



ANTI-CORRUPTION AGENCY: HISTORY AND DEVELOPMENT

KAZAKHSTAN

April 2025

DEVELOPMENT OF ANTI-CORRUPTION SYSTEM

1998	Law on Combating Corruption
2004	Joining the OECD Istanbul Action Plan
2008	Ratification of the UN Convention against Corruption
2014	Establishment of the Anti-Corruption Service
2015	Anti-Corruption Strategy for 2015-2025 Anti-Corruption Law
2019	Establishment of the Anti-Corruption Agency as an independent authority, directly reporting to the President
2020	Accession to GRECO of the Council of Europe
2022	Anti-Corruption Policy Concept for 2022-2026 (strategy document) and Action Plan

PARADIGM SHIFT

1998

PRIORITY OF LAW ENFORCEMENT RESPONSE

LAW ON COMBATING CORRUPTION

- Set out aims, objectives and main principles
- A starting point for the policy on toughening criminal responsibility

2015

PRIORITY OF CORRUPTION PREVENTION

ANTI-CORRUPTION LAW

- PREVENTION INSTRUMENTS INTRODUCED:
 - ANTI-CORRUPTION MONITORING
 - ANALYSIS OF CORRUPTION RISKS
 - ANTI-CORRUPTION CULTURE
 - ANTI-CORRUPTION ASSESSMENT/EXAMINATION OF DRAFT LEGISLATIVE ACTS (2019)
 - FINANCIAL OVERSIGHT MEASURES



Decree
of the Head of State
No.12
13 June 2019

MISSION

Eradicate corruption for the welfare of the people of Kazakhstan

VALUES

Justice. Integrity. Trust.

independent law enforcement authority, reporting to the President

comprehensive prevention and law enforcement anti-corruption mandate

responsible for development and implementation of the national anti-corruption policy

THREE MAIN FUNCTIONS

PREVENTION

DETECTION

of corruption crimes
in the public sector

PRE-TRIAL INVESTIGATIONS

(bribery, embezzlement,
abuse of power, etc.)

DECREE OF THE HEAD OF STATE 2 February 2022

1



INTEGRITY
CULTURE

2



ELIMINATION
OF CORRUPTION
PREREQUISITES

3



ENSURING
INEVITABILITY
OF PUNISHMENT

ANTI-CORRUPTION POLICY CONCEPT

OBJECTIVES

- building zero-tolerance to corruption
- eradication of conditions for corruption
- enhancement of law enforcement response to ensure inevitability of accountability
- increasing the role of the civil society in anti-corruption efforts
- effective monitoring of anti-corruption policy action
- improvements in the operations of the national anti-corruption authority

ANTI-CORRUPTION POLICY CONCEPT

(strategy document for 2022-2026)



ACTION PLAN
DELIVERY

2022

2023

2024

97%



GOOD PRACTICE

using a project based approach
in planning and implementing
anti-corruption policies

ISTANBUL ACTION PLAN

5th monitoring round



ENHANCEMENT OF LEGISLATION



IMPLEMENTATION OF PRACTICAL MECHANISMS





CORRUPTION PREVENTION

detecting and
eliminating
corruption risks

integrity culture
(education and awareness)

integrity compliance
in semi-public sector

engagement
of the civil society

anti-corruption
projects

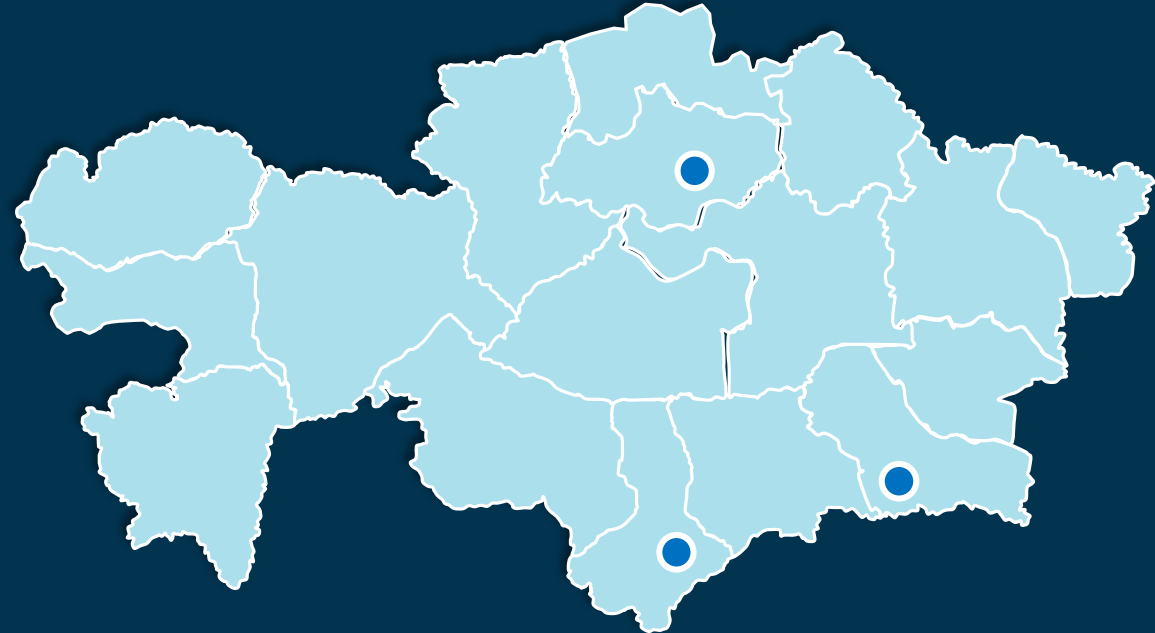
anti-corruption
research

IDENTIFYING AND ADDRESSING CORRUPTION RISKS



MAP OF CORRUPTION RISKS

- analysis of corruption risks
- anti-corruption monitoring
- anti-corruption risk assessment of draft legislative acts



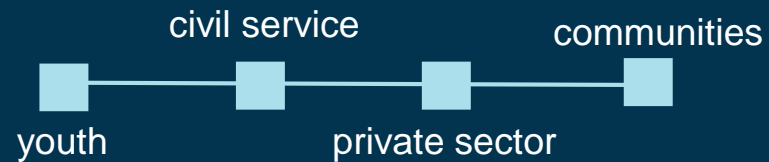
Agency analytics

statistics mass-media analysis surveys
expert interviews views of business community review of complaints

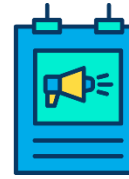
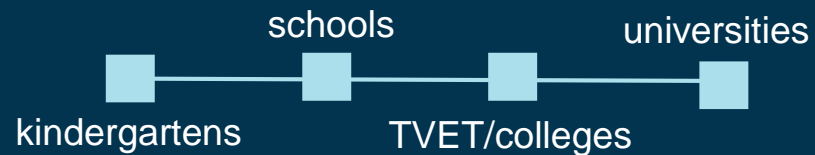
INTEGRITY CULTURE

Integrity awareness

GOVERNMENT PLAN
FOR TARGET AUDIENCES



Anti-corruption education



Videos, posters, movies, theatre performances, TV programs, contests, summer schools



Online course
for civil servants and
the semi-public sector



UN Global Resource
for anti-corruption education



Academic Integrity
University League



Public Lawyer
action campaign

ETHICS STANDARDS



INTERACTION WITH THE PUBLIC



Anti-corruption
education

measures to foster
attitudes against corrupt
behavior in the society



Commissions
for anti-corruption
affairs

operate under
the public/community
councils of regional
local authorities



Advancing coordination
of anti-corruption
compliance units

the Agency has
a legislatively enshrined
coordinating function



Public / Community Council
of the Agency

an advisory body that
ensures public oversight

PUBLIC ENGAGEMENT



LAW ON PUBLIC OVERSIGHT

2 October 2023

- discussion of legal acts and decisions of government authority
- assessment of legal acts and decisions
- monitoring activities of the relevant authority

LAW ON PUBLIC COUNCILS

258 councils

www.kazkenes.com

- representing public community interests
- interaction between the authority and community and its development
- oversight over activities of the authority

ANTI-CORRUPTION VOLUNTEERING project

(August 2023 – present)



2 500 volunteers

- prevented overpriced procurement worth \$ 31 mln (₸ 16 bln)
- monitoring quality of roads

CORRUPTION REPORTING CHANNELS



a single platform for submitting enquiries and complaints to government authorities



Agency hotline
1424



telegram-channel

CONSULTATIONS AND LEGAL AID

public reception
offices



hotline1424



since 2022

EVERY
GOVERNMENT
AUTHORITY
IMPLEMENTS

PROJECT
GROUPS



identification of corruption risks



addressing corruption risks



integrity culture



prevention of corruption
in semi-public organizations

ANTI-CORRUPTION COMPLIANCE

corruption prevention and compliance with requirements of anti-corruption legislation in the semi-public sector



Semi-public sector entities
have structural units that carry out
functions of anti-corruption compliance



