

One of the reforms, announced in the State of the Nation Address in March, is to increase competitiveness of **the mass media and strengthen the role of civil society institutions**.

To this end, the mass media legislation is being fundamentally revised to take into account the interests of the state, public expectations and trends in the media development as an area.

The relevant draft law provides for raising the status of journalists and strengthening legal guarantees for their protection, improvements in the government information policy funding mechanisms and a review of the principles of media registration, development of self-regulatory institutions, etc.

The draft law will establish a balance between the freedom of speech, pluralism of opinions and necessary restrictions, which safeguard national security, public order, health and morals.

The measures have also been taken to strengthen **interaction of the state with the civil society** to broaden involvement of public organizations and experts in preparation and implementation of reforms, including through open discussions of draft documents of the State Planning System.<sup>15</sup>

The opportunities of financial and non-financial government support for charities and volunteer activities have been expanded.<sup>16</sup>

The successor of the National Council of Public Trust under the President of the Republic of Kazakhstan (*hereinafter – NCPT*) grew into **the National Qurultai** – this is a new institutional level of a dialogue across the nation. Whilst the NCPT was more of an expert platform to help the state determine the right course of reforms, the National Qurultai is a meeting of representatives of various groups of the society who want these reforms to work (*it includes representatives of regional public councils*).<sup>17</sup>

An effective mechanism for public engagement in decision-making by government institutions is **public councils**. They have been functioning since 2021 not only in government authorities, but also in quasi-public sector entities.<sup>18</sup>

Their purpose is to communicate the civil society opinion on socially significant issues through various forms of oversight (*public hearings, monitoring, examinations as well as scrutiny of reports of state organizations on their activities*).

A mandatory consideration by government authorities of their public councils' recommendations make this legal instrument an effective tool of public oversight.

In 2022, the membership of 90% of public councils was revised. The representation of the civil society saw an increase by 23.5% and now accounts for 86% of the total number of members.

Upon the initiative of the Agency, the local level public councils established and operate **anti-corruption commissions** – the heads of local executive authorities deliver regular reports at their meetings.

The National Report on Public Councils in Kazakhstan is published annually on the website of the Ministry of Information and Public Development. Information concerning the activities of public councils, their membership, analytical and other documents are available on a special website Kazkenes.kz, which allows the public to submit enquiries.

On December 7, 2022, the Mazhilis of the Parliament of the Republic of Kazakhstan approved the draft Law “On public oversight” [1]. Its adoption will serve as a significant step in increasing transparency and accountability of government agencies and quasi-public sector entities to the public.

**The “Open Government” portals** continue to function. They enable the public to participate in decision-making by commenting on draft regulatory legal acts and budget programs and provide access to open data and information from government agencies.

In general, the political and democratic reforms carried out in 2022 enhanced the state and the public partnership, justice as well as equality in the distribution of the national revenue, strengthened the fight against social inequality, and ensured political competition. This has a positive impact on the perception of corruption among the public.



## 2. Activities of the Commission under the President of the Republic of Kazakhstan on Anti-Corruption Issues

In 2022, the Commission under the President of the Republic of Kazakhstan on Anti-Corruption Issues held three meetings to consider six matters, including:

- implementation of the Concept of the Anti-Corruption Policy of the Republic of Kazakhstan for 2022-2026;
- consideration of recommendations of the Group of States against Corruption (GRECO) *(in July and September)*;
- implementation of a Comprehensive plan to counteract shadow economy for 2021-2023;
- implementation of a Comprehensive anti-corruption plan in the customs, construction, education and healthcare sectors;
- implementation of the Election program of the President of the Republic of Kazakhstan “Fair Kazakhstan – for All and for Everyone. Now and Forever” in relation to anti-corruption issues.

The members of the Commission as well as the heads of governmental and quasi-public sector stakeholders attended these meetings.

They resulted in specific recommendations given to competent government agencies and organizations. The oversight pertinent to their implementation is ensured by the Department of Law Enforcement System of the Security Council *(working body of the Commission)*.<sup>19</sup>

The discussed matters were covered through public communications and reported to the Head of State.

## 3. Implementation of the Concept of Anti-Corruption Policy of the Republic of Kazakhstan

On February 2, 2022, the Decree of the Head of State approved **the Concept of the Anti-Corruption Policy** of the Republic of Kazakhstan for 2022-2026 with a plan of specific actions for its implementation *(hereinafter – the Concept, the Concept of Anti-Corruption Policy, the Action Plan for the Implementation of the Concept)*. The same act discontinued the Anti-Corruption Strategy of the Republic of Kazakhstan for 2015-2025.<sup>20</sup> [2]

The new strategic document pursues systematic elimination of the prerequisites of corruption, ensuring the inevitability of responsibility for corruption, and a fundamental change in public consciousness.

Its preparation took into account the public opinion and advanced foreign experience and anti-corruption standards enshrined in the UN Convention against Corruption<sup>21</sup> as well as reflected in the recommendations of GRECO, OECD, FATF and other reputable international organizations.

As part of the implementation of the Concept, significant legislative amendments were adopted by the end of 2022 to further improve the anti-corruption

legislation, including through the introduction of new corruption prevention instruments.<sup>22</sup>

One of the key novelties is **the introduction of the responsibility of officials for illicit enrichment**.

This preventive tool is the cornerstone of the entire anti-corruption system. Fiscal and career sanctions will be imposed in cases of discrepancies between an official's income and spend based on the outcomes of comparison of declarations. This instrument will be operational in 2027 the latest, given a full-scale coverage of the population by declarations.

**The system of protection of whistleblowers** has also been strengthened. [1] The new legislative norms provide for guarantees of protection of their labor rights as well as criminal liability for disclosure of confidential information concerning them and their anti-corruption assistance.

For example, a person, who reports a fact of corruption, cannot be brought to disciplinary responsibility, dismissed from office or transferred to another job position within three years from the date of the whistleblowing report without a recommendation of a disciplinary commission. It is mandatory for a representative of the Anti-Corruption Service to attend its meetings.

In case of disagreement with the decision of this collegial body, the Anti-Corruption Service will send a notification to a local labor affairs inspection authority or a prosecutor's office on the violation of the rights and legitimate interests of the concerned employee.

The amendments to the Anti-corruption law have come into force to provide for independence of **anti-corruption compliance services/units** from their executive authority and officials in a quasi-public sector entity, its accountability/reporting to their board of directors, supervisory board or other independent management authority.<sup>23</sup>

To ensure a consistent anti-corruption policy across the quasi-public sector, the Agency is now legally entrusted with methodological coordination of activities of anti-corruption compliance services. To implement this function, a Model regulation on anti-corruption compliance services in quasi-public sector entities has been approved.<sup>24</sup>

Since July 2022, a pilot "**Integrity check**" project has been implemented in relation to employees and administrative civil servants of the Agency and its territorial divisions. In 2022, more than 500 verification cases took place.

The results serve as evidence of a high preventive potential of this tool: 83% of the Agency's employees passed the checks (*449 out of 544*); at the same time, 54 employees, who were not subjected to testing, reported illegal offers from third parties (*no such reports were received before the start of the project*).

A package of legislative amendments has been adopted to implement the task of the Concept pertaining to elimination of opportunities for corruption<sup>25</sup> through the development of **digitization and information security**. This includes the Rules of digital transformation of public administration.<sup>26</sup>

**An assessment of RLA drafts** concerning their **compliance with strategic directions of digital transformation** is part of the comprehensive re-engineering

of business processes of government agencies. This will help to eliminate burdensome and insufficiently transparent procedures and minimize a human factor at the stage of document development.

In the course of the initiated “digital transformation” of public administration, 303 business processes of government agencies and organizations have been redesigned. The number of public services in a proactive format has reached 40 (24 in 2021), 698 (692) public services have been transferred to an alternative basis, and 17 (10) public services have been connected with the external platforms of second-tier banks. The implementation of proactive services through the Smart Data Ukimet has launched (*a platform for collecting, storing and analyzing data from government authorities*).

In pursuance of the Action Plan for the implementation of the Concept, it is now mandatory to study issues of the development and operation of information systems in the course of an assessment of corruption risks.<sup>27</sup>

Along with this, measures are being taken to expand **infrastructure of non-cash payments**. On June 8, 2022, the Instant Payment System (*hereinafter referred to as IPS*) went into operation allowing interbank transfers through phone numbers.

The IPS is designed for fast interbank transfers and online payments using any payment instrument (*a bank account, an electronic wallet*) 24 hours a day, seven days a week using basic banking details (*phone number, QR code and other identifiers*).

The banks are being connected to the IPS – participation agreements have been concluded with ten banks, seven of which (*JSC “First Heartland Jýsan Bank”, JSC “Eurasian Bank”, JSC “Bank Freedom Finance Kazakhstan”, JSC “Bank Center Credit”, JSC “Forte Bank”, JSC “Bereke Bank”, JSC “Kazpost”*) connected and now offer the IPS service for their own customers.

The number of POS terminals in comparison with 2021 increased by 63.4%, reaching 831,780 units, and non-cash transactions increased from KZT 73.1 trillion to KZT 103.8 trillion, or by 42%.

With a view to foster public zero tolerance to corruption, the government endorsed the **Action plan on public awareness activities** for various target groups (*children and youth, civil servants, public sector employees, employees of quasi-public organizations, and the business community*). This area of work has been coordinated at the national country level for the first time (*previously, there were separate interdepartmental plans*).

The methodological guidelines pertinent to ways of informing citizens and entrepreneurs about their rights with a provision of an explanation of the current legal acts pertinent to specific life situations and legal circumstances in a clear and user-friendly language as well as with the use of digital solutions have been adopted.

Within the framework of the Action Plan, the Agency has developed Methodological guidelines for **determining jobs/positions prone to corruption risks** and communicated them to the government agencies and organizations for guidance.

This is the first stage in the organization of prevention among the civil servants. Government bodies will further implement systematic preventive measures with this category of civil servants through their ethics commissioners.

In order to ensure timely delivery and achievement of the goals and objectives of the Anti-Corruption Policy Concept, the Agency consistently monitors its implementation using a project-based approach and escalating problematic issues to the Commission under the President of the Republic of Kazakhstan on Anti-Corruption Issues.

#### **4. Comprehensive anti-corruption plan in the customs, construction, education and healthcare sectors**

Along with the implementation of strategic documents, specific areas most susceptible to corruption manifestations are also systemically addressed.

Notably, within the framework of the expanded meeting “On anti-corruption measures” held on February 1, 2022 chaired by the Head of State, the Agency and other government authorities were given tasks. They include fostering anti-corruption culture, elimination of corruption manifestations in the process of digitalization of government bodies, pricing, customs and tax control, public procurement, provision of benefits and preferences as well as activities of socio-entrepreneurial corporations and public-private partnerships. [5]

At the same time, following the request of the Head of State, **a Comprehensive anti-corruption plan in the customs, construction, education and healthcare sectors** has been developed (*hereinafter referred to as the Plan*) (*endorsed by a joint order of MF, MES, MH and MIID*)<sup>28</sup> [5]. These areas are the ones where the public come across corruption manifestations most often.

For example, in **the customs sector**, corruption risks are associated with a possibility of officials receiving illegal rewards for expediting an uplift of seizures of bank accounts, adjusting reports, unhindered clearance of customs registration of cargo vehicles, avoiding imposition of an administrative liability, general patronage, etc.

To address this and minimize corruption, the criteria for determining a degree of risks in the Risk Management System (*hereinafter – the RMS*) applied in appointing complex on-site customs inspections have been updated. This measure will eliminate the human factor in determining individuals who will be subject to a comprehensive audit.

Automated risk profiles in the RMS have been adopted to identify cases of illegal exemption from customs duties and taxes. This helps to identify the illegal use of incentives pertinent to payments of customs duties and the transfer of preferential goods to other persons.

The process of distributing goods declarations between staff has been automated. This excludes discretionary powers related to customs operations and appointment of officials performing customs control functions.

The appropriate procedure has been developed and approved to regulate the actions of staff of state revenue authorities when conducting desk customs inspections to identify violations after the release of goods.

In **the construction sector**, corruption manifestations are associated with:

using design and costs estimate documentation with existing shortcomings and flaws;

transfer of budgetary funds for actually unfulfilled types of work;

conclusion of public procurement contracts for current repairs, medium repairs or construction of facilities at the end of the year (*when outside temperatures drop*) (*this does not allow a contractor to perform certain construction and installation works, while a local executive authority needs to ensure the spend of the budget provided for the implementation of the contract*);

shortcomings that cause significant corruption risks in issuing licenses for architectural, urban planning and construction activities.

As part of the Comprehensive Plan, a minimum expectations for facility and technical equipment requirement for licensees (*software and equipment*) were added to the universal qualification requirements for licenses in architectural, urban planning, and construction activities.

The “E-Qurylys” information system has been implemented. It hosts a register of licensees and provides testing for obtaining a certificate of an expert allowing performing works and engineering services in architectural, urban planning, and construction sectors.

A mandatory comprehensive assessment of urban development projects has been introduced. It excludes lobbying of the interests of construction companies in the matters of issuing high-demand land plots.

The standards of the top marginal costs of construction of facilities at the expense of public investments and funds of quasi-public sector entities have been approved.

Moreover, price indexing has been developed and implemented in the construction sector. This includes guides on current estimated prices for building materials, products and structures.

In **the education sector**, corruption is usually associated with bribery and embezzlement of budget funds in labor relations (*employment, payment of wages, accrual of excessive wages or payments to individuals, who are not employed in an organization*) and public procurement contracts.

At the stage of the development of the Plan, the Agency initiated an action to centralize accounting departments across educational institutions to exclude a technical possibility of illegal payments.

The changes have been made to the qualification requirements for educational activities and the list of documents confirming compliance with them. This pertains to licensing online learning and granting a five-year period for new applications pertinent to the license.

This measure made it possible to optimize the list of documents confirming compliance with the qualification requirements for small educational organizations.

A new model of university funding that ensures allocation of funds based on numbers of students (*through JSC “Financial Center”*) is now in place.

The integration of the “National Educational Database” information system with other systems secured availability of data when checking the social status

of a citizen (*MLSP*) and correcting data on education through the “electronic government” portal and “Smart Data Ukimet” (*MDDIAI*).

The public service for provision of free and reduced-price meals to certain categories of students and pupils in secondary schools has been transferred to a proactive format (*cancels the need of requesting certificates confirming that an applicant (family) is eligible for targeted social welfare assistance*).

The actions in the Plan related to automation of the risk assessment process of educational organizations through integration of information systems are underway. The implementation of these measures will allow automating the risk management system when developing schedules for inspections and preventive checks.

**In the healthcare sector**, purchases of medical equipment have been centralized through a Single distributor to eliminate corruption risks (*in 2022, according to the new rules, 177 units of medical equipment were purchased and distributed to the regions for a total amount of more than KZT 20 billion, as a result, savings amounted to KZT 3.1 billion*).

A system of labeling and traceability of goods at all stages, including import, production, and sale, has been introduced.

In order to reduce barriers impeding private medical organizations to enter the market, general requirements for standards of equipping medical devices in healthcare organizations have been established. They simplify the standards for equipping organizations of primary healthcare and consultative diagnostic, surgical and palliative care.

The law now regulates the requirements for justification of import of medicines in an emergency. This includes the procedure for canceling previously issued permits.

At the same time, barriers related to registration of prices for medicines have been reduced and risk levels of entities subject to inspection during periods of quarantine and restrictions have been determined.

The implementation of the Comprehensive Plan continues. The supervision oversight of its implementation is carried out within the framework of the Commission under the President of the Republic of Kazakhstan for Anti-Corruption Issues.

## **5. Development of the Anti-Corruption Service**

The Agency continues to improve not only the anti-corruption policy, but also its own approaches in all major areas of activity. The key guideline is a comprehensive provision of the well-being of citizens by eliminating prerequisites of corruption. To this end, a number of measures have been taken in pursuance of the assignments given by the Head of State.

The Agency discontinued the rating system used for many years to appraise performance of its territorial departments whereby points were assigned for each official brought to criminal responsibility. This “stick” system pushed the staff

to excessive registration of investigation of crimes committed by civil servants and businesses and carried high risks of procedural violations.

Hence, fundamentally **revised principles for assessment of performance of Anti-Corruption Service divisions** eliminated the race for statistics and allowed focusing on new preventive approaches.

**The maps of corruption risks have become the main tool. They are** developed for each region based on the results of sociological surveys, analyses of complaints of individuals and legal entities, criminal cases and legal statistics. They present a list of topical issues of concern to the public that are not resolved due to lack of transparency of processes, administrative barriers, slow or arbitrary response of officials, and legislative gaps.

The Agency's senior management travelled across the regions of the country to lead on extensive awareness activities – agreements were reached with the governors and the public on joint resolution of issues included in the corruption risks maps.

The work on monitoring the efficiency of use of budget funds have also undergone significant changes.

Jointly with the “Atameken” NCE the Agency continued using the **“Single Procurement Window”** system to monitor public purchases in real time as to their validity of volumes and prices at the planning stage. The inefficient use of budget funds for KZT 29 billion was prevented (*government agencies subsequently directed 93% of this to purchase goods and services in compliance with the corresponding requirements, and 7% remained in the budget*).

At the same time, the range of measures **to prevent embezzlement of budget funds** has been expanded so that crimes are prevented before they take place. In 2022, 65 information letters concerning specific risks of embezzlement of budget funds were submitted to the governors of the regions and senior managers of government bodies. Hence, this prevented violations totaling KZT 4.9 billion.

Along with this, the Agency **has strengthened administrative practice**. Methodological guidelines with a systematic algorithm of proceedings in cases of administrative offenses have been approved. As a result, the number of administrative proceedings has increased by more than 2.5 times (*2021 – 103; 2022 – 275*).

Whilst having a preventive effect, the administrative practice entails less serious sanctions for offenders and consequently saves significant financial, administrative and human resources.

Another area of changes concerned the development and application of additional protective mechanisms against illegal **interference in business**.

The algorithm of internal departmental control has been approved. It is mandatory for any regional division to verify each investigative action involving business representatives with the central office. As a result, entrepreneurs were protected from one thousand investigative actions without a negative impact on investigations.

Unreasonable calls made to entrepreneurs to visit the Agency for evidence are also suppressed. A special handout has been developed – it explains grounds when

a visit can be requested as well as contact telephone numbers for reporting illegal actions of the staff.

A special group of the Agency employees and representatives of the “Atameken” NCE has been created and continuously operated. The main task of the group is collegial consideration of issues raised in complaints of businesses, including corruption actions of government agencies against entrepreneurs.

In general, the Agency adheres to the modern principles of **humanization and digitalization** of the criminal process across its operational intelligence and investigative divisions.

In particular, the use of **electronic tracking devices** (*bracelets*) is ensured for remote monitoring of individuals against whom a preventive measure rather than detention has been chosen. In 2022, bracelets were used with 41 suspect placed under house arrest (2020 – 6; 2021 – 27).

This tool allows a timely response to attempts of violating the established routine as monitoring enables to trace movements every minute online and access the history of events. Interference in a suspect’s personal life is also excluded (*there is no need for constant home visits*).

Electronic means of tracking help use the human and financial resources of the Agency more efficiently.

Another step toward the implementation of the task given by the Head of State is the establishment of **the Division for Financial Investigations, Search and Asset Recovery**. The work of this unit focusses on investigating crimes with signs of money laundering and taking timely measures to identify and recover assets.

For this purpose, a register of requests for interaction with financial intelligence divisions, international requests for mutual legal assistance is maintained as well as the sale of property confiscated in criminal cases and acquired with corruption proceeds is monitored.

Special attention is paid to education of employees pertinent to specifics of locating and returning assets from abroad. The experts of the Council of Europe and the UN Office on Drugs and Crime conduct seminars and trainings on conducting parallel financial investigations and asset recovery, particularities of interaction with financial intelligence and law enforcement bodies of foreign states.

To encourage this work in the regions, a standard of financial investigations with a step-by-step algorithm of required investigative actions and a procedure for their conduct with samples of requests that meet requirements employed in the USA, European and Southeast Asian countries has been developed and communicated to territorial divisions (*to financial intelligence organizations and competent authorities of foreign states for mutual legal assistance*).

The staff of the Anti-Corruption Service participate in the work of commissions on countering illegal concentration of economic resources, demonopolization of the economy as well as in developing mechanisms to stimulate the return of capital from abroad and strengthen measures to counter the outflow



of funds from the country, including within the framework of the development of the draft Law “On the return of illegally acquired assets to the state”.

During the reported period, property assets and funds worth about KZT 653 billion were returned to the state budget and quasi-public sector entities.

Strengthening the potential of employees is carried out in a wide range. The **HR work** has progressed onto a new stage of development – a clear vector has been taken for selection and promotion of employees within the staff of the Agency based on the principles of meritocracy.

In particular, 57 employees, who demonstrated high professional, work ethics and personal qualities, received a promotion to senior positions following the appointment routes “from the central office to the region” and “from the region to the central office”. The senior management team of the central office and a number of territorial divisions has been significantly reinforced. 314 employees underwent professional development training.

An increase in the professionalization of personnel is accompanied by measures **to ensure the rule of law**, work discipline, compliance with anti-corruption restrictions and ethical standards.

More than 300 preventive activities were carried out, 383 appeals enquiries were examined, 157 official investigations were conducted – 80 employees were brought to disciplinary responsibility, six were dismissed on negative grounds, and seven were convicted.

In order to minimize corruption risks and prevent torture, the Agency ensures **full video** surveillance across the offices and other premises of the administrative buildings in the central office and territorial divisions (*466 video surveillance cameras in operation*).

## 6. Fostering an anti-corruption culture

The Anti-Corruption Service continued systematic work on fostering an anti-corruption culture across the society.

More than eleven thousand public awareness events offered explanation to communities pertinent to the norms of the anti-corruption legislation and ways of public participation in anti-corruption efforts.

This includes involvement of public opinion leaders in working **with various target groups** broadcast of videos to demonstrate negative consequences of corruption and call for compliance with the principles of integrity and justice, and distribution of handouts.

One of the large-scale projects was the traditional action “**Public Legal Advisor**”. About nine thousand members of the public across the regions received free legal aid rendered by 1.3 thousand representatives of government authorities, regional chambers of legal consultants, regional legal bar associations, and notaries.

The Agency jointly with the “**Atameken**” NCE undertake similar activities for entrepreneurs (*about 500 awareness events for more than twenty thousand entrepreneurs, 116 meetings for 1,150 representatives of large businesses*).

Special attention is paid to **the younger generation**. School subject courses cover topics on an anti-corruption culture. In the 2022-2023 academic year the course “Global Competencies” for Grades 5-11 is included in the standard curricula as a variable component. The course pursues value orientations, communication skills, ethical norms and behavioral attitudes of students.

We continue the practice of the nationwide action “**Hour of Integrity**”. It focusses on explaining the values of justice, integrity and patriotism based on the works of prominent thinkers.

The Agency jointly with the Academy of the Public Administration under the President of the Republic of Kazakhstan undertake measures to enhance the anti-corruption education of **civil servants**.

Notably, the topics and content of professional development and retraining courses for civil servants have been updated. The Agency employees act as trainers, which adds practical significance to the training.

As part of professional development, 1,784 civil servants underwent anti-corruption training (*CGA – 1,225; LEA – 559*).

The analytical direction is also developing. With a view to improve the anti-corruption policy, a number of research studies were completed jointly with higher educational institutions and NGOs.

## 7. External assessment of corruption risks

**The corruption risks map** developed by the Agency covers issues that have been generated through the key preventive tools – anti-corruption monitoring and external assessment of corruption risks.

Notably, activities of 66 government bodies at the central and regional levels were subjected to **an external assessment of corruption risks**. This resulted in 1,165 recommendations with 987 of them implemented.

At the central level, external assessments were carried out in the committees of the government defense order and transport as well as the department of subsoil use of solid minerals of the MIID. The territorial divisions of the Anti-Corruption Service helped to assess regional socio-entrepreneurial corporations (*hereinafter – SEC*), the migration service of the MIA and the NC “Kazakhstan Temir Zholy” JSC.

This resulted in identification of risks pertinent to the use of public funds of more than KZT 78 billion. For example, **in the activities of the SEC**, they are associated with financial violations in the amount of over KZT 47 billion (*underestimation of the value of assets for sale, irrevocable loans, unreasonable provision of concessional loans, failure to take measures for unfulfilled obligations to supply products to resource stability funds, unjustified high labor costs, etc.*).

The facts of non-competitive provision of land plots for alleged investment projects for construction of apartment buildings, restaurants, car washes, etc. have been revealed.

Currently, the measures are being taken to return illegally allocated land plots to the state. According to the “Kokshe” SEC, twelve land plots were returned to the state (*total area – 493.4 hectares; cadastral value – KZT 78.8 million*), the “Astana”

SEC – nine (7.7 hectares; KZT 3.2 million), and the “Zhetysu” SEC – six (593.4 hectares; KZT 825.7 million).

In order to comprehensively reform the SEC, the Government is working on a draft law on the development of the quasi-public sector, which, among other things, will offer a transparent mechanism for the provision of land plots through SECs.

In the Aktobe region, the outcomes of the assessment led to a pre-trial investigation against the Chairman of the Management Board of the “Aktobe” SEC JSC. A “problematic” social facility has been identified – its construction has not been completed since 2018 (a school in the village of Kumzhargan of Mugalzhar district). As a result of the measures taken by the Agency, KZT 197 million was returned to the state – this amount will be used for completion of the construction as well as the development of children’s sports in the region.

The corruption schemes have been identified in **the Transport Committee** (*failure to submit protocols on administrative offenses; bringing physical persons to responsibility instead of legal persons; registration of special permits for overloading as a formality*), which lead to an annual loss of the budget (*finest and fees*) of over KZT 10 billion.

The corruption risks have been eliminated in the process of distributing **preferential diesel fuel for farmers. The return of unused agricultural land** has been ensured.

In the aspect of the Agency’s already implemented recommendations, we should note the introduction of the **unified state information system – the “USISS”** as a follow-up to the external assessment in the area of **agricultural subsidies**.

The functional capacity of the system excludes the human factor when verifying the availability of resources (*land, workers, purchased equipment, etc.*). It is technically impossible to recall or reuse an electronic invoice (*previously there were facts when an electronic invoice was withdrawn after the approval of subsidies – this led to failure of payment*). Moreover, the new system is free of charge for farmers, which allowed their saving of about KZT 1.3 billion.

**63 illegally allocated apartments** were returned to the state housing fund (*Zhetysu region – 48, West Kazakhstan – 9, Akmol and Pavlodar – 3 each*).

In the West Kazakhstan region, **the payment fee for rental housing** has been reduced 2.5 times (*from KZT 165 to 65 per 1m<sup>2</sup> per month*) – this saved the public KZT 36 million.

In Shymkent, **unreasonable demands to restrict privatization of housing** were excluded from the decree of the governor’s office. As a result, 120 residents of two apartment buildings purchased their homes legally.

The Agency revealed corruption schemes of **distribution of wagons and locomotives to entrepreneurs** in Astana, Shymkent, Karaganda, Kostanay, and Mangistau regions.

The Agency carried out an external assessment of corruption risks in the activities of the department of subsoil use for solid minerals of the **MIID and NC “Kazakhstan Temir Zholy” JSC** jointly with the MDDIAI.

It established a failure to implement the information system in the field of subsoil use on time as well as duplication of its functionality, lack of demand and

inefficient implementation of the systems of the NC “Kazakhstan Temir Zholy” JSC and its subsidiaries.

On November 1, 2022, the MIID jointly with the MDDIAI launched a pilot project for the provision of public services pertinent to issuance of licenses for exploration and extraction of solid minerals through **a unified platform of subsoil users – “Minerals.gov.kz” (KazNedra)**. This system makes it possible to submit applications electronically as an alternative to the current paper version.

Following the initiative of the Agency, the State Revenue Committee identified 518 subsoil users who did not fulfill their obligations to pay for the use of land plots totaling more than KZT 663 million. Along with this, payments related to non-payment of subscription bonuses by subsoil users equal to KZT 550 million were collected.

In addition, based on the recommendation of the Agency with a view to minimizing corruption risks, representatives of the “Atameken” NCE and the members of the Parliament are now part of the collegial bodies of the MIID (*the expert commission, working group, commission on transition to the licensing regime and holding competitions*).

## **8. Anti-corruption monitoring and anti-corruption evaluation of draft regulatory legal acts**

**The monitoring of responsibility of managers** for corruption crimes of their subordinates continued. In 2022, the resignation of six political civil servants was accepted. 211 civil servants (*two of them political*) and 26 employees of quasi-public sector organizations were brought to disciplinary responsibility.

**The anti-corruption evaluation** examined 7,983 draft legal acts, of which 109 (1.4%) were draft laws; 2,954 (37%) – by-laws of the CGA and 4,920 (61.6%) are those of LEA. This resulted in the identification of 17,170 corruption risks. The share of recommendations taken into account in the adopted RLA was 55.4% (*the target performance indicator in the Agency’s Development Plan was 50%*).

**226 anti-corruption monitoring** studies were conducted – 844 proposals were developed and submitted to government bodies – 579 were implemented.

Based on the results of monitoring concerning the public-private partnership (*hereinafter – PPP*) the Agency submitted a proposal to the Ministry of National Economy – it was used in making the **amendments to the Law “On public-private partnership”**.<sup>29</sup>

In order to ensure a balanced distribution of risks between public and private partners, the legislative act sets **the limit of state co-financing** – not exceeding 30% of the estimated investment.

A new PPP principle has been introduced – **transparency and accessibility of information**, which involves ensuring public access to the main articles of PPP contracts and relevant economic assessments in a single information system.

Following the suggestion of the Anti-Corruption Service, based on the monitoring of **road construction and repairs activities**, regional governor’s offices excluded unreasonable costs pertaining to medium-scale road repairs equal

to KZT 268.1 million (*in Shymkent – by KZT 234 million materials not provided for by regulations were included in the original estimate; in the Zhetysu region – by KZT 34.1 million, 2% of unforeseen costs were included in the estimate, not provided for by law*).

The damage of KZT 169.5 million was prevented in the Kostanay region due to identification of non-compliance with construction regulations during road repairs and timely addressing of deficiencies.

**In the housing relations sector** corruption risks exist at all stages of housing provision: a low level of automation of accounting and inventory of waiting lists, lack of transparency in the management of the state housing fund and “blurred” responsibility of officials.

The Agency facilitated exclusion of more than eight thousand persons, who had been included on the register waiting list without appropriate grounds, and restored the rights of 125 citizens, including those from socially vulnerable categories. The budget received about KZT 87 million from settled rent debts and paid financial gaps in the residual value of privatization, which had been unreasonably underestimated.

**The pricing of electricity supply services** was monitored in the Karaganda region. Electricity supplier organizations did not have invoices confirming the price increase from the manufacturer.

Following joint efforts with the appropriate authority, the projected price increase has been reduced. Hence, the residents of the region will save a total of KZT 2.5 billion during one year as the excess of the tariff was addressed (*from October 2022 to October 2023*).

After revealing the facts of unjustified increase of the tariff in Balkash, the benefit for the residents amounted to KZT 133 million given a reduced compensating tariff for heating services.

The exposed corruption schemes within the **“Artsport” project**, implemented to develop mass children’s sports and creativity activities through public funding of clubs and training, received a wide public response.

About KZT 43 billion had been allocated for per capita financing (*in 2021 – KZT 5.8 billion, in 2022 – KZT 37 billion*). Within a short period of the project implementation, nineteen criminal cases were registered against eleven individuals. Six persons were brought to trial, four of them convicted, and five prosecuted on non-rehabilitating grounds.

Corruption risks were identified at almost all stages of the public budget spend process.

At the time of the monitoring, there was no forecast of the amount required for funding. Due to early spend of the budget, the implementation of the project was interrupted twice. Insufficient digitization of applications for entry and registration of attendance of classes at the “ArtSport” electronic platform was also revealed. A flaw in the system allowed enrolling non-existing students.

In addition, if parents wanted to switch a sports activity or a creative club, exchange of issued vouchers was not available. The lack of such flexibility and limitations in the diversity of educational areas entailed collusion between parents and suppliers in switching between clubs. This led to fictitious acts of delivery.

## **9. Anti-corruption efforts across government authorities and quasi-public sector organizations**

Along with the development of its own analytics, the Agency is taking systematic measures to increase the preventive potential of other anti-corruption actors.

In government authorities and quasi-public sector entities, this work takes place on an ongoing basis through implementation of planned and unscheduled actions aimed at eliminating corruption prerequisites.

They pertain to anti-corruption monitoring and internal analysis of corruption risks (self-assessment), formation of an anti-corruption culture, compliance with anti-corruption restrictions, regulation of conflict of interest, public procurement, public services, interaction with citizens, etc.

The measures taken in recent years have made it possible to increase the involvement of government authorities and organizations in combating corruption, including at the regional level.

For instance, the Department for Coordination of Employment and Social Programs of the akimat of the East Kazakhstan region has developed the “Interactive Platform” mobile application that automatically records the location of a social worker and provides a service recipient with an opportunity to assess quality of services.

This allowed to stop malpractice whereby special needs people with Group 1 and Group 2 disability and elderly people were not actually provided with special services or when those were carried out improperly.

In order to provide a full coverage of service recipients the developers have ensured the functioning of a mobile application without access to the Internet – this is especially important for residents in remote settlements.

This digital solution received highly positive public feedback (*more than eight thousand positive reviews*).

The akimat of the Karaganda region launched the “IQala” portal, which should automate the process of providing services, eliminate extra paperwork and direct contact with service providers as well as other corruption risks (*26 city services of three large monopolists – “Karaganda Zharyk”, “Teplotranzit-Karaganda”, “Karaganda energy industry” – the scope is being expanded*).

The “E-sep.su” project has been implemented in the West Kazakhstan region. It enabled automation of processes pertinent to subsidizing the cost of services for accounting supply of drinking water. This led to ensuring transparency of water consumption and made it possible to eliminate corruption risks, save budget funds of KZT 265 million as well as reduce drinking water consumption by 20%.

In accordance with the tasks of the Head of State and the requirements of legal acts, a new approach to planning anti-corruption work was actively introduced in 2022.

In particular, the Concept of Anti-Corruption Policy provides that the introduction of project management in the implementation of government



documents and projects will become an effective tool for preventing corruption at all levels of public governance.

Therefore, the project charters with daily monitoring in the project management information system have started to replace traditional plans with the end-of-year control. There are 44 project offices (*CGA – 24, LEA – 20*), which ensure implementation of projects, including those in quasi-public sector entities.

