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**Anti-Corruption Policy Concept  
of the Republic of Kazakhstan for 2022-2026**

Nur-Sultan, 2022

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## Section 1. Passport of the Concept

Name	Anti-Corruption Policy Concept of the Republic of Kazakhstan for 2022-2026
Basis for development	Order of the President of the Republic of Kazakhstan (paragraph 88 of the National Action Plan for the implementation of the Address of the Head of State to the People of Kazakhstan dated 1 September 2021 “The unity of the people and systemic reforms are a solid foundation for the country’s prosperity”)
State body responsible for the development	Anti-Corruption Agency of the Republic of Kazakhstan (Anti-Corruption Service)
State bodies and organizations responsible for the implementation	Government agencies, subordinate organizations, entities of the quasi-public sector
Implementation timeline	2022-2026

## Section 2. Analysis of the current situation

### 2.1. Achieved results

The anti-corruption policy of Kazakhstan is continually being improved in response to the needs of society whilst taking into account the national practice and advanced foreign experience.

To this end, a consistent and comprehensive approach has been ensured through the implementation of the Anti-Corruption Strategy of the Republic of Kazakhstan for 2015-2025, approved by the Decree of the President of the Republic of Kazakhstan No.986 dated 26 December 2014 (hereinafter referred to as the Anti-Corruption Strategy).

The adoption of the Law “On Combating Corruption” led to a system of anti-corruption measures embedding a reasonable balance of prevention and law-enforcement response instruments.

The civil society is actively involved in the fight against corruption through anti-corruption education and the creation of an environment of “zero” tolerance for any of its manifestations.

An independent anti-corruption authority – the Anti-Corruption Agency of the Republic of Kazakhstan (Anti-Corruption Service) – subordinate and accountable to the President of the Republic of Kazakhstan has been established.

The activities of the Agency, being the foremost conductor of the state anti-corruption policy, combine elements of effective prevention, large-scale education and constructive partnership with the society as well as law-enforcement response measures.

The framework for project management has allowed introducing a standard anti-corruption projects stream in each government agency. This has strengthened the coordinating potential of the Anti-Corruption Service.

#### ***Prevention measures in the civil service***

The new Law “On the Civil Service of the Republic of Kazakhstan” has ensured a transition to a “career” model of the civil service and introduced meritocracy principles through mechanisms of open competitive selection and promotion based on competences. The conditions allowing for collective “team movement” of staff from one organization to another (*following an appointment of a senior official*) have been reduced. The system for evaluating effectiveness of civil servants has been fundamentally revised and the new system of remuneration depending on performance outcomes has been tested.

The Code of Ethics for Civil Servants is in force. Ethics Commissioners have been introduced in local and central state bodies. Ethics Councils are in operation.

A new anti-corruption restriction for civil servants, MPs and judges prohibits them from holding overseas bank accounts.

There is a complete ban on receiving and giving gifts in connection with performance of official duties of those holding a responsible public position, persons authorized to perform public functions as well as members of their families.

The norms prohibiting joint service (work) of these persons with close relatives, spouses and in-laws have been strengthened. Candidates for public office are required to notify about relatives working in that public organization.

Measures of financial control have been improved. In 2021, within the framework of the universal declaration of assets civil servants, persons equivalent to them as well as their spouses submitted baseline “input” declarations. From 2022, a comparison of their income and spend will be carried out.

The assessment of the activity of heads of local administrations has been supplemented with the “level of corruption” target indicator and the methodology for measurements of the index of corruption across regions approved.

***Minimization of prerequisites for corruption in courts and law enforcement agencies***

The system of selection and appraisal of judges has been improved. Commissions on judicial ethics function in regional and equivalent courts. A unit for internal security and prevention of corruption in courts has been established within the Supreme Court department for ensuring activities of courts.

The position of a “conciliator judge” has been introduced. This has reduced the workload pressure on courts by three times: almost half of the cases result in conciliation as parties themselves sort out the dispute, thus minimizing corruption risks.

Litigation has moved online. A possibility of manipulations in the algorithm of automated distribution of cases has been eliminated.

An independent Court of the Astana International Financial Center, operating under a special legal regime, has been established to unconditionally apply the principle of the rule of law for prompt resolution of civil and commercial disputes of international business.

A three-tier model of criminal process is being introduced to strengthen guarantees of observance of constitutional rights of citizens, inevitability of punishment and prevention of corruption.

All-around video surveillance is introduced in penitentiary institutions, police premises as well as all operational and investigative units of law enforcement agencies.

In everyday practice, electronic systems for pre-trial investigations, administrative proceedings, registration of subjects and objects of inspections as well as the “Qamqor” information service are used.

A striking example of the use of digitalization to reduce corruption risks in the activities of law enforcement agencies is mainstreaming the “Sergek” video traffic control practice, which excludes direct contact between offenders and officials.

The introduction of recruitment standards used in the civil service into the law enforcement system makes it possible to ensure transparency of selection and, subsequently, quality and integrity of personnel.

Along with strengthening the criminal liability of law enforcement officers for committing corruption, measures have been taken to increase their salaries as well as provide compensation allowances for housing rent and purchase costs in relation to

certain staff categories.

***Expansion of public oversight, ensuring openness of government bodies***

In Kazakhstan, public oversight has been strengthened through a broad range of non-governmental organizations.

The national preventive mechanism and public monitoring commissions are actively working. The National Council of Public Trust under the President of the Republic of Kazakhstan has been established.

Within the framework of the “hearing state” concept, an effective institutional and legal basis has been formed to involve civil society in decision-making processes.

The legal status of public councils has been expanded through amendments to the Law on Public Councils.

Political parties play an important role in the process of introducing public oversight. The “Nur Otan” Party adopted the Anti-Corruption Program through 2025, and a number of anti-corruption initiatives are being implemented as part of the Electoral Program “The path of change: a decent life for everyone!”.

A special monitoring group, consisting of representatives of the public, provided an assessment of the implementation of the Anti-Corruption Strategy.

The Law “On Access to Information” laid the foundation for the formation of a state accountable and transparent to the public.

Five open data portals have been created at the “Open Government” electronic platform: “Open Budgets”, “Open Legal Regulations”, “Open Data”, “Assessment of the effectiveness of state bodies”, and “Open Dialogue”.

These resources allow citizens to participate in discussions of budget programs and draft regulations, receive statistical information and make enquiries to the heads of state bodies and quasi-public sector organizations with problematic issues.

The work with citizens’ appeals was relaunched through a special service “E-Appeal”, which allows for convenient and quick submission of complaints and tracking their progress online.

The adoption of the Administrative Procedural Code has introduced effective mechanisms to protect the rights of individuals and legal entities in public law disputes and strengthened guarantees for participation of citizens in public governance decision-making.

The anti-corruption assessment of 11,200 draft regulatory legal acts involved 150 independent experts from among the public. This made it possible to identify more than 30,000 corruption risks.

An effective model of local self-government is being developed based on participation of citizens in solving important issues of regional significance.

A “public participation budget” allows residents of the capital, cities of national and regional significance to initiate projects pertinent to provision of public amenities, landscaping and sanitary cleaning.

The “level four budget” provides rural population with an opportunity to independently determining what public funds will be spent on.

The election of local administrations of cities of district significance, rural areas,

towns and villages has been introduced.

The “Adaldyk Alany” project has been scaled throughout the country. It made it possible to build channels for interaction between the state bodies and civil society in matters of preventing corruption.

***Anti-corruption education, promotion of the ideology of integrity and “zero tolerance” to corruption***

All interested groups are involved in the national anti-corruption movement: students, teachers, civil servants, entrepreneurs, investors, independent experts, volunteers and others.

Educational programs across all bachelor’s degree majors are supplemented with an elective subject on Fundamentals of Anti-Corruption Culture.

A number of Kazakhstani universities with high anti-corruption standards have united into the League of Academic Integrity.

A differentiated system of rewards to citizens who report facts of corruption and otherwise assist in combating corruption has been introduced. Now the amount of a reward depends on the size of the reported bribe or the damage caused – it is no longer a fixed amount as it used to be. The maximum payment can amount to four thousand monthly calculation indices.

Comprehensive measures have been taken to improve the anti-corruption culture in the society. According to the survey study “Monitoring the state of corruption in Kazakhstan in 2020” by the Transparency Kazakhstan Public Foundation, 60% of Kazakhstanis expressed their readiness to assist in the fight against corruption.

***Automation of business processes***

The use of new technologies makes it possible to provide services to citizens in electronic and mobile formats. This reflects a priority task of customer-oriented government.

In the UN EGDI for 2020, Kazakhstan ranked 29<sup>th</sup> among 193 countries (in 2018 – 39<sup>th</sup>), 1<sup>st</sup> among the CIS countries and 6<sup>th</sup> among Asian countries.

The improvement of Kazakhstan’s ranking was the outcome of comprehensive and consistent efforts within the framework of the Digital Kazakhstan State Program.

Transformation processes contributed to the minimization of corruption risks in many socially sensitive areas.

Transferring the functions of central and local executive bodies to a competitive environment made it possible to reduce administrative barriers and other prerequisites for corruption.

Standards, regulations and rules of public services are consolidated into a single document. Public services are provided in the “one stop shop” centers for population and entrepreneurs. Proactive services delivery is being developed.

The share of electronic public services in 2020 was 90% whilst the level of satisfaction of service recipients with their quality and accessibility was 75.1% (2018 – 72.4%, 2019 – 74.8%).

***Countering corruption in the quasi-public and private sectors***

The creation of anti-corruption compliance services is legislatively established.

The Law “On Procurement of Certain Entities of the Quasi-Public Sector” was adopted. It unified the procurement of the “Samruk-Kazyna” NWF, JSC and other national holdings, national companies, and their subsidiaries.

An electronic procurement mechanism with desk monitoring and a register of bad faith participants has been introduced. Requirements pertinent to out-of-competition procedures have been increased.

Since 2021, public councils have been established in the quasi-public sector in order to increase accountability.

The scope of potential subjects of corruption offenses in the quasi-public sector has been expanded. It includes persons authorized to make decisions on organization’s operations and procurement or responsible for selection and implementation of projects financed from the state budget and the National Fund.

The business community adopted the Charter of Entrepreneurs of Kazakhstan on Combating Corruption. It encourages domestic businesses to introduce additional anti-corruption mechanisms based on international best practices.

### ***Strengthening accountability for corruption and ensuring inevitability of punishment***

There is a lifetime ban on employment of persons, who have committed corruption crimes, in the civil service and quasi-public sector entities.

Sanctions for law enforcement officers, judges, bribers and bribery intermediaries pertinent to corruption offenses have been tightened.

A possibility of applying for parole for those convicted of grave and especially grave corruption crimes is excluded. A ban on serving a sentence for bribery in a minimum security institution in the first instance has been established.

The personal responsibility norm in relation to heads of government agencies, organizations and quasi-public sector entities for corruption of subordinates has been introduced. Since its implementation, the resignation of 8 political employees has been accepted; 13 political employees, 98 senior level administrative civil servants, 109 law-enforcement officials in managing positions and 21 top managers of the quasi-public sector have been brought to disciplinary responsibility.

In general, over 3,000 people were convicted of corruption offenses in 2018-2020. This includes 1 minister, 3 vice ministers, 8 akims of regions and their deputies, 31 akims of cities, districts and their deputies, and 8 heads of national companies.

### ***International cooperation***

Kazakhstan has joined the core international conventions in the field of combating corruption and money laundering, the Istanbul Action Plan against Corruption (within the Organization for Economic Cooperation and Development (OECD) and joined the Group of States against Corruption (GRECO).

Constructive collaboration with international organizations and foreign anti-corruption agencies has been established.

In 2019, at the Plenary meeting of the OECD Anti-Corruption Network for Eastern Europe and Central Asia, the monitoring group provided a positive assessment of Kazakhstan’s interim report on the implementation of the recommendations



stemming from 4th round of the Istanbul Plan (progress achieved on 20 recommendations out of 29).

The undertaken measures laid a solid foundation for further eradication of corruption manifestations in the society. This allowed Kazakhstan to score 38 points in the Transparency International Corruption Perceptions Index 2020 (+7 points in two years) for the first time, moving to the 94th place (+30 positions in two years) among 180 countries.

## **2.2. Key issues to be addressed in the medium term**

### ***“Petty” corruption***

“Petty” corruption, taking place in interaction of citizens and entrepreneurs with representatives of government agencies and organizations in everyday life, persists in many areas.

According to the results of the sociological study “Monitoring the state of corruption in 2020”, conducted by Transparency Kazakhstan Public Foundation, the list of organizations and institutions sensitive from the point of view of corruption does not practically change from year to year: state medical clinics and hospitals, the police, land relations departments, public services centers, state kindergartens and universities.

A significant share of corruption crimes is bribery – more than 50% over the past three years.

Among the main reasons are persistent administrative barriers, ambiguous and discretionary regulatory norms, insufficient openness of government bodies, and a high proportion of public services provided on an alternative (paper) basis.

There are no standards for an accessible and understandable explanation offered to various social groups of their rights, obligations and procedures based on specific cases taking into account regional, sectoral and other characteristics.

This is also due to shortcomings and gaps in the automation of public administration business processes.

Some digital solutions, due to their weak quality and half-hearted implementation, create corruption risks. Officials may often use “imaginary” digitalization to continue committing corruption acts – citizens and entrepreneurs are forced to look for illegal ways to solve their problems due to technical failures, unnecessary processes in “digitized” government functions and other shortcomings in the operation of information systems.

Along with this, poor integration of databases does not allow ensuring a proactive service governance model.

### ***Corruption risks in the public and private sectors***

There is a weak interest of government agencies and the quasi-public sector in eliminating prerequisites for corruption identified by the anti-corruption authority as part of an external analysis of corruption risks.

The instrument of internal analysis of corruption risks (*self-study*) has not yet become an effective tool for “self-purification” of government agencies and quasi-public organizations.

Along with this, there is not an effective mechanism for responding to the intra-sectoral system of public administration based on a “region – center” principle.

A passive attitude of government agencies and quasi-public sector organizations in matters of combating corruption does not allow relying on them to ensure a real decrease in the level of corruption.

The remuneration of civil servants and employees of state organizations remains insufficiently competitive compared to the corporate sector.

There is not an effective mechanism for preventing conflict of interest in the performance of public functions.

The existing assets declaration system is not properly supported by effective tools to respond to cases of significant discrepancies between income and spend.

The search for stolen assets and their return to the budget remain in the background due to difficulties in proving their criminal origin.

Prevention measures are mainly aimed at combating corruption among civil servants. This reduces the effectiveness of preventing corruption manifestations among other individuals but who at the same time have a high impact on citizens’ perception of the level of corruption.

In this context, countering corruption in the non-public sector and a need to support honest business gain particular importance.

### ***High corruption vulnerability of the budget allocation process***

Insufficient transparency of information pertinent to the allocation and spend of public funds is a systemic factor that increases corruption risks in public financial management.

The key reason behind the negative practice is the insufficient connection between the planning system and the spend of budgetary funds. Applications for budget allocations are often based on unreasonably high price bidding offers of companies, often affiliated with staff in positions of responsibility.

Ineffective planning leads to such serious consequences as economic and profit loss and creates a fertile ground for theft throughout budget spending.

The lack of a unified information system containing data on the spend of the national and local budgets contributes to non-transparency and dispersal of the relevant information.

Conditions have not been created for the public to access a “simplified” version of the budget which could indicate only key information without technical details and, accordingly, without restrictions for public oversight.

Lack of transparency in budgeting decision-making reduces opportunities for accountability and encourages corruption.

The pandemic and the post-COVID period have exposed the problem of the lack of connection between allocated funds and socio-economic results.

The mechanisms for distributing government support (subsidies, grants, guarantees, concessional loans) for business entities allow for its inefficient and inappropriate use.

This happens because authorized bodies do not specify final indicators of success

for such budget support. There are wrong triggers, including those that promote corrupt behaviour.

The decision on the suitability of subsidizing business entities does not involve a research community with a relevant specialization. Discretionary funding allows for diversion of resources and evasion of budget discipline mechanisms.

This state of affairs reduces the effectiveness of measures to create equal, competitive and fair conditions for obtaining budget support.

There is a tendency to withdraw budgetary funds from state oversight by increasing the authorized capital of legal entities in the quasi-public sector. Bypassing public procurement procedures and concluding civil transactions between the administrator of the budget program and a subordinate organization, funds are transferred for purposes not related to the development of the industry. This results in vague contractual obligations, irrational budget spend and theft.

The four-tier system of state audit and financial control bodies, largely duplicating each other, does not allow to fully ensuring prevention of corruption in the budget process.

### ***Lack of transparency in procurement***

In 2020, the share of public procurement in the total amount of budget expenditure was 35%, which is 7% of Kazakhstan's GDP. This demonstrates a very significant economic impact on the market.

Such a turnover of budgetary funds enhances corruption attractiveness of the public procurement system. Every fifth corruption crime is committed in this area.

The fragmentation of the legal framework, various platforms and procurement sites are a consequence of the lack of a single implementation approach and a consistent development strategy for this area, despite one source of funds – the state budget.

Under these conditions, the facts of artificially inflating purchase prices are widespread.

The assessment of a supplier's potential is not always objective due to non-transparency of conclusion of contracts with subcontractors in delivery of obligations under a public procurement contract.

A common problem is signing of fictitious acts. The inevitability of disciplinary liability for untimely spend delivery gives rise to a "forced" violation of the law. As a result, the priority is not quality of work, but formal execution of the budget.

The share of direct purchases from a single source is still high (61% on average for 2018-2020).

A possibility of making purchases in a paper format limits public monitoring, which is to deter unjustified procurement of goods, works and services, artificial cost increases and other violations.

According to experts from international organizations (the Asian Development Bank, World Bank, European Bank for Reconstruction and Development, Islamic Development Bank, and OECD), the lack of a unified legislative and regulatory framework in Kazakhstan creates obstacles to a common and cost-effective procurement practice.

### ***High level of state participation in the economy***

A significant share of state participation in the economy hinders competition between economic entities, obstructs the formation of a strong private sector and slows down the country's transition to a new model of economic growth.

The privileged access of state-owned enterprises to resources, markets and finance puts private companies at a disadvantage and undermines efforts to promote economic diversification, foreign direct investment and productivity growth, and creates conditions for corruption.

Their dominance in the domestic market reduces the overall competitiveness of domestic enterprises, which, when projected onto the foreign market, leads to the loss of economic positions in relation to neighbouring states.

A significant part of public procurement is non-alternatively distributed among companies with state participation. This devalues the possibility of using this instrument for the development of small and medium-sized businesses.

Separate entities of the quasi-public sector were created without an in-depth examination for their need. The external analyses of corruption risks established that a number of them duplicated the activities of structural divisions of ministries. As noted in the Concept for the Development of Civil Society in the Republic of Kazakhstan, today the share of the state in the economy together with the quasi-public sector reaches 60-80%.

Along with this, the current mechanism of privatization and transfer of assets to a competitive environment does not exclude a conflict of interest and allows the acquisition of objects for a price below the guarantee fee.

The format for preparing relevant bids, including the definition of conditions, methods, sizes of shareholdings, terms of implementation and pre-sale preparation of objects, does not imply an openness of this process.

### ***Imperfection of the mechanisms for constructive interaction of civil society institutions with the state***

The experience of countries with a low level of corruption shows that the main condition for its minimization is a wide involvement of the civil society.

At the same time, there is no sufficient legal regulation of public oversight in Kazakhstan.

The privacy of data limits the ability of citizens to directly participate in decision-making whereas the available information is difficult to understand and is of a formal nature.

This approach curbs diversity of opinions. The potential of the media in combating corruption is not fully used.

Bureaucratized methods of reporting corruption facts reduce the activity of citizens in identifying and exposing corrupt officials.

The current legislation does not provide for a system of measures for the protection of persons reporting corruption that meets international standards.

### ***Imperfect system for monitoring the effectiveness of anti-corruption measures***

There is not a unified national public system for assessing the level of corruption

in the context of all subjects, spheres and territories.

Monitoring of anti-corruption measures is not based on a stable and transparent methodology of sociological measurements.

There is not an exhaustive, substantiated, understandable and stable list of measurable targets for the heads of state bodies and organizations as well as entities of the quasi-public sector in terms of preventing corruption.

An analysis of the current situation in the field of combating corruption as a whole shows that, despite the measures taken, the demand of the society to ensure justice, equality of all before the law and the inevitability of responsibility remains

### **Section 3. Review of international experience**

The international experience across advanced foreign practices shows that effective anti-corruption requires a systematic approach that involves a combination of numerous factors and elements as a complex. At the same time, special attention should be paid to the development of institutional mechanisms and legal instruments, raising public awareness and the involvement of the civil society.

Without broad public support, anti-corruption efforts are doomed to failure. In this context, the formation of an appropriate culture plays a significant role. That is why the Doha Declaration emphasizes the role of education in preventing crime and corruption and creating a culture of law-abiding.

The practice of the most developed countries shows that wide access to information, transparency of decision-making processes and creation of mechanisms for public participation contribute greatly to minimizing corruption.

For example, the availability of information on public budget spend is one of the focal factors in ensuring accountability of the activities of public bodies. The portals in Brazil, the USA, Ukraine, and South Korea contain the most detailed information about budgets.

Another example is the e-procurement system in Georgia, where, along with standard functionality, it allows for posting questions and publicly available answers on the competition page online, file claims at any stage of the tender process, and identify tender risks in a digital format as part of the monitoring of the State Agency of Procurement and Tenders.

Availability of open information creates conditions for investigative journalism. This practice is widespread in the UK, France, Sweden and other European countries.

The instrument of involving the World Bank seems to be interesting. The Integrity App enables citizens to report concerns pertinent to fraud and corruption. Its users, for example, can send a photo of an unfinished construction of a school, an audio recording of a request for a bribe, or any other file or document.

Digitalization is an important factor in reducing administrative barriers, reducing discretion and improving the quality of public services.

The Estonian state database contains almost everything – from economic statistics and court archives to medical records and citizens' complaints. At the same time, any action leaves its trace in the history of the system. This ensures data security

and minimizes corruption, allowing finding the offender in a short time. In addition, the face-to-face contact between officials and citizens is simply absent or reduced to a minimum.

South Korea has implemented the UNI-PASS Electronic Customs Clearance System (UNI-PASS), which has reduced corruption risks by reducing face-to-face contact between customs officers and service recipients.

Integrity testing has been successfully used in Australia, Hungary, Moldova, Romania and the United States to prevent and detect corruption. It is a simulated situation for identifying corrupt behaviour that a person being tested is not aware.

An important preventive mechanism is the settlement of conflict of interest, including measures for declaring personal interests, response and responsibilities.

Along with this, an integral part of anti-corruption regulation is to counter “revolving door” practices. This term refers to the transition of workers from the public to the private sector.

So, in Norway, the rules for a cooling-off period are applied to civil servants in transfers to private business structures and to businessmen when joining government power institutions for up to six months. Similar measures are used in Germany, Spain, Latvia, USA, France and other countries.

Along with the expansion of restrictive measures, social guarantees for civil servants are being established. Different approaches are used around the world: special retirement pension systems, free health insurance as well as travel costs, child benefits, and housing allowances among others.

For example, in France and Japan there are housing and transport compensation allowances. In the UK, public sector pension contributions are 15% higher than in the private sector.

At the same time, in foreign countries there are fewer restrictions pertinent to additional sources of income for civil servants.

Thus, in Greece, civil servants can engage in other paid work with a permission granted in cases of absence of interference with the quality performance of official duties.

The effectiveness of anti-corruption agencies directly depends on access to the necessary data. For example, in order to perform their functions, the anti-corruption agencies in Hong Kong, Serbia, and Singapore have been provided with a wide access to electronic databases and have the right to request information from banks and other financial institutions about the accounts and financial resources of officials without their consent.

The Financial Action Task Force on Money Laundering (FATF) notes the importance of ensuring the ability of competent authorities to obtain or have timely access to sufficient, accurate and timely information on the beneficial ownership of legal entities.

With this in mind, in 2016 the UK introduced a register of people with significant control (People with Significant Control Register). It includes persons who own more than 25% of the capital of the company or have the ability to control or influence its

management.

The current anti-corruption trend is to encourage good business behaviour. In the Eastern European countries, the Clear Wave initiative – the labelling of products, services and marketing materials of transparent business has been implemented. This sign is a symbol of business ethics, transparency, responsibility and sustainability.

Integrity pacts are also practiced. They set standards for business conduct. In most cases, they are associated with a specific open government competition or tender for large projects.

Internationally known integrity pacts are the Extractive Industries Transparency Initiatives (EITI) and construction sector transparency (CoST).

In general, the analysis of best practices allows us to identify the following trends and prospects for the development of the anti-corruption policy:

- 1) systematization of educational activities aimed to strengthen the culture of integrity in the society;
- 2) promotion of business integrity;
- 3) involvement of the civil society in the implementation of the state anti-corruption policy;
- 4) expanding access to information about the government activities and ensuring transparency in decision-making;
- 5) digitalization as a tool for minimizing corruption;
- 6) expansion of social guarantees for civil servants;
- 7) prevention and settlement of conflict of interest;
- 8) increasing the effectiveness of legal coercion measures in the civil law, disciplinary, administrative law and criminal law aspects.

#### **Section 4. Vision for the development of the anti-corruption policy**

Kazakhstan aims to move from routine countering of corruption to a fundamental change in the public consciousness, rejection by the public of any form of corruption and nepotism, and the priority of preventive measures.

The development of a coherent anti-corruption policy will continue, taking into account the results achieved, international standards and strategic goals for the coming period.

Appropriate measures and targets are stipulated in the strategic documents of the country – the Strategy “Kazakhstan-2050: a New Political Course of an Established State”, the National Priorities of the Republic of Kazakhstan through 2025, the National Development Plan of the Republic of Kazakhstan through 2025, the National Security Strategy of the Republic of Kazakhstan through 2025, the Concept for the Development of Public Administration in Republic of Kazakhstan through 2030, the Concept of Legal Policy of the Republic of Kazakhstan through 2030 and others.