An anti-corruption compliance unit
is independent from the executive
authority and reports to their board
of directors or supervisory board

ANTI-CORRUPTION AGENCY COORDINATION

Standard guidelines
for compliance units

Methodological
recommendations for corruption
prevention in organizations

Conferences, seminars,
anti-corruption compliance
school

Telegram chat
for communications
and feedback
from compliance officers



ENSURING RULE OF LAW AND HOLDING CORRUPTION OFFENDERS ACCOUNTABLE

Detection and investigation of corruption crimes

exposing
criminal groups

detering systemic
corruption and
large-scale corruption
schemes

investigating
high level officials

INVESTIGATIONS

the investigator is a procedurally independent officer

investigations comply with the provisions of the Constitution and criminal legislation

persons providing assistance in investigation receive financial incentives

maximum punishment for bribery – 15 years imprisonment

interaction with other countries within the MLA framework

to fulfill the follow the money principle the Agency established a unit for financial investigations, tracing and recovery of assets

investigators undergo professional development training, including with involvement of foreign experts

Law 'On the return of illegally acquired assets to the state'

(July 2023)



since 2022

RETURNED

AGENCY INPUT

\$ 2.6 bln

1 641

corruption cases registered
for investigation

INVESTIGATED

1 493

INDIVIDUALS

CONVICTED

914

INDIVIDUALS



WHISTLEBLOWER PROTECTION

10%

of the amount of a bribe
or damage is rewarded
for reporting corruption

\$ 31 400

maximum reward
(₹ 15.7 mln)



protection of labor rights
in case of retaliation
by the employer



LEGISLATIVE AND ADMINISTRATIVE MEASURES

2019-2024



Public monitoring

Enhancing
whistleblower protection

Increased financial
rewards for reporting
corruption



Full ban on gifts
to officials/civil servants

Ban on bank accounts
in foreign jurisdictions
for civil servants,
parliamentarians and
judges

Candidates for a public
position are obliged
to give notice
of relatives employed
in the same organization



Anti-corruption
compliance units
in the semi-public sector

Anti-corruption
examination of draft
legal acts

Liability of senior
managers for corruption
committed by their
immediate subordinates

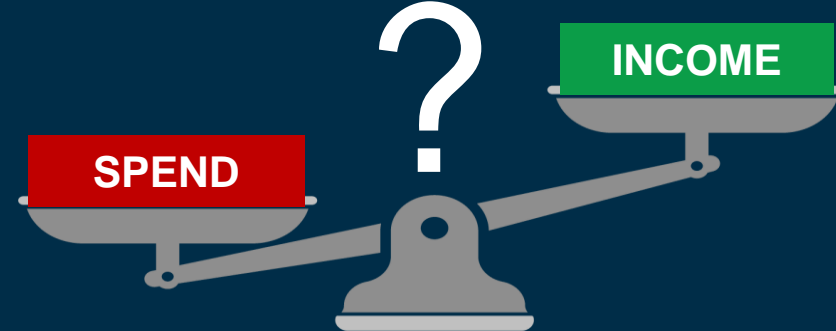


Ban on the use of parole
for corruption offenders

Tougher penalties
for corruption crimes
(committed by law
enforcement officials, judges,
bribe givers and
intermediaries)

Lifetime ban
on employment
of corruption convicts
in civil service and
semi-public sector

LIABILITY FOR ILLICIT ENRICHMENT



FINANCIAL SANCTIONS

if discrepancy exceeds
 $1,000 \times \text{MCI}$

administrative fine
90% of the discrepancy amount

CAREER SANCTIONS

discrepancy should exceed
an annual income

dismissal from the civil service
on negative grounds
for three years

** there will be an opportunity to prove that income is legal*



IN PROGRESS

- Special law on professional integrity testing (INTEGRITY CHECK)

- Criminalization of the promise/offer of a bribe

- Strengthening liability of legal entities for corruption

- Detailed regulation of conflict of interest

- Public register of corruption offenders

- Disciplinary liability for heads of government authorities and organizations for failure to implement anti-corruption measures

- Classification of extortion of illegal remuneration by certain categories of citizens as corruption crimes (medics, teachers, staff at one-stop-shops, etc.)

INTEGRITY TESTING



ANTIKOR

**Anti-Corruption
Agency**



**Ministry
of Emergency Situations**



**Financial
Monitoring Agency**



**Ministry
of Internal Affairs**

4 government authorities are implementing the pilot project

INTERNATIONAL COOPERATION



UN Convention
against corruption

ratified in 2008



Council of Europe
Criminal Law Convention

*request approved
on 30 June 2022*

domestic interagency review



Convention
on Combating Bribery
of Foreign Public Officials
in International Business
Transactions

intention to accede



OECD
Anti-Corruption Network
for Eastern Europe
and Central Asia

since 2004

Interstate Council
on Combatting
Corruption

since 2013

Group of States
against Corruption
(Council of Europe)

since 2020

Network of Corruption
Prevention Authorities
(Council of Europe)

since 2020

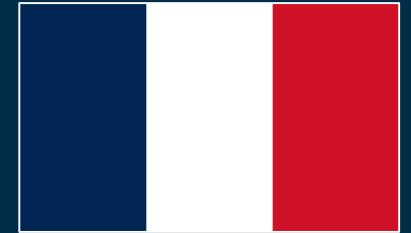
Global Operational
Network of Anti-Corruption
Law Enforcement
Authorities (UNODC)

since 2021

International Association
of Anti-Corruption
Authorities

since 2024

MEMORANDA OF UNDERSTANDING





3rd EVALUATION ROUND

17 recommendations approved
at the plenary in March 2025



**ISTANBUL
ACTION PLAN** | 5th round
of monitoring

**INTEGRITY
REVIEW** | to be completed
in 2025

**INTEGRITY
INDICATORS** | joined in 2024

CORRUPTION PERCEPTIONS INDEX – 2024

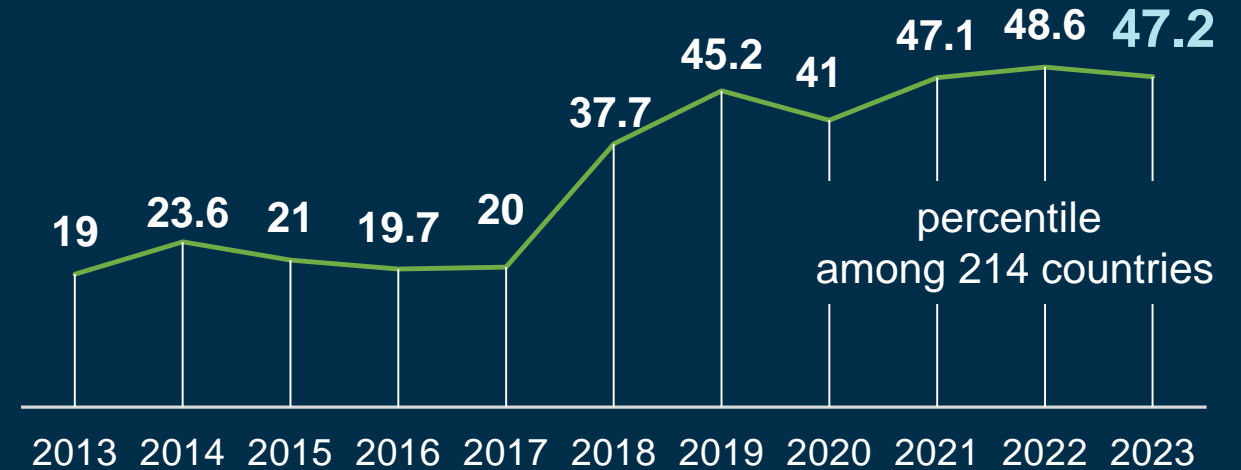
score

40/100

rank

88/180

CONTROL OF CORRUPTION INDEX (WORLD BANK – WORLD GOVERNANCE INDICATORS)



RULE OF LAW INDEX – 2024 FACTOR 2: ABSENCE OF CORRUPTION

rank

59/142

PUBLIC INTEGRITY INDEX

rank

58/119

DEVELOPMENT OF INFRASTRUCTURE FOR NON-CASH PAYMENTS

recent 5 years

non-cash
transactions

x 22

online-
payments

x 40

share
of non-cash
payments

88%
37%



DIGITAL TENGE

“MARKING & TRACKING” MONEY in budget spend processes

- strengthening transparency of government payments through “coloring” budget funds
- “coloring” money mechanism from funds allocation to disbursement
- assigning a unique identifier to each banking transaction

PILOT PROJECTS

road
construction

agricultural
equipment
and machinery
purchases

local government
development
projects



DIGITALIZATION OF PUBLIC SERVICES

24

**E-Government Development Index
(UN EGDI 2024)**

10

Online Service Index (OSI)

27

E-Participation Index

e+gov

92%

public services available online
website, smart phone app, banking apps

81%

delivery quality satisfaction



**eGov
mobile**





ANTI KOR