In order to systematize this work, the Project office and the Agency prevention units carry out coordination and methodological functions to facilitate the implementation of **Standard Projects Stream No. 4 “Prevention and Anti-Corruption”** (*hereinafter – SPS-4*) in government authorities.<sup>30</sup>

This SPS-4 includes three blocks of projects: internal analysis of corruption risks (self-assessment), anti-corruption culture and anti-corruption compliance.

With a view of ensuring high-quality implementation and continuous improvement of SPS-4, the Agency appointed anti-corruption commissioners in its territorial divisions to coordinate the work of local civil servants involved in projects.

Local executive and central government bodies conducted **internal analyses of corruption risks** in 428 organizations and identified about 4,486 corruption risks, of which 3,773 were eliminated.

For example, a subordinate organization of the Ministry of Culture and Sports (*the National Cinema Support Center*) has identified a conflict of interest – the producer of a film project concluded a preliminary contract for paid services with her spouse, approving him for the role of one of the main characters.

The Department of Physical Culture and Sports of the East Kazakhstan region, when conducting an internal analysis of corruption risks in its subordinate organizations, established and eliminated violations of paragraph 2 of Article 26 of the Labor Code (*the employees of sports institutions previously convicted of corruption crimes, murder, rape, illegal possession and sale of narcotic or psychotropic substances and other serious crimes*).<sup>31</sup>

In the West Kazakhstan region, the changes made to the public procurement plan saved over KZT 11 billion of budget funds.

The akimat of this region appointed 32 heads of state organizations, who did not undergo the staff rotation, to other positions, and organized the appraisal of 329 sports workers, who did not pass it on time.

In the Kostanay region, the fact of embezzlement of budget funds of KZT 1.3 million was revealed. The management of the regional department submitted the paperwork to the Anti-Corruption Service. Consequently, this resulted in a guilty verdict.

The local executive bodies in the Karaganda region, during their analysis, established facts of illegal payments of KZT 1.4 million to the supplier for services, which were not actually rendered for sanatorium treatment of individuals with disabilities. The local department of the Economic Investigation Service is investigating a criminal case based on this fact.

It is important to note that employees and heads of government agencies identify risks and violations themselves. This is the principle of zero tolerance for corruption in the government implemented in practice.

The project approach made it possible to personalize responsibility, establish clear and measurable indicators, streamline anti-corruption measures and unite the efforts of government organizations in preventing corruption.

As part of the second direction of SPS-4, the Agency, together with akimats, organizes events to foster **anti-corruption culture** (*anti-corruption training of civil servants, broadcast of social videos in public places and on regional television, meetings with honorary residents, drama performances on topics of justice and good faith, anti-corruption summer schools for children and students, etc.*).

The third group of SPS-4 projects focusses on the implementation of **anti-corruption compliance** in the quasi-public sector. Compliance services (units) have been established in 6,118 (*out of 6,369*) quasi-governmental organizations. 652 organizations (*LEA – 522, CGA – 130*) developed anti-corruption compliance documents within the framework of the project. Nineteen entities have confirmed compliance with the ISO 37001/ST RK 3049-2017.

Building consistency generates their positive results. Some compliance services have identified significant corruption risks.

Notably, the compliance officer of the “Astana REC” JSC, when monitoring public procurement tenders, identified payments for topographic services at an inflated cost. The timely response resulted in prevention of unjustified purchase for KZT 5 million.

The compliance officer of the state enterprise “Elorda Eco System” identified 15 public procurement tenders conducted with gross violations (*no competition, thirty procedural violations and four systemic deficiencies*).

The driver of changes in the quasi-public sector is “Samruk-Kazyna” JSC.

Pursuant to the task of the Head of State, the Roadmap for the reform of “Samruk-Kazyna” JSC was approved (*minutes of the in-person meeting of the Management Board dated February 24, 2022 No. 13/22*). A separate section is devoted to anti-corruption and compliance.

The reform of the Fund included introduction of compliance verification of purchases from a single source, a provision for unilateral termination of transactions in case of violation of the anti-corruption obligations by suppliers, and the selection of candidates for vacant positions has been strengthened from the point of view of compliance with the anti-corruption legislation.

Verification of trustworthiness of counterparties in the Fund’s e-procurement system is being automated (*zakup.sk.kz*), and an electronic format for declaring a conflict of interest is being introduced.

The whistleblowing system (a hotline) is an effective tool for combating offenses.

The employees of the Samruk-Kazyna Group of Companies and any other associated persons can call the hotline operated by an independent company (KPMG). The whistleblowing policy guarantees anonymity and protection from harassment of callers.



The Samruk-Kazyna Corporate University in cooperation with the Anti-Corruption Service has launched a project to train/retrain compliance specialists for quasi-public sector entities.

In order to develop a consistent anti-corruption practice, “Samruk-Kazyna” JSC adopted a Reference model with standard recommendations, approaches and tools for implementing the compliance function in portfolio companies.

## **10. De-bureaucratization, digitization, public services and public procurement**

In order to increase the efficiency of decision-making in the government, exclude excessive regulation of the activities of the executive branch, reduce document flow, and increase the independence and personal responsibility of heads of government agencies, the Head of State signed a decree **“On measures to de-bureaucratize the government activities”**.<sup>32</sup>

Getting rid of bureaucratic delays coupled with the introduction of digital technologies simplify the work of the government authorities, but, first, aim to improve the lives of citizens.

In this context, the **development of the judicial system** is of paramount importance. The measures are taking place on an ongoing basis to simplify access to justice and introduce a customer-based approach in the courts.<sup>33</sup>

There are 265 front offices in the courthouses. Taking into account the modern standards of barrier-free public services, they are spacious halls with an information center, areas of correspondence office and self-service, dedicated rooms for mediators and lawyers as well as rooms for familiarization with case materials.

The measures are underway to simplify legal proceedings, increase accessibility and transparency of justice, and introduce “SMART assistants” for judges.

Since 2014, a single window of access to courts – the “Judicial Cabinet” information service has been operational. It has a mobile version. Users can apply to the court online, pay state fees, become acquainted with court documents, and submit an application for the provision of the minutes of the court session or a comment on the minutes of the court session, etc. without leaving their home or office.

The system now has a function to create a ready-made statement of claim to the court automatically. Online application constructors are available for three categories of disputes (*labor, inheritance, divorce, purchase and sale agreements, supply agreements, loan agreements, and lease agreements*).

The possibility of an online conversation between the parties to a civil case before the start of the court session is available.

All courtrooms across the country are equipped with modern audio and video systems that record the course of the court session. They have been used in 96.8% of trials.

The courts now have electronic courtrooms. The judge and each of the parties have their own electronic workplace. A mutual exchange of petitions, “digitized” evidence and other documents takes place through them. The advantages are obvious

– reduced procedural costs, increased speed of information processing, and reduced length of processes.

As part of the digitization of legal proceedings, an IT product has been created – the “SMART assistant” for judges. The program itself prepares draft judicial acts on uncontested cases that do not require judicial discretion.

For example, the system registers and prepares a draft judicial act on a ban on leaving the country, use of parole or issue of sanctions, etc. A judge only needs to check the document and sign it electronically.

Along with ensuring access to justice, transparency and openness of all state bodies are ensured. In pursuance of the instruction of the Head of State, a new format of meetings of heads of central executive authorities with the population has been introduced. Prior to these changes, meetings used to take place once a year in Astana. Now ministers travel directly to the regions – not only regional centers, but also districts.<sup>34</sup> This made it possible to expand involvement and solve many problems “on the ground” (*213 meetings of ministers with the population in 2022*).

As part of the implementation of the Administrative Procedural Code and the concept of the “Hearing state”, the information system “e-Otinish” has been put into business operation. It pursues ensuring transparency of the appeals review process and improving the customer-based approach (*implemented in more than 25 thousand administrative bodies and 26 thousand subordinate and structural divisions*).

**Public services** are one of the most dynamically developing areas of public administration. **Three key vectors** have been identified: a transition to ‘fail-safe procedures’, an establishment of a system for the immediate restoration of the rights of service recipients and an introduction of an advanced application submission for services.

The work takes places within the framework of the Action Plan for the implementation of the Concept of Public Administration Development until 2030,<sup>35</sup> which envisages a transition to proactive public services based on the needs of citizens, complete elimination of the human factor and reduction of delivery duration, and a transfer of services to an electronic format.

The Agency for Civil Service Affairs (*hereinafter referred to as the ACSA*) has introduced a practice of restoring violated rights of service recipients by remote proactive monitoring without waiting for their complaints. This identified 149 unjustified refusals and cases of incomplete indication of the reasons for the refusal. The rights of 124 service recipients have been restored.

As part of ensuring quality control over the provision of public services, 756 inspections were carried out. They resulted in identification of about 46 thousand violations. Thus, 602 employees of service providers were brought to disciplinary responsibility and 305 officials were brought to administrative responsibility.

In order to prevent violations of rights of service recipients and enhance transparency and accountability, the format of maintaining the Register of Public Services has been revised. Public services are divided into subcategories, which

makes it possible to automate and streamline concealed subcategories of public services.<sup>36</sup>

For example, according to the “Registration of Marriage” public service, it is accounted as electronic, although it has two subcategories (*“Registration of marriage in cases of a decrease in the age of marriage”* and *“Amendments/additions to the marriage certificate”*) that exist in a paper form. For the “Transport Registration” service, the subcategories include primary registration delivered electronically and other cases – in a paper form (*de-registration, temporary registration*).

As of today, the Register includes 1,337 public services – 1,245 of them are provided electronically, which constitutes 93%.

There is a possibility of obtaining public services via smartphones (*1,006 types of public services can be obtained through the eGov Mobile application*).

A law simplifying the procedure for signing electronic documents and processes has been adopted. A result is generated and issued by the information system automatically without involvement of officials.<sup>37</sup>

Cancellation of the use of fifteen certificates and the introduction of digital confirmation of nineteen certificates allowed reducing paper turnover by 52.4 million documents.

A striking example of reducing bureaucracy as a factor of corruption is the implementation of access to digital documents in mobile applications (*19 types*), which have been used more than 12.8 million times by about 10.62 million people.

In pursuance of the task of the Head of State pertinent to the development of effective approaches for prompt and transparent allocation of land plots, the work is underway to launch the Single State Real Estate Cadaster system (*hereinafter – SSREC*).

The implementation of the SSREC simplifies the procedure for registration of rights to a land plot through automation of services, excludes a number of documents (*land management project, identification document for a land plot*), reduces land commission approvals (*number of approvals is reduced*), enables online monitoring of documents at various stages, introduces composite services (*obtaining a document for a land plot with registration of rights*) and shortens timings for consideration and approval of documents from one year to thirty days.

As part of the launch of the SSREC, a Public Cadastral Map has been developed (<https://map.gov4c.kz/egkn/>), which makes information about land, legal, natural and other cadasters available in an interactive format.

This resource significantly minimizes corruption risks by automating and simplifying real estate and land transactions.

The SSREC system has successfully passed tests for compliance with information security and after the entry into force of the relevant legislative amendments<sup>38</sup> will go into business operation (*in September 2023*).

The Ministry of Justice has fully automated the issuance of a duplicate title document for real estate, copies of documents from the registration file and an electronic technical passport.

According to the Ministry of Labor and Social Protection, the “Digital Family Card” is operational. Its main purpose is to transition from applications submission,

when a need arises, toward early diagnostics for public services and timely satisfaction of the expectations of the population (*in 2022, 57 thousand citizens received SMS for ten types of social benefits to ensure their consent to the provision of public services*).

In the area of education, 80% of parents submitted documents for admission to Grade 1 electronically.

In educational institutions, the introduction of cloud technologies has begun to ensure full access of citizens to information about school budgets. This will ensure public oversight of the targeted budget spend, reduce corruption risks and eliminate illegal collection of funds for various purposes.

At the same time, the admission of documents to colleges is automated and carried out through the “Electronic Government” web-portal.

The Ministry of Defense has transferred public services related to postponement of and exemption from conscription, which are most susceptible to corruption risks, to an electronic format.

### **Digitalization and transparency of the law enforcement continues.**

According to the Prosecutor General’s Office, in 2022 the investigation of 90.8% of criminal cases **was administered electronically** (*205,270 out of 226,030 cases*), 8.1 million electronic protocols and prescriptions were compiled, which is 88% of the total of administrative materials.

In accordance with the task of the Head of State, **continuous video** surveillance is being introduced in penitentiary institutions and police offices, as well as in all operational and investigative units of law enforcement agencies. [1]

By the end of 2022, the Prosecutor General’s Office conducted checks with other law enforcement agencies (*ACA, FMA, MIA*) and established the actual functioning of 22,215 video cameras (*out of 26,386*) as well as 1,483 “blind spots” not covered by video surveillance systems. The measures are underway to eliminate the identified shortcomings.

The Financial Monitoring Agency has implemented a **universal portal for entities subject to financial monitoring**. It is used to send reports on suspicious and threshold transactions, as well as to provide access to training materials on AML/CFT.

In order to reduce corruption risks, the “Economic Investigation Service” information system now has an automated mechanism for informing the management of security units, the investigative department of the FMA and those at territorial departments about the entrance to the building of the heads of counterparty companies of “cashing” firms.

In order to protect bona fide business entities from unjustified involvement in criminal prosecution, the “Business protection” project is being implemented. It has tightened departmental control and digitized accounting for all encumbrances on property, searches and seizures.

With the help of analytical IT tools, only entities with exceptionally high risks of illegal activity become subjects to scrutiny.

The MIA has implemented an effective digital solution to ensure road safety – **“Korgau” application**, which allows identifying cars with fake license plates,

without insurance, wanted or systematically violating traffic rules and avoiding paying fines.

In the past, detection of such violations required to stop all cars and check documents. This created inconveniences for law-abiding citizens and caused corruption risks. Now the system automatically analyzes the data from street cameras and sends a message to the tablet of the nearest police officer with an alert of a “dangerous” driver nearby.

In order to exclude corruption risks, the function of receiving applications from foreigners to obtain a temporary residence permit has been transferred from the Ministry of Internal Affairs to the OSS.

**The launch of the situational analysis center** allowed analyzing processes in the field of crime, administrative offenses, migration, and road safety (*all departmental databases have been combined using big data analysis tools*).

In the institutions of the penal enforcement system, “virtual visits” of convicts with relatives are now available. Electronic shops (*terminals*) for online purchases of permitted goods have been installed.

The administrative barriers have also been eliminated in the internal affairs authorities by automating the key human resources processes: the assignment of regular ranks (*more than eight thousand employees received titles automatically without paperwork*); the assignment of degree medals for seniority and the provision of annual vacations (*4,117 vacation orders were automatically generated*).

According to the Ministry of Finance, a number of legislative measures have been adopted to minimize corruption risks in **public procurement**.

In order to bring it into line with the norms of the Administrative Procedural Code, the amendments have been made to the Rules for conducting desk control (desktop reviews).<sup>39</sup>

In particular, the hearing of public procurement participants on draft responses to complaints and draft notifications on the elimination of violations has been introduced.

If they disagree with decisions based on the results of the hearing, the Internal State Audit Committee of the Ministry of Finance follows up on complaints and conducts quality control of the results of desktop reviews based on all arguments of potential suppliers.

At the same time, there is a mandatory procedure for the execution of the conclusions of quality control of the desktop oversight.

As part of the transition of the Risk Management System to the new **analytical tool – the Qlik Sense**, 64 risk indicators were identified (*audit of financial reporting – 20, public procurement – 18, state property – 26*) to form a list of state audit objects.

The control at the end of 2022 showed that 678 of the unloaded 13,107 payments of government agencies were identified as the most risk prone. The violations amounted to KZT 2.1 billion.

Since July 1, 2022, **a new procurement method – “a competition using a rating-point system”** has been introduced.<sup>40</sup> This approach excludes the involvement of members of a competition commission and automatically

determines a procurement winner based on the supplier rating by combining price and quality criteria.

**An electronic store** that provides transparency, automation and reducing timings for procurement of goods without conducting competitive procedures has been introduced.

**Personal responsibility of the person**, who made the decision on public procurement **by means of a single source** through the direct conclusion of a contract, given non-compliance with the principle of efficient spend, is established. There is also a provision on the priority implementation of competitive procurement methods by the buyer.<sup>41</sup>

At the same time, in order to protect the rights of entrepreneurs by expanding the competitive environment and minimizing corruption risks, the criterion of having professional experience in the supply of goods and provision of certain services (*with the exception of technical supervision services*) has been eliminated.<sup>42</sup>

On January 1, 2022, the **Law “On procurement of certain subjects of the quasi-public sector”** entered into force. It provides for a unified procedure for procurement in the quasi-public sector by analogy with public procurement.<sup>43</sup>

These measures envisage supporting domestic business, developing competition, minimizing corruption risks, simplifying and ensuring transparency of procurement in the quasi-public sector.

In order to exclude physical contact of officials with participants of foreign economic activity, the **“Main Dispatch Department”** (*based on the “Situation center” and the “Electronic declaration center” of the SRC*) has been created. It monitors the inspection of goods and vehicles online around the clock by analyzing X-ray images of inspection and inspection complexes.<sup>44</sup>

Since 2022, portable video recorders with real-time data transmission function have been used during customs inspections.

As part of the modernization of the **“Single Window for Export-Import Operations” information system**, six more customs related public services went into operation (*inclusion in the registers of owners of temporary storage warehouses, available warehouses, customs warehouses, warehouses for storing own goods, as well as customs representatives and authorized economic operators*). The timing for issuing documents has been reduced by two times.

In order to ensure transparency and legality of customs inspections carried out by employees of state revenue bodies, the “Electronic Act of Customs Inspection” module has been introduced in the “Astana-1” information system.

An electronic queue system has been introduced at six automobile checkpoints on the EAEU external border to exclude manipulation and ensure transparency of the process of passing vehicles across the border.

In the **healthcare sector**, five socially sensitive public services have been transferred to an electronic format (*“Passing preliminary mandatory medical examinations”, “Issuing an opinion on the need for sanatorium treatment”, “Issuing a temporary disability certificate”, “Issuing a certificate of temporary disability”, “Issuing certificates of compliance with appropriate pharmaceutical practices”*).

Given the comprehensive measures to digitalize public relations, by the end of 2022, Kazakhstan earned the 28th place in the global **E-Government Development Index** and the 8th place in the **Online Services Index**. 81.2% of citizens are satisfied with the quality of public services (2021 – 75.4%).

## 11. Minimizing corruption risks in the civil service sector

In his Address to the Nation dated September 1, 2022, the Head of State instructed the ACSA to become a full-fledged strategic HR agency. [4]

In pursuance of this instruction, the approaches are being worked out to endow the ACSA with the functions of strategic personnel management, transformation of personnel services of government authorities and reengineering of HR processes.

In relation to prevention of corruption, **a new selection algorithm for the civil service** has been developed. It excludes the human factor in evaluating the results of the competition for positions (*by depersonalizing applicants*). At the same time, compliance with the testing rules will be ensured by a proctoring system (*a procedure for remote monitoring of contestants using automatic control tools*), which has shown its positive effect during the selection for the Presidential Youth Personnel Reserve. The new competition procedure provides for an automatic phased exclusion of applicants, who scored the lowest points, followed by a final admission to the interview stage of three candidates, who demonstrated the best results in total.

In addition, the **procedure for admission to the civil service** has been simplified for graduates of higher educational institutions who have demonstrated high academic performance and had a scholarship (*direct appointment to entry level positions at the district and rural levels*) and graduates of the Academy of Public Administration under the President of the Republic of Kazakhstan who have successfully completed their studies (*at the regional level and for individual leadership positions of the “B” corps*).

A survey of civil servants indicated that, despite the introduction of a new pay system, only 11.8% believe that their wages were sufficient to support their families financially and 40% did not own their housing. There is a high level of bank loans among civil servants.

In order to eliminate these corruption risks, the project “**Social security of civil servants**” is being implemented. It will provide comprehensive measures to strengthen social security of employees and improve their employment conditions.

Along with this, the requirements for the ethical image of employees are increasing. The new edition of the **Code of Ethics** updated the principles and standards of the civil service. The activities of councils and ethics commissioners focus on prevention of violations.

**The law enforcement service as a special type of the civil service** is also undergoing the reform. One of the legislative measures, which among other targets pursues prevention of corruption, was to bring the HR processes of law enforcement agencies to universal standards (*competitive procedures, rewards, disciplinary practice, appraisals, etc.*).<sup>45</sup>

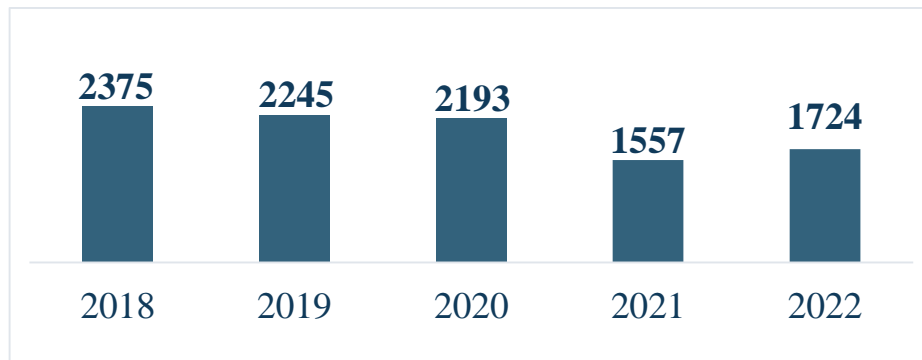
The National Report on the state of affairs in the civil service in the Republic of Kazakhstan provides detailed information on the developments in 2022.

## 12. Statistics

In parallel with prevention, the inevitability of responsibility for corruption is ensured.

In 2022, **all law enforcement and special state bodies registered 1,724 corruption crimes** (2021 – 1,557).<sup>46</sup>

*Diagram 1. Dynamics of corruption crimes*



*Table 1. The most common corruption crimes*

| Type of crime  | 2021 | 2022 |
|--|------|------|
| Giving a bribe   | 568  | 549  |
| Receiving a bribe                                      | 449  | 446  |
| Fraud  | 160  | 311  |
| Abuse of official authority                            | 123  | 110  |
| Embezzlement or misappropriation of entrusted property | 116  | 87   |

**725 persons were convicted** of corruption crimes (892 in 2021). Among them are staff (employees) of internal affairs authorities – 187 (207), akimats – 143 (145), akims – 7 (5), the Ministry of Finance – 40 (34), the Ministry of Agriculture – 18 (19), the Ministry of Industry and Infrastructure Development – 14 (5), the Ministry of Healthcare – 5 (16), the Ministry of Emergency Situations – 5 (5), the Economic Investigation Service – 5 (4), the Prosecutor’s Office – 5 (3), the Anti-Corruption Service – 5 (2), judges – 2 (3) and others.

The Anti-Corruption Service registered 1,118 corruption crimes and exposed 1,016 persons.

As a result of the shift in emphasis on the suppression of criminal schemes and corruption “pyramids” involving high-ranking officials, **the detection of grave and especially grave crimes amounted to 13%** (from 733 to 827).



115 officials, who committed corruption crimes affecting the rights of entrepreneurs, were exposed. 73 officials were convicted. The rights of 106 entrepreneurs were protected from the arbitrariness of officials.

The reparation of the damage following completion of pre-trial investigations amounted to **KZT 108 billion**.

At large, the Agency ensured the return of property assets and cash equal to **KZT 653 billion**.

The submissions requesting to eliminate violations of the rule of law that contributed to the commission of a criminal offense followed one hundred per cent of criminal cases sent to the court and terminated on non-rehabilitating grounds (867 submissions, 665 officials were brought to disciplinary responsibility, including 314 managers).

The financial incentives totaling KZT 40.6 million were paid to 134 whistleblowers. Seven civil servants were awarded appreciation certificates.

In 2022, 83 persons were on the wanted list. Following the measures taken, there are 59 remaining. Six persons were detained outside the country – one of them had been on the list for more than eleven years.

### 13. State and trends of corruption at the international level

In the past year, the issues of combating corruption at the global level have remained topical, as evidenced by a rich international agenda.

A recurring theme was the impact of **the coronavirus pandemic** (COVID-19) on the situation with corruption in different parts of the world. In particular, the **UN** experts note that many countries faced an increase in manifestations of corruption not only during the pandemic when overcoming this crisis phenomenon, but also during the recovery period.

**The public administration, healthcare and procurement** systems remain at risk (*Conference of the State Parties to the UN Convention against Corruption, November 7-11, 2022, Vienna, Austria*).

**Transparency International** focuses on the issues of combating transnational corruption, countering kleptocracy, asset recovery, access to information, protection of the rights of journalists and whistleblowers, etc. (*20th International Anti-Corruption Conference, Washington, USA, CPI-2022 annual report*). Their concerns also pertain to lobbying and corruption practices in gas and oil corporations and obstacles created in the development of “green” energy (*“Grand Corruption and Climate Change Policies”, Transparency International Review Report*).

The issues related to the **climate change** also draw **global attention**. The UN analysts note that billions of people will face food and water shortages, increased exposure to diseases, loss of housing and livelihoods as well as forced migration. In this regard, it is extremely important to reduce corruption risks in the effective use of allocated funds to mitigate the consequences in developing countries (*“Preventing and combating corruption as it relates to crimes that have an impact on the environment: An overview”, UNODC*).

On top of that, the first-ever global report of the **UN Office on Drugs and Crime** on corruption **in the world of sports** (*“Global Report on Corruption in Sport”, UNODC*) notes an increase in criminal activity in the organization of sports events associated with globalization, significant investments and technological innovations affecting sports results.

**The Group of States against Corruption at the Council of Europe** (*hereinafter referred to as GRECO, a body at the Council of Europe, in which Kazakhstan has been a member since 2020*) continues to promote the role of anti-corruption education, raising awareness among the public, especially children and youth, on the harmful consequences of corruption for human lives and the rule of law.

The GRECO emphasizes the need to create appropriate mechanisms in the participating countries to ensure public-sector transparency and general public involvement at all stages of the legislative process (*from initiation to adoption*). There is a tendency to shorten the deadlines or provide draft laws to the public at late stages, which greatly restricts citizens’ engagement (*speech by the President of the GRECO M. Mrčela on the International Anti-Corruption Day*).

Strengthening integrity standards among political civil servants, increasing the public trust and developing preventive approaches in infrastructure investments and natural resource supply chains have an important place on the **OECD agenda**.

Attention is also focused on transnational corruption through the prism of investigative journalism, whistleblower protection and corporate compliance (*the annual OECD Anti-Corruption & Integrity Forum, March 30 - April 1, 2022, Paris, France – virtual*).

**The World Bank** draws attention to the need to increase transparency in the development of budgets and use the capabilities of analytical data to strengthen the accountability of state authorities and the rule of law. The ProAct (*Procurement Anticorruption and Transparency*) platform, which contains extensive procurement data, is being promoted as a tool for the civil society (*speech by the President of the World Bank Group D. Malpass, at the 20th International Anti-Corruption Conference Transparency International, Washington, USA*).

In 2022, along with the G-20 Leaders’ Summit (*G20 High-Level Principles on Enhancing the Role of Auditing in Tackling Corruption were approved*), **a number of regional international events** took place. These are the 4th session of the Conference of the State Parties to the Arab Convention against Corruption (*a mechanism for monitoring the implementation of the Convention has been defined*); the 38th meeting of the Committee of Experts of the Inter-American Convention against Corruption (*adopted country reports of Panama, Chile and El Salvador on the implementation of the Convention*); High-Level Conference on the Promotion of Good Governance and Fight against Corruption in Africa (*the strategy of the African Union and the framework program of the International Monetary Fund on good governance and anti-corruption in Africa are presented*).

A number of analytical publications contributed to the international resource library. The pertain to the effectiveness of the fight against corruption and compliance with the rule of law in the countries of the European Union (*The Rule of Law Report*), good governance in the countries of South-Eastern Europe (*The Report*

on *Good Governance in Southeast Europe*), compliance with the provisions of the OECD Convention on Combating Bribery of Foreign Officials (*The Report on the Implementation of the OECD Anti-Bribery Convention*) and include a wide range of thematic publications (*the Higher School of Economics University Anti-Corruption Portal, anticor.hse.ru*).

With a view to minimizing the impact of global challenges on the development of the country, Kazakhstan strives to take comprehensive measures for international integration on anti-corruption issues, taking into account the particularities of the national legal system.

#### 14. International cooperation

Kazakhstan has intensified its work at the foreign anti-corruption platforms.

In March 2022, at the 90<sup>th</sup> plenary meeting of the **Group of States against Corruption of the Council of Europe**, an evaluation report on the anti-corruption system of Kazakhstan was reviewed (*available on the websites of the Council of Europe and the Agency in different languages – English, Kazakh, Russian, and French*).

Kazakhstan is currently undergoing the 1<sup>st</sup> and 2<sup>nd</sup> joint rounds of the GRECO evaluation. The experts of this anti-corruption body approved 27 recommendations to improve the effectiveness of anti-corruption measures. They are based on the standards of the Council of Europe, established by anti-corruption conventions and other legal instruments.

It is expected that the introduction of GRECO standards will contribute to the enhancement of Kazakhstan's anti-corruption system.

For example, as part of the implementation of Recommendation No. 11, the Law "On amendments and additions to the law "On anti-legalization (laundering) of criminally obtained proceeds and the financing of terrorism" was adopted in July 2022.<sup>47</sup>

The new norms provide for the mandatory establishment by legal entities of their beneficial owners, ownership and management structures as well as strengthening control over the reliability of the data provided by them.

Depending on the level of risk of the legalization (laundering) of proceeds from crime, the law provides for enhanced and simplified measures of due diligence of beneficial owners.

On July 1, 2022, Kazakhstan received an official invitation from the Committee of Ministers of the Council of Europe to join **the Council of Europe Criminal Law Convention**.

Practical regional seminars on asset recovery and financial investigations of corruption were organized jointly with the Council of Europe and the European Union "Rule of Law in Central Asia" program.

The leading experts from France, Switzerland and other countries (*more than 300 experts*) discussed the legal framework and mechanisms for the application of these instruments in Central Asia and Kazakhstan as well as the best practice and the international experience at large.

A bilateral dialogue was established between the anti-corruption bodies of Kazakhstan and France followed by a memorandum of understanding.

In 2022, Kazakhstan became the 60<sup>th</sup> member of **the GlobE Network** – the Anti-Corruption Network of the state parties to the UN Convention against Corruption and actively participates in its practical activities.

On October 14, a regular meeting of the CIS Council of Heads of State chaired the President of Kazakhstan was held in Astana. An **Agreement on anti-corruption cooperation of the CIS member states** was signed.

The Agency's cooperation with the **Organization for Economic Cooperation and Development** continues within the framework of the Anti-Corruption Network for Eastern Europe and Central Asia and the Integrity Review.

Kazakhstan is actively involved in the Istanbul Anti-Corruption Action Plan (*hereinafter – IAP*), a sub-regional initiative of the Anti-Corruption Network supporting anti-corruption reforms in Armenia, Azerbaijan, Georgia, Kyrgyzstan, Mongolia, Tajikistan, Uzbekistan, and Ukraine.

As part of this cooperation, the anti-corruption policy and criminal legislation of the Republic of Kazakhstan are subject to expert assessment for compliance with international standards.

Between 2007 and 2021, Kazakhstan underwent four rounds of monitoring of the implementation of the IAP recommendations and now joined the 5<sup>th</sup> round, which will be based on anti-corruption performance indicators for expert assessment and regional dialogue in specific areas (*anti-corruption policy, prevention of corruption and the application of criminal liability for corruption*).

The 5<sup>th</sup> round of monitoring for Kazakhstan is scheduled to start in November 2024. It will evaluate this current year.

Along with this, the Government of the Republic of Kazakhstan and the OECD are implementing a joint project – “Integrity Review”.

Successful completion of the review is one of the steps to prepare Kazakhstan for accession to the OECD Recommendation on Public Integrity, which is a mandatory criterion for joining the OECD.

In 2022, the OECD group of experts held a number of meetings with representatives of government authorities (*GPO, ACSA, ASPR, MISD, MCS, MSHE, ME, MDDIAI, MF, MJ, the Accounts Committee for Control over the Execution of the Republican Budget, the Audit Commission for Astana, the Academy of Public Administration under the President of the Republic of Kazakhstan*), the civil society (*Public Council of the Agency, NPA “Adildik Zholy”, PI “Integrity Astana”, PF “PaperLab”*), the “Atameken” NCE and business entities.

The delegation included the Deputy Head of the OECD Public Sector Integrity Division (*Shana Krishnan*) and policy analysts (*Santiago Wortman Jofre and Pauline Bertrand*).

The discussion over these meetings focused on the issues of implementation and evaluation of the anti-corruption policy, interaction of government authorities with the civil society, activities of public councils, the civil service reform and other relevant topics.

## 15. Anti-corruption research and ratings

In 2022, the “RSC Amanat” LLP conducted a **sociological study** (*eight thousand respondents from all regions of the country*) to assess the anti-corruption culture and levels of intolerance to manifestations of corruption among three target groups (*population, business, and students*).

The results of the study suggest that 64.9% of the citizens “expressed their willingness to make a personal contribution to reducing the level of corruption”.

At the same time, 88.7% of the youth respondents expressed a negative attitude to any corruption manifestations whilst every second (55.5%) is ready to take part in anti-corruption activities.

69% of the surveyed entrepreneurs believe that it was possible to develop their business without giving bribes. At the same time, every second entrepreneur in Shymkent (49.9%), the East Kazakhstan (53.4%) and Turkestan (46.1%) regions did not share this opinion.

The main barrier to business development (72.1%), in their opinion, is the corruption of employees authorizing appropriate permits and unjustified delays in their issuance.

5% of the surveyed businessmen faced the need to solve issues in government agencies informally. In 40% of such cases, they themselves initiated corruption. The reasons behind this are a lack of hope to resolve a situation (32%), a desire to express gratitude (25.3%) or speed up the solution of the issue (20.9%) and receive a public service (14.5%).

Among the government organizations where entrepreneurs faced corruption manifestations are state revenue authorities, transport control, structural divisions of akimats and law enforcement agencies.

Overall, more than half of the respondents (57.5%) noted the dynamics of reduction of corruption over the past three years.

One of the effectiveness indicators of the anti-corruption policy is the **level of trust in the Agency**, measured by the Presidential Administration as part of the evaluation of the effectiveness of government authorities (*in accordance with Decree No. 954 of March 19, 2010*). By the end of 2022, the public trust in the Anti-Corruption Service increased by 1.5 units to 64.1%.

Regarding the global picture reflected in the Transparency International **Corruption Perception Index** (*hereinafter referred to as the CPI*) Kazakhstan received a score of 36, which is one point lower than the result in the CPI-2021.

It should be noted that nine countries with 36 points (*Albania, Kazakhstan, Panama, Peru, Serbia, Thailand, Turkey, Sri Lanka, and Ecuador*) are all in the 101<sup>st</sup> place, whilst six countries with 34 points are in the 110<sup>th</sup> position. No country scored 35.

The leaders were Denmark (90), Finland and New Zealand (87). South Sudan (13), Syria (13) and Somalia (12) are on the bottom lines.

The two-thirds of the countries scored below 50, and the average result across the world is 43. In terms of regions, the countries of the Western Europe and

the European Union ranked the best with an average result of 66. The region with the lowest score is sub-Saharan Africa (32).

The average score of 19 countries in the Eastern Europe and Central Asia region was 35. Georgia is in the best position (56). There is an increase of three points in the scores of Moldova (39) and Uzbekistan (31), two – Kosovo (41), one – Albania (36), Northern Macedonia (40) and Ukraine (33).

A decrease of one point is observed in Bosnia (34), the Russian Federation (28), Montenegro (45). Belarus (39), Serbia and Turkey (36) lost two points. Azerbaijan scored lower by seven points (*from 30 to 23*).

To calculate the scores for Kazakhstan, Transparency International used the average value of data assessment from nine sources, which use different methodologies (*survey of entrepreneurs, expert assessment, analysis of media materials, etc.*). These studies do not focus on determining the level of corruption, but on its perception by entrepreneurs and a certain circle of experts.

In addition, with the exception of surveys of entrepreneurs (*WEF, IMD*), the studies assess perceptions through the prism of political reforms and democratization (*including the effectiveness of the public administration system, transparency of the Parliament, independence of the judiciary, state audit bodies, freedom of the media, public oversight, financing of political parties*), state participation in economy (*quality of budget planning and spend system*), nepotism and bureaucracy (*including administrative pressure*), public services, conflict of interest regulation and other issues.

Hence, the growth of scores in the CPI directly depends on the qualitative improvements in these areas that go beyond the competence of the anti-corruption authority and the term “corruption” in general as stipulated by the national legislation.

One of the reasons for the decline in the score and missing reflection of the progress in the CPI-2022 is the fact that some of the data used for Kazakhstan covers 2021 (*FH, V-DEM, WJP, IHS*), other – early 2022 (*IMD, WEF, PRS, EIU*), whereas the conclusions of the Bertelsmann Foundation (*BTI*) are based on the data for 2019-2020.

At the same time, given the systemic reforms, Kazakhstan has improved its position in the CPI by ten points over ten years (*from 26 to 36*), whilst in the Rule of Law Index (*in the line of anti-corruption*) it has risen by twelve positions (*from 74 to 62 places*).

Moreover, the World Bank study showed an annual improvement in Kazakhstan’s performance in the Corruption Control Index by 5.8 units (*from 42.3 to 48.1 percentile*), and more than a double improvement since 2017 (*from 20.2*).

These results seem noteworthy against the background of the stagnation of corruption across the world for the eleventh year in a row, as 95% of the countries have not demonstrated a positive trend since 2017.



## CONCLUSION

The extensive constitutional reform carried out in 2022, following the initiative of the President of Kazakhstan K.K. Tokayev, has laid the foundation for profound democratic and economic transformation with a view to improving the welfare of citizens, ensuring justice and equality in the society.

The endorsement by the Head of State of the Concept of Anti-Corruption Policy for 2022-2026 has served as a new impetus to eradication of corruption. The goals and objectives specified in this strategic document are the main guidelines of the anti-corruption agenda in the medium term.

During the first year of the Concept's implementation, officials' responsibility for illegal enrichment was introduced into the national legislation; mechanisms for protecting whistleblowers were expanded; norms on strengthening the independence of anti-corruption compliance services came into force; and a pilot project on "Integrity Check" (*integrity testing*) was launched.

Alongside this, comprehensive digitalization of public relations based on the principle of "human-centricity" has continued (*digitization of court trials, law enforcement activities, public services, introduction of a "Digital Family Card", expansion of the infrastructure of non-cash payments, etc.*).

The civil service saw the measures to minimize corruption risks (*reengineering of HR processes, exclusion of the human factor in the selection of candidates, strengthening the social security of employees, upgrading ethical standards of the civil service, etc.*).

Within the framework of international integration, the implementation of GRECO recommendations continues (*as part of the 1st and 2nd rounds of evaluation*). The Council of Europe has approved an application for accession to the Criminal Law Convention. Kazakhstan has become the 60<sup>th</sup> member of the GlobE Global Anti-Corruption Network.

These initiatives will strengthen the investment attractiveness of the country as well as expand opportunities for asset recovery and extradition of corrupt officials.

Overall, the anti-corruption measures taken in 2022 to a certain degree made a positive impact on the socio-economic situation. The examples are the return to the state of illegally obtained land plots, key companies in the industry, energy, railway and telecommunications services sectors, assets as well as cash – all in total worth KZT 653 billion, where more than KZT 120 billion of the recovered assets were allocated for the construction of schools; the farmers making saving worth KZT 1.3 billion due to a free information system in the field of subsidizing agriculture; the removal from the housing waiting list of eight thousand persons, who had registered illegally; the expansion of the proactive format of public services, etc.

The implementation of the Concept envisages plans to submit a draft law to the Parliament. It will provide for further improvement of the regulation of conflict of interest in the civil service and in the quasi-public sector; criminalization of the promise/offer of a bribe; strengthening liability of legal entities for corruption; introduction of a public register of corrupt officials in the system of anti-corruption measures and other measures.

The priority areas for the anti-corruption policy in the forthcoming period are eradication of prerequisites of corruption in socially sensitive areas (*education, healthcare, land relations, construction, social services, public procurement, control and licensing activities, law enforcement, etc.*); protection of business from corruption; recovery of illegally withdrawn assets; high-quality digitization of public relations; and large-scale awareness.

A coordinating role of the anti-corruption authority established by law will contribute to strengthening cooperation between government authorities and the public in eradication of the prerequisites of corruption, including through effective project management tools.

In the context of countering corruption through the prism of democracy, measures aimed at ensuring the independence of the judicial system, the integrity of law enforcement agencies, public access to information, the effectiveness and independence of state audit bodies, freedom of the media, and transparency of the budget process remain relevant for Kazakhstan.



**List of assignments:**

1. President of Kazakhstan Kassym-Jomart Tokayev's State of the Nation Address, September 1, 2020 "Kazakhstan in a new reality: Time for action".
2. President of Kazakhstan Kassym-Jomart Tokayev's State of the Nation Address, September 1, 2021 "Unity of the people and systemic reforms are a solid foundation for the nation's prosperity".
3. President of Kazakhstan Kassym-Jomart Tokayev's State of the Nation Address, March 16, 2022 "New Kazakhstan: The path of renewal and modernization".
4. President of Kazakhstan Kassym-Jomart Tokayev's State of the Nation Address, September 1, 2022 "A fair state. One nation. Prosperous society".
5. Minutes of the meeting chaired by the President of the Republic of Kazakhstan "On anti-corruption measures" dated February 1, 2022.

**Note:** in order to fulfill the requirement to include information on the execution of strategic and program documents (*paragraph 8 of the Rules for the Preparation and Submission of the National Anti-Corruption Report to the President of the Republic of Kazakhstan and its publication*), references in the text are provided to the above listed tasks.

### List of abbreviations:

|         |   |
|---------|---|
| NCE     | – National Chamber of Entrepreneurs   |
| Media   | – Mass media  |
| NCPT    | – National Council of Public Trust under the President of the Republic of Kazakhstan                |
| GRECO   | – Group of States against Corruption  |
| UN      | – United Nations  |
| OECD    | – Organization for Economic Cooperation and Development   |
| FATF    | – Financial Action Task Force   |
| RLA     | – regulatory legal act  |
| IPS     | – instant payment system  |
| JSC     | – joint-stock company   |
| MF      | – Ministry of Finance of the Republic of Kazakhstan   |
| MES     | – Ministry of Education and Science of the Republic of Kazakhstan                                   |
| MH      | – Ministry of Healthcare of the Republic of Kazakhstan  |
| MIID    | – Ministry of Industry and Infrastructure Development of the Republic of Kazakhstan                 |
| RMS     | – risk management system  |
| MLSP    | – Ministry of Labor and Social Protection of Population of the Republic of Kazakhstan               |
| MDDIAI  | – Ministry of Digital Development, Innovations and Aerospace Industry of the Republic of Kazakhstan |
| LLP     | – limited liability partnership   |
| NPJSC   | – non-profit joint stock company  |
| CGA     | – central government authority  |
| LEA     | – local executive authority   |
| SEC     | – social-entrepreneurial corporation  |
| MIA     | – Ministry of Internal Affairs of the Republic of Kazakhstan  |
| NC      | – national company  |
| PPP     | – public-private partnership  |
| SPS-4   | – Standard Projects Stream on prevention and countering corruption                                  |
| ACSA    | – Agency of the Republic of Kazakhstan for Civil Service Affairs                                    |
| SSREC   | – Single State Real Estate Cadaster   |
| ACA     | – Anti-Corruption Agency of the Republic of Kazakhstan  |
| FMA     | – Financial Monitoring Agency of the Republic of Kazakhstan   |
| AML/CFT | – Anti-Money Laundering/Combating the Financing of Terrorism  |
| IS      | – information system  |
| TR      | – traffic regulations   |
| OSS     | – one-stop-shop center  |
| SRC     | – State Revenue Committee of the Ministry of Finance of the Republic of Kazakhstan                  |
| EAEU    | – Eurasian Economic Union   |

|      |   |   |
|------|---|---|
| CPI  | – | Corruption Perceptions Index by Transparency International (CPI TI)     |
| CIS  | – | Commonwealth of Independent States                                      |
| IAP  | – | OECD Istanbul Anti-Corruption Action Plan (Istanbul Action Plan, OECD)  |
| GPO  | – | General Prosecutor’s Office of the Republic of Kazakhstan               |
| ASPR | – | Agency for Strategic Planning and Reforms of the Republic of Kazakhstan |
| MCS  | – | Ministry of Culture and Sports of the Republic of Kazakhstan            |
| MSHE | – | Ministry of Science and Higher Education of the Republic of Kazakhstan  |
| ME   | – | Ministry of Education of the Republic of Kazakhstan                     |
| MJ   | – | Ministry of Justice of the Republic of Kazakhstan                       |
| NPA  | – | nation-wide public association  |
| PI   | – | private institution   |
| PF   | – | public foundation   |
| RSC  | – | Research Services Center  |

### **Accronyms of rating organizations:**

BTI (Bertelsmann Transformation Index) – the Bertelsmann Transformation Index, which assesses transformation processes towards democracy and a market economy of countries in transition (Bertelsmann Stiftung, Germany)

EIU (Economist Intelligence Unit) – the research and analysis division of the global media and information-services company “The Economist Group”, which produces expert assessments of country risks

FH (Freedom House) – a non-governmental organization (USA) that produces reports on political rights, civil liberties, and democracy (“Freedom in the world”, “Nations in Transit”, etc.)

IHS (S&P Global) – an international information services provider that generates reports of expert assessments of country risks

IMD (International Institute for Management Development) – an independent business school (“International Institute for Management Development”, Switzerland), which issues the World Competitiveness Yearbook (“World Competitiveness Ranking”), etc.

PRS Group (Political Risks Services) – a geopolitical and country risk rating, assessment and forecasting, including investment risk analysis, company (USA)

V-DEM (Varieties of Democracy) – an international research project (“Varieties of Democracy”, Sweden) that measures democracy

WEF (World Economic Forum) – a not-for-profit organization (“World Economic Forum”, Switzerland), known for hosting the Davos Forum and releasing the “Global Competitiveness Index”

WJP (World Justice Project) – a non-governmental organization (“World Justice Project”, USA) known for working to advance the rule of law worldwide and issuing the “Rule of Law Index”

### List of references:

<sup>1</sup> Decree of the President of the Republic of Kazakhstan dated December 29, 2015 No. 154 “On approval of the Rules for preparation and submission of the National Anti-Corruption Report to the President of the Republic of Kazakhstan and its publication”;

<sup>2</sup> Law of the Republic of Kazakhstan dated June 8, 2022 (adopted at the national referendum on June 5, 2022) “On amendments and additions to the Constitution of the Republic of Kazakhstan”;

<sup>3</sup> Law of the Republic of Kazakhstan dated January 23, 2001 No. 148 “On local public administration and self-governance in the Republic of Kazakhstan”; Law of the Republic of Kazakhstan dated November 5, 2022 No. 157-VII LRK “On amendments and additions to some legislative acts of the Republic of Kazakhstan on the implementation of the Address of the Head of State dated March 16, 2022”;

<sup>4</sup> Law of the Republic of Kazakhstan dated September 17, 2022 No. 142-VII LRK “On Amendments and additions to the Constitution of the Republic of Kazakhstan”;

<sup>5</sup> Decree of the President of the Republic of Kazakhstan dated November 26, 2022 No. 3 “On measures to return illegally withdrawn assets to the state”;

<sup>6</sup> Decree of the President of the Republic of Kazakhstan dated June 5, 2022 No. 908 “On the interdepartmental commission on combating illegal concentration of economic resources”;

<sup>7</sup> Decree of the Prime Minister of the Republic of Kazakhstan dated March 22, 2022 No. 57-p “On the formation of the commission on the demonopolization of the economy”;

<sup>8</sup> Decree of the President of the Republic of Kazakhstan dated June 22, 2022 No. 938 “On approval of the Concept of Protection and Development of Competition in the Republic of Kazakhstan for 2022-2026”;

<sup>9</sup> Law of the Republic of Kazakhstan dated December 30, 2022 No. 177-VII LRK “On amendments and additions to certain legislative acts of the Republic of Kazakhstan on the implementation of certain instructions of the Head of State”; Order of the Minister of Education of the Republic of Kazakhstan dated February 17, 2023 No. 38 “On approval of the Rules for the distribution of the Education infrastructure support fund funding, expenditure, monitoring and reporting ”;

<sup>10</sup> Constitutional Law of the Republic of Kazakhstan dated November 5, 2022 No. 154-VII LRK “On the Commissioner for human rights in the Republic of Kazakhstan”;

<sup>11</sup> Constitutional Law of the Republic of Kazakhstan dated November 5, 2022 No. 155-VII LRK “On the Prosecutor’s Office”;

<sup>12</sup> Constitutional Law of the Republic of Kazakhstan dated November 5, 2022 No. 153-VII LRK “On the Constitutional Court of the Republic of Kazakhstan”;

<sup>13</sup> Decree of the President of the Republic of Kazakhstan dated October 15, 2021 No. 674 “On approval of the Concept of Legal Policy of the Republic of Kazakhstan until 2030”;

<sup>14</sup> Law of the Republic of Kazakhstan dated December 27, 2021 No. 88-VII “On amendments and additions to some legislative acts of the Republic of Kazakhstan on the implementation of a three-tier model with the separation of powers and areas of responsibility between law enforcement agencies, the prosecutor’s office and the court”;

<sup>15</sup> Resolution of the Government of the Republic of Kazakhstan dated November 29, 2017 No. 790 “On approval of the State planning system in the Republic of Kazakhstan”;

<sup>16</sup> Law of the Republic of Kazakhstan dated July 4, 2022 No. 134-VII LRK “On amendments and additions to certain legislative acts of the Republic of Kazakhstan on volunteer activities, charity, state social order, state order for the implementation of strategic partnership, grants and awards for non-governmental organizations, medical and social security”;

<sup>17</sup> Decree of the President of the Republic of Kazakhstan dated June 14, 2022 No. 930 “On the establishment of the National Qurultai under the President of the Republic of Kazakhstan and the invalidation of certain decrees of the President of the Republic of Kazakhstan”;

<sup>18</sup> Law of the Republic of Kazakhstan dated November 2, 2015 No. 383-V LRK “On public councils”;

<sup>19</sup> Decree of the President of the Republic of Kazakhstan dated April 2, 2002 No. 839 “On the formation of the Commission under the President of the Republic of Kazakhstan on Anti-Corruption Issues”;

<sup>20</sup> Decree of the President of the Republic of Kazakhstan dated February 2, 2022 No. 802 “On approval of the Concept of Anti-Corruption Policy of the Republic of Kazakhstan for 2022-2026 and amendments to some decrees of the President of the Republic of Kazakhstan”;

<sup>21</sup> Law of the Republic of Kazakhstan dated May 4, 2008 No. 31-IV “On ratification of the United Nations Convention against Corruption”;

<sup>22</sup> Law of the Republic of Kazakhstan dated January 3, 2023 No. 188-VII LRK “On amendments and additions to some legislative acts of the Republic of Kazakhstan on combating corruption and ensuring the safety of persons subject to state protection”;

<sup>23</sup> Law of the Republic of Kazakhstan dated June 8, 2021 No. 48-VII LRK “On amendments and additions to some legislative acts of the Republic of Kazakhstan on procurement of certain subjects of the quasi-public sector”;

<sup>24</sup> Order of the Chairman of the Anti-Corruption Agency of the Republic of Kazakhstan (Anti-Corruption Service) dated March 31, 2023 No. 112 “On approval of the Model regulation for anti-corruption compliance services in quasi-public sector entities”;

<sup>25</sup> Law of the Republic of Kazakhstan dated July 14, 2022 No. 141-VII “On amendments and additions to some legislative acts of the Republic

of Kazakhstan on stimulating innovation, digitalization development, information security and education”;

<sup>26</sup> Resolution of the Government of the Republic of Kazakhstan dated November 9, 2022 No. 881 “On approval of the Rules of digital transformation of public administration”

<sup>27</sup> Order of the Chairman of the Anti-Corruption Agency of the Republic of Kazakhstan (Anti-Corruption Service) dated January 16, 2023 No. 21 “On amendments to the order of the Chairman of the Agency of the Republic of Kazakhstan for Civil Service Affairs and Anti-Corruption dated October 19, 2016 No. 12 “On approval of Standard rules for internal analysis of corruption risks”;

<sup>28</sup> Joint Order of the Deputy Prime Minister - Minister of Finance of the Republic of Kazakhstan dated May 30, 2022 No. 540, Minister of Education and Science of the Republic of Kazakhstan dated May 31, 2022 No. 250, Minister of Health of the Republic of Kazakhstan dated May 31, 2022 No. 403 and Minister of Industry and Infrastructure Development of the Republic of Kazakhstan dated June 1, 2022 No. 309 “On approval of a Comprehensive plan to combat corruption on a systematic basis in the customs, construction, education and healthcare sectors”;

<sup>29</sup> Law of the Republic of Kazakhstan dated December 30, 2022 No. 177-VII LRK “On amendments and additions to some legislative acts of the Republic of Kazakhstan on the implementation of certain instructions of the Head of State”;

<sup>30</sup> Resolution of the Government of the Republic of Kazakhstan dated May 31, 2021 No. 358 “On approval of the Rules for project management”;

<sup>31</sup> Labor Code of the Republic of Kazakhstan dated November 23, 2015;

<sup>32</sup> Decree of the President of the Republic of Kazakhstan dated April 13, 2022 No. 872 “On measures to de-bureaucratize the activities of the state apparatus”;

<sup>33</sup> Decree of the President of the Republic of Kazakhstan dated September 8, 2022 No. 1002 “On measures to modernize judicial administration”; Decree of the President of the Republic of Kazakhstan dated January 19, 2023 No. 106 “On some issues of Judicial administration of the Republic of Kazakhstan”;

<sup>34</sup> Decree of the President of the Republic of Kazakhstan dated April 7, 2022 No. 863 “On holding meetings of heads of central executive bodies with the population”;

<sup>35</sup> Decree of the President of the Republic of Kazakhstan dated February 26, 2021 No. 522 “On approval of the Concept of Public Administration development in the Republic of Kazakhstan until 2030”;

<sup>36</sup> Order of the Acting Minister of Digital Development, Innovation and Aerospace Industry of the Republic of Kazakhstan dated January 31, 2020 No. 39/NK “On approval of the Register of public services”;

<sup>37</sup> Law of the Republic of Kazakhstan dated July 14, 2022 No. 141-VII LRK “On amendments and additions to some legislative acts of the Republic of Kazakhstan on stimulating innovation, digitalization development, information security and education”;

<sup>38</sup> Law of the Republic of Kazakhstan dated April 5, 2023 No. 221-VII LRK “On amendments and additions to some legislative acts of the Republic of Kazakhstan on the digitalization of public services in the field of land relations”;

<sup>39</sup> Order of the Deputy Prime Minister - Minister of Finance of the Republic of Kazakhstan dated April 28, 2022 No. 454 “On Amendments to the Order of the Minister of Finance of the Republic of Kazakhstan dated November 30, 2015 No. 598 “On approval of the Rules of desk control”;

Order of the Minister of Finance of the Republic of Kazakhstan dated January 18, 2022 No. 46 “On approval of the List of goods, works, services for which public procurement is carried out by means of a tender using a rating-point system”;

<sup>40</sup> Order of the Minister of Finance of the Republic of Kazakhstan dated January 18, 2022 No. 46 “On approval of the List of goods, works, services for which public procurement is carried out by means of a tender using a rating-point system”;

<sup>41</sup> Law of the Republic of Kazakhstan dated November 15, 2021 No. 72-VII LRK “On amendments and additions to some legislative acts of the Republic of Kazakhstan on public procurement, procurement of subsoil users and natural monopolies, communications, road transport, defense and financing of science”;

<sup>42</sup> Order of the Minister of Finance of the Republic of Kazakhstan dated January 14, 2022 No. 35 “On Amendments to the Order of the Minister of Finance of the Republic of Kazakhstan dated December 11, 2015 No. 648 “On approval of the Rules for public procurement”;

<sup>43</sup> Law of the Republic of Kazakhstan dated June 8, 2021 No. 47-VII LRK “On procurement of certain subjects of the quasi-public sector”;

<sup>44</sup> Resolution of the Government of the Republic of Kazakhstan dated March 16, 2022 No. 130 “On certain issues of the Ministry of Finance of the Republic of Kazakhstan”;

<sup>45</sup> Law of the Republic of Kazakhstan dated July 11, 2022 No. 136-VII LRK “On amendments and additions to certain legislative acts of the Republic of Kazakhstan on improving the procedure for law enforcement service, increasing legal and social protection and responsibility of law enforcement officers, special state bodies and military personnel, interdepartmental coordination, independence of internal affairs bodies, strengthening responsibility for individual criminal offenses and arms trafficking”;

<sup>46</sup> According to the data of the Committee on Legal Statistics and Special Records of the Prosecutor General’s Office of the Republic of Kazakhstan;

<sup>47</sup> Law of the Republic of Kazakhstan dated July 1, 2022 No. 131-VII LRK “On amendments and additions to some legislative acts of the Republic of Kazakhstan on countering the legalization (laundering) of proceeds from crime and the financing of terrorism, as well as state price regulation”.