In the anti-corruption field, the strategic goal is to achieve a score of 47 in the Transparency International Corruption Perceptions Index by the end of 2026 with 55

points by 2030.

Given that this indicator reflects an assessment beyond anti-corruption measures including political, social, and economic reforms, all anti-corruption actors will be involved in the work to achieve it.

The developed anti-corruption measures will be aimed at the comprehensive elimination of the prerequisites for corruption, especially “petty” corruption, ensuring the inevitability of responsibility and the widespread involvement of the civil society in combating corruption.

An absolute rejection of corruption will be achieved by increasing the anti-corruption culture, systematizing educational and educational measures, motivating government representatives and the business community toward integrity.

The state bodies, organizations and quasi-public sector entities will become more interested and active in combating corruption, including through the introduction of a public system for assessing their real contribution.

In general, the anti-corruption policy aims to create such conditions, which will make corruption unprofitable in economic and reputational terms.

## **Section 5. Main principles and approaches to the development of anti-corruption policy**

The anti-corruption policy is based on the following principles:

- 1) equality of all before the law and justice;
- 2) publicity, transparency and accountability to the public;
- 3) comprehensive use of anti-corruption measures;
- 4) priority of prevention of corruption;
- 5) interaction between the state and the civil society;
- 6) efficiency and effectiveness;
- 7) rejection of corruption in all its manifestations;
- 8) protection of persons providing assistance in combating corruption;
- 9) inevitability of liability for corruption;
- 10) high-quality digital transformation.

The approaches to the development of the anti-corruption policy will be implemented through the following tasks:

- 1) formation of intolerance to corruption;
- 2) elimination of opportunities for corruption;
- 3) improving measures to ensure inevitability of liability;
- 4) strengthening the role of the civil society in combating corruption;
- 5) ensuring effective monitoring of the implementation of the anti-corruption measures;
- 6) further improvement of the activities of the anti-corruption authority.

### **Task 1. Formation of intolerance to corruption**



### ***Changing Values and Raising an Anti-Corruption Culture***

Honesty, legality and pragmatism should become the internal value beliefs of everyone.

The society should not perceive corruption as a guarantor of a simplified solution to problems and use friendly relations and protectionism in work relations. Corrupt officials should be subjected to public reprimand.

The choice of a person to commit or not to commit an act of corruption should not be weighed against the severity of the punishment and the expected benefits from committing the crime.

The adoption of a set of communication measures with decomposition at the level of various target groups will play a key role in the anti-corruption evolution of public consciousness.

It is necessary to develop targeted informing of citizens about their rights, explaining legal acts in an understandable and concise language as well as using digital solutions, including automated response messages on certain life situations and legal facts.

Large-scale awareness work will help protect citizens from the need to look for illegal ways to resolve issues.

A fundamentally important role in the formation of a system of integrity is played by the education of the younger generation who should have new views and life principles that do not allow corruption.

The fundamental success factor lies in the inculcation of anti-corruption values at all stages of personality development.

In this aspect, it is necessary to develop anti-corruption behaviour through the institution of the family, including using the potential of the Assembly of the People of Kazakhstan.

Strengthening the immunity of young people against corruption will be facilitated by the implementation of international practices and initiatives to enhance the role of education, as well as empowerment of their rights and opportunities in the prevention of corruption.

Themes of integrity and anti-corruption culture will be included in the education system. It is necessary to accompany the child in various age periods with anti-corruption education, starting from preschool.

An effective tool in this work should be academic honesty, so common in the developed countries of the world.

Thus, this will foster a new generation of citizens with strong social immunity from corruption.

### ***Improving integrity across the civil service***

In accordance with the OECD standards, the main principles of public service are transparency, ethics and integrity.

In order to increase the confidence of citizens in the authorities, the issues of strengthening a positive image of the civil service, including through a wide coverage of examples of honest and role model civil servants, require serious attention.

It is necessary to develop mandatory anti-corruption training for civil servants, ensuring its continuity, consistency and relevance.

To ensure integrity across the staff in the civil service, measures will be developed to work with employees whose official duties are associated with high corruption risks.

Another important element of integrity is the regulation of conflict of interest. This requires detailed regulation of the identification and settlement of conflict of interest with the application of effective measures of liability, as well as the “cooling off” principle before employment after dismissal from the civil service.

This requires the motivation of the employees themselves. In this context, the provision of competitive wages and a social package based on the principle of personalization of individual contribution is of key importance.

A strong anti-corruption culture must be formed across the civil service, where corruption will be financially unprofitable.

### ***Promoting Business Integrity***

In the light of the adoption of measures to combat corruption in the field of entrepreneurship, it is relevant to incentivize good-faith business.

An effective measure in this direction is a voluntary implementation of the anti-corruption standard.

Being integral to this, it is important to provide for the practice of developing and implementing internal anti-corruption programs with specific measures to prevent corruption in the activities of companies and their personnel.

Another recommendation is a possibility of including an anti-corruption clause in the contract with counterparties to promote mutual understanding by the parties of the inadmissibility of committing corruption offenses and readiness to prevent them in a timely manner.

To enhance the effectiveness of these measures, it is necessary to expand competences of anti-corruption compliance services and develop the market for compliance specialists alongside the introduction of relevant educational programs in universities.

A continuous process of training employees on the basics of anti-corruption behaviour should be established.

To increase transparency and responsibility in the business environment and reduce corporate corruption, there is a need for a broad use of a business register, i.e. an open integrated database of business entities that provides for accumulating comprehensive information about business entities, including from the standpoint of their integrity and reliability.

An evaluation of potential counterparties by entrepreneurs using such a database and compliance with the principle of due diligence will protect bona fide entrepreneurs from corruption risks.

Financial processes subject to high corruption risks require a system of corruption indicators and algorithms for their detection.

The results of the application of the proposed anti-corruption tools should be

advisory in nature and not contradict the established standards and principles of doing business.

Compliance of business entities with anti-corruption recommendations will serve as a basis for the use of economic and reputational incentives.

## **Task 2. Elimination of opportunities for corruption**

### ***Reducing risks of inefficient spending of budget resources and corruption in procurement***

In order to exclude inefficient capital investments, especially in the public sector, the mechanism for assessing economic feasibility of projects involving budget funds will be revised.

The introduction of the block budget (multi-year flexible budget allocations), including the “one signature” rule, will be accompanied by the adoption of new budget rules and an objective methodology for setting budget limits.

This will improve the efficiency of decisions and responsibility of civil servants as well as the effectiveness of financial management.

The budget process also necessitates a move from financial to project deadlines. This will eliminate rushed signing of acts of work performed at the end of the calendar year and subsequent violations of the law.

In general, the introduction of project management in the implementation of state documents and projects will become an effective tool for preventing corruption at all levels of governance.

Projects will be financed subject to target indicators and measurable results of public investment. This will require the formation of a methodology for calculating indicators with a forecast of their impact on the socio-economic development of the country as a whole or a particular region.

The assessment will be done through the prism of improving the quality of life of the population and the presence of corruption factors. In this case, the principle “money follows a person” should become fundamental as it provides for per capita financing of socially significant areas and excludes the allocation of budget funds to cover losses.

However, in order to set realistic targets and indicators, as well as to monitor the achievement of performance indicators, it is necessary to have reliable statistical information. In this regard, the current methods for calculating indicators will be revised.

Such measures will increase the level of predictive activity of the public sector and the organization of “scenario” based planning and targeted use of public budget funds.

To achieve transparency of the budget policy, it is necessary to connect the processes of public procurement, budget planning and public financial management on a single platform.

Openness of information pertinent to what budget funds reach the final recipients significantly minimizes corruption risks.

The introduction of monitoring over budget funds based on the principle of “coloring money” (from the moment of allocation to spend) will exclude their misuse.

The reduction in the share of purchases from a single source will be facilitated through the revision of the legal grounds from the standpoint of their justification, especially in relation to intellectual property objects, purchases carried out in a special mode and within the framework of government assignments.

The determination of the average selling price, based on guidance from the market value of goods, will serve as a basis for an effective organization of the procurement system.

With the growth of honest competition, the expansion of the limits of exchange trading on homogeneous and easily replaceable goods will affect the development of an organized commodity market.

Establishing uniform requirements for public procurement and quasi-public sector procurement can provide a unified approach in the regulation of this area.

The system of state audit bodies and financial control will be optimized, eliminating duplication of functions and strengthening their independence, in order to improve the efficiency of management and use of budget funds as well as the assets of the state and quasi-public sector entities.

### ***Increasing the economic efficiency of budget support***

High corruption risks in the field of state support (multiplicity of administrators, fragmentation of legal acts, lack of transparency and control over the spending of significant budget funds) require a change in the state policy in this field.

Only trustworthy business entities will be entitled to state financial support.

The revision of this field will also allow optimizing the types of state support, while excluding funding areas that are not consistent with the priorities of program and strategic documents, have overlapping goals, and do not ensure an economic and / or social impact.

The result of automating the distribution of state support elements will be the formation of a single IT platform that combines the relevant electronic infrastructure into a universal portal controlled by the state.

The introduction of a public register of beneficiaries of budget allocations will allow tracking an individual recipient of state support. This will significantly increase its intended use, minimizing conflict of interest.

It is required to develop a methodology for managing corruption risks in relation to all types of state support.

Potential recipients will have reliable and timely information on the types of budget support and its timescale. A “proactive” format for its allocation will be introduced subject to unconditional objectivity of supporting data.

Integration of information resources involved in collecting, processing and storing data, as well as evaluating recipients’ compliance with the requirement criteria will reduce human participation and direct contacts to a minimum.

### ***Reducing the share of state participation in the economy***

Reducing the share of state-owned companies in procurement will become one

of the fundamental principles of the state policy.

The optimization of the list of monopoly privileges and exceptions for state-owned enterprises (national holdings) will lead to an increase in the efficiency of procurement procedures and competitiveness of prices.

The continuation of a comprehensive functional analysis of the activities of the public sector will make it possible to determine the functions to be transferred to a competitive environment.

One of the effective mechanisms can be the introduction of legal entities of public law.

At the same time, in order to eliminate corruption risks, it is important to strengthen the relevant requirements and control pertinent to decision-making on privatization. Delegation of authority to the private sector should be accompanied by the implementation of outcome-based accountability systems.

It is necessary to revise the list and mechanisms for transferring objects to the non-state sector, ensuring the transparency of procedures and a fair market value not lower than the guarantee fee.

Legislated mechanisms for the effective management of the state property will be implemented within the framework of the Concept for the Development of Public Administration in the Republic of Kazakhstan through 2030.

Along with this, it is necessary to work out a ban on receiving state support (subsidies, grants) by organizations with a 100% state participation, with the exception of areas with insufficient competition.

### ***High-quality digitalization as a factor in reducing corruption***

Digitalization does not only ensure access availability of public services, but also guarantees the debureaucratization and transparency of all procedures, excluding direct contact between a citizen and an official and, subsequently, prerequisites for “petty” corruption.

Further application of advanced technological solutions by digitizing business processes of state bodies will promote prevention of corruption in all areas without exceptions.

The creation of a new digital government architecture based on a single array of data will greatly simplify the lives of citizens. There will be no need to make enquiries to government agencies and public service centers, since requested documents will be provided automatically.

A consistent step will be the exclusion of “hidden” public services as well as the reduction of alternative ways of providing public services while expanding the electronic format through non-state platforms.

Systemic measures for the proactive provision of public services and reengineering of business processes of state bodies will be implemented as part of the Concept for the Development of Public Administration in the Republic of Kazakhstan through 2030.

The examination of draft regulatory legal acts for their compliance with the requirements of digital transformation as well as the identification and elimination of

corruption risks in the development and operation of information systems will facilitate reduction of the level of corruption.

An essential measure will be an increase in the share of non-cash payments by expanding the infrastructure of instant payments, including through a citizen's digital "social wallet", which will simplify and ensure the transparency of cash flows.

***Improving tools for identifying and eliminating prerequisites for corruption***

The publicity of conducting internal analyses of corruption risks will encourage state bodies and quasi-public sector entities to be more active in their independent elimination of the prerequisites for corruption.

The involvement of public councils in the process of internal analysis of corruption risks and monitoring of the implementation of recommendations will ensure quality and objectivity.

The development of the instrument of external analysis of corruption risks following the project approach will improve its efficiency, ensure personal responsibility, comprehensive problem solving and prevention of formalism.

The development of sectoral maps of risks with indicators signalling possible corruption vulnerabilities will facilitate this. Such risk profiles will become the basis for targeted preventive measures in the most sensitive areas for citizens, moving away from inconclusive discussions of the overall picture of corruption.

The recommendations of external and internal analyses of corruption risks will be included in the list of sources for legal monitoring. Its results will be the subject of consideration at the meetings of the public council.

It is necessary to further develop the instrument of scientific anti-corruption assessment of draft regulatory legal acts, including through the development of expertise potential.

The scientific approach and the introduction of elements of artificial intelligence will improve the quality and scale of this work, ensuring the efficient use of resources.

In general, in order to achieve the greatest preventive effect in combating corruption, additional measures will be taken to develop the research component of the anti-corruption policy.

**Task 3. Improving measures to ensure the inevitability of liability**

The principle of the inevitability of liability should mean not only the punitive practice, but also ensuring law and order in the country, compensation of the damage caused and restoration of social justice.

The key here should be to ensure the rule of law and an impeccable justice system, where all offenders will be held accountable for corruption, regardless of their positions and connections.

The implementation of the Concept of the Legal Policy of the Republic of Kazakhstan through 2030 will strengthen the independence of the judiciary and judges and ensure transparency in their activities as well as fairness of decisions.

The introduction of a three-tier model of criminal justice will also become an

effective measure in ensuring law and order in the country.

Illegal methods of work and provocative actions in the fight against corruption are unacceptable. The constitutional principle of the presumption of innocence should be strictly followed.

It is necessary to develop mechanisms for the implementation of an integrity check, which will allow timely identification and dismissal of employees lacking integrity to prevent damage to the society from their potential corrupt acts.

At the same time, guarantees will be provided for protection against abuse by inspectors undertaking checks.

Illegal acquisition of benefits is the main motive for committing a corruption offense. Therefore, it is necessary to introduce mechanisms that will make corruption “unprofitable”, that is, will make it impossible to use illegally acquired funds.

One of these tools will be the introduction of liability for illicit enrichment, when expenses significantly exceed income.

In order to ensure the effectiveness of this instrument, an effective risk-based verification of declarations will be applied, including through electronic systems as part of the framework of the universal declaration of income and spend.

The introduction of a register of public office positions will allow to track substantial purchases and transactions not only of persons included in this list, but also of their close relatives as part of the financial monitoring framework.

The next step will be the implementation of the fundamental principle of the UN Convention against Corruption – ensuring the search and return of criminal assets in the investigation of criminal offenses, especially those associated with risks of obtaining criminal income and its legalization.

To this end, based on the “follow the money” principle, it is necessary to provide the use of a mandatory financial investigation instrument, ensuring appropriate specialization of law enforcement officers and their active cooperation with authorized state bodies and organizations.

An interested party in corruption, along with officials lacking integrity, is the business community. According to expert estimates, the profit of legal entities from a bribe on average is ten times higher than the size of the bribe itself.

Therefore, one of the prerequisites for reducing corruption is to strengthen the liability of legal entities for committing corruption offenses.

The use of significant penalties and other restrictive measures will make it economically unprofitable for companies to bribe officials.

At the same time, the work to protect business entities from illegal actions of officials, including raiding, will continue.

In the context of systemic measures to eradicate “petty” corruption, there will be a review of the approaches employed to suppress facts of extortion of illegal material remuneration by employees of state bodies and organizations, as well as non-governmental organizations.

For a more effective preventive mechanism, it is necessary to criminalize the offer/promise of a bribe in line with international standards.

To achieve significant progress in combating corruption and ensuring the inevitability of liability, Kazakhstan will need to join additional international legal instruments – the Council of Europe Criminal Law Convention on Corruption and the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions.

#### **Task 4. Strengthening the role of the civil society in combating corruption**

##### ***Development of public oversight***

The opinion of the civil society should become a “litmus test” for the effectiveness of government agencies in the implementation of the anti-corruption policy.

The mechanisms for implementing public oversight will not be limited to the activities of public councils.

In this vein, it is important to adopt the Law “On Public Oversight”, which will give tangible contours to this instrument as an alternative to government oversight.

It is necessary to improve interaction processes between representatives of the civil society and the state through their participation in the budget process, monitoring of public procurement, assessing the quality of public services provided, identifying the most problematic and pressing issues in a particular sphere or region.

Effective public monitoring of projects funded through the state budget and the National Fund of the Republic of Kazakhstan will be introduced.

The publicity of information on decisions of state bodies will contribute to a constructive dialogue with the civil society and will eliminate the need for unnecessary contacts between the population and officials.

At the same time, fragmentation and multitasking in the provision of information by state bodies and entities of the quasi-public sector should be eliminated.

For effective feedback, it is necessary to ensure simplification of public information resources of state bodies to reflect relevant and understandable data for citizens.

The functions of public councils of state bodies and quasi-public sector entities require an objective review in order to strengthen their role in the prevention of corruption.

A wide involvement of journalists and other mass media representatives in the fight against corruption will help strengthen the active citizenship.

It is necessary to promote the fullest use of the potential of the powers and rights of journalists in combating corruption.

##### ***Improving mechanisms for reporting corruption***

Existing reporting mechanisms will be developed to encourage citizen participation in the detection of corruption.

It is important to shape a right public attitude. A culture of rejection of corruption should not be perceived as denunciation.



Members of the public should be given an opportunity to report corruption through simplified digital communications.

At the same time, special attention should be paid to information that causes a response among the public on issues pertinent to efficient use of budgetary funds. A broad public reaction should be a basis for rewarding in the event of prevention of abuse and inefficient spending.

In line with the OECD and GRECO recommendations, it is required to legislatively implement a comprehensive system for protection of whistleblowers.

It is necessary to consolidate measures to safeguard labour rights of whistleblowers to protect them from persecution and harassment in the workplace.

The confidentiality of information about the whistleblower and his assistance in combating corruption should be guaranteed and criminal liability for its disclosure introduced.

### **Task 5. Ensuring effective monitoring of the implementation of the anti-corruption measures**

Achieving the best results in combating corruption and an objective assessment of the effectiveness of the measures taken will be ensured through an integrated monitoring system.

Taking into account the implemented project approach, it will be built on the principles of objectivity and publicity and will become an indicator reflecting the situation in the field of combating corruption in a real time.

Such a tool will ensure full participation of citizens in the prevention of corruption and will also become a source for rating the work of heads of state bodies and quasi-public sector entities in combating corruption to stimulate them to really improve the quality of life of citizens.

The issue of developing sociological measurements of the level of corruption with wide public access to the results of such studies and their ways and methods requires separate elaboration.

The issue of developing a national corruption perception index becomes relevant. This will make it possible to understand how effective anti-corruption measures are, to assess changes and make adjustments to the implemented anti-corruption policy.

### **Task 6. Further improvement of activities of the anti-corruption authority**

In light of the shift in emphasis toward prevention of corruption, the use of integrated analytics tools, based on the analysis of big data, becomes relevant with further addressing of the issue of providing the Anti-Corruption Service with access to databases and information systems of state bodies and organizations. This entails establishing clear access grounds and mechanisms for controlling the information received to exclude possibilities for abuse and disclosure of the received data and their

use for off-duty purposes.

Such a mechanism will contribute to identifying underlying patterns and correlations of risks, trends in corruption offenses and other inside matters.

Reporting from the public pertinent to corruption prerequisites should also be used as part of big data analysis for subsequent response.

The “1424” call-center will meet advanced standards in personnel and technical aspects.

A coordinating role of the anti-corruption authority will be strengthened in relation to the activities of anti-corruption compliance services of quasi-public sector entities.

To ensure comprehensiveness and completeness in matters of preventing corruption, it is necessary to regulate the interaction of ethics commissioners with the Anti-Corruption Service.

The emerging new ways of committing corruption offenses require a continuous process of qualitative improvement of skills of the Anti-Corruption Service staff.

Measures will be taken to identify and suppress crimes committed by means of digital financial assets, crypto exchanges and other digital platforms.

As part of further substantive international cooperation in combating corruption, the work on the implementation of advanced anti-corruption standards, including the GRECO and OECD recommendations, will continue.

## **Section 6. Target indicators and expected results**

### **6.1. Target indicators for 2026:**

1) Transparency International Corruption Perceptions Index – a score not lower than 47;

2) The share of persons, who in the previous 12 months had at least one contact with a public official and paid a bribe to a public official or from whom this public official demanded a bribe (global indicator in the list of national indicators of the Sustainable Development Goals to be achieved by 2030) – not exceeding 25.3%;

3) The World Bank Government Effectiveness Index – not lower than 74<sup>th</sup>-75<sup>th</sup> percentile;

4) “Institutions” indicator in the World Economic Forum Global Competitiveness Index – not lower than 48<sup>th</sup> place;

5) The World Justice Project Rule of Law Index – a score not lower than 0.57;

6) The World Bank Voice and Accountability Index – not lower than 57.5<sup>th</sup> percentile;

7) The World Bank Control of Corruption Index – not lower than 48<sup>th</sup>-50<sup>th</sup> percentile;

8) The reduction in the GDP of the share of state participation in the country’s economy – not exceeding 13.9%;

9) The level of public confidence in the Anti-Corruption Service (as part of the performance assessment conducted by the Administration of the President of the Republic of Kazakhstan) – not lower than 66%.

6.2. Main results expected by the end of 2026:

- 1) high involvement of the civil society in combating corruption;
- 2) an open and publicly accountable government;
- 3) an effective corruption risk management system;
- 4) transparent budgetary processes and competitive procurement;
- 5) a fair system of prosecution for corruption.

**APPROVED**  
**by the Decree of the President**  
**of the Republic of Kazakhstan**  
**No.802 dated 2 February 2022**

**APPENDIX**  
**to the Anti-corruption Policy**  
**Concept of the Republic of**  
**Kazakhstan for 2022-2026**

**ACTION PLAN**  
**ANTI-CORRUPTION POLICY CONCEPT**  
**OF THE REPUBLIC OF KAZAKHSTAN**  
**FOR 2022-2026**

No	Name of reforms / main actions	Completion form	Deadline	Lead
1	2	3	4	5
<b>Strategic indicator:</b> Transparency International Corruption Perceptions Index, score: 2022 – 42, 2023 – 43, 2024 – 44, 2025 – 45, 2026 – 47				ACA, CSB, LEB
<b>Task 1. Formation of intolerance to corruption</b> Target indicators: the share of persons, who in the previous 12 months had at least one contact with a public official and paid a bribe to a public official or from whom this public official demanded a bribe (global indicator in the list of national indicators of the Sustainable Development Goals to be achieved by 2030), per cent: 2022 – 31.2, 2023 – 29.6, 2024 – 28.3, 2025 – 27, 2026 – 25.3; World Bank Government Effectiveness Index, percentile: 2022 – 62-65, 2023 – 65-68, 2024 – 68-73, 2025 – 74-75, 2026 – 74-75				ACA          MNE, MISD, MDDIAI, ACSA
<b>1.1. Changing Values and Raising an Anti-Corruption Culture</b>				

1	2	3	4	5
1.	Adoption of an action plan for conducting awareness activities with decomposition by levels of various target groups	government decree	Quarter IV, 2022	MISD, ACA, MCS, MDDIAI, MES, interested state bodies, APK (by agreement)
2.	Introduction of a public register of corruption offenders into the system of anti-corruption measures with clear mechanisms for including and excluding individuals from this public register	draft law	Quarter IV, 2023	ACA
3.	Improving legal advocacy by providing targeted information to citizens and entrepreneurs about their rights, explaining existing legal acts in a clear and concise language, as well as using digital solutions for certain life situations and legal facts	guidelines  orders	Quarter III, 2022  Quarter III, 2023	MJ  government stakeholders
4.	Working on joining the UNODC Global Resource for Anti-Corruption Education and Youth Empowerment Initiative	proposals submitted to the AP	Quarter I, 2023	ACA, MES
5.	Introduction of themes of integrity and anti-corruption culture into educational programs at all levels of education	educational programs	Quarter IV, 2024	MES, LEB
6.	Implementation across all universities: 1) international/national anti-corruption standards; 2) tools of academic integrity	certificates of conformity  rectors' orders	Quarter I, 2026	MES
<b>1.2. Improving integrity across the civil service</b>				
7.	Preventive activities pertinent to civil servants, including: 1) establishing criteria for determining official roles prone to corruption risks; 2) organization of systematic prevention activities with civil servants in roles prone to corruption risks by Ethics Commissioners	guidelines  reporting to the AP	Quarter IV, 2022  Quarter II, 2024	ACA, ACSA, other government stakeholders
8.	Development of anti-corruption training ensuring its continuity, consistency and relevance	educational programs	Quarter IV, of 2023	ACSA, SC, GPO, MID, MD, APA, MF
9.	Regulation of identifying and resolving conflict of interest in the civil service and in the quasi-public sector	draft law	Quarter IV, 2024	ACA, ACSA
10.	Addressing an issue of increasing attractiveness of the civil service by	proposals submitted	Quarter I, 2023	ACSA, ACA, MNE, MF, GPO

1	2	3	4	5
	means including: 1) expansion of the social package; 2) creation of work conditions for civil servants; 3) expansion of opportunities for engaging in other paid activities	to the AP		
<b>1.3. Promoting Business Integrity</b>				
11.	Postgraduate training courses for compliance specialists	educational programs	Quarter IV, 2023	MES, ACA, MLSP
12.	Voluntary implementation of ISO 37001 or ST RK 3049 (anti-corruption standards) in activities of entities across the quasi-public and private sectors	compliance certificates	2022-2026	ACA, MNE, interested state bodies, APA, Atameken NCE (by agreement)
13.	Free-of-charge anti-corruption training of employees of entities across the quasi-public and private sectors	educational programs	2022-2026	ACA, CSB, LEB, Atameken NCE (by agreement)
14.	Improving the functionality of the Register of Business Partners information system by means including: 1) development of indices: Taxpayer Integrity Index, Financial Stability Index and Payment Discipline Index; 2) introduction of the Due Diligence principle; 3) adding anti-corruption indicators; 4) elaboration of the issue of labeling the products of companies that have implemented an anti-corruption standard on a voluntary basis with the a “clear wave” label; 5) elaboration of an anti-corruption business rating; 6) considering a possibility of introducing functionality to support start-up entrepreneurs in the first year after registration	act of commissioning	Quarter III, 2023	Atameken NCE (by agreement), ACA, MF, interested government stakeholders
15.	Addressing the issue of introducing incentives, preferences and concessions in public procurement and other support measures for private businesses that have implemented and maintain anti-corruption standards	proposals submitted to the AP	Quarter I, 2023	ACA, MNE, MF, MIID, Atameken NCE (by agreement), other government stakeholders
<b>Task 2. Elimination of opportunities for corruption</b> Target indicators:				

1	2	3	4	5
the reduction in the GDP of the share of state participation in the country's economy: 2022 – 14.7, 2023 – 14.5, 2024 – 14.2, 2025 – 14.0, 2026 – 13.9; “Institutions” indicator in the World Economic Forum Global Competitiveness Index, place: 2022 – 58, 2023 – 56, 2024 – 53, 2025 – 50, 2026 – 48				MNE, MF, APDC  MNE, LEB
<b>2.1. Reducing risks of inefficient spending of budget resources and corruption in procurement</b>				
16.	Elaboration of a proposal to introduce project financing in the field of construction and installation works, eliminating risks of forced signing of fabricated work-completed acts	proposals submitted to the AP	Quarter IV, 2022	MF, MNE
17.	Improving efficiency of public financial management in line with nationwide priorities, including: 1) rules of “one signature” within the framework of implementation of a “block budget”;  2) revision of existing methods for calculating indicators;  3) addressing the issue of increasing responsibility of budget program administrators for proper monitoring and management of investment projects;  4) publication of processes at a single open data internet portal from the moment of planning to the moment of disbursement of budget funds to include procurement and data on recipients of budget funds – this includes a public register of recipients of budget funds;  5) introduction of the mechanism of “coloring money” in budget spend processes	draft law  orders  proposals submitted to the AP  public data at a single open data internet portal  act of commissioning	Quarter IV, 2024  Quarter IV, 2023  Quarter III, 2022  Quarter I, 2023  Quarter IV, 2024	MNE, MF, ASPR, MDDIAI, Atameken NCE (by agreement), other government stakeholders  BNS ASPR, MNE, other government stakeholders  MNE, other government stakeholders  MF, MDDIAI, MISD, MNE  MF, ACA, MDDIAI
18.	Improving efficiency of the per capita financing system in socially significant areas (“money follows the person”)	proposals submitted to the AP	Quarter I, 2023	MNE, MF, other government stakeholders
19.	Strengthening a competitive environment in procurement, including:	act of commissioning	Quarter I, 2024	MF, NWF Samruk-Kazyna JSC

1	2	3	4	5
	<p>1) creation of a unified catalog of goods for standardization and unification of technical specifications for purchased goods;</p> <p>2) determination of average selling prices for goods;</p> <p>3) expansion of stock trading</p>	<p>guidelines</p> <p>draft law</p>	<p>Quarter IV, 2022</p> <p>Quarter I, 2024</p>	<p>(by agreement), NMH Baiterek JSC (by agreement), national companies</p> <p>MF, Atameken NCE (by agreement)</p> <p>MTI</p>
20.	Reducing legal grounds for procurement from a single source and procurement carried out in a special mode, as well as within the framework of government assignments (with the exception of procurement for the needs of law enforcement and national security)	draft law	Quarter III, 2025	MF, MJ, MNE, NSC, MD, MIA
21.	Addressing the issue of establishing unified requirements for government procurement and procurement of the quasi-public sector	proposals submitted to the AP	Quarter I, 2025	MF, NWF Samruk-Kazyna JSC (by agreement)
22.	Improving the system of state audit and financial control, including through optimization, elimination of duplication and ensuring independence	draft law	Quarter I, 2026	SAC, MF
<b>2.2. Increasing economic efficiency of budget support</b>				
23.	Increasing economic efficiency of state support measures for entrepreneurship in all sectors of the economy (subsidies, guarantees, grants) based on a comprehensive analysis of their effectiveness and revision of relevant regulatory legal acts	draft law	Quarter II, 2024	MNE, ASPR, APDC, ACA, MDDIAI, MF, Atameken NCE (by agreement), other government stakeholders, providing state support measures
<b>2.3. Reducing the share of state participation in the economy</b>				
24.	Addressing the issue of introducing restrictions on all measures of government support to organizations with 100% state participation, with an exception of areas with insufficient competition	proposals submitted to the AP	Quarter II, 2022	MNE, MF, APDC, NWF Samruk-Kazyna JSC (by agreement), Atameken NCE

1	2	3	4	5
				(by agreement), other government stakeholders
25.	Reduction of state participation in the economy through demonopolization and creation of a favorable competitive environment (with an exception to spheres pertinent to ensuring national security)	draft law	Quarter III, 2024	APDC, MF, other government stakeholders, NWF Samruk-Kazyna JSC (by agreement), Atameken NCE (by agreement)
<b>2.4. High-quality digitalization as a factor in reducing the level of corruption</b>				
26.	“Digital Reboot” of public administration: 1) analysis and optimization of business processes; 2) development of a proactive format of public services; 3) reduction of alternative forms of provision of public services; 4) expansion of the electronic format for the provision of public services through non-state platforms	proposals submitted to the AP, orders	Quarter IV, 2025	MDDIAI, ACSA, other government stakeholders
27.	Examination of draft regulatory legal acts for their compliance with requirements of digital transformation	draft law	Quarter IV, 2022	MDDIAI
28.	Creation of a new digital government architecture based on a single data array	act of commissioning	Quarter IV, 2025	MDDIAI
29.	Identification and elimination of corruption risks in the development and operation of information systems	orders	2022-2026	MDDIAI, ACA
30.	Expansion of infrastructure of noncash payments	proposals submitted to the AP	Quarter I, 2024	NB, MTI, MF, MDDIAI, MNE, other government stakeholders
31.	Development of digitalization of medical services within the Guaranteed Volume of Free Medical Care / Mandatory Social Health Insurance ensuring their accessibility and transparency, including through: 1) identification of a recipient through QR-coding when receiving medical	proposals submitted to the AP	Quarter III, 2025	MH, other government stakeholders



1	2	3	4	5
	services, especially in outpatient medicine provision; 2) transfer of purchase of medicines and medical devices, services of healthcare entities to the public procurement web-portal			
<b>2.5. Improving tools for identifying and eliminating prerequisites for corruption</b>				
32.	Addressing the issue of establishing an anti-corruption research center	proposals in anti-corruption policy	Quarter I, 2023	ACA
33.	Development of anti-corruption assessment/examination of draft regulatory legal acts, including through introduction of: 1) a unified examination for standard and similar draft regulatory legal acts; 2) elements of artificial intelligence	government decree	Quarter II, 2023	ACA
34.	Development of instruments of internal (self-study) and external (by the Anti-Corruption Agency) corruption risks analyses, including through: 1) implementation of a project approach; 2) improving rules for conducting corruption risks analyses; 3) mandatory involvement of public councils in the process of internal and external corruption risks analyses, discussion and monitoring of the implementation of recommendations; 4) supplementing sources of legal monitoring with recommendations from external and internal corruption risks analyses; 5) consideration of results of legal monitoring at meetings of public councils	government decree, order	Quarter IV, 2022	ACA, MJ, CSB, MFA
35.	Development of the anti-corruption standard, including through: 1) empowering the anti-corruption authority with a competence to approve the relevant methodology;  2) approval of the methodology;	draft law  orders	Quarter IV, 2023  Quarter IV, 2024	ACA, other government stakeholders

1	2	3	4	5
	3) creating maps of corruption with profiles of corruption risks in relation to sectors of the economy and public administration	maps of risks	Quarter IV, 2025	
<b>Task 3. Improving measures to ensure inevitability of liability</b> Target indicator: World Justice Project Rule of Law Index, score: 2022 – 0.53, 2023 – 0.54, 2024 – 0.55, 2025 – 0.56, 2026 – 0.57				MJ, MISD, MDDIAI, MIA, MLSPP, MNE, MTI, MF, SC, GPO, NSC, AC, ACA, ACSA, MH
36.	Development of the “Smart Court” project in terms of: 1) further increase in the proportion of cases considered in the “virtual court”; 2) introduction of artificial intelligence in legal proceedings (digital analytics)	act of commissioning	Quarter III, 2023	BC, MDDIAI
37.	Elaboration of a mechanism for implementing the Integrity Check	proposals submitted to the AP	Quarter I, 2023	ACA, SC, GPO, MIA, NSC, AFM, other government stakeholders
38.	Introduction of liability for illicit enrichment (unexplained wealth)	Draft law	Quarter IV, 2023	ACA, GPO, AFM, NSC, MF, MJ
39.	Implementation of a risk-based system for monitoring of declarations with regard to income and spend compliance	reporting to the AP	Quarter III, 2026	MF, ACA, AFM
40.	Implementation of the financial investigation based on the “follow the money” principle	draft law	Quarter IV, 2023	ACA, AFM, GPO, NSC, MIA, MD
41.	Introduction of criminal liability for the promise/offer of a bribe	draft law	Quarter IV, 2023	ACA, GPO, SC, NSC, MIA
42.	Improving work to identify crimes related to extortion of illegal remuneration by an employee of a government agency, state and non-state organizations	draft law	Quarter IV, 2023	ACA, GPO, MIA, SC
43.	Strengthening liability of legal entities for committing corruption offenses	draft law	Quarter IV, 2023	ACA, GPO, SC, NSC, MJ, MF,

1	2	3	4	5
				Atameken NCE (by agreement)
44.	Improving legal mechanisms of responsibility for failure to take measures to combat corruption	draft law	Quarter IV, 2023	ACA
45.	Submission to the Mazhilis of the Parliament of the Republic of Kazakhstan of a draft law on accession to the Council of Europe Criminal Law Convention on Corruption	draft law	Quarter IV, 2026	ACA, GPO, NSC, AFM, MIA, MFA
46.	Submission to the Mazhilis of the Parliament of the Republic of Kazakhstan of a draft law on accession to the OECD Convention on Combating Bribery of Foreign Officials in International Commercial Transactions	draft law	Quarter IV, 2026	ACA, GPO, NSC, AFM, MIA, MFA
<b>Task 4. Strengthening the role of the civil society in combating corruption</b> Target indicator: World Bank Voice and Accountability percentile: 2022 – 27.5, 2023 – 35, 2024 – 42.5, 2025 – 50, 2026 – 57.5				MISD, ACSA
<b>4.1. Development of public oversight</b>				
47.	Public monitoring of the implementation of national projects, regional development plans and other documents of the State Planning System with the provision of the project role of a “public controller”	providing access to the project management information system	2022-2026	MNE, MDDIAI, ASPR, MISD, Office for monitoring the implementation of national projects, other government stakeholders
48.	Strengthening the role of public councils in prevention of corruption	recommendations in the National report on the activities of public councils in the Republic of Kazakhstan	2022-2026	MISD
49.	Simplifying public information: 1) improving the formats and descriptions of information posted on the Open Data and Open Budgets Internet Portals to ensure convenience and ease of understanding by citizens;	orders	Quarter III, 2023	MISD, MDDIAI, MF, MNE, NB

1	2	3	4	5
	2) improvement of the interface and automated data entry of the Open Government Internet Portals	acts of commissioning	2022-2026	MDDIAI, CSB, LEB
50.	Studying the issue of expanding the potential of journalists in combating corruption	proposals submitted to the AP	Quarter II, 2023	MISD, ACA
<b>4.2. Improving mechanisms for reporting corruption</b>				
51.	Development of communication channels: 1) performance improvement of “1424” call center; 2) introduction of modern digital channels for reporting corruption facts	act of commissioning	Quarter III, 2024	ACA, MDDIAI
52.	Improving the Rules for rewarding persons reporting corruption offenses or assisting in combating corruption in other ways	government decree	Quarter IV, 2023	ACA, MF
53.	Strengthening state protection of whistleblowers, including by protecting their labour rights, guaranteeing confidentiality of personal information and assistance provided to them	draft law	Quarter IV, 2022	ACA, GPO, ACSA, MLSP
<b>Task 5. Ensuring effective monitoring of the implementation of the anti-corruption measures</b> Target indicator: World Bank Control of Corruption Index, percentile: 2022 – 39-41, 2023 – 41-43, 2024 – 43-46, 2025 – 46-48, 2026 – 48-50				ACA, CSB, LEB
54.	Implementation and development of a system for monitoring and evaluating effectiveness of anti-corruption measures	draft law	Quarter IV, 2023	ACA, GPO
55.	Creation of a public anti-corruption portal	act of commissioning	Quarter III, 2024	ACA, MDDIAI
56.	Development of proposals for establishing a national corruption perceptions index	proposals submitted to the AP	Quarter III, 2022	ACA, ASPR

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<b>Task 6. Further improvement of the activities of the anti-corruption authority</b> Target indicator: the level of public confidence in the Anti-Corruption Service, % (as part of the performance assessment conducted by the Administration of the President of the Republic of Kazakhstan): 2022 – 64%, 2023 – 64.5%, 2024 – 65%, 2025 – 65.5%, 2026 – 66%				ACA
57.	Development of integrated analytics, including addressing the issue of providing the Anti-Corruption Service with access to databases and information systems of government agencies and organizations with establishment of clear grounds for access, control mechanisms for information received, excluding a possibility of abuse and disclosure of received data and its use for off-duty purposes	proposals submitted to the AP	Quarter IV, 2022	ACA, MDDIAI, other government stakeholders
58.	Strengthening the coordination of government agencies and subjects of the quasi-public sector in prevention of corruption: 1) strengthening the coordinating role of the Anti-Corruption Service in activities of anti-corruption compliance; 2) regulation of the interaction of ethics commissioners with the Anti-Corruption Service	draft law  draft law	Quarter IV, 2022  Quarter IV, 2023	ACA, ACSA
59.	Implementation of a continuous process of advanced training of employees of the Anti-Corruption Service	compliance training programs	2022-2026	ACA, GPO, ACSA
60.	Countering corruption crimes committed using digital financial assets, crypto exchanges and other digital platforms	guidelines	Quarter IV, 2025	ACA, GPO, AFM, NB
61.	Development of proposals to improve the effectiveness of anti-corruption policy based on the recommendations of international organizations (GRECO, OECD and others)	consolidation of recommendations	2022-2026	ACA, other governmental stakeholders

**Note:** explanation of abbreviations:

MISD	– Ministry of Information and Social Development of the Republic of Kazakhstan
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Atameken NCE	– Atameken National Chamber of Entrepreneurs of the Republic of Kazakhstan
MJ	– Ministry of Justice of the Republic of Kazakhstan
NMH Baiterek, JSC	– Baiterek National Managing Holding, Joint Stock Company
MES	– Ministry of Education and Science of the Republic of Kazakhstan
APDC	– Agency for Protection and Development of Competition of the Republic of Kazakhstan
GPO	– Prosecutor General’s Office of the Republic of Kazakhstan
GRECO	– Group of States Against Corruption
MH	– Ministry of Health of the Republic of Kazakhstan
SAC	– Supreme Audit Chamber of the Republic of Kazakhstan
MLSPP	– Ministry of Labor and Social Protection of the Population of the Republic of Kazakhstan
LEB	– Local Executive Body
SC	– Supreme Court of the Republic of Kazakhstan
MIID	– Ministry of Industry and Infrastructure Development of the Republic of Kazakhstan
MF	– Ministry of Finance of the Republic of Kazakhstan
AFM	– Agency of the Republic of Kazakhstan for Financial Monitoring
MD	– Ministry of Defense of the Republic of Kazakhstan
NS RK	– National Standard of the Republic of Kazakhstan
APK	– Assembly of the People of Kazakhstan
MSHI	– Mandatory Social Health Insurance
APA	– Academy of Public Administration under the President of the Republic of Kazakhstan
ACSA	– Agency of the Republic of Kazakhstan for Civil Service Affairs
MCS	– Ministry of Culture and Sports of the Republic of Kazakhstan
CGB	– Central Government Bodies
AP	– Administration of the President of the Republic of Kazakhstan
NWF Samruk-Kazyna, JSC	– Samruk-Kazyna National Wealth Fund, Joint-Stock Company
ACA	– Anti-Corruption Agency of the Republic of Kazakhstan (Anti-Corruption Service)
ASPR	– Agency for Strategic Planning and Reforms of the Republic of Kazakhstan
BNS ASPR	– Bureau of National Statistics of the Agency for Strategic Planning and Reforms of the Republic of Kazakhstan
MTI	– Ministry of Trade and Integration of the Republic of Kazakhstan
MFA	– Ministry of Foreign Affairs of the Republic of Kazakhstan
GVFMC	– Guaranteed Volume of Free Medical Care
NB	– National Bank of the Republic of Kazakhstan
NSC	– National Security Committee of the Republic of Kazakhstan
MNE	– Ministry of National Economy of the Republic of Kazakhstan
MDDIAI	– Ministry of Digital Development, Innovation and Aerospace Industry of the Republic of Kazakhstan
MIA	– Ministry of Internal Affairs of the Republic of Kazakhstan
OECD	– Organization for Economic Cooperation and Development
ISO	– International Organization for Standardization