



ANNUAL REPORT
ON THE ACTIVITIES OF THE
ASTANA INTERNATIONAL
FINANCIAL CENTRE

2024



AN ECOSYSTEM
THAT EMPOWERS
BUSINESS

Astana International Financial Centre

TABLE OF CONTENTS

6 GOVERNOR'S STATEMENT

8 AIFC WORLD

10 Mission, Vision, and Values

12 Governance, Organisational Structure

18 Our Strategy

20 Top-tier advantages

24 2024 HIGHLIGHTS

25 AIFC in Numbers 2024

26 AIFC new products 2024

28 CATALYSTS FOR GROWTH

30 Credible jurisdiction

34 World-Class Dispute Resolution

42 Forward-Looking Regulation

54 Facilitating Capital Mobility

66 Finance for a Better World: A Commitment to Responsible Growth

78 Innovation and FinTech Frontier

84 APPENDICES

86 Appendix 1: Publications

88 Appendix 2: Regulatory policy updates

94 Appendix 3: AIFC Complex

96 Glossary

GOVERNOR'S STATEMENT

In an era of global uncertainty, the Astana International Financial Centre continues to stand for stability and credibility. These foundational principles have enabled the AIFC to evolve into a strategic partner for investors, institutions, and governments seeking a secure and future-ready gateway into Eurasia and beyond.

2024 was a landmark year for the Astana International Financial Centre. Since its inception, the AIFC has attracted over 3,500 registered participants from 84 countries (more than 1,100 companies in 2024) and more than US\$14 bn (US\$3.1 bn) of investment channeled into Kazakhstan's economy, the AIFC has firmly established itself as a trusted conduit for cross-border capital and innovation. Astana ranks first among financial centres in Eastern Europe and Central Asia, and 64th globally in the Global Financial Centres Index - a clear reflection of our expanding international standing.

The Centre's economic contribution continued to grow. As of 2024, AIFC participants paid over KZT 148 bn in taxes and created thousands of high-value jobs, demonstrating the AIFC's growing role in supporting Kazakhstan's sustainable economic development and diversification efforts.

At the same time, the AIFC strengthened its institutional foundations. Our key bodies and organisations - the AIFC Court, the International Arbitration Centre, the Astana Financial Services Authority, and the Astana International Exchange - delivered exemplary outcomes, enhancing investor confidence, reinforcing the rule of law,



and deepening the region's capital market infrastructure.

In 2024, the Centre significantly deepened its role as a platform for economic diplomacy and regional integration, reinforcing its position as a vital institutional pillar supporting the Middle Corridor and the Belt and Road Initiative. By providing legal certainty, fostering financial innovation, and enhancing multilateral connectivity, the AIFC has underpinned landmark infrastructure investments and cross-border ventures, exemplified by initiatives such as KPMC and Caspian Integrated Maritime Solutions.

Key milestones this year include the commencement of operations by "Middle Corridor Multimodal" - a joint venture between Kazakhstan, Azerbaijan, and Georgia, now attracting interest from Turkey and China - and the establishment of "SK-AIH Investment Fund Ltd.", a strategic partnership between Samruk-Kazyna, Kazakhstan's sovereign wealth fund, and Azerbaijan Investment Holding to finance projects along the Middle Corridor.

Additionally, a growing number of transport and logistics companies

are choosing the AIFC as their base of operations, further advancing East-West trade through the heart of Eurasia.

The success of the AIFC Court and International Arbitration Centre continues to distinguish our platform. In 2024 alone, over 1,000 cases were resolved involving parties from 32 countries-each processed with the efficiency, integrity, and international standards that are now hallmarks of our dispute resolution ecosystem. With over 11,000 contracts globally now using AIFC model clauses, and 100% enforcement of awards throughout the entire territory of Kazakhstan using the AIFC Court's enforcement procedure. AIFC Court judgments have also been enforced overseas, including in the UAE, Turkey, and South Korea. We are proud to offer a legal framework rooted in English common law-unique in the region and vital to global investor confidence.

In parallel, the Astana Financial Services Authority enhanced our regulatory competitiveness with bold updates in digital assets including the launch of a comprehensive framework for tokenised securities, ESG-linked instruments, venture studios and

corporate treasury centres. Moreover major players like Binance and Bybit transitioned from the sandbox to full regulatory status, reflecting the AIFC Fintech Lab's efficacy in nurturing fintech innovation. These steps-alongside a strong supervisory regime-position the AIFC as a preferred jurisdiction for innovative finance, while upholding robust compliance with global standards such as IOSCO, FATF, and IAIS.

A cornerstone of the AIFC's strategic mandate - the robust development of our capital markets - witnessed significant advancement and dynamism in 2024. The Astana International Exchange (AIX) was central to this, achieving a record number of 140 new listings and facilitating approximately US\$2.4 bn in capital raised. The overall trading volume on AIX more than doubled to US\$1.3 bn in 2024.

AIX as a platform plays an active role in Kazakhstan's Privatisation Programme, starting with the Kazatomprom IPO, followed by KazMunayGas in 2022, KEGOC's SPO in 2023 and successfully facilitating Air Astana IPO in 2024. During the Air Astana IPO in February 2024, AIX first time in Kazakhstan has introduced a conditional trading, enabling Kazakh investors to trade alongside global investors on the London Stock Exchange (LSE) in real time. Such flagship listings, alongside a significant increase in both equity and debt instruments from diverse issuers, are tangible indicators of escalating global investor and issuer confidence in the AIFC's sophisticated, integral, and forward-looking market infrastructure. Furthermore, our fintech and green finance ecosystems continued to thrive, with major

industry players, sustainability-linked bonds, and Islamic finance solutions strengthening our market diversity. By the end of 2024, the AIFC had successfully completed 9 cases of company redomiciliation, underscoring its appeal as a jurisdiction of choice for international businesses seeking regulatory certainty and global connectivity. Notable arrivals during the year included high-profile firms such as Fix Price Group PLC, Specta Group Ltd. and others.

The successful relocation of these complex, mature corporate structures demonstrates the AIFC's capacity to host companies across different sectors and stages of growth - from industrial giants to consumer-focused brands. It also underscores the AIFC's global competitiveness in offering a credible, efficient, and investor-friendly regulatory environment for companies seeking a stable and progressive jurisdiction for their next phase of development.

In 2025, AIFC will implement a new strategic cycle until 2027 to consolidate and expand its role as a leading financial centre. This strategy is shaped by global macroeconomic trends - including rising debt levels, inflationary pressures, rapid technological shifts, and evolving global trade and capital flows - and grounded in AIFC's unique legal and regulatory framework.

The strategic priorities of the new strategy will still be based on the five objectives outlined in the Constitutional Statute of the Republic of Kazakhstan "On the Astana International Financial Centre" dated 7 December 2015. These objectives include creating an attractive

investment environment, developing the securities market, expanding financial services such as banking, insurance, and fintech, fostering professional services, and achieving international recognition as a financial hub.

As part of new strategic initiatives until 2027, AIFC aims to expand its focus on the regions within Kazakhstan and new countries, expand its priority industries where investments should be attracted and focus more on commercialization. Additionally, AIFC plans to drive commercialization by enhancing financial product offerings, developing new business models, and fostering private-sector partnerships. Networking efforts will focus on community-building through flagship events and sponsorship opportunities to increase market visibility and forge new partnerships.

Looking forward, our ambition remains clear: to serve as the institutional bedrock of Kazakhstan's financial future and a regional engine for sustainable growth. The AIFC will continue to champion green finance, responsible innovation, and economic resilience-anchored in an unwavering commitment to transparency, trust, and international best practices.

Together, we are building not just a financial centre-but a lasting platform for prosperity, partnership, and progress across generations.

Renat Bekturov
Governor Astana International
Financial Centre

AIFC WORLD

The Astana International Financial Centre (AIFC) is an innovative financial hub in Central Asia, designed to connect global capital with the vast opportunities of emerging markets. Positioned at the crossroads of Europe and Asia, AIFC serves as a bridge for investors and businesses seeking to expand their reach in a dynamic and rapidly growing region. Inspired by the success of leading financial centers like New York, London, Dubai, Hong Kong, and Singapore, the AIFC combines international best practices with innovative approaches to create a world-class platform for investment, business, and financial services.

In an era where global financial resources are abundant, identifying high-potential investment opportunities and navigating diverse regulatory landscapes is essential for sustainable growth. AIFC provides an efficient, transparent, and investor-friendly platform that integrates the best practices of leading financial centres, offering a seamless entry point into one of the world's most promising economic corridors.

For investors, AIFC presents a unique gateway to portfolio diversification and access to growth-driven markets. The Centre offers a broad spectrum of opportunities, from securities issued by state-owned and private enterprises to participation in large-scale infrastructure projects like the Belt and Road Initiative, as well as innovative technology and fintech startups. AIFC's ecosystem is designed to accommodate diverse investment strategies, spanning banking, insurance, capital markets, Islamic finance, and digital financial solutions, ensuring investors have access to cutting-edge financial instruments to optimise their portfolios.

For businesses, AIFC provides a stable, predictable, and internationally recognised platform to scale operations and engage with global markets. With a legal system based on principles of English common law, a transparent and progressive regulatory framework, and a competitive tax regime, AIFC fosters an environment where companies can secure investment, and operate efficiently. Businesses also benefit from AIFC's connectivity to major international financial institutions, asset managers, and Islamic finance providers, unlocking opportunities for capital raising and strategic partnerships.

Innovation is at the heart of AIFC's vision, particularly in financial technology, where the Centre is building a vibrant ecosystem for fintech startups, digital assets, and high-liquidity financial instruments. By providing state-of-the-art infrastructure and regulatory clarity, AIFC empowers businesses and investors to stay ahead of market trends and leverage emerging technologies for long-term success.

AIFC is committed to driving sustainable and inclusive economic growth, creating an environment where investors can thrive, businesses can expand, and innovation can flourish. Whether seeking new frontiers for investment or a strong foundation for business expansion, AIFC offers the strategic advantages, resources, and connectivity to unlock businesses' full potential.

In addition, AIFC positions itself as a regional knowledge hub by producing valuable industry research and market insights (the full list of publications produced in 2024 can be found in Appendix 1), and by hosting flagship platforms such as Astana Finance Days and AIFC Connect. These initiatives provide stakeholders with expert analysis, facilitate strategic dialogue, and foster deeper understanding of emerging financial and investment trends across the region and beyond.

MISSION, VISION AND VALUES

Our vision

To become the driver and main hub for investment and financial innovation in the Kazakhstan economy to facilitate its further growth and strengthening the leading role in the region.

Our mission

To contribute to the sustainable economic development of Kazakhstan by providing a unique investment and business infrastructure, a reliable jurisdiction and an independent court and arbitration facility, as well as supporting innovation and the development of financial products and services.

Our values

Aspiration: Represents a forward-looking mindset and ambition to achieve excellence.

Ingenuity: Embodies creativity, problem-solving, and a commitment to innovation.

Fairness: Symbolises transparency, ethical conduct, and openness.

Commitment: Reflects dedication to results, accountability, and achieving measurable outcomes.

GOVERNANCE

ORGANISATIONAL STRUCTURE

The AIFC Management Council is a permanent collegial body chaired by the President of the Republic of Kazakhstan and is the supreme governing body of the AIFC. It is responsible for identifying strategic directions for AIFC development and fostering the development of favourable conditions to promote the AIFC as a leading international financial centre.

The Council is authorised to adopt AIFC Acts, determine the strategy, the structure and composition of AIFC Bodies, approve annual reports on AIFC activities, etc. The composition of the Council is approved by the Decree of the President of the Republic of Kazakhstan and consists of the government officials and international experts.



AIFC BODIES

Authority

THE AIFC AUTHORITY

formulates the centre's development strategy and drafts acts on matters unrelated to the regulation of financial services. To spur the AIFC's integration into the global financial architecture, the AIFC Authority also establishes links with international financial centres, institutions and investment companies.

AFSA

THE ASTANA FINANCIAL SERVICES

AUTHORITY is the integrated regulator of all financial and market activities and ancillary services. It is also the registration authority for all AIFC participants. Its mission is to ensure the fair and transparent operation of AIFC financial and capital market systems.

Court

THE AIFC COURT

hears commercial disputes in the AIFC. With eleven highly experienced judges and a Registrar, it has exclusive jurisdiction for commercial disputes and no jurisdiction over criminal or administrative disputes.

IAC

THE INTERNATIONAL ARBITRATION

CENTRE provides an independent alternative to court litigation and operates at the highest international standards to resolve commercial disputes. It has its own panel of highly regarded international arbitrators and mediators.

AIFC ORGANISATIONS



THE ASTANA INTERNATIONAL EXCHANGE (AIX)

was established to develop trusted and liquid capital markets in Central Asia and beyond by providing innovative products and services for businesses and investors.

GFC

THE GREEN FINANCE CENTRE

was established to attract investment to Kazakhstan and Central Asian region using green and sustainable financing tools, and also to provide strategic and business consulting services to the public and private sectors.

Tech

THE AIFC TECH HUB drives digital transformation within the AIFC and beyond by fostering innovation in FinTech, DataTech, EdTech, and AITech. By building strategic partnerships and launching pilot projects with government and corporate stakeholders, the Tech Hub aims to position Kazakhstan as a regional leader in technology-driven finance and innovation.

Academy

AIFC ACADEMY promotes human capital development in the AIFC and beyond by creating digital educational platforms for continuous development, forming and supporting professional communities, providing accessible expertise and open dialogue with market professionals.

CORPORATE GOVERNANCE

Sound corporate governance practices are essential for the proper functioning of an international financial centre and for building trust among the investor community. The AIFC is committed to continuously improving its corporate governance framework by aligning it with evolving international best practices.

AIFC CORPORATE GOVERNANCE PRINCIPLES

In 2020, the AIFC developed the AIFC Corporate Governance Principles (Principles), in a partnership with TheCityUK. Operating on an 'apply and explain' basis, the Principles are designed to improve the capabilities and influence the mindsets of boards and individual directors, while contributing to the sustainable long-term success of the AIFC.

The AIFC's commitment to corporate governance is observed through the following: its robust corporate governance framework; its regular review to ensure that the framework is relevant and effective; its commitment to continuously develop practices aimed at promoting sound and prudent management; and its dissemination of good corporate governance knowledge among companies, institutions and individuals across the country.

AIFC CORPORATE GOVERNANCE PRINCIPLES

- 01 Companies should be led by a board that promotes the long-term success of the company, generating value for its shareholders, acting responsibly towards key stakeholders, and in the case of companies operating in Kazakhstan, also contributing to the country's sustainable economic development.
- 02 Companies should have an effective board that is collectively accountable for ensuring the company is managed prudently and effectively.
- 03 The board should establish the company's mission, purpose, values and strategy, and satisfy itself that these and its culture are aligned.
- 04 The board should set, and its members should comply with, high standards of ethical behaviour, and hold management accountable for delivering these standards throughout the organisation.
- 05 The board should ensure that there is a clear division of responsibilities between the non-executive directors and executive management, and that no one individual has unfettered powers of decision-making.
- 06 Boards should be large enough to accommodate all necessary skills and competences, but still be small enough to promote cohesion, flexibility and effective participation. The optimum size for a board is eight to twelve people.
- 07 The board and its committees should have an appropriate balance of skills, experience, independence and knowledge of the company's business, and adequate resources, including access to expertise as required and timely and comprehensive information relating to the affairs of the company.
- 08 The board should be responsible for setting the risk appetite of the company. Risk appetite refers to the amount of risk that a board is willing to take on in order to achieve its strategic objectives.
- 09 The board should ensure that the company's financial and other reports present an accurate, balanced and understandable assessment of the company's financial position and prospects by ensuring that there are effective internal risk control and reporting requirements.
- 10 The board should ensure that the company has a risk management, internal control and compliance framework that is effective, well-defined and well-integrated.
- 11 The board should ensure that there is a formal and rigorous annual performance evaluation of the board, its committees and individual directors. Annual evaluation of the board should include composition, diversity and effectiveness. Individual director evaluations should determine whether directors are contributing effectively to the work of the board and its committees.
- 12 The board should have a formal and transparent procedure for developing policies on director and executive remuneration. No director should be involved in deciding his or her own remuneration.
- 13 The board should ensure that the remuneration policies and practices are designed to support strategy and are aligned with the long-term interests of the company.

OUR STRATEGY IS TO:

AS PART OF ITS DEVELOPMENT STRATEGY IMPLEMENTATION THROUGH 2025, THE AIFC HAS PRIORITISED ITS STRATEGY TO SUPPORT KAZAKHSTAN'S ECONOMIC GROWTH MORE DIRECTLY BY FACILITATING FOREIGN DIRECT INVESTMENT (STATE, QUASI-GOVERNMENT AND PRIVATE SECTOR), AND FOREIGN AND DOMESTIC EQUITY AND DEBT CAPITAL THROUGH THE SECURITIES MARKET.

Strategic initiatives

CREATE AN ENVIRONMENT FOR INVESTMENT

01 Create an attractive environment for investment in financial services, and assist in attracting investment to the Kazakhstan economy

02 Achieve international recognition as a financial centre

DEVELOP CAPITAL MARKETS

03 Develop the Kazakhstan securities market and ensure it integrates well with international capital markets

DELIVERING VALUE TO CUSTOMERS THROUGH PRODUCT VARIETY

04 Develop insurance market, banking service, Islamic finance, financial technology, electronic commerce and innovative projects in Kazakhstan

05 Develop financial and professional services based on international best practices

Our success criteria

Be a top-50 GFCI business environment component by 2025

Assist in raising US\$10 bn in investment by 2025

Achieve and maintain a top-40 GFCI ranking by 2030

Achieve and maintain a top-30 GFCI ranking by 205

Increase Kazakhstan's MSCI Frontier Market Index weighting to 5% by 2025

Obtain MSCI emerging market status by 2030

Register 2,000 companies by 2025

Register 600 financial and professional services companies by 2025

What we achieved in 2024

Astana's 57th ranking in the GFCI'37 (March 2025) business environment component

The AIFC helped raise US\$14 bn of investment in the Kazakhstan economy by the end of 2024

Astana placed 64th out of 121 worldwide and 1st out of 16 among Eastern European and Central Asian centres in GFCI'37 (March 2025)

Kazakhstan achieved a 7.27% MSCI Frontier Market Index weighting by the end of 2024

Ongoing work with the special Steering Committee and Working Group chaired by the Kazakhstan Agency for Regulation and Development of Financial Market (ARDFM)

The AIFC has registered over 3500 companies (+1,174 companies in 2024)

1,162 Financial companies*
133 Professional services companies

*Common Classification of Kinds of Economic Activity in the Republic of Kazakhstan - CCEA (64-66)

TOP-TIER

ADVANTAGES

AIFC LAW AND JURISDICTION



AIFC Acts, as the core of AIFC law, were developed based on the principles, legislation and precedents of the law of England and Wales and the standards of leading global financial centres. The AIFC Court and IAC are the region's first independent common law judiciary and international arbitration centre for the settlement of commercial disputes.

The AIFC has its own eJustice system that allows parties to file cases online at the AIFC Court and IAC from anywhere around the world without the need to be in Astana.

TAX BENEFITS



Exemption of AIFC participants from CIT payments until 1 January, 2066 for financial services, ancillary services provided to licensed participants, as well as dividends and capital gains on participants' shares and securities registered on AIX

VISA SUPPORT



AIFC provides foreign citizens with visa support on the "one window" principle.

INVESTMENT TAX RESIDENCY PROGRAMME

The programme offers foreign investors and their immediate families a multi-entry investor visa for Kazakhstan upon investing in AIFC instruments such as securities listed on AIX, investment funds, and the authorised capital of companies registered in the AIFC, as well as Kazakhstan tax residency under simplified conditions.

REDOMICILATION



AIFC has developed acts allowing the transfer of a company from other jurisdictions.

CURRENCY FLEXIBILITY TO FACILITATE GLOBAL BUSINESS



AIFC participants are permitted to conduct transactions in any mutually agreed currency. This includes, but is not limited to, US dollars, euros, Russian rubles, and Kazakhstani tenge, providing flexibility and efficiency in cross-border operations.

ORGANISATIONAL-LEGAL FORMS OF AIFC LEGAL ENTITIES



AIFC offers 15 flexible legal structures for setting up businesses, including opportunities to establish holding companies for asset management and investment consolidation. Companies can be created with as little as US\$1 in capital, and businesses can also set up Special Purpose Companies (SPCs) for structured finance, risk management, and venture investments.

WORLD CLASS EXCHANGE INFRASTRUCTURE



A world-class stock exchange provides a high-tech trading platform and regulatory environment familiar to the global investment community. The AIX is a member of the World Federation of Exchanges and was granted 'recognised stock exchange' status from the United Kingdom's HM Revenue & Customs.

ENGLISH IS THE OFFICIAL LANGUAGE OF THE AIFC



The official language of the AIFC is English. AIFC Acts, court proceedings, records, all transactions and responses to inquiries are in English. 100% FOREIGN OWNERSHIP Within the AIFC, registered entities can enjoy 100% foreign ownership.

EXTENSIVE VENTURE FINANCING MECHANISMS

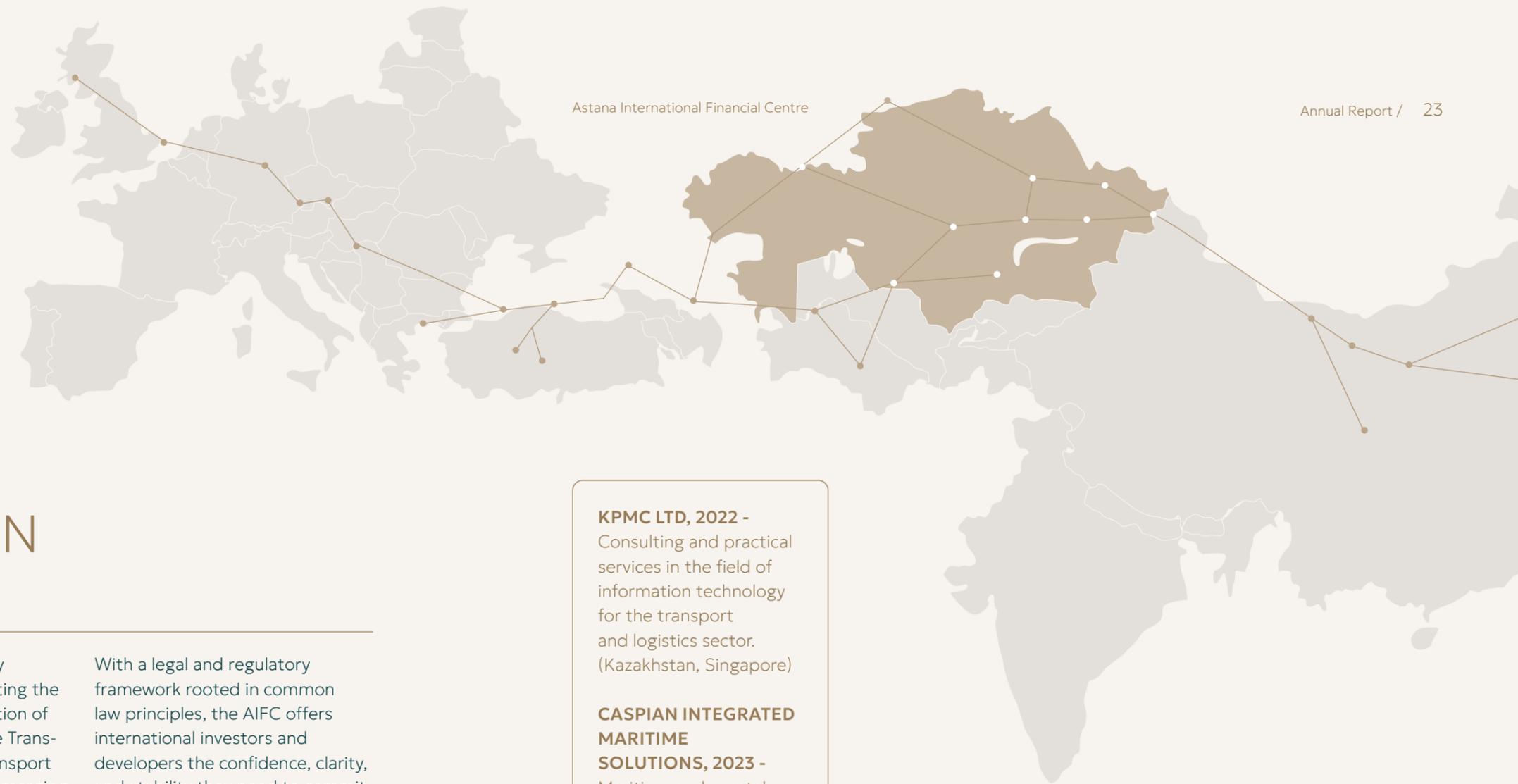


For the first time in the history of CIS countries such forms of agreements as convertible loans, KISS and SAFE and purchase of shares were introduced.

DYNAMICLY DEVELOPING DIGITAL ASSET MARKET



AIFC is rapidly emerging as a leading hub for digital assets, offering a regulated and business-friendly environment for crypto exchanges, tokenised assets, and blockchain-based financial services. Through the AIFC FinTech Lab, companies can test and scale innovative digital asset solutions under a clear regulatory framework.



AT THE HEART OF EURASIAN CONNECTIVITY

AIFC PLAYS AN INCREASINGLY IMPORTANT ROLE IN SUPPORTING THE DEVELOPMENT AND REALISATION OF THE MIDDLE CORRIDOR – THE TRANS-CASPIAN INTERNATIONAL TRANSPORT ROUTE – WHICH IS RAPIDLY EMERGING AS A KEY ALTERNATIVE TRADE ARTERY BETWEEN ASIA AND EUROPE.

AIFC plays an increasingly important role in supporting the development and realisation of the Middle Corridor – the Trans-Caspian International Transport Route – which is rapidly emerging as a key alternative trade artery between Asia and Europe.

As global trade routes adjust to evolving geopolitical realities, the Middle Corridor stands out as a resilient, diversified, and forward-looking pathway that aligns closely with the long-term economic aspirations of Eurasian nations.

Situated at the very heart of Eurasia, Kazakhstan naturally serves as a vital bridge within this corridor. The AIFC strengthens this position by acting as a strategic platform for investment, governance, and innovation—helping unlock the full potential of the route’s infrastructure and economic promise.

With a legal and regulatory framework rooted in common law principles, the AIFC offers international investors and developers the confidence, clarity, and stability they need to commit to long-term, cross-border projects.

Its world-class institutions - the AIFC Court and the International Arbitration Centre - provide trusted, neutral avenues for dispute resolution, while its independent regulator upholds the highest standards of transparency and financial integrity.

AIFC facilitated the establishment of several strategic joint ventures aimed at enhancing the Middle Corridor (TITR) and strengthening regional economic integration. These collaborations aim to improve multimodal logistics, attract cross-border investments, and strengthen regional connectivity.

KPMC LTD, 2022 - Consulting and practical services in the field of information technology for the transport and logistics sector. (Kazakhstan, Singapore)

CASPIAN INTEGRATED MARITIME SOLUTIONS, 2023 - Maritime and coastal freight transport. (Kazakhstan, UAE)

MIDDLE CORRIDOR MULTIMODAL LTD., 2023 - Multimodal and transportation and logistics services on the Trans-Caspian International Transportation Route. (Kazakhstan, Azerbaijan, and Georgia)

SK-AIH INVESTMENT FUND LTD., 2024 - the fund actively pursuing investments in various sectors, including projects directly related to the Middle Corridor. (Kazakhstan, Azerbaijan)

GATEWAY TO CENTRAL ASIA

OPERATING FROM KAZAKHSTAN, THE ASTANA INTERNATIONAL FINANCIAL CENTRE PROVIDES STRATEGIC ACCESS TO CENTRAL ASIA’S RAPIDLY EXPANDING MARKET ECONOMY.

The region-comprising Kazakhstan, Uzbekistan, Kyrgyzstan, Tajikistan, and Turkmenistan-is undergoing a profound economic transformation, driven by diversification initiatives, infrastructure modernisation, and a growing openness to international investment.

With a combined GDP exceeding US\$400 bn and a population of over 80 mn, Central Asia represents an emerging economic bloc of increasing global relevance. Governments across the region are implementing structural reforms to reduce dependence on energy exports and to stimulate growth in sectors such as infrastructure, logistics, green energy, agriculture, and digital technologies.

2024 HIGHLIGHTS

AIFC IN NUMBERS 2024

>3,500

AIFC
participants
(+1,174)

US\$7 bn

capital raised on
the AIX
(+US\$2.4 bn)

US\$14 bn

of investment raised
(+US\$3.1 bn)

KZT 104.77 bn

facilitated by
GFC

>3,400

completed AIFC
Court and IAC cases
(+1000)

US\$1.31 bn

trading volume
on AIX
(2.3x more than 2023)

KZT 148.4 bn

of taxes paid by
AIFC participants
(+KZT 63.2 bn)

>400

trained specialists by
AIFC Academy

No. 64

Astana's position in
GFCI'37

2 mn+

investor accounts
on AIX CSD
(+0.5 mn)

>10,000

local jobs created by
AIFC participants
(+2,844)

>2600

(+1,009)
services provided by
AIFC Expat Center

AIFC

I-REC INTERNATIONAL RENEWABLE ENERGY CERTIFICATE



AIX now offers the market an opportunity to trade renewable energy certificates. Corresponding changes have been made to the AIX Business Rules in September 2024. I-REC certificates will be traded alongside conventional capital market instruments.

The I-REC certificate confirms that the energy was produced from renewable sources and corresponds to 1 MWh of clean electricity. Adding I-REC certificates helps companies achieve environmental goals while sustaining financial performance.

CARBON PLATFORM



The AIFC Carbon Platform is being launched on the AIX and will create opportunities for environmental instruments trading. The platform has the potential to expand and transform into a regional hub for Central Asia and the Caucasus.

VENTURE STUDIO



The AIFC Venture Studio Framework enables companies to launch venture studios within the AIFC, supporting the creation of startups from early-stage concepts to Minimum Viable Products (MVPs)- without requiring immediate incorporation of each idea.

Key features include:

- Capacity to support up to 20 ventures and launch up to 10 venture-backed companies per studio
- Streamlined processes for idea validation, market testing, and entrepreneur matching
- Access to critical resources, including funding and expert support, to accelerate development

This initiative is designed to bridge the gap between entrepreneurs and investors, offering a flexible and collaborative platform that transforms ideas into investable, market-ready ventures-while tapping into the region's expanding innovation potential.

NEW PRODUCTS 2024

CORPORATE TREASURY CENTRES



AFSA has enacted the AIFC Treasury framework. The Framework introduces specific regulations tailored for operations of Corporate Treasury Centres (CTC) in the AIFC, which will be able to open the CTC Funds. This framework offers a robust regulatory and tax environment that caters specifically to the needs of CTCs, making the AIFC an attractive location for intragroup financing, liquidity management, investment and other treasury functions.

ESG



AIFC made significant strides in promoting ESG principles through a variety of regulatory, institutional, and market-led initiatives:

- **Turkic Green Finance Council.** The Council aims to develop ESG markets across OTS member states
- **ESG Debentures Framework.** Introduced in October 2024, this framework established minimal standards for green and sustainable bonds and sukuks, enhancing market clarity and investor confidence.
- **ESG Disclosure Guidance.** Effective from October 2024, this voluntary guidance applies to banks, fund managers, and insurers to promote ESG integration into business operations.
- **Green Equity Principles and Guidelines (AIX).** Adopted in October 2024, based on World Federation of Exchanges standards, this supports the classification and visibility of green issuers.

AIFC COMMUNITY



In 2024, the AIFC introduced the AIFC Community - a new dynamic initiative designed to foster valuable professional connections, facilitate knowledge exchange, and keep participants informed about the latest developments within the AIFC. By providing a collaborative platform, it enables industry leaders, experts, and businesses to share best practices, explore emerging opportunities, and drive collective growth within the financial ecosystem. With a commitment to building a thriving and interconnected community, AIFC Community empowers participants through exclusive networking opportunities, insightful discussions, and strategic guidance, ensuring they can navigate the evolving financial landscape with confidence and success.

CATALYSTS FOR GROWTH

“Although the AIFC has not been operating for long, it has achieved significant results. The center has created the best environment in the region for attracting investments, while offering investors various tax, visa and labor benefits. Each investor at the center receives tailored and comprehensive support. A fair and impartial judicial system has been established. Thanks to new digital solutions, almost every Kazakhstani can participate in IPOs”

“In the context of strengthening cooperation in the financial sector, Kazakhstan is placing emphasis on the work of the Astana International Financial Centre. The AIFC is a unique institution in the region that brings together the best practices of the world’s leading financial centres”

Kassym-Zhomart Tokayev
President of the Republic of Kazakhstan

CREDIBLE JURISDICTION



1st

Jurisdiction in the Central Asian region, based on the principles of common law.

The AIFC legal framework is based on the Kazakhstan Constitution, comprises the Constitutional Statute and a number of AIFC Acts that follow the principles of the law of England and Wales as well as leading global financial standards.

With over 80 acts adopted since its establishment, the AIFC has developed a comprehensive regulatory framework that covers corporate, contractual, employment and other legal matters. AIFC Legal Advisory Council involvement ensures that acts align with best international practices, and, as such contribute to the AIFC's reputation as a financial centre that meets global standards.

KEY ADVANTAGES OF THE AIFC JURISDICTION INCLUDE:

ENGLISH LANGUAGE



AIFC law is drafted in English, ensuring clarity and accessibility for the international business community

TRANSPARENCY



The legal framework governing corporate, contractual, employment, compensation procedures, bankruptcy, information protection, private property and dispute resolution, among others, is transparent and concise

INCLUSIVITY



A noteworthy feature of AIFC law is its inclusiveness, enabling the enhancement and refinement of legal acts through the input of interested market representatives

BEST PRACTICES



AIFC law integrates best commercial practices developed over centuries within common law jurisdictions, providing a robust legal framework

SECTOR-WIDE APPLICABILITY



AIFC law can be applied across various sectors of the economy, extending beyond AIFC participants to any individuals who consent to its application



PROMOTION AND DEVELOPMENT OF LEGAL PROFESSION IN THE AIFC

A core element of the AIFC's institutional framework is a well-established and reliable legal system, founded on the principles, rules, and precedents of the law of England and Wales. Contributing to the advancement of this legal environment, the AIFC Legal Services Board (AIFC LSB) played an important role in 2024 by continuing to regulate and support the development of the legal profession within the AIFC.

In accordance with the AIFC Legal Services Framework Regulations, legal professionals who provide legal services in respect of the Acting Law of the AIFC are required to be registered by the AIFC LSB and are subject to its ongoing regulatory oversight. This requirement ensures that only qualified, competent, and accountable individuals are permitted to advise on AIFC law, thereby safeguarding the integrity of the AIFC's legal system.

Throughout 2024, the AIFC LSB exercised its regulatory functions to ensure that legal services within the AIFC adhered to high standards of competence, ethics, and integrity, in line with international best practices.

The LSB is composed of representatives from AIFC bodies, consultative and advisory bodies, and Legal Services

Providers. During the year, LSB Members actively contributed to the development of the AIFC legal community by sharing their knowledge, insights, and professional experience. As of the end of 2024, the Roll of Registered Legal Advisers maintained by the AIFC LSB included 107 legal professionals from a wide range of jurisdictions, including Kazakhstan, the United Kingdom, the United States, Hungary, India, Qatar, Kyrgyzstan, Uzbekistan and South Africa.

The AIFC Legal Services Board's work in 2024 reinforced the integrity and credibility of the AIFC's legal environment. Through its commitment to high professional standards, ethical conduct, and the protection of users of legal services, the AIFC LSB contributed meaningfully to the continued success of the AIFC as a leading international financial centre.



The legal framework of the AIFC is an example of the successful parallel functioning of English law and the national legal system. The AIFC Acts cover most of the relationships that arise between AIFC-registered legal entities and other relevant parties on corporate, contractual, employment and other issues.



OFFICE OF COMMISSIONER OF DATA PROTECTION

By the end of 2024, Office of Commissioner of Data Protection (Office) started to actively foster the compliance culture thereby making adherence to the requirements of the AIFC Data Protection Regulations (DPR) and AIFC Data Protection Rules.

It is important to note that all AIFC Bodies and AIFC Participants are subject to the AIFC DPR and must comply with its requirements. These requirements are critical as they pertain to the processing of clients' personal data, sensitive personal data of employees and etc.

Throughout 2024, significant steps were taken to align the AIFC's data protection framework with leading global practices by introducing a set of amendments. By enacting these amendments, the AIFC aims to ensure a more

robust framework that enhances compliance, protects individuals' rights, and fosters trust in data management practices within the AIFC ecosystem.

A major milestone was reached on 12 November 2024, when the AIFC became a member of the Global Privacy Assembly (GPA) - an international, non-governmental organisation that brings together privacy and data protection regulators to promote best practices and enhance global standards.



OFFICE OF SECURITY REGISTRY

The Security Registry, established by the Governor of the AIFC and administered by the Security Registrar in accordance with the AIFC Security Regulations No. 7 of 2017 (as amended on 20 May 2024) and the AIFC Security Rules No.1 of 2018, operates as a distinct institution.

It requires the submission of specific forms (financing statements) and the corresponding security agreements as prerequisites for perfection of a security interest. Registration within the AIFC Security Registry serves as an added layer of protection for lenders, offering a form of assurance regarding the borrower's fulfillment of obligations.

Pursuant to the aforementioned legislative acts, the Office of the Security Registrar is responsible for conducting

the registration of securities and providing informational services, including the issuance of certificates confirming registered encumbrances. These services are essential for ensuring legal certainty in transactions and supporting a range of commercial needs.

Since 2020, the Office of the Security Registrar has registered over 40 security interests (financing statements) and processed more than 200 search requests for certificates confirming the presence or absence of encumbrances.

WORLD-CLASS DISPUTE RESOLUTION

In a rapidly evolving global economy, the Astana International Financial Centre strengthens Kazakhstan's position as a regional hub for finance, investment, and international business arbitration. The AIFC Court and International Arbitration Centre (IAC) play a key role by providing independent, transparent, and efficient dispute resolution mechanisms. These institutions boost investor confidence, uphold the rule of law, and improve the business environment.

Throughout 2024, the AIFC Court and IAC have continued to serve as cornerstones of legal reliability and trustworthiness, attracting an increasing amount of international and regional business. By offering world-class judicial and arbitration services, aligned with the highest international standards and strong profile of world-renowned judges and arbitrators with extensive global experience, the AIFC Court and IAC directly contribute to enhancing the ease of doing business, thereby strengthening Kazakhstan's investment climate and its attractiveness as a trusted destination for foreign direct investment.

Looking ahead, the AIFC Court and IAC remain dedicated to maintaining their impeccable standards, adapting proactively to global legal developments, and continually expanding their international networks. These efforts not only solidify Kazakhstan's strategic value on the global stage but also firmly establish the AIFC as a vital catalyst for sustained economic prosperity and continuous improvement of the regional business climate.



INSTITUTIONAL PROFILE AND CAPABILITIES

AIFC COURT

The AIFC Court operates independently from the national judicial system of Kazakhstan, embracing principles, legislation, and precedents of English common law. All judgments rendered by the AIFC Court of Appeal are final, emphasizing the court's role as a definitive arbiter for commercial disputes.

The AIFC Court includes 11 independent judges, appointed by the President of Kazakhstan, and consists of:

- a court of first instance (including a small claims court offering a fast-track procedure for claims of up to **US\$150,000**)
- a court of appeal

Chief Justice



The Rt. Hon. The Lord Burnett of Maldon

Registrar and Chief Executive, AIFC Court



Mr. Christopher Campbell-Holt

INTERNATIONAL ARBITRATION CENTRE

The IAC provides an independent and expeditious alternative to court litigation and operates to the highest international standards in its resolution of civil and commercial disputes in the AIFC. A panel of more than 50 outstanding international arbitrators and mediators from Europe, Asia, the USA, India, Singapore and Hong Kong, all with extensive experience in commercial and civil law, operates exclusively on the principles of independence, impartiality and integrity.

Arbitration awards are enforceable both domestically as orders of the AIFC Court and internationally under the 1958 New York Convention, reaffirming Kazakhstan's integration into the global legal framework.

IAC Chairman



Thomas Krümmel

Registrar and Chief Executive, IAC



The Rt. Hon. The Lord Burnett of Maldon

RECORD CASELOAD AND INTERNATIONAL REACH

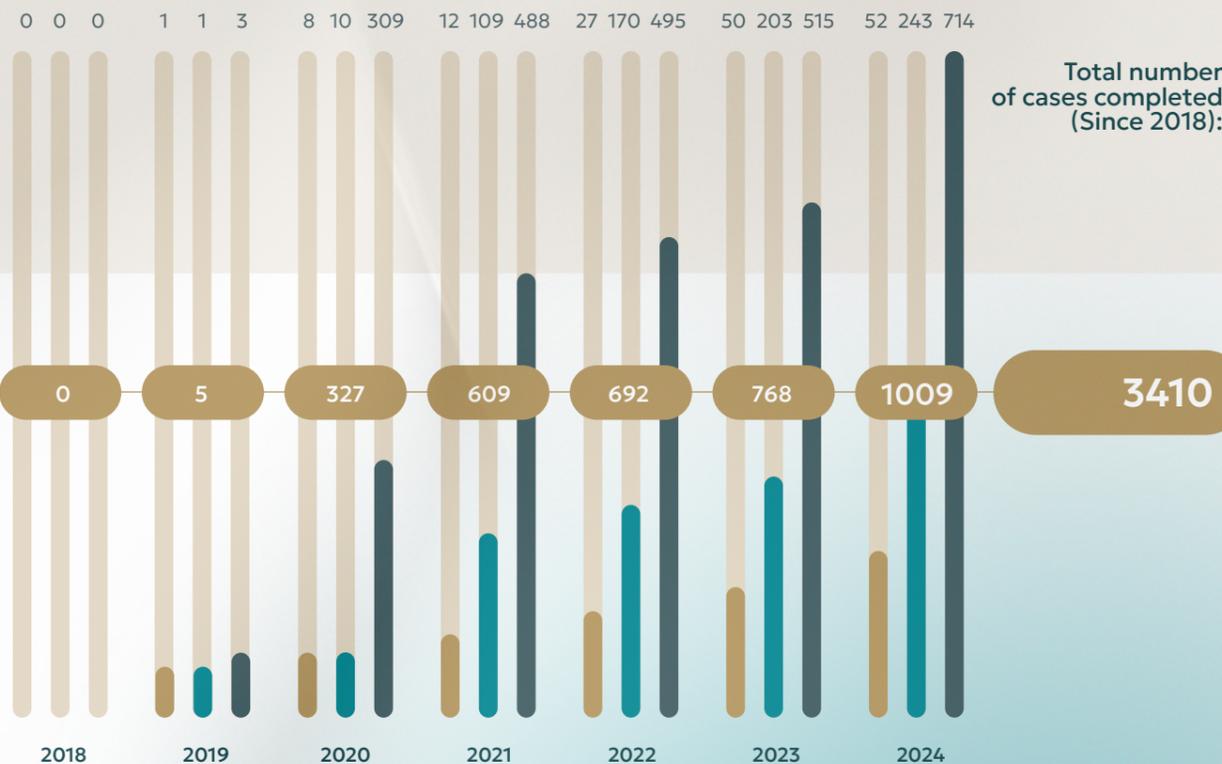
From inception to 2024, there has been a notable increase in total cases handled annually, peaking in 2024 at 1,009 cases. This caseload comprised 54 court judgments and 955 concluded arbitration/mediation matters (including 241 arbitration awards and 714 mediation settlements). The disputes involved parties from 32 countries spanning Central Asia, Europe, East Asia, and North America – all doing business in Kazakhstan.

The Rt. Hon. Lord Cameron, former UK Prime Minister, and current UK Secretary of State for Foreign, Commonwealth, and Development Affairs:

“The AIFC Court has ... successfully resolved over two thousand disputes in just a few years. Openness and the rule of law attract investment. I am delighted that others in the [Eurasia] region are now interested in a similar model.”

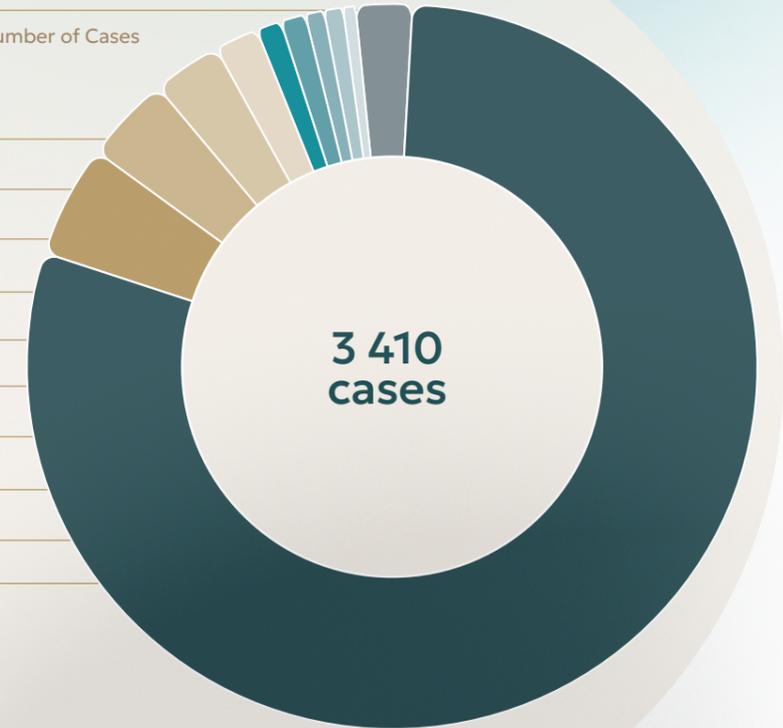
AIFC COURT & IAC CASES COMPLETED

● AIFC COURT JUDGMENTS ● IAC ARBITRATION AWARDS ● IAC MEDIATION SETTLEMENTS



TOP COUNTRIES BY NUMBER OF CASES

Country/Region	% of Total Number of Cases
KAZAKHSTAN	79.3
RUSSIA	5
UZBEKISTAN	3.8
TURKEY	3.2
TAJIKISTAN	1.8
UKRAINE	1.3
KYRGYZSTAN	1.1
AZERBAIJAN	0.8
CHINA	0.7
BELARUS	0.5
OTHER INC USA, UK, GERMANY, INDIA, UAE, JAPAN, AND ETC	2.5



Kazakhstan clearly leads, representing 79% of all disputes, which underscores the importance of the AIFC Court and IAC within the domestic business landscape.

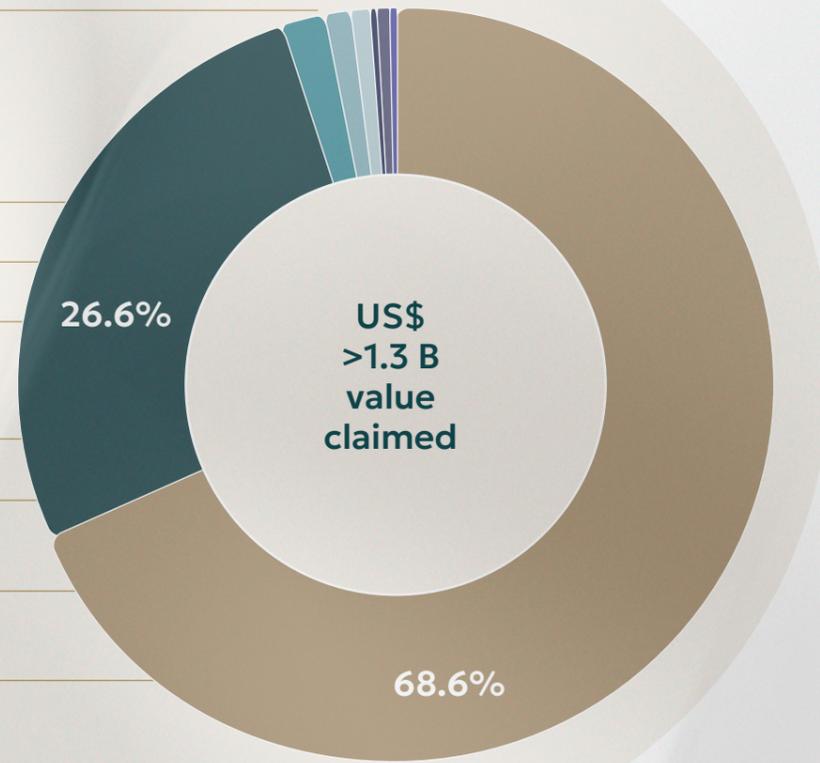
Russia, Uzbekistan, and Turkey are substantial regional contributors, reflecting the institutions' attractiveness and operational significance throughout Eurasia.

The involvement of leading global economies (such as China, the U.S., and major European nations) illustrates an expanding global trust and confidence in the AIFC's

international legal standards and dispute resolution capabilities. These figures collectively affirm the AIFC Court and IAC's successful positioning as an internationally recognised dispute resolution hub, attracting diverse participation and underpinning cross-border economic integration and investor assurance in the region.

TYPES OF CLAIMS (SINCE 2018)

Types of claims	%
GENERAL COMMERCIAL CONTRACTS	68.6
FINANCE & BANKING	26.6
CONSTRUCTION & PPP	1.9
ARBITRATION REWARD RECOGNITION & ENFORCEMENT	1.2
PROPERTY	0.6
AIFC EMPLOYMENT REGULATION	0.5
COMPANY AMALGAMATION	0.4
ARBITRATION AWARD SET ASIDE	0.2



Notably, model AIFC dispute resolution clauses were incorporated into more than 11,000 business contracts by the end of 2024, reflecting deep confidence in these forums for governing commercial relationships.

To manage the remarkable growth without sacrificing service quality, the Court and IAC strategically leveraged advanced digital infrastructure, particularly expanding their innovative eJustice platform. Over 90% of the year's caseload benefitted from electronic case filings, digital document management, and secure virtual hearings, enabling smooth, uninterrupted operations regardless of geographical limitations or external disruptions. Judges, arbitrators, and mediators routinely utilised secure video conferencing technology, streamlining processes and significantly reducing time and cost for all parties involved.

Moreover, the institutions proactively addressed operational challenges related to increased complexity and higher claim values (up to US\$330 mn per dispute), by optimizing case-scheduling systems and effectively balancing judicial workloads. At any given time, 40–50 cases were simultaneously under active management, ensuring timely resolution and preventing case backlog.

The total value claimed across disputes handled has exceeded US\$1.3 bn, illustrating not only the rising volume but also the growing significance, complexity, and scale of disputes resolved within the AIFC framework.

ENFORCEMENT AND INVESTOR TRUST

All judgments and awards rendered in 2024 were enforced throughout Kazakhstan with a 100% satisfaction rate using the AIFC Court's streamlined enforcement procedure.

AIFC Court judgments have also been voluntarily recognised and enforced overseas including in the UAE, Turkey, and South Korea, demonstrating international trust in the AIFC's decisions.

The growing legitimacy of the Court and IAC is further evident from the expanding community of legal professionals engaging with

them: as of 2024, 693 lawyers from 34 countries are registered to practice at the AIFC Court (holding rights of audience). This represents a significant increase in the advocacy pool (up from 571 lawyers from 32 jurisdictions in 2023), ensuring parties have access to a diverse range of local and international counsel.

693 LAWYERS REGISTERED FOR RIGHTS OF AUDIENCE

Top 10 Countries

34 countries

1		KAZAKHSTAN 445 lawyers
2		UK 107 lawyers
3		CHINA 37 lawyers
4		RUSSIA 24 lawyers
5		US 18 lawyers
6		INDIA 13 lawyers
7		AUSTRALIA 6 lawyers
8		SINGAPORE 6 lawyers
9		UAE (DUBAI) 5 lawyers
10		TURKEY 4 lawyers

CAPACITY BUILDING AND TRAINING

AIFC's dispute resolution framework was complemented by an active Training Centre, which functions under the Court and IAC. In 2024, the Training Centre delivered 12 interactive skills-based programs on topics ranging from advocacy in international courts to effective arbitration techniques. Over 1,300 professionals (lawyers, in-house counsel, and experts) were trained and accredited through these programs during the year.

Flagship events like the IAC Eurasia Arbitration Week co-hosted with Herbert Smith Freehills LLP attracted speakers from 15 countries and 200+ participants, fostering knowledge exchange on the latest trends in arbitration. Other notable initiatives included the Women in Arbitration Day in partnership with ArbitralWomen, and outreach sessions such as "An Audience with the Chief Justice and IAC Chairman," aimed at clarifying the AIFC Court's procedures for the business community.

Investment in youth was also prominent: the 4th Annual IAC Central Asia Vis Pre-Moot in collaboration with the U.S. Department of Commerce engaged 40 student teams from 29 countries, and the first-ever AIFC Court & IAC High Schools' Open Day introduced 100 Kazakhstani students to modern dispute resolution. Through these educational and capacity-building efforts, the AIFC Court and IAC not only enhanced the competencies of those who use their services but also cultivated the next generation of legal talent in the region. This strategic focus on training and outreach ensures a sustainable ecosystem around the Court and IAC, with well-informed users and practitioners.

>4800 trained professionals since 2018

12

SKILL-BASED PROGRAMS

+1300

TRAINED PROFESSIONALS IN 2024

GLOBAL ENGAGEMENT

By 2024, the AIFC Court and IAC had firmly established themselves on the world stage, garnering significant international recognition for their excellence and partnerships. A major acknowledgment came from the London Commercial Courts Report 2024, which cited the AIFC Court and IAC as emerging leaders in the dispute resolution landscape. This inclusion in a prominent global report highlights the growing stature of the AIFC's institutions among established judicial institutions.

Another milestone in 2024 was the global expansion of the AIFC Court and IAC's footprint – notably the launch of AIFC Court & IAC Beijing, a world-class physical and digital facility in China, which joined the institutions' network of ten other representative premises across nine countries. This expansion exemplifies their rising profile and commitment to accessibility.

The year also marked an expansion of formal collaborations. The AIFC Court and IAC have signed over 100 MOUs with local, regional, and international bodies to date, including 35 new agreements in 2024 alone with leading dispute resolution institutions and professional associations worldwide. These partnerships span continents – from agreements with arbitration centers in Europe and Asia to cooperation pacts with law societies and universities – reflecting a broad commitment to knowledge exchange and mutual support. Such collaborations enhance the AIFC institutions' credibility and ensure they remain aligned with global best practices. For instance, a new cooperation

established in 2024 with the Istanbul Arbitration Centre and the Istanbul-based Energy Disputes Arbitration Centre has strengthened ties with a key jurisdiction (the Republic of Türkiye) and its legal community. Similar outreach in China, Central Asia, and the Middle East has positioned the AIFC Court and IAC as integral players in the international network of commercial courts and arbitral centres and reinforced their position as the dispute resolution venue of choice in the Eurasian region.

The AIFC Court's and IAC's strategic plans for 2025 are aligned to Kazakhstan's investment attractiveness priorities and include further initiatives to support the attraction of investment to Kazakhstan from China, Turkey, the wider Eurasia region, and the rest of the world. In 2025, case volume is expected to continue to increase. Reputation as the preferred international dispute resolution institutions in Eurasia, and as the 'deal breakers' for final decisions to invest in Kazakhstan, is expected to be further enhanced.

Besides Astana, there are 10 world class physical premises and digital technology of AIFC Court and IAC:

- **Armenia** (Yerevan),
- **Azerbaijan** (Baku),
- **China** (Beijing)
- **Georgia** (Tbilisi),
- **Kazakhstan** (Almaty)
- **Kyrgyzstan** (Bishkek),
- **Tajikistan** (Dushanbe),
- **Turkey** (Istanbul),
- **Turkmenistan** (Ashgabat),
- **Uzbekistan** (Tashkent)

Matthew Kirtland,
Co-Managing Partner,
Norton Rose Fulbright (USA):

“

“It has a very good system of adjudication with great staff and facilities in a way that is very attractive to investors in the region ... It is a very good alternative to London and Paris”

FORWARD-LOOKING REGULATION



The Astana Financial Services Authority (AFSA) serves as the independent regulator of the AIFC, established under constitutional law to oversee financial services and related activities within the Centre. AFSA's mandate encompasses the authorisation, registration, and supervision of financial firms and market institutions in the AIFC, ensuring that only qualified firms and fit-and-proper persons operate in this jurisdiction.

As a regulator, AFSA creates a fair, transparent, and conducive business environment by enforcing AIFC regulations and upholding market integrity. It aligns its regulatory framework and standards with international best practices to promote financial stability and attract global investors. In line with this mandate, AFSA actively contributes to financial-system soundness and transparency – for example, by adhering to global norms in anti-money laundering and joining international bodies like IOSCO, Banking Supervisors from Central and Eastern Europe (BSCEE) and the International Association of Insurance Supervisors (IAIS) to benchmark its practices. This commitment to high standards and independent oversight underpins investor confidence in the AIFC and supports the Centre's development as a reputable financial hub.

KEY STRATEGIC AREAS IN 2024



Angela Knight CBE,
Chairperson of the Board
of Directors



Evgeniya Bogdanova,
Chief Executive Officer

Enhancing the digital asset ecosystem:

The AFSA has prioritised the development and expansion of a digital asset ecosystem, reflecting its commitment to fostering innovation, efficiency and security in the financial landscape.

Refining fund and asset management frameworks:

This initiative streamlines and enhances regulatory structures, contributing to the overall effectiveness and integrity of fund and asset management activities.

Capital market development:

The AFSA has actively pursued collaboration to foster more extensive and advanced capital market development. This strategic focus underlines the AFSA's commitment to creating a robust and well-functioning capital market ecosystem.

POLICY DEVELOPMENT

In 2024, AFSA implemented substantial enhancements to its regulatory framework, reinforcing alignment with international regulatory standards and responding effectively to the evolving requirements of the financial services industry within the AIFC. AFSA comprehensively reviewed and updated 17 regulatory acts (further details on regulatory updates can be found in Appendix 2), underscoring its dedication to regulatory precision and excellence.

EXPANDED REGULATORY FRAMEWORK

In 2024, AFSA broadened the AIFC’s regulatory regime with new frameworks for emerging business models and instruments. Notably, it introduced tailored regulations for family offices, corporate treasury centers, and venture studios, providing these entities with a clear pathway to establish in the AIFC. At the same time, AFSA launched a framework for the issuance of green and sustainability-linked bonds and sukuk, setting the stage for sustainable finance products within the Centre. To keep the overall rulebook up to date, AFSA also amended existing AIFC regulations – for example, extending oversight to tokenised commodities and investments and refining rules for multilateral and organised trading facilities. These developments ensure that the AIFC’s regulatory environment remains comprehensive and in line with innovative global market trends, while maintaining robust investor protections.

ESG AND SUSTAINABLE FINANCE INITIATIVES

In line with global trends, AFSA took notable steps to support green and sustainable finance. A dedicated AIFC ESG Debentures regulatory framework became effective in October 2024, establishing minimum standards and requirements for issuing green and sustainability-linked debt instruments (including sukuk). This framework provides clear guidelines to issuers on classification and disclosure, making it easier to bring green bonds to market while helping investors identify credible sustainable investment opportunities. AFSA’s initiative is expected to stimulate capital flows into climate-friendly projects by giving the market confidence in the integrity of AIFC-listed green instruments. Complementing this, AFSA’s earlier guidance on voluntary ESG disclosures encourages companies and financial institutions in the AIFC to report on sustainability metrics in a transparent manner. By embedding ESG considerations into its regulatory agenda, AFSA in 2024 laid the groundwork for the AIFC to emerge as a regional centre for green finance and responsible investment, aligned with international principles (such as the ICMA Green Bond standards and UN SDGs).

STRENGTHENING OVERSIGHT AND BEST PRACTICES

Alongside new frameworks, AFSA enhanced several core regulatory standards in 2024. Amendments were introduced to the Anti-Money Laundering, Counter-Terrorist Financing, and sanctions compliance rules to address evolving risks. The insolvency regime was refined to improve clarity and creditor protections. AFSA also upgraded sectoral regulations governing derivatives trading, asset management, and credit rating agencies, incorporating global best practices into the AIFC context. In addition, a simplified regulatory framework for low-risk financial services businesses was rolled out to proportionately ease compliance for smaller firms.

REGISTRATION, AUTHORISATION AND RECOGNITION

The progressive regulatory developments in 2024 translated into strong market growth across the AIFC. AFSA’s effective oversight and facilitative approach led to a sharp increase in the number of market participants and financial activities within the Centre:

GROWING PARTICIPANT INTEREST

AFSA registered a record number of 1,174 new participant companies in 2024 – almost double the new registrations from the prior year – bringing the total number of firms in the AIFC to over 3,500, spanning 84 countries including the US, UK, China, Türkiye, and Singapore. The year 2024 saw dynamic growth in the AIFC’s financial sector under AFSA’s supervision, with several key metrics reaching all-time highs. This expansion reflects the strong appeal of the AIFC platform and the investor trust in its regulatory environment.

Likewise, AFSA issued 49 new licences to financial services firms (a 100% increase over 2023), raising the total number of AIFC-licensed financial institutions to 126 by year-end. These includes banking, insurance, asset management, securities brokerage, fintech, and Islamic finance institutions. Notably, over one-third of the licensed firms are in fund and wealth management, highlighting AIFC’s competitive edge in asset management.

An additional 21 ancillary service providers (such as law and audit firms) were authorised, pushing the total of licensed ancillary firms above 130. This influx of participants and intermediaries has diversified the Centre’s ecosystem and broadened the services available to investors.

PROFESSIONAL SERVICES COMPANIES, 2024



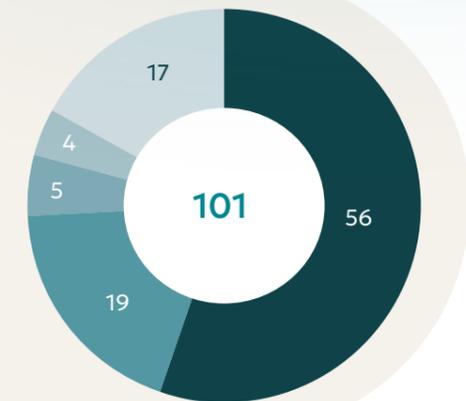
> US\$1.1 BN OF AUM

AIFC REGULATED FUNDS



AIFC REGULATED FUNDS, 2024

● HEDGE FUNDS	56
● PE	19
● OTHER FUNDS	17
● VC FUNDS	5
● REITs	4



ASSET MANAGEMENT “FIRSTS” AND AUM GROWTH

The asset management industry within the AIFC, regulated by AFSA, experienced remarkable growth in 2024. Over the past 3.5 years, assets under management (AUM) in AIFC have surged by 865%, rising from about US\$115 mn in early 2021 to over US\$1.1 bn by the end of 2024.

Even within 2024 alone, the number of collective investment funds registered in the AIFC more than doubled – from 42 at the start of the year to 101 by year-end – while the count of fund/asset managers grew from 46 to 65. This rapid expansion was enabled by AFSA’s robust yet flexible fund management framework and its efforts to attract specialist firms.

The year was marked by several industry “firsts” in the AIFC: AFSA registered the Centre’s first retail-oriented (non-exempt) investment fund, the first Shariah-compliant fund (an Islamic exchange-traded

fund), and the first umbrella fund structure, expanding the range of fund products available to investors. AFSA also, for the first time, permitted the listing of private (exempt) funds on the local stock exchange; by end-2024, three such funds were listed on Astana International Exchange (AIX) under AFSA’s regulatory approval. These milestones not only illustrate the diversification of AIFC’s financial offerings but also signal the growth of its markets – achievements sustained by AFSA’s diligent regulatory support and international-standard rules for funds and capital markets.

APPROVED INDIVIDUALS AND OTHER KEY INDIVIDUALS

AFSA recommended the approval of 235 key individuals (189 Approved, 46 Approved In-Principle) for the purposes of undertaking Controlled Functions in 2024.

To ensure that the appropriate risk and conduct culture is embedded in Authorised Firms, AFSA makes an objective assessment of the people that will manage firms’ businesses to ensure they have the right skills, expertise and experience to fulfil their roles to the standard expected by AFSA.

SUPERVISION AND ENFORCEMENT, AML/CFT

AFSA is committed to promoting the integrity and soundness of AIFC’s financial system. In supervising regulated firms, it aims to ensure that AIFC’s participating companies conduct business in a responsible and accountable manner, which contributes to sustainable financial markets within AIFC, Kazakhstan and beyond.

CAPITAL MARKETS OVERSIGHT

AIX, the sole licensed exchange operator within the AIFC, achieved a significant milestone in 2024, with its trading volume surpassing US\$1.3 bn - exceeding the total trading volume of the previous five years combined. This marks a remarkable achievement for the development of the AIFC capital market. In 2024 alone, AIX achieved a major milestone with over 100 new listings, bringing the total number of securities traded on the exchange to more than 200. This reflects the increasing interest from issuers in listing on AIX, reinforcing its role as a key listing venue for both local and international companies. This growth is driven by a robust market infrastructure and a regulatory framework that aligns with global standards.

International Trading System Ltd. (ITS), the first company that received a license from AFSA to operate a Multilateral Trading Platform (MTF), resumed its operations during 2024 after establishing an AIFC-based and AFSA-authorized clearing and settlement infrastructure. Key accomplishments include adding almost 2,900 tradable securities such as shares, depository receipts, as well as Exchange-Traded Funds, with a primary listing on the leading global exchanges such as NYSE and NASDAQ; the launch of the first AIFC non-exempt fund listed on AIX and admitted to trading on ITS (ITS World ETF), reaching a total trading volume of US\$200 mn with the highest daily turnover of US\$16 mn. ITS obtained Qualified Intermediary (QI) status from the US Internal Revenue Service (IRS), allowing reduced tax rates on income from US-registered securities.

PRUDENTIAL SUPERVISION

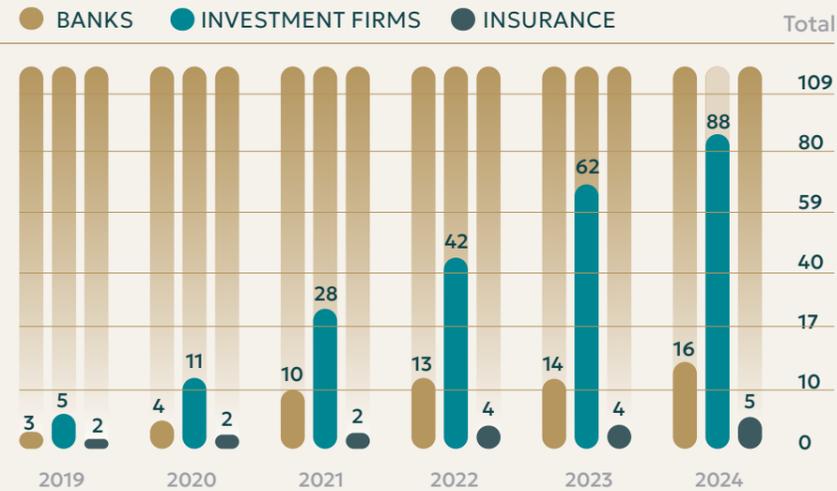
To meet its regulatory and supervisory goals and implement its principles, AFSA has developed and adopted a robust prudential regulation framework and risk-based supervision approach for banking business, insurance and investment firms based on international standards and best practices. AFSA's supervision objectives are to ensure that financial markets in the AIFC are fair, efficient and transparent.

As of the end of 2024, the total assets of 109 prudentially supervised firms reached the level of US\$1.51 bn. Compared to the previous 2023 year results the overall assets have increased by the 20%. The banking business sector is represented by 16 firms, whose assets resulted in the level of US\$997 mn (+13% within the year). The Insurance sector is comprised of 5 firms, 3 of which are captive insurers and 2

insurance intermediary firms. The total assets of the insurance sector are at the level of US\$43 mn. The investment sector in 2024 resulted in the increase of the number of Authorised Firms and their financial positions. The 2024 started for the AIFC with 62 investment firms, which increased by 26 during the reporting year. The total assets of investment firms increased by the end of 2024 to US\$474 mn (+38%).

PRUDENTIALLY SUPERVISED COMPANIES

Total assets: **\$1.51B**
+20% increase compared to 2023



ENHANCED SUPERVISION FOR MARKET CONFIDENCE

In 2024, AFSA enhanced its supervisory approach by adopting a more proactive and risk-based framework designed to reinforce trust and maintain market integrity. AFSA conducted regular off-site reviews combined with focused on-site inspections covering a diverse range of entities, including financial services firms, asset managers, fintech startups, and professional service providers.

AFSA placed special emphasis on engaging actively with market participants, carefully examining firms' internal controls, risk management systems, and governance structures. Notable supervisory initiatives included thematic assessments of liquidity management, corporate governance practices, and cybersecurity resilience, reflecting AFSA's commitment to proactively tackling emerging market risks.

Throughout the year, AFSA completed 10 supervisory inspections. These efforts not only improved compliance practices among regulated entities but also reinforced the confidence of investors and stakeholders in the regulatory framework.

ENFORCEMENT ACTIONS DRIVING MARKET DISCIPLINE



FATF/EAG Mutual Evaluation Report



International association of insurance supervisors (IAIS)



IOSCO recognition of the AFSA Supervisory Framework

AFSA's enforcement activities in 2024 continued to reflect its unwavering commitment to fairness, transparency, and effective deterrence. AFSA diligently pursued enforcement measures against breaches, including unauthorised financial activities, market manipulation, AML violations, and failures to adequately protect investors.

During the year, AFSA undertook 10 enforcement actions. Prominent cases included firm actions against unauthorised operations by unlicensed entities

clearly communicating AFSA's zero-tolerance stance towards regulatory breaches.

To enhance clarity and consistency in its approach, AFSA introduced a structured and transparent framework, ensuring predictability in enforcement outcomes. AFSA regularly communicated enforcement results and lessons learned to the market, supporting an informed regulatory environment and promoting better compliance practices among participants.

THOROUGH AML AND SANCTIONS COMPLIANCE.

In 2024, AFSA significantly intensified its efforts in combating money laundering (AML) and terrorism financing (CFT), aligning its compliance framework closely with the latest global standards set by the Financial Action Task Force (FATF). Extensive updates and enhancements to AML/CFT and sanctions regulations were made, reflecting international best practices to address emerging threats.

AFSA targeted its AML supervision more rigorously towards high-risk sectors, including digital asset providers, banks, and asset managers. AFSA conducted a detailed AML review during 10 supervisory inspections and 2 pre-graduation inspections, leading to substantial improvements in regulated entities' internal controls and risk management practices.

Reflecting the importance of global collaboration, AFSA strengthened its cross-border cooperation by actively exchanging critical information with international counterparts through established agreements. This collaboration significantly contributed to identifying and mitigating potential AML risks within the AIFC.

By strengthening supervision, implementing targeted enforcement actions, and rigorously enforcing AML compliance, AFSA significantly boosted the resilience, security, and integrity of the AIFC financial ecosystem throughout 2024.

The year also saw significant growth in AIFC's market infrastructure and international recognition.

17 Recognised jurisdictions
57 MoUs

In 2024, AFSA actively organised and supported key events such as Astana Finance Days, Disaster Risk Financing and Insurance Conference (in partnership with the World Bank), and the AIFC Community: 2024 Business Wrap-up.

INTERNATIONAL OUTREACH

AFSA recognised 12 new jurisdictions as equivalent in 2024 – including the UK, USA, EU member states, Singapore, UAE financial centers, Qatar, and others – bringing the total to a 17 jurisdictions. This equivalence framework means that financial institutions from these jurisdictions can be fast-tracked for recognition in AIFC, given the compatibility of regulatory regimes. It streamlines the onboarding of financial market infrastructures (trading platforms and clearing and settlement institutions), qualified potential market participants (brokers) and foreign fund managers by eliminating duplicative compliance gaps, thereby encouraging cross-border activity.

AFSA also signed cooperation agreements with several foreign regulators during the year particularly El Salvador's digital asset commission, the Central Bank of Azerbaijan, Turkey's insurance regulator, and Sweden's Finansinspektionen to deepen regulatory collaboration.

By end-2024, AFSA had a network of 57 MoUs and bilateral agreements. These partnerships and recognitions not only underscore AFSA's credibility internationally, but also expand market access for AIFC participants, cementing Astana's position as an emerging global financial hub.

PUBLIC OUTREACH

These events facilitated financial literacy, sustainable investment discussions, international collaboration, and networking among market participants, further enhancing the AIFC's reputation as a leading global financial hub.

To continue the tradition of using Town Halls to facilitate open communication and transparency between AFSA and stakeholders four Regulatory

Town Hall meetings was conducted throughout 2024. AIFC Participants were presented the upcoming regulatory changes in Derivatives framework, Venture studio framework, Family Offices framework, ESG Debentures framework, ESG disclosure guidance, Tokenised Commodities framework, Credit Rating Agencies framework, Derivatives framework and etc.

DIGITAL TRANSFORMATION AND EFFICIENCY

AFSA made significant strides in digitalising its own regulatory processes to improve efficiency and service quality. The AFSA's fully online company registration system, launched in previous years, won the Corporate Registers Forum's Innovation Award in 2023 for its effectiveness.

Building on this foundation, in 2024 AFSA introduced further digital post-registration services, allowing companies to electronically register share transfers or changes in capital – tasks that previously required paperwork. As a result, processing times for certain corporate actions have dropped from 7-10 days to just 1-5 business days. More broadly, AFSA's Digital Resident portal now enables 98% of all company registration filings to be submitted online, with many routine approvals

completed within hours. This high level of process automation (reducing incorporation time from up to 5 days to as little as 3 hours) has enhanced the ease of doing business in the AIFC. By streamlining regulatory interactions, AFSA not only increases its operational efficiency but also delivers a better experience for AIFC participants, aligning with international standards of modern regulatory service delivery.



A HUB FOR ISLAMIC FINANCE

The AIFC remains committed to advancing Islamic finance as a key pillar of its diversified financial ecosystem. With the support of international organisations such as the Asian Development Bank (ADB), IsDB, IFSB (Islamic Financial Services Board), AAOIFI (Accounting and Auditing Organization for Islamic Financial Institutions) and CIBAFI (General Council for Islamic Banks and Financial Institutions), a favourable legal and regulatory framework has

been established. This framework covers Islamic banking, non-banking financial services, Islamic funds, Takaful (Islamic insurance), and other Shariah-compliant financial activities, in line with best international practices and standards.

As of the end of 2024, more than 25 Islamic financial and non-financial institutions from Kazakhstan, Qatar, Malaysia, Bahrain, Pakistan and other countries are registered at the

AIFC, including providers of Islamic banking services, Islamic finance companies, Shariah-compliant asset management firms, Islamic rating agency services, brokerage and law firms specialising in Islamic finance, Shariah advisory companies.

The Centre continues to foster international partnerships and capacity-building programmes, reinforcing its role in promoting ethical and sustainable finance across Central Asia and beyond.

AIFC PARTICIPANTS MAP 2024

1 593 Companies

Involve foreign investors
(45% of all AIFC Participants)

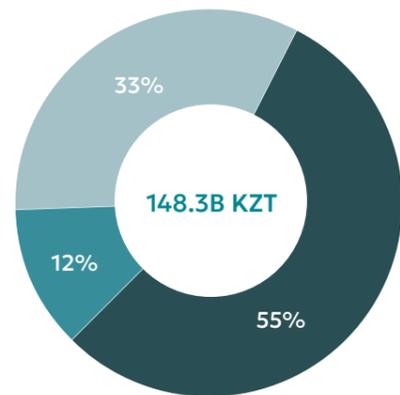
3 539 Companies

Total number of companies
registered in the AIFC
(AIFC Participants)



TAXES PAID BY AIFC PARTICIPANTS

Breakdown by Type of Company



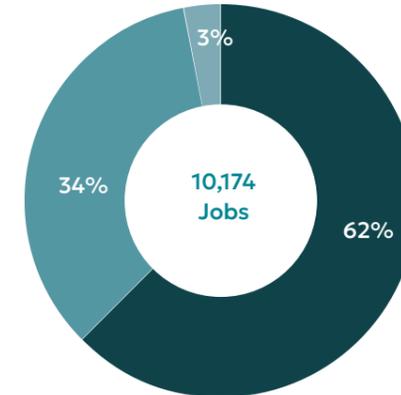
- OTHER COMPANIES — 55%
- FINANCIAL COMPANIES — 33%
- PROFESSIONAL SERVICES COMPANIES — 12%

Industry Breakdown of Other Companies



JOBS CREATED BY AIFC PARTICIPANTS

Breakdown by Type of Company



- OTHER COMPANIES — 62%
- FINANCIAL COMPANIES — 34%
- PROFESSIONAL SERVICES COMPANIES — 3%

Industry Breakdown of Other Companies





FACILITATING CAPITAL MOBILITY

Capital markets form the essential foundation of modern economies. They foster innovation, create wealth, and channel crucial investments into transformative projects that shape societies. For Kazakhstan and the wider Central Asian region, the establishment of the AIFC in 2018 was a defining step towards aligning with global financial standards, unlocking economic potential, and accelerating sustainable growth.

Central to this ambitious initiative stands the Astana International Exchange (AIX)- a vibrant platform that has quickly become integral to Kazakhstan’s journey towards financial leadership in Eurasia. Serving not only as the national centrepiece of capital market development but also as a strategic bridge connecting Eurasian economies to global financial networks, AIX has been instrumental in transforming the investment landscape of the region.

Reflecting AIFC’s broader vision of making Kazakhstan a regional financial hub, AIX has combined globally respected regulatory practices, state-of-the-art infrastructure, and collaborative partnerships with leading international financial institutions. Through these efforts, AIX has effectively overcome traditional barriers to capital formation, drawing a diverse group of issuers, investors, and financial intermediaries from around the world.

2024

YEAR-END RESULTS

<p>●</p> <p>256</p> <p>Securities in the AIX official list</p> 	<p>●</p> <p>140</p> <p>Securities listed in 2024</p> 	<p>●</p> <p>148</p> <p>Issuers</p> 
<p>●</p> <p>>2.0 mn</p> <p>Investor accounts opened with AIX CSD</p> 	<p>●</p> <p>1.314</p> <p>2024 annual trading volume, US\$ mn</p> 	<p>●</p> <p>471</p> <p>Capital raised via equity offering, US\$ mn</p> 
<p>●</p> <p>6.5</p> <p>Capital raised via offering debt, US\$ bn</p>		

AIX AT A GLANCE

AIX SHAREHOLDERS:



FAVOURABLE CONDITIONS FOR ATTRACTING INVESTMENT

- UK tax and customs authority 'Recognised stock exchange' status, which means UK pension funds and other investors can invest on it
- FTSE Frontier Index Series trading venue
- UKLA and DIFC AIX Rules incorporate best practices and expertise from the UK Listing Authority (UKLA) and Dubai International Financial Centre (DIFC)
- ESMA recognises the AIX as an eligible third-country trading venue to ensure MiFID II / MiFIR transparency compliance

EASY CAPITAL MARKET ACCESS

- Quick and simple listing and cross-listing procedures for issuers
- Brokers have the option to trade on the AIX using the recognition process, without an AIFC license
- 16 custodians including Citibank Kazakhstan
- 9 major global custodians have acquired access to the AIX CSD via Citibank
- 53 local and international brokers (Kazakhstan, China, UAE and Europe)

WORLD-CLASS INFRASTRUCTURE

- Vertically integrated trading and settlement structure (Euroclear, Citi)
- Thomas Murray "A+" rating (low risk) for the AIX Central Securities Depository
- Swift Alliance Cloud The AIX was one of the first financial institutions to acquire access to the Swift Alliance Cloud1 for seamless direct integration with the global Swift network

ROBUST SECURITY

- NASDAQ trading platform
- Amazon Web Services cloud based trading platform
- Global information and cybersecurity ISO 27001, ISO 27032, ISO 27018 and ISO 27017 certificates

CUSTOMER-FIT OPPORTUNITIES

AIX is a dynamic, versatile, and customer-oriented financial platform designed to cater to a wide range of investors and issuers. AIX offers a diverse array of specialised market segments, ensuring flexibility, accessibility, and tailored solutions for businesses of all sizes and industries.

Whether it is a medium-sized enterprise, a mining company, or a large corporation, AIX provides innovative and cost-effective tools to meet the funding and investment needs. Below is a summary of the dedicated market segments:

EQUITY		
Market Segment	Description	Key Benefits
REGIONAL EQUITY MARKET SEGMENT (REMS)	Supports mid-sized businesses in Kazakhstan & Central Asia with simplified, cost-effective equity listings.	Reduced listing costs, streamlined regulatory requirements.
BELT AND ROAD MARKET SEGMENT (BRMS)	Facilitates capital access for companies participating in China's Belt and Road Initiative (BRI).	Designed to connect issuers and investors under the BRI, to enhance cross-border funding.
DIRECT LISTING	Enables private companies to list securities with no capital raise.	No underwriters required, based on market-driven pricing.
MINING SEGMENT	Provides a specialised listing platform for large & junior mining firms, aligned with global reporting standards (JORC, NI 43-101, KAZRC).	Sector-specific regulations, exemptions for junior miners.
DEBT		
Market Segment	Description	Key Benefits
SME BONDS	Tailored for small and medium-sized enterprises (SMEs) seeking debt financing.	Reduced listing fees, streamlined approval process.
COMMERCIAL PAPERS	Short-term unsecured debt instruments issued by large corporations.	Product to effectively manage the short term liquidity needs
LIQUIDITY MANAGEMENT PROGRAMME	Enables corporate groups to reallocate capital efficiently.	Designed to enhance intra-group financing.

RECORD MARKET GROWTH

In 2024, AIX achieved unprecedented growth across listings and trading activity. The exchange recorded 140 new listings (a record high), of which 123 were debt listings, 7 attributable to equity listings and 10 structured products, which is 2.2x higher than results shown for the entire 2023.

This included groundbreaking issuances such as Kazakhstan’s first sukuk (Islamic bond) and a debut regional green bond by a Kyrgyz issuer, showcasing AIX’s commitment to product innovation. Several international issuers from the USA, United Kingdom, UAE, Greece, and Cyprus have also joined the AIX in 2024 expanding the market’s breadth.

By the end of 2024, AIX had 256 securities listed from 148 issuers, ranging from equities and corporate bonds to exchange-traded products. This diversity of instruments and participants contributed to a vibrant marketplace. The total equity market capitalisation of the exchange has increased to approximately US\$76 bn, reflecting a year-on-year growth of approximately 22%, driven

by new listings and stock price appreciation. This growth signifies that companies listed on AIX have enhanced their value and garnered increased interest from investors over the past year. The number of active investors also rose in tandem with market growth – trading accounts in the Central Depository jumped as more retail and institutional investors engaged in AIX trading.

ROBUST TRADING ACTIVITY

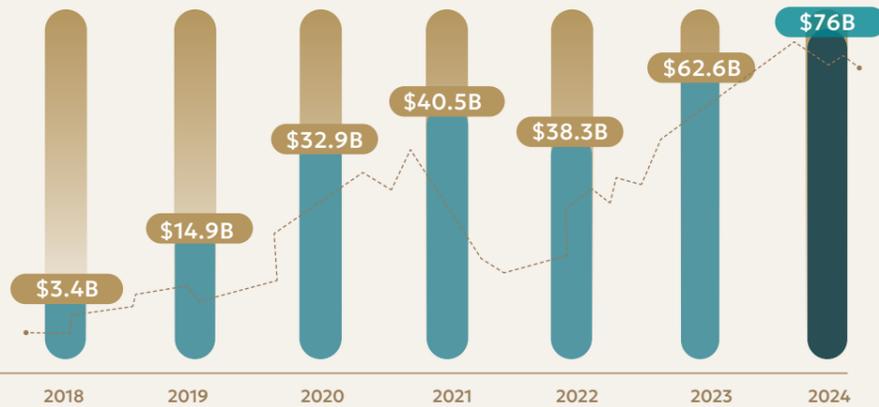
AIX’s total trading turnover more than doubled year-on-year, soaring from US\$582 mn in 2023 to over US\$1.3 bn in 2024.

This surge in activity means that 2024’s turnover alone surpassed all trading on AIX from its inception in 2018 through 2023. Equity trading was especially robust – nearly quadrupling to US\$495 mn, supported by major public offerings and active secondary trading. The AIX’s benchmark, the AIX Qazaq Index, climbed roughly 25–26% during

2024, reflecting strong price performance among Kazakhstan’s blue chips in AIX’s market. By adding major companies like KEGOC, Air Astana, and Freedom Holding Corp to the index basket during the year, the index’s coverage broadened to better represent the national economy’s key sectors.

MARKET CAPITALISATION

\$76B



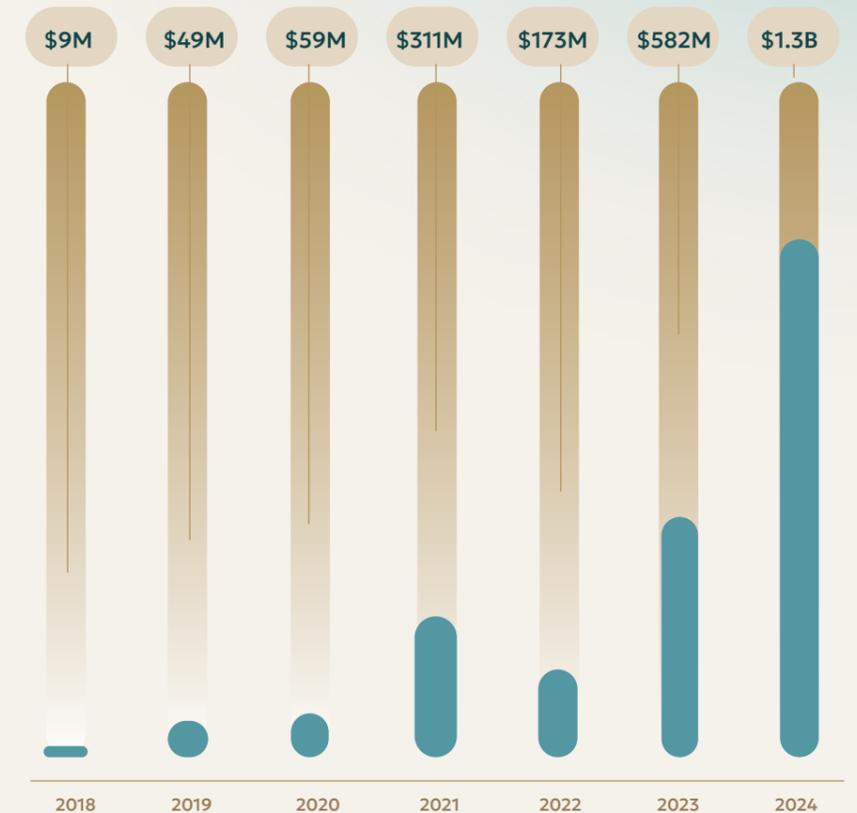
TOTAL TRADING VOLUME

\$1.3B

Trading Volume in 2024

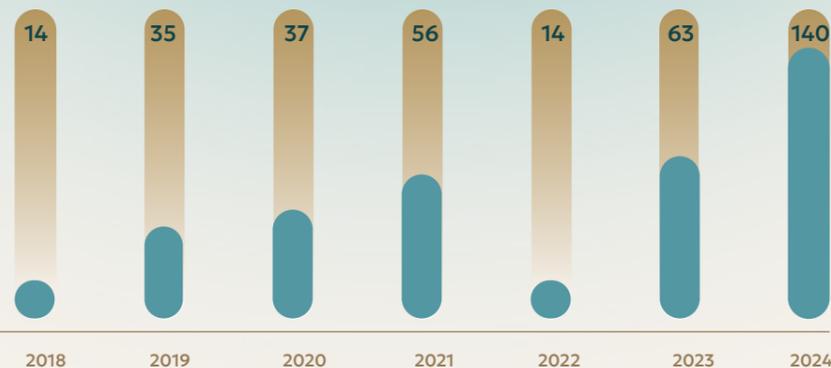
2.3x increase

Compared to 2023



NUMBER OF LISTINGS

+140
in 2024



MAJOR LISTINGS AND IPOS

AIX served as the platform for landmark equity offerings and bond issuances, marking key in the development of Kazakhstan’s capital market.

The Air Astana’s IPO in February 2024 raised approximately US\$370mn. Notably, the Kazakh content, particularly contribution of local retail investors amounted to 58% of the offering, underscoring the depth of the domestic market.

In the debt market, the Ministry of Finance’s US\$1.5 bn sovereign Eurobond dual-listed on AIX and LSE, with US\$322mn in orders arrived via AIX which affirmed the platform’s capacities to facilitate large-scale bond transactions. These milestones have directly contributed to the development and credibility of Kazakhstan’s capital markets on the global stage.

TOP-5 EQUITIES IN TERMS OF TRADING VOLUME



EQUITY CAPITAL RAISED

\$471M Total Equity Capital raised

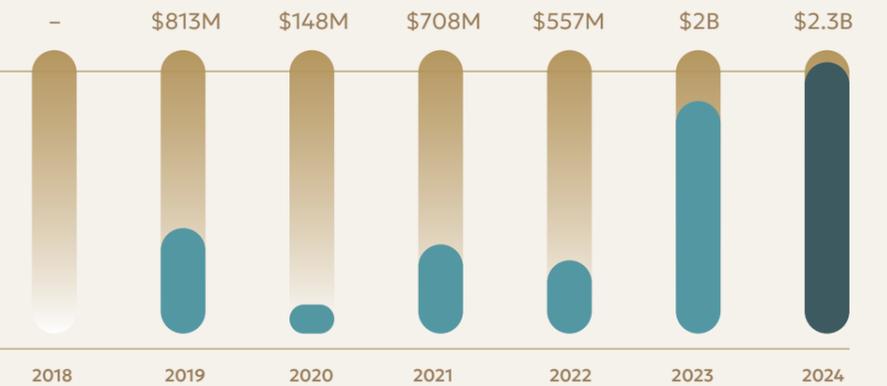
\$106M Equity Capital raised in 2024



DEBT CAPITAL RAISED

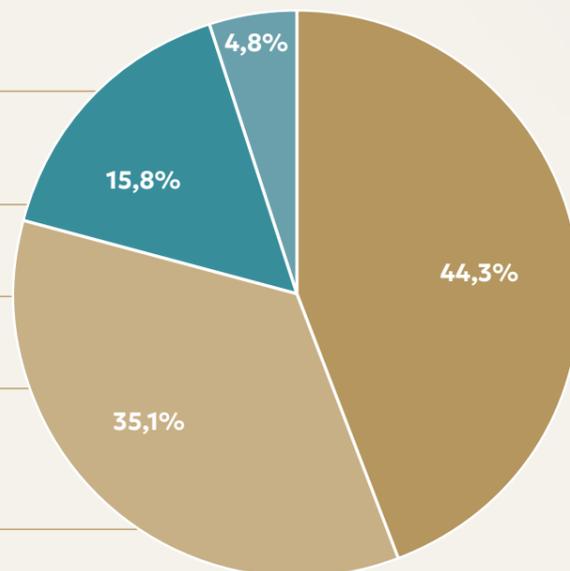
\$6.5B Total Debt Capital raised

\$2.3B Debt Capital raised in 2024



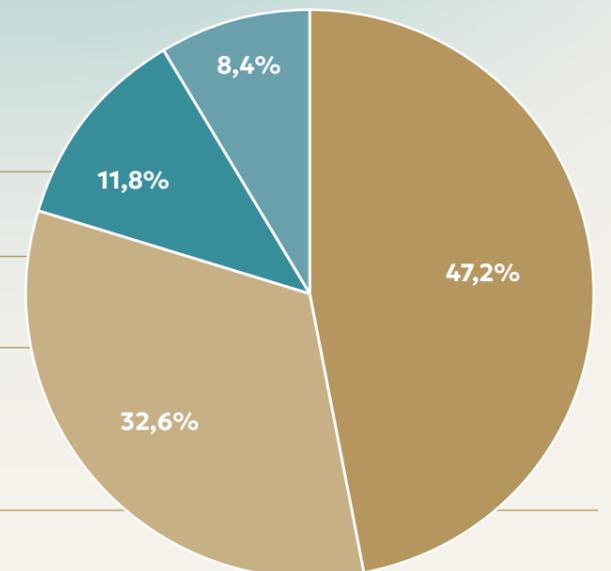
EQUITY MARKET SECTOR DISTRIBUTION

FINANCIALS	44,3%
ENERGY	35,1%
CONSUMER STAPLES	15,8%
OTHER (MATERIALS, INDUSTRIALS, UTILITIES)	4,8%



DEBT MARKET SECTOR DISTRIBUTION

FINANCIALS	47,2%
ENERGY	32,6%
INDUSTRIALS	11,8%
OTHER (COMMUNICATION SERVICES, CONSUMER DISCRETIONARY, IT, MATERIALS, REAL ESTATE)	8,4%



Kazakhstan's First Sukuk Issuance (2024)

In December 2024, Kazakhstan marked a significant milestone in its financial sector with the issuance of its first domestic sukuk. Gamma-T SPC Limited, a subsidiary of Gamma-T LLP rendering services in coal mining sector, issued the debut Sukuk on AIX structured as an Ijarah (lease-based) sukuk, the inaugural tranche amounted to approximately US\$9.6 mn, featuring a 20% coupon rate and a maturity date set for December 5, 2027.

This issuance is part of a broader US\$19.2 mn sukuk program and represents a pioneering step in integrating Islamic finance instruments into Kazakhstan's capital markets. The AIX's facilitation of this sukuk underscores its commitment to diversifying investment opportunities and aligning with global Sharia-compliant financial practices.

The successful launch of Kazakhstan's first sukuk not only diversifies the nation's financial instruments but also positions the country as an emerging hub for Islamic finance in Central Asia.

INTRODUCTION OF INNOVATIVE PRODUCTS

In 2024 AIX broadened its product suite, cementing its reputation as a regional innovator.

Notably, the exchange introduced changes to its regulations to include International Renewable Energy Certificates (I-REC) in September 2024 – a debut for the entire region- an initiative that supports Kazakhstan's sustainable energy goals. AIX also adopted a Green Equity framework in line with World Federation of Exchanges (WFE) standards, enhancing visibility for "green" issuers and giving environmentally conscious investors more information to guide their decisions. To further diversify product line, AIX facilitated the listing of funds Central Asian publicly traded Exchange-Traded Fund (ETF) and new exempt fund structures for professional investors.

Internally, market rules and infrastructure were refined to drive growth and innovation. AIX lowered the minimum free-float requirement from 25% to 10% for listings in line with the international and industry trends. The AIX Central Securities Depository (CSD) expanded its custody services to include international Euroclearable securities, offering local market participants safekeeping services at favourable terms and conditions. Additionally, the AIX Registrar business saw unprecedented growth, with 26 investment funds choosing AIX's registry services by 2024, and rolled out online portals for investor communications and proxy voting. These strategic initiatives and innovations in 2024 positioned AIX as a competitive, cutting-edge exchange, well-equipped to meet the evolving needs of issuers and investors.

Debut Regional Green Bond from Kyrgyzstan (2024)

In December 2024, PlanDeM LLC, a renewable energy developer headquartered in the Kyrgyz Republic, became the first issuer from the country to access regional capital markets through a green bond listed on AIX. The bond was issued under a Green Wholesale Bond Programme, allowing for future issuances in various currencies and maturities.

The debut tranche totaled approximately CNY 370 mn (equivalent to US\$52 mn), with 30-years maturity and a floating coupon rate of 1-year SHIBOR plus 1.7%. Coupon payments are deferred for the first ten years and commence thereafter due on a quarterly basis. The proceeds will finance a portfolio of over 1.6 GW of solar and wind power projects in Kazakhstan, Sri Lanka, Serbia, South Africa, and other emerging markets.

This landmark issuance highlights AIX's growing role as a regional platform for sustainable finance and supports the mobilisation of long-term green capital in Central Asia. It also reflects the increasing demand for ESG-aligned investments across frontier and emerging markets.

INTERNATIONAL COLLABORATIONS AND PARTNERSHIPS

In 2024, AIX actively strengthened its international linkages to enhance global connectivity and attract foreign investment.

A landmark development was AIX's integration into the Tabadul Digital Exchange Hub, a cross-border trading network initiated by the Abu Dhabi Securities Exchange. Through a partnership with Abu Dhabi Exchange, AIX joined Tabadul to enable seamless cross-exchange trading between Kazakhstan and Gulf markets. By year-end 2024, two UAE-based brokerage firms have got access to AIX market with two leading Kazakh brokers (Freedom Finance Global and Halyk Finance)

being recognised as Tabadul hub brokers, facilitating bilateral access to securities on AIX and ADX. This collaboration enhances liquidity and provides investors in each market the ability to trade listed securities across the borders in real time, significantly widening AIX's international reach.

AIX CSD ECOSYSTEM

As further confirmation of its global standing, the AIX/AIX CSD welcomed 25 new members in 2024, half of which were international companies from UAE, Oman, Cyprus, Armenia, Kyrgyzstan and Russia.

Six out of these 25 new members were set up in the AIFC, signifying a growing interest in the AIFC jurisdiction.

As of 2024 year-end, of the 64 companies connected to AIX and AIX CSD, 53 hold brokerage licenses (six offer both brokerage and custodial services), ten

are custodians and one is a central securities depository. In terms of national affiliation, 27 are represented by foreign companies, 11 are operating in the AIFC jurisdiction, and one is a multilateral institution; the remaining 25 are companies from mainland Kazakhstan.



TABYS is a mobile application designed for retail investors, offering a range of financial products, including 16 Exchange-Traded Notes (ETNs) with a starting investment slightly more than US\$1. It can be used by Kazakhstan residents over the age of 16 years.

RETAIL INVESTORS

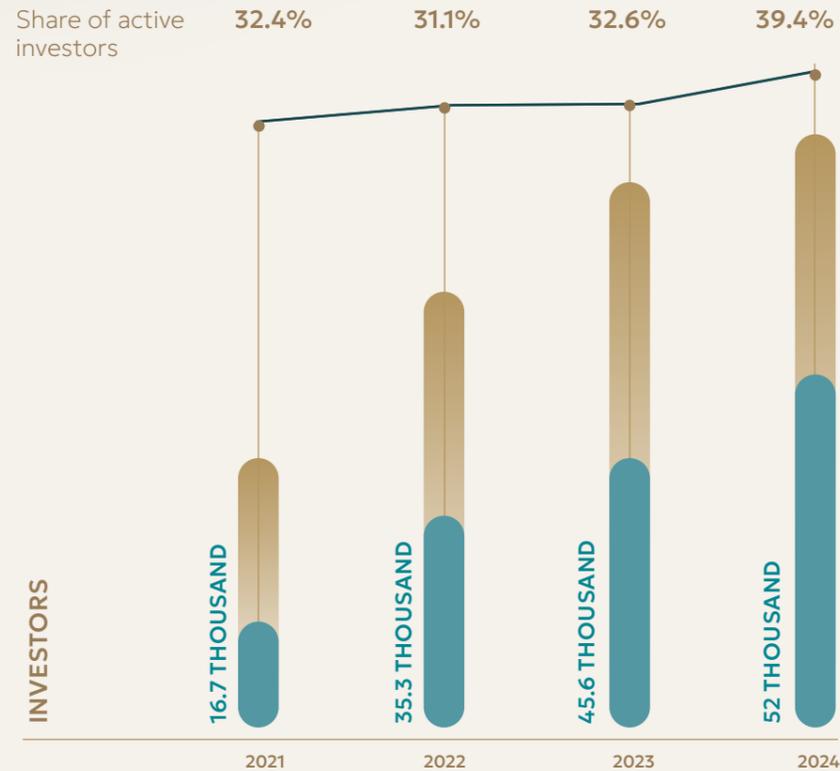
One of the AIX strategic pillars is to promote financial literacy and expand overall retail investor base to make investment in securities more accessible, ensuring informed and conscious investment decisions. In 2022, it

launched a direct IPO subscription platform, within the TABYS mobile app, which allows retail investors to purchase equity instruments from the issuers under the state Privatisation Programme.

The TABYS app, with over 52,000 investor accounts, 21,000 active users and US\$26.8 mn of turnover, broadly used in the IPOS of KazMunayGas and Air Astana and SPO of KEGOC and has become a trend-setter in investing via mobile app. In addition, in 2024, Tabys has expanded investing opportunities for its clients having introduced a direct subscription and the first bond sold

was of Solva Group Ltd., one of the largest microfinance organisations operating in the mainland China. Over the course of two weeks, retail investors submitted more than 600 applications through Tabys resulting into total nominal volume of the two-year bond issuance on AIX to reach the amount of US\$15 mn.

TABYS INVESTORS



52,000

Investors

14%

Growth in the number of investors in 2024

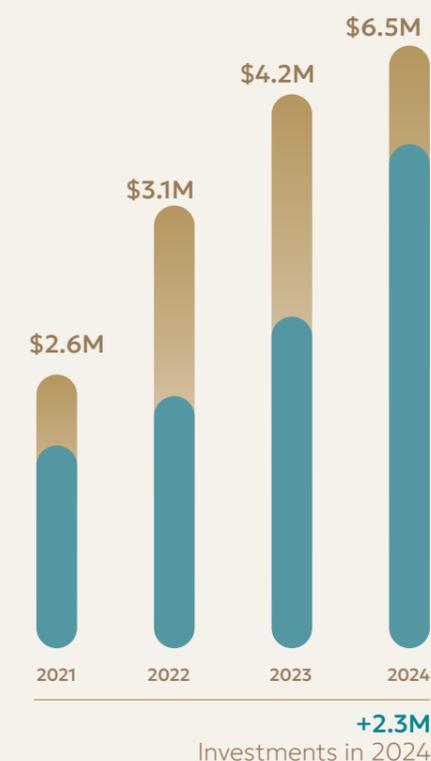
\$6.5M

Total Volume of Investments

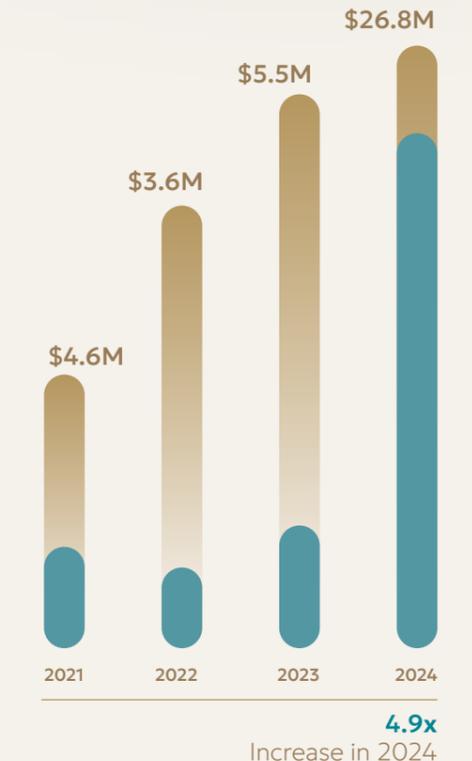
\$26.8M

Trading Volume in 2024

VOLUME OF INVESTMENTS



TRADING VOLUME





FINANCE FOR A BETTER WORLD:

A COMMITMENT TO RESPONSIBLE GROWTH

The AIFC has firmly established itself as a central institution in advancing sustainable finance in Kazakhstan and the broader Central Asian region. As the global economy transitions towards a low-carbon and ESG-driven model, the AIFC plays a critical role in aligning financial markets with sustainable growth, creating unparalleled opportunities for institutional investors, issuers, and green finance innovators.

The AIFC's commitment to market development and investor confidence has been recognised globally, with Astana ranked as a leading financial centre for green finance in Eastern Europe and Central Asia, according to the Global Green Finance Index (GGFI). This milestone reflects the AIFC's successful efforts in building a transparent, well-regulated, and investment-ready green financial ecosystem, reinforcing the Centre's role as the go-to platform for capital deployment into sustainable infrastructure, energy transition, and ESG-compliant industries. By combining world-class regulatory frameworks,

innovative financial instruments, and strategic international partnerships, the AIFC continues to attract global investors, multinational financial institutions, and forward-thinking enterprises looking to capitalise on the opportunities within the green and sustainable finance sector. As Kazakhstan advances towards its Carbon Neutrality Strategy 2060 and the Concept for transition of the Republic of Kazakhstan to a "green economy", the AIFC stands as the gateway to sustainable investment in Central Asia, setting the stage for long-term prosperity, resilience, and financial innovation.

Milestones in Kazakhstan's Sustainable Finance Landscape

2017

Adoption of the Concept of the Green Financial System, laying the foundation for sustainability-linked financial mechanisms.

2018

Adoption of the Concept of the Green Financial System, laying the foundation for sustainability-linked financial mechanisms.

2021

Adoption of the Concept of the Green Financial System, laying the foundation for sustainability-linked financial mechanisms.

2024

Adoption of the Concept of the Green Financial System, laying the foundation for sustainability-linked financial mechanisms.

AIFC GREEN FINANCE CENTRE: LEADING THE REGION'S SUSTAINABILITY TRANSITION

Global ESG Market

The global sustainable finance market continues its rapid expansion, with cumulative green, social, sustainability, sustainability-linked, and transition bonds (GSSSB) surpassing US\$6 trillion as of September 2024, according to the World Bank. Strong issuance in the third quarter of 2024 pushed total annual volumes to US\$921 bn, with green bonds accounting for 57% of total issuances.

Investor sentiment is shifting decisively towards ESG-aligned investments, with 75% of private market investors planning to divest from non-ESG products (PwC). Bloomberg projects global ESG assets to exceed US\$40 trillion by 2030, representing a quarter of total assets under management (AuM).

As sustainability standards evolve, the International Sustainability Standards Board (ISSB) has introduced globally accepted reporting frameworks, elevating the need for greater transparency and accountability. The year 2024, marked by record-breaking global temperatures, has reinforced the urgency for financial institutions and capital markets to accelerate sustainable investments.

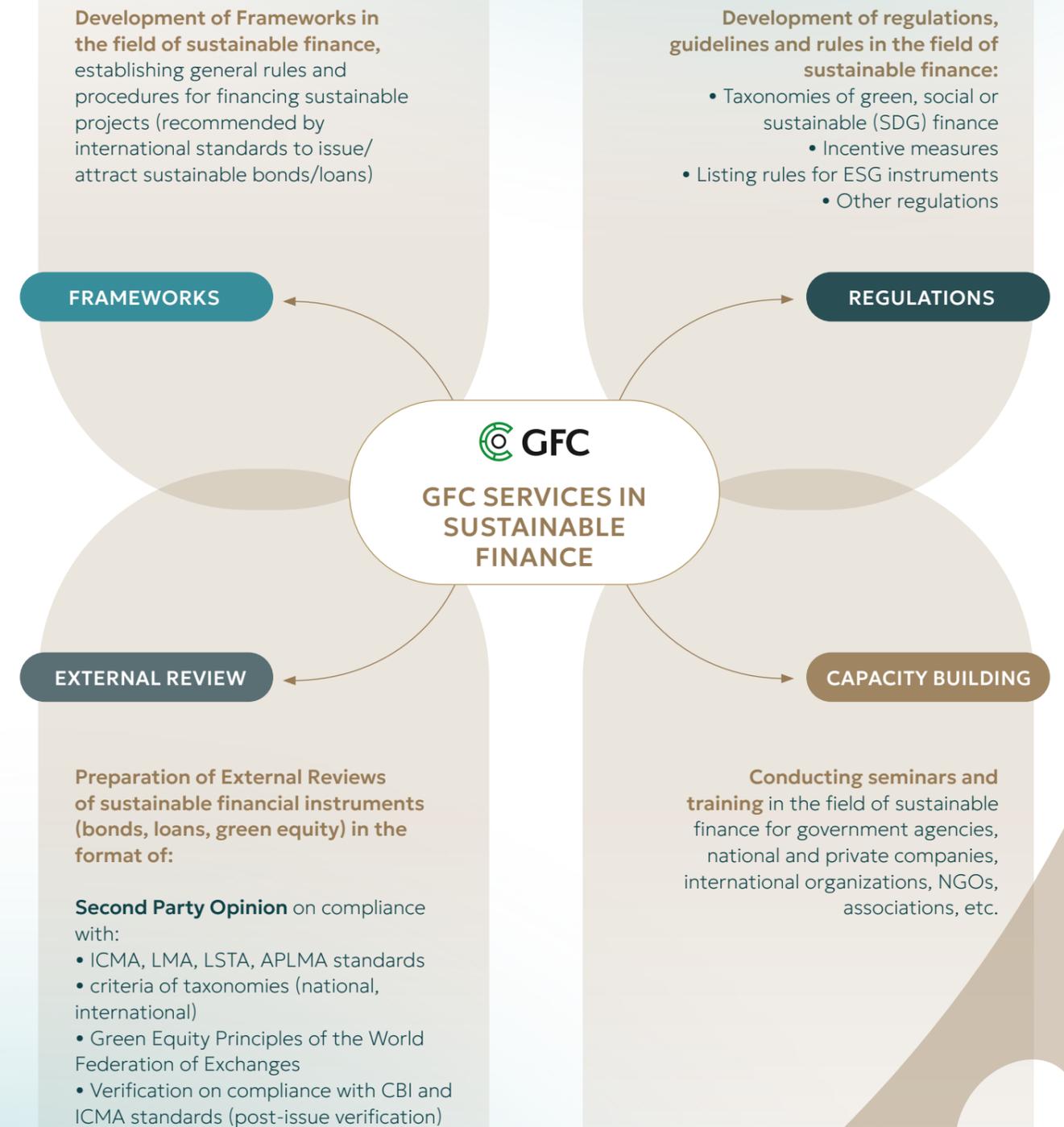
AIFC through its dedicated entity, the AIFC Green Finance Centre (GFC), has been instrumental in developing green finance policies, fostering innovative financial instruments, and providing world-class sustainability services.

GFC as the only Climate Bonds Initiative-accredited institution in the region and an external reviewer recognised by the International Capital Market Association (ICMA), has played a pivotal role in structuring sustainable finance frameworks, mobilising green capital, and shaping market standards. GFC's mission extends beyond Kazakhstan, supporting regional governments, stock exchanges, and financial institutions in developing green and sustainable finance ecosystems. Since its inception, it has led groundbreaking policy initiatives, financial market advancements, and corporate sustainability integration.

On November 6, 2024 during the 11th Summit of the Organisation of Turkic States (OTS), a historic Memorandum was signed by five member countries to establish the Turkic Green Finance Council. Proposed by Kazakhstan's President K.K. Tokayev, the initiative designates the AIFC as the Council's Secretariat, with Kazakhstan presiding as the first chair. The Council aims to accelerate the

development of green and sustainable finance markets across the OTS region, focusing on increasing ESG investments in environmentally friendly projects. Key activities include guiding the creation of strategic documents, implementing ESG reporting for public companies, and fostering regional collaboration through sustainable finance projects, training, and forums.

The AIFC, through GFC, will play a central role in supporting the Council's operations. With a proven track record - more than 70% of Kazakhstan's green bonds and loans verified by the GFC - the AIFC is uniquely positioned to drive this initiative. As the regional office for the Green Investment Principles under the Belt and Road Initiative and the only Climate Bonds Initiative-accredited verifier in Central Asia, the AIFC brings unparalleled expertise to the table. The establishment of the Turkic Green Finance Council marks a significant step forward in mobilising sustainable investments and advancing green finance across the OTS region, further solidifying the AIFC's leadership in this critical area.



TRANSFORMING KAZAKHSTAN'S FINANCIAL MARKETS THROUGH GREEN FINANCE

GFC is the 1st organisation in Central Asia accredited by the Climate Bonds Initiative and recognised by the International Capital Markets Association as an external assessment provider.

#2 leading green finance hub in Eastern Europe and Central Asia according to the Global Green Finance Index (GGFI'14), outperforming key regional players such as Prague, Istanbul, and Warsaw.

By the end of 2024, Kazakhstan's sustainable finance market had reached KZT 889 bn (US\$1.69 bn) with green securities comprising 34% of total sustainable finance transactions. Since establishment GFC facilitated KZT 442.9 bn in verified sustainable bond and loan issuances.

For the first time, in 2024, 49% of green financing was directed toward waste recycling and management projects, reflecting a diversification beyond renewable energy and clean transportation.

KEY MARKET TRENDS 2024:

 **around \$930M**
volume of sustainable finance verified*

 **+2.8m tons CO₂**
the annual amount of GHG emissions that are estimated to be avoided

 **76% of Kazakhstan's** green bond and loan issuances were externally verified by GFC.

 **Green financing** expanded into waste management, energy-efficient housing, and sustainable industrial production.

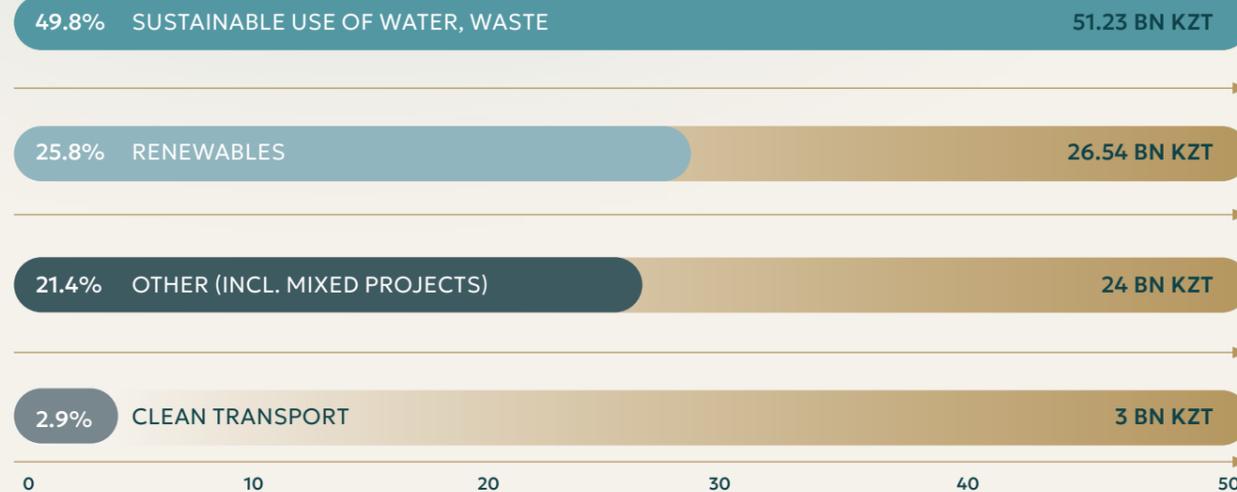
 **AIFC led the** integration of ESG disclosure requirements in banking, asset management, and insurance sectors.

 **Building Capacity** Through ESG Training – Delivering first executive-level ESG education programs for Kazakhmys, the leading mining company in Kazakhstan.

*It implies that both external reviews and verifications are prepared by GFC

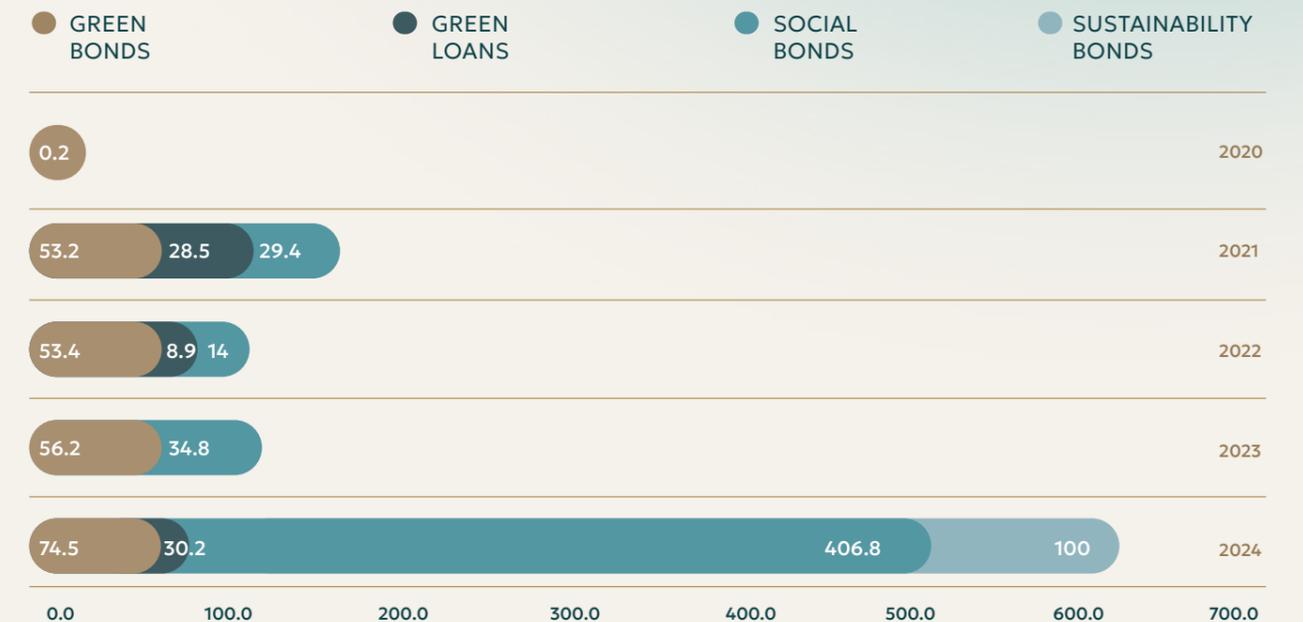
GREEN FINANCE IN 2024

104.77 BN KZT



LABELED GSS LISTED ISSUES AND LOANS IN 2020-2024 IN KAZAKHSTAN,

KZT bn (year-by-year breakdown)



REGIONAL LEADERSHIP: EXPANDING GREEN FINANCE ACROSS CENTRAL ASIA

GFC's influence extends far beyond Kazakhstan, with landmark contributions to sustainable finance development in Azerbaijan, Uzbekistan, Kyrgyzstan, Tajikistan, and the Eurasian Economic Union (EAEU).

KEY REGIONAL ACHIEVEMENTS IN 2024:

Kazakhstan: Supported the issuance of the region's first Sustainability Eurobonds, a significant milestone that enhances the credibility of Kazakhstan's sustainable finance market and demonstrates the country's commitment to integrating ESG principles into its financial ecosystem. This issuance strengthens investor confidence and sets a precedent for further green and sustainability-linked debt instruments in the region. (KZT 100 bn, US\$222.7 mn) by the Development Bank of Kazakhstan.

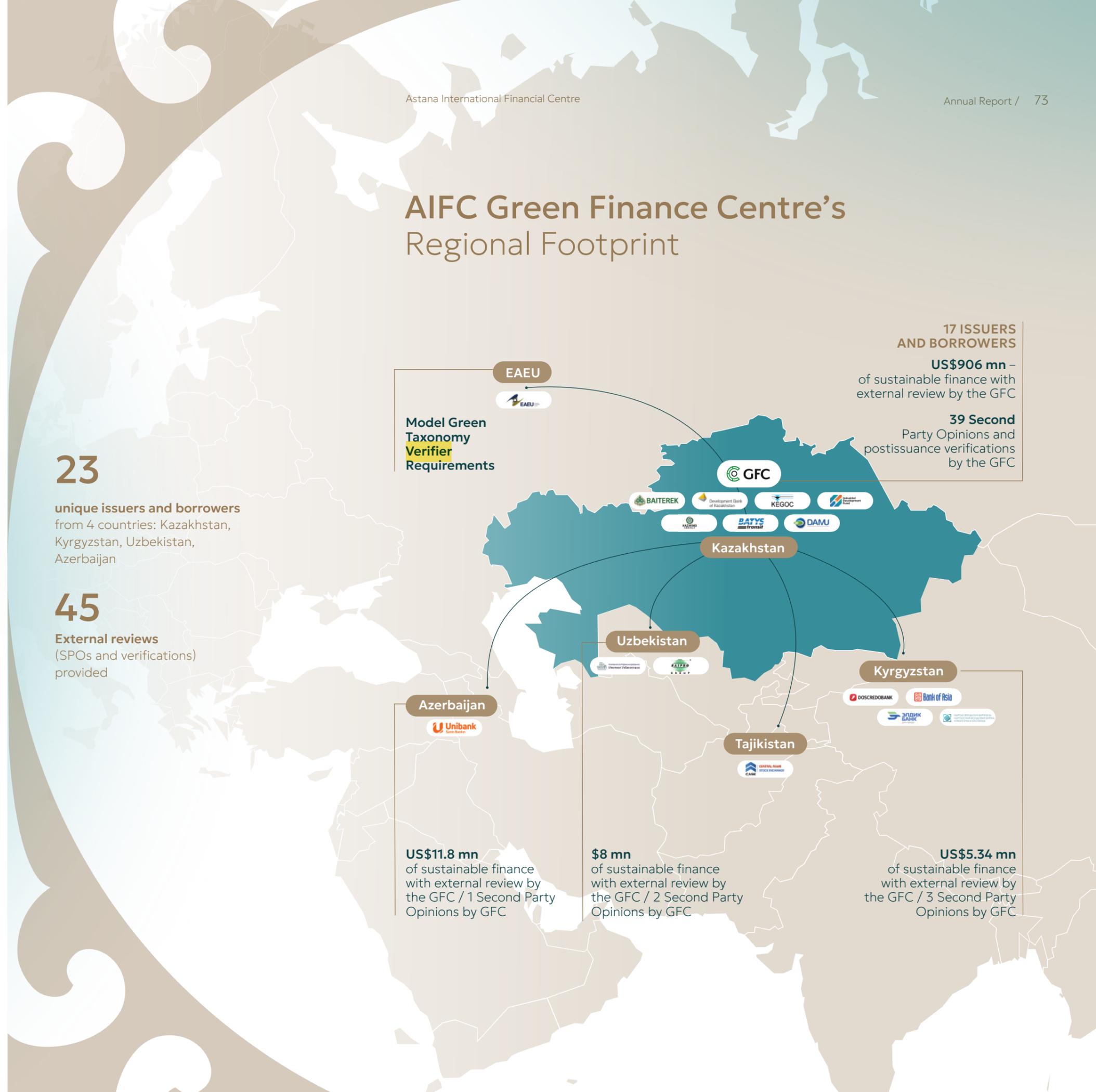
Azerbaijan: Verified the country's first-ever green bonds (AZN 20 mn, US\$11.8 mn) ahead of COP29.

Uzbekistan: Supported the issuance of the first corporate green bond (UZS 50 bn, US\$4 mn) for energy-efficient housing projects.

EAEU: Developed the Model Green Taxonomy Verifier Requirements, facilitating regional harmonization of sustainability standards.

Tajikistan & Kyrgyzstan: Assisted in structuring sovereign green bond frameworks and ESG listing requirements for their national stock exchanges.

AIFC Green Finance Centre's Regional Footprint



23

unique issuers and borrowers from 4 countries: Kazakhstan, Kyrgyzstan, Uzbekistan, Azerbaijan

45

External reviews (SPOs and verifications) provided

17 ISSUERS AND BORROWERS

US\$906 mn – of sustainable finance with external review by the GFC

39 Second Party Opinions and postissuance verifications by the GFC

EAEU
Model Green Taxonomy Verifier Requirements

Kazakhstan
GFC, BAITEREK, Development Bank of Kazakhstan, KEGOC, BATYS, DAMU

Uzbekistan
US\$11.8 mn of sustainable finance with external review by the GFC / 1 Second Party Opinions by GFC

Azerbaijan
US\$11.8 mn of sustainable finance with external review by the GFC / 1 Second Party Opinions by GFC

Tajikistan
\$8 mn of sustainable finance with external review by the GFC / 2 Second Party Opinions by GFC

Kyrgyzstan
US\$5.34 mn of sustainable finance with external review by the GFC / 3 Second Party Opinions by GFC

STRATEGIC DEVELOPMENTS IN SUSTAINABLE FINANCE

ENHANCING KAZAKHSTAN'S GREEN FINANCE FRAMEWORK

STRENGTHENING THE GREEN TAXONOMY OF KAZAKHSTAN:

Building upon the achievements of the initial green taxonomy launched in 2021, AIFC worked with the Ministry of Ecology and Natural Resources to update the Green Taxonomy of Kazakhstan by incorporating proposals that reflect the latest international developments and priorities set out in the Strategy to achieve carbon neutrality by 2060, specifically, to include natural gas and nuclear projects in the national taxonomy to facilitate their expanded use in power and industry, as well as a faster transition to low-carbon energy sources. In March 2024, these amendments to the Taxonomy were approved by Government.

FOUNDATION OF SOCIAL FINANCE IN KAZAKHSTAN:

Similarly to green financing, the GFC developed a draft Social Taxonomy for Kazakhstan, along with corresponding amendments to the Entrepreneurial Code of Kazakhstan. This was driven by the need for clearer definitions of social projects, particularly for issuing social bonds. The draft has been supported by the Ministry of National Economy, with the tentative timeframes for its adoption set in 2025.

PROMOTING GREEN LOANS IN KAZAKHSTAN:

The AIFC assisted the Ministry of Ecology and Natural Resources in developing Methodological guidelines for the application of the Taxonomy by all market participants in green financing, including green lending, green bond issuance, and financial support for green projects (guidelines available online) and in raising related awareness. This was coordinated with financial regulators (National Bank and Agency for Regulation and Development of Financial Market), and was a follow-up on previous GFC's initiative, where amendments were made to the National Bank's bank reporting forms in December 2023 that introduced the "Green Loans" code specifically for loan reporting in accordance with the Green Taxonomy. These efforts are aimed at helping the banking sector in increasing the share of green loans in lending portfolios from about 3% in 2023 to 7.5% by 2030, as envisioned in the Concept for Kazakhstan's transition to a green economy by 2030.

PAVING THE WAY FOR GOVERNMENT GREEN BONDS IN KAZAKHSTAN:

GFC is playing a significant role in facilitating the issuance of sovereign green bonds by the Ministry of Finance. Amendments to the Budget Code and corresponding by-laws, enables the Ministry of Finance to issue green bonds for funding eco-friendly projects, showcasing Kazakhstan's commitment to sustainability.

Overall, to date, strategic and conceptual documents focusing on the key aspects of climate and ESG financing, investment and reporting have been developed and adopted in AIFC not only at the AIX level, but at the AFSA level as well, including the following pronouncements made in 2024:



AIFC ESG Disclosure Guidance

(Effective October 2024) – Establishing ESG integration requirements for banks, insurers, and asset managers.



AIFC ESG Debenture Framework

(Effective October 2024) – Introducing ESG-labelled sukuks and debt instruments.



AIX Green Equity Principles

(Effective October 2024) – Aligning Kazakhstan with World Federation of Exchanges' Green Equity Standards.

GFC CASEBOOK, 2024

1ST SUSTAINABILITY BOND IN KAZAKHSTAN AND CIS, DEVELOPMENT BANK OF KAZAKHSTAN

Transaction Summary

Instrument type: Sustainability Eurobond
Issue volume: KZT 100 000 m
Stock exchange: Dual listing on Vienna MTF and KASE
Issue date: Apr 2024
Maturity: 3 years
Coupon rate: 13%
Base rate: 14.75%
Issuer's credit rating: S&P Global Ratings: BBB-/stable
Standards: ICMA GBP, SBP, SBG LMA, LSTA and APLMA GLP and SLP

SOCIAL BOND, INDUSTRIAL DEVELOPMENT FUND, KAZAKHSTAN

Transaction Summary

Instrument type: Social bond
Issue volume: KZT 6800 m
Stock exchange: AIX
Issue date: May 2024
Maturity: 3 years
Coupon rate: 13.5%
Base rate: 14.75%
Issuer's credit rating: Moody's: Ba1
Standards: ICMA SBP; LMA, LSTA and APLMA SLP

GREEN BOND, MORTGAGE REFINANCING COMPANY OF UZBEKISTAN JSC, UZBEKISTAN

Transaction summary

Instrument type: Green bond
Issue volume: UZS 50 000 m (~USD 4 m)
Stock exchange: Republican Stock Exchange «Toshkent»
Issue date: Sep 2024
Maturity: 5 years
Coupon rate: 18%
Base rate: 13.5%
Issuer's credit rating: Ahbor-Reyting: uzA++
Standards: ICMA GBP LMA, LSTA and APLMA GLP

GREEN BOND, UNIBANK JSC, AZERBAIJAN

Transaction summary

Instrument type: Green bond
Issue volume: AZN 20 m (~USD 11.8 m)
Stock exchange: Baku Stock Exchange
Issue date: Oct 2024
Maturity: 3 years
Coupon rate: 11.5%
Base rate: 7.25%
Issuer's credit rating: Moody's: B2/positive
Standards: ICMA GBP; LMA LSTA and APLMA GLP

SOCIAL BOND, "NATIONAL MANAGEMENT HOLDING "BAITEREK" JSC, KAZAKHSTAN

Transaction summary

Instrument type: Social bond
Issue volume: KZT 100 000 m
Stock exchange: KASE
Issue date: Dec 2024
Maturity: 1.25 year
Coupon rate: 15%
Base rate: 15.25%
Issuer's credit rating: Fitch Ratings: BBB/«Stable»
Standards: ICMA GBP, SBP and SBG

SUSTAINABILITY BOND, "ELDIK BANK" OJSC, KYRGYZSTAN

Transaction summary

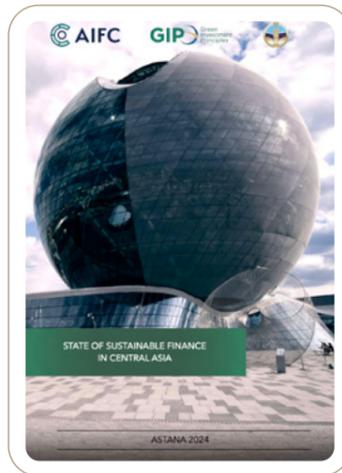
Instrument type: Sustainability bond
Issue volume: 200 m kyrgyz som
Stock exchange: Kyrgyz Stock Exchange
Issue date: Dec 2024
Maturity: 3 years
Coupon rate: 11%
Base rate: 9%
Issuer's credit rating: Fitch Ratings: BBB/«stable»
Standards: ICMA GBP, SBP, SBG LMA, LSTA and APLMA GLP, SLP

EXPANDING SUSTAINABLE INVESTMENT HORIZONS

The AIFC Carbon Platform developed on the Astana International Exchange (AIX), marks a transformative step towards carbon neutrality in Central Asia and the Caucasus.

Aligned with Kazakhstan’s goal to achieve carbon neutrality by 2060 and reduce greenhouse gas emissions by 15% from 1990 levels, the platform aims to activate carbon trading and establish a competitive carbon price. This initiative is timely, given the EU’s impending Carbon Border Adjustment Mechanism (CBAM), which could impact Kazakhstan’s exports by up to US\$1.5 bn, highlighting the urgency for regional decarbonization efforts. The platform will facilitate trading of environmental instruments, including carbon

credits and renewable energy certificates, leveraging AIFC’s robust regulatory framework and technical infrastructure. By fostering a market-driven carbon price, the platform will incentivise decarbonization projects, attract investments, and position the AIFC as a regional hub for environmental finance. This initiative not only supports Kazakhstan’s strategic goals but also addresses the growing demand for voluntary carbon markets across Central Asia and the Caucasus.



In June 2024, the AIFC, GIP Regional Office in Central Asia in collaboration with the project group of the Al-Farabi Kazakh National University prepared a comprehensive regional report titled «The State of Sustainable Finance in Central Asia», covering Kazakhstan, Uzbekistan, Kyrgyzstan, Tajikistan, and Turkmenistan.

According to the major findings of the report, the countries of Central Asia do not stand aside of global trends in sustainable finance and the development of local sustainable finance markets is gaining momentum throughout the region, in view of the tremendous demands* on financial resources to support country-level climate goals and commitments. Among Central Asian countries, Kazakhstan has made the most progress in developing its local sustainable finance market. As the first country in the region to adopt green finance standards, Kazakhstan has seen over twenty thematic issuances.

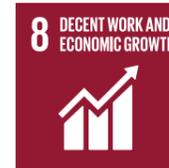
* In Kazakhstan alone, its Carbon Neutrality Strategy until 2060 estimates net investment in technologies that contribute to low-carbon development and carbon neutrality at 610 billion USD, with direct public investment accounting for a small share (3.8%) of all investments

ATTAINING UN SUSTAINABLE DEVELOPMENT GOALS



SDG 7. AFFORDABLE AND CLEAN ENERGY

- Green bond issues, including to finance renewable energy projects in regions other than Central Asia
- Capacity building activities within the GIP regional office



SDG 8. DECENT WORK AND ECONOMIC GROWTH

- Development of the sustainable finance market
- Expanding the range of available sustainable financing instruments



SDG 11. SUSTAINABLE CITIES AND COMMUNITIES

- GFC verified green bonds to finance mortgage loans aimed to support energy-efficient improvements to apartments and houses in Uzbekistan (issuer: Uzbekistan Mortgage Refinancing Company)



SDG 13. CLIMATE ACTION

- Development of the green finance market (KZT 304.8 bn as of end of 2024)
- GFC verified green bonds and loans worth USD 18 million in Kyrgyzstan, Uzbekistan and Azerbaijan in 2024
- AIFC participation at COP29
- Annual Green growth tracks during Astana finance days
- Updating of the Green Taxonomy of Kazakhstan to include transitional energy



SDG 17. PARTNERSHIPS FOR THE GOALS

- AIFC is a member of the Financial Centers for Sustainability (FC4S), uniting financial centers of the world working to develop the sustainable finance market
- GFC is the regional office of Green Investment Principles for Belt and Road

INNOVATION AND FINTECH FRONTIER

Since its launch in 2018, the AIFC has been at the forefront of transforming Kazakhstan into a modern, innovation-driven economy. As Central Asia's first and most advanced regulatory sandbox, it has created a thriving ecosystem where fintech pioneers can develop and test groundbreaking financial solutions - accelerating Kazakhstan's integration into global finance while strengthening its domestic market.

Crucially, the AIFC has pioneered Kazakhstan's regulated digital asset market, establishing the country's only legal framework for cryptocurrency trading and blockchain innovation. While maintaining strict safeguards, this progressive approach has attracted leading global exchanges and fostered a secure, transparent digital finance ecosystem - protecting investors while unlocking new capital flows and technological expertise.

AIFC FINTECH LAB: DRIVING INNOVATION THROUGH SANDBOX TESTING

112

digital assets permitted for trading

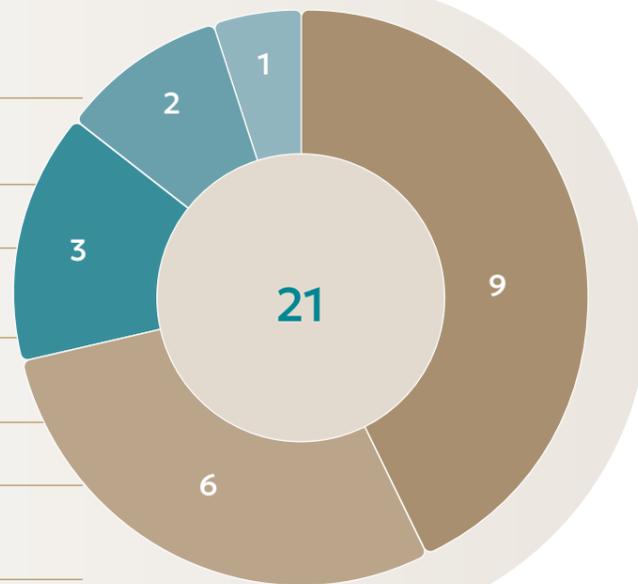
18

DASPs

The FinTech Lab has proved to be a highly popular destination for financial innovators from all over the world. In 2024, AFSA received and processed 6 applications, with a total of 10 Participants accepted to the FinTech Lab. As a result, by the end of 2024, the total number of licensed companies in the Fintech Lab was 21.

FINTECH LAB PARTICIPANTS

DIGITAL ASSET EXCHANGES	9
DIGITAL ASSET BROKERS AND DEALERS	6
PAYMENT INSTITUTIONS OFFERING DIGITAL ASSET SERVICES	3
CROWDFUNDING PLATFORM	2
SECURITY TOKEN OFFERING EXCHANGE OPERATE	1



QAZPOST JOINS AIFC DIGITAL ASSET MARKET

In 2024 JSC QazPost, the National postal operator of Kazakhstan was officially included on the list of organisations that can provide fiat transactions with digital assets along with second-tier banks in Kazakhstan. The relevant changes are reflected in the Rules of Cooperation of Digital Assets Services Providers and commercial banks of Kazakhstan.

AFSA together with the National Bank of the Republic of Kazakhstan and the Agency of the Republic of Kazakhstan on Regulation and Development of Financial Market made amendments of a clarifying nature to the Rules of Cooperation, expanding the list of fiat channels by including the National postal operator.

AIFC actively supports the development of financial innovations, including those involving digital assets, which is one of the most dynamically developing areas. The amendments allow the National postal operator to act as a fiat channel, that is to provide its customers with financial services for deposits and withdrawals. The addition of a new fiat channel also expands the choice for digital asset service providers, thus facilitating the arrival of new entrants into the regulated digital assets market.

DIGITAL ASSET ECOSYSTEM GROWTH

The successful 18-month pilot project (2022-2023), conducted with national regulators and commercial banks, established the country's first regulated fiat gateways for digital assets, achieving unprecedented operational and regulatory milestones. The project's legacy continues to shape the region's secure and compliant digital finance landscape, advancing AIFC digital asset ecosystem.

During the year, the number of licensed Digital Asset Service Providers (DASPs) reached 21, and trading was permitted for 112 digital assets. Additionally, the FinTech Lab successfully attracted substantial international interest, onboarding four new digital asset exchanges - including WhiteBIT, a leading European crypto exchange-highlighting the AIFC's increasing global appeal as a fintech hub.

Several sandbox graduates achieved full regulatory authorisation in 2024, reflecting the success of the FinTech Lab as a springboard for fintech growth. In particular, Binance (through its local entity BN KZ) and Bybit obtained full AFSA licenses after meeting sandbox requirements. These transitions mark a milestone for AIFC - in total, three companies have now successfully migrated from the sandbox to the full regulatory regime, illustrating a clear pathway from experimentation

to full authorisation. The ability of global platforms to graduate like Binance and Bybit demonstrates the robustness of AIFC's regulatory support for innovators and instils confidence that companies can safely scale their operations within the AFSA's framework.

The expansion of AIFC's fintech sector is evidenced by remarkable growth in digital asset activity and user adoption. Digital asset trading volumes on AIFC-licensed platforms soared from US\$324 mn in 2023 to over US\$1.4 bn in 2024, a more than fourfold increase. Over the same period, the client base for digital asset services expanded from about 53,000 to 140,000 users, reflecting rapid uptake of fintech offerings among both local and international participants. This exponential growth in volume and users highlights AIFC's emergence as a dynamic regional hub for digital assets and fintech services, supported by progressive regulations and market infrastructure.



GLOBAL DASP PLAYERS IN AIFC:



REGULATORY ADVANCEMENTS

AIFC's leadership in fintech is underpinned by continuous regulatory innovation. In recent years, AFSA has established comprehensive rules for emerging sectors – for example, introducing frameworks for Security Token Offerings (STOs) and stablecoins, along with a dedicated Digital Assets Rulebook, to govern crypto-asset activities in a secure manner. Building on this foundation, multiple new frameworks and amendments were implemented in 2024 to accommodate innovative business models and uphold market integrity:

- **Tokenised Commodities:** Introduction of the AIFC Tokenised Commodities framework effective from 18 October 2024, enabling supervised trading of Commodity Derivative Tokens, Environmental Instrument Tokens, and Commodity stablecoins. These amendments integrate digital asset technology within commodity markets, enhancing innovation and market participation under clear regulatory standards.
- **Investment Tokens:** Establishment of the comprehensive AIFC Investment Token Framework to regulate the trading of Derivative

Tokens, Security Tokens, and Environmental Instrument Tokens, unified as “Investment Tokens.” This framework provides legal clarity and investor protection, fostering a secure trading environment for digital financial instruments within the AIFC.

- **OTC Digital Assets Trading:** Issuance of Guidance on Over-the-Counter (OTC) digital asset transactions effective 29 March 2024, enhancing transparency, risk management, and operational efficiency. The guidance aligns with global standards, supporting DATFs and digital asset miners by creating a clear regulatory framework for OTC activities.

COLLABORATIONS AND PUBLIC OUTREACH

In 2024 the AIFC FinTech Lab reinforced its role as a key knowledge hub through participation in industry research projects and holding several raising awareness events:

- Co-developed with the National Bank of Kazakhstan, report on Artificial Intelligence in Kazakhstan's Financial Market alongside ARDFR and AIFC, providing critical insights into AI adoption frameworks.
- Partnered with Rise Research, Freedom Horizons, Mastercard, and KPMG on the 2024 Digital Assets in Central Asia & Caucasus report, positioning Kazakhstan as

a regional leader in digital asset regulation.

- AFSA has presented its regulatory approaches to Crypto and Digital Asset markets to the members of IOSCO. The training was conducted within the 26th edition IOSCO Seminar Training Programme: “Regulation and Supervision of Crypto and Digital Assets Markets.”

NEW PRODUCTS TO TEST

In 2024 FinTech Lab introduced new categories of digital asset products and services to pilot within sandbox, reflecting AFSA's commitment to support ongoing innovation.

- **Digital Asset Margin Trading:** Participants can test services that allow users to borrow money to trade digital assets. The borrowed funds are secured using the user's digital assets or other types of collateral. This allows users to trade with more capital than they actually own.
- **Digital Asset Derivatives:** Participants can test trading tools like options, futures, or contracts based on the price of digital assets. These products can help manage price risks or generate profit from price movements. In the sandbox, such products are available to professional clients only.
- **Staking Services:** Participants can test services where clients lock their digital tokens for a certain period to help support a blockchain network. In return, they earn rewards, which are then shared with the clients.
- **NFT Trading and Related Activities:** Participants can test platforms where users buy, sell, or exchange unique digital items (NFTs), such as digital art, music, collectibles, etc.
- **Digital Asset Loans:** Participants can test platforms that offer loans in digital assets. These loans are secured by digital assets or other acceptable types of collateral.
- **Liquidity Mining / Yield Farming:** Participants can try out ways to invest clients' digital assets into decentralized finance (DeFi) platforms to earn rewards. The earned rewards and profits are then shared with the clients.
- **Other Derivatives and Services (Peer-to-Peer, Derivatives, etc.):** Participants can explore and test other digital asset products and services, like peer-to-peer trading platforms, automated trading bots, or synthetic assets. All these must follow the current AIFC regulations and AFSA's risk management rules.

APPENDICES



APPENDIX 1:

PUBLICATIONS

QR-code

Name



01 CREATIVE INDUSTRIES
IN KAZAKHSTAN TRENDS
AND PROSPECTS



QR-code

Name



06 ISLAMIC FINANCE
COUNTRY REPORT FOR
KAZAKHSTAN



02 KAZAKHSTAN: COMMERCIAL
REAL ESTATE AND THE
PROSPECTS OF THE REIT
MARKET



07 ISLAMIC FINANCE:
KAZAKHSTAN MARKET
ANALYSIS



03 MINING INDUSTRY OF
KAZAKHSTAN



08 STATE OF SUSTAINABLE
FINANCE IN CENTRAL ASIA



04 TRANSPORT AND
LOGISTICS IN
KAZAKHSTAN



09 NATIONAL BANK:
ARTIFICIAL INTELLIGENCE
IN KAZAKHSTAN
FINANCIAL MARKET



05 FERTILISERS AND
PESTICIDES IN
THE WORLD AND
KAZAKHSTAN



APPENDIX 2: REGULATORY POLICY UPDATES

01 CAPITAL MARKET

ENHANCEMENTS TO THE AIFC DERIVATIVES FRAMEWORK

In 2024 the AFSA has introduced enhancements to the Derivatives framework in the AIFC with the commencement date of 1 January 2025. The enhancements, grounded in benchmarking on the best practices and the analysis of feedback received from the market, offers some refinements to the framework and introduces enhancements to conduct requirements for Derivatives transactions. The amendments aim to establish a clear regulatory framework for Derivatives traded on Authorised Market Institutions and Multilateral/Organised Trading Facilities (MTF/OTF), ensuring effective pricing, settlement, operations and market conduct. Given the elevated risks associated with Derivatives operations, the framework establishes certain conduct requirements to protect Clients in Derivatives transactions requiring risk warning, additional disclosures and setting limits on Derivatives operations to mitigate risk exposure.

FRAMEWORK FOR GREEN AND SUSTAINABILITY-LINKED BONDS AND SUKUKS

The AFSA has enacted the AIFC ESG Debentures framework effective from 1 October 2024. The framework introduces minimal standards of regulation and requirements for issuance and offering of green and sustainable debt instruments including sukuk under an overarching concept of the “AIFC ESG Debentures”. The intention is to provide clear guidelines to issuers, making it simpler to design and market these financial products while also helping investors identify sustainable investing opportunities. This framework seeks to stimulate green finance capital flows and support financing for adaptation and mitigation efforts, contributing to global climate goals. It promotes transparency, accountability, and alignment with international standards, ensuring that issuers meet clear environmental objectives.

02 ASSET MANAGEMENT

ENHANCEMENTS TO THE AIFC ASSET MANAGEMENT FRAMEWORK

Considering the developments in the AIFC asset management sector and insights gained during the supervision of the regulated community the AFSA has enacted the Amendments to the AIFC Asset Management Framework with enactment effective from 1 January 2025. This step is to further enhance the legislative framework governing investment funds or collective investment schemes in the AIFC and activities of the asset and fund managers operating in or from the AIFC.

AFSA has expanded the list of Specialist Funds available in the AIFC, to include Credit Funds, Digital Asset Funds, Exchange Traded Funds, Money Market Funds, Investment Token Funds and Qualified Investment Token Funds. Due to the development of the AIFC asset management sector and the assessment of market needs, AFSA recognises the necessity to broaden the range of Specialist Funds available in the AIFC. This facilitates the diversification of investment options, empowering

investors to tailor portfolios to specific sectors and strategies. Offering a comprehensive list of Specialist Funds not only gives a competitive advantage, but also aligns with global investment trends, demonstrating regulatory adaptability.

AFSA also enhanced the Venture Capital Fund framework to attract greater participation in the venture capital market by introducing amendments that broaden opportunities for investors. Currently, Venture Capital Funds are Exempt Domestic Funds focused on equity investments in early-stage unlisted businesses. The changes include allowing Venture Capital Funds to operate as Foreign Funds for Professional Clients, thereby attracting international investors; expanding investment options beyond equity to include securities and units of early-stage unlisted companies; and enabling funds to adopt a Master-Feeder structure for greater diversification and efficiency.

Additionally effective from 1 July 2024, the AFSA has enacted the AIFC Family Offices framework. The Framework introduces

specific regulations tailored for operations of Single Family Office (SFO) in the AIFC, which are able to open the SFO Funds. Such vehicles will allow managing family wealth in line with international practices. Recognising the unique nature of SFOs and their limited investor base, the framework includes streamlined regulatory provisions for SFO Fund Managers. The AIFC Family Offices Framework represents a significant step towards strengthening the AIFC's position as a leading international financial centre in Eurasia. This framework offers a robust regulatory and tax environment that caters specifically to the needs of SFOs, making the AIFC an attractive location for establishing and managing family wealth.

TREASURY FRAMEWORK

The AFSA has enacted the AIFC Treasury framework, which introduces specific regulations tailored for operations of Corporate Treasury Centres (CTC) in the AIFC, which will be able to open the CTC Funds. Such vehicles will allow carrying out treasury activities within the AIFC's existing regulatory and tax regimes in line with international practices. Recognising the unique nature of CTCs and their limited investor base, the

framework includes streamlined regulatory provisions for CTC Fund Managers. This framework is aimed to make AIFC an attractive location for intragroup financing, liquidity management, investment and other treasury functions.

PRUDENTIAL RELIEFS MEASURES FOR FIRMS AUTHORISED TO CARRY OUT THE REGULATED ACTIVITY OF MANAGING A COLLECTIVE INVESTMENT SCHEME IN RESPECT OF EXEMPT FUNDS

In 2024 AFSA provided prudential relief measures for firms authorised to carry out the regulated activity of Managing a Collective Investment Scheme in respect of Exempt Funds. The respective class modification took effect on 24 April 2024. The relief measures grant a grace period to firms to comply with the Minimum Capital Requirement for the period of implementing their Risk Mitigation Programme and 24 months after its completion. These measures are expected to enhance the fund and fund management environment in the AIFC, increase fund managers' competitiveness by reducing their compliance costs, and facilitate access to capital for startups, encourage investment in innovative projects.

DIGITAL ASSETS AND FINTECH

DEVELOPMENT OF THE AIFC TOKENISED COMMODITIES FRAMEWORK

Effective 18 October 2024 the AFSA has enacted the AIFC Tokenised Commodities framework, focused on trading of Commodity Derivative Tokens and Environmental Instrument Tokens, which are part of the Investment Token scope, on Exchange platforms. It also covers the issuance of Commodity stablecoins that may be traded on Digital Asset Trading Facilities. The new regulatory regime on tokenised commodities builds on AFSA's efforts to create a strong infrastructure for both financial and commodities markets. By extending its regulatory perimeter to include tokenised instruments linked to commodities, the regime promotes market innovation, facilitates trading of new types of instruments, and encourages broader participation on digital asset and investment exchange platforms. This move further strengthens the AIFC's position as a leading hub for fintech and commodities trading.

DEVELOPMENT OF THE AIFC INVESTMENT TOKEN FRAMEWORK

The AFSA has enacted the AIFC Investment Token Framework to introduce a comprehensive regulatory regime that governs

trading of Investment Tokens within the AIFC. In line with AFSA's policy approach, the regulatory regime for Investment Exchanges and Clearing Houses continues to apply to platforms that trade and/or clear Investment Tokens. The regulatory framework now includes Derivative Tokens, alongside Security Tokens and Environmental Instrument Tokens, all unified under the term "Investment Token." The Investment Token Framework aims to provide clarity, legal certainty, and investor protection in the field of tokenised financial instruments, fostering a secure and well-regulated environment for businesses and investors.

GUIDANCE ON OTC TRADING FOR DIGITAL ASSETS

In response to the growing demand for OTC transactions and to comply with regulatory requirements governing such transactions, the AFSA issued Guidance on Over-the-Counter Transactions involving Digital Assets. The aim was to enhance transparency, mitigate risks, and facilitate seamless OTC activities. This guidance aligns with industry trends and establishes a regulatory framework that fosters a controlled environment, supporting the unique needs of DATFs and digital assets miners. The Guidance was adopted on 29 March 2024.

OTHER

ENHANCEMENTS TO AIFC LEGAL ENTITIES FRAMEWORK

The AFSA has introduced enhancements to the AIFC Legal Entities Framework to address the challenges faced by the AIFC Participants. These amendments focus on key areas such as the issuance and transfer of securities, branch registers for Public Companies, a streamlined public offering regime for Private Companies, clarifications on the voluntary strike-off process, expanded powers for the Registrar of Companies, and new obligations for firms. The amendments simplify certain corporate processes and overall ease of doing business by the AIFC Participants

AMENDMENTS TO THE AIFC INSOLVENCY FRAMEWORK

The AFSA has introduced amendments to the AIFC Insolvency framework to enhance clarity, alignment, and functionality of insolvency proceedings for entities registered in the AIFC. These changes address identified gaps concerning some aspects of the winding-up procedure.

ENHANCEMENTS TO THE AIFC CREDIT RATING AGENCIES FRAMEWORK

In 2024 the AFSA has introduced enhancements to the Credit Rating Agencies (CRA) framework in the AIFC. Following international practices and the analysis of feedback received from the market, enhancements consider transitioning of CRAs to

the Regulated Activities regime. This shift in the regulatory status carries several positive implications and considerations, such as the potential impact on CRAs' perception by the market and enhance their credibility while signalling to investors, regulators, and market participants that they meet higher regulatory standards. This transition significantly changes the regulatory landscape for CRAs in the AIFC by intensified regulatory oversight in line with international standards and practices and stricter requirements imposed on CRAs.

AMENDMENTS TO THE AML/ CFT FRAMEWORK

The AFSA has introduced comprehensive amendments to the Anti-Money Laundering, Counter-Terrorist Financing, and Sanctions Framework within the AIFC, effective January 1, 2025. These amendments have been meticulously designed to enhance existing norms by incorporating necessary clarifications and eliminating ambiguities that have emerged from the practical application of the rules, as addressed through numerous requests from the AIFC Participants and analysed outcomes of inspections and thematic reviews of the AIFC Participants over the recent years.

DEVELOPMENT OF AIFC VENTURE STUDIO FRAMEWORK

The adoption of the AIFC Venture Studio Rules provides a legislative framework for the creation of venture companies. These rules

establish legal clarity for financial and non-financial support for startups, facilitating collaboration between entrepreneurs and startups in the market.

ESG DISCLOSURE GUIDANCE

The AFSA has issued the AIFC Environmental, Social and Governance (ESG) Disclosure Guidance effective from 14 October 2024. This Guidance applies to all Banks, Fund Managers, and Insurers to support the integration of ESG factors into their operations and decision-making processes, fostering a more sustainable and responsible financial ecosystem within the AIFC. AFSA is taking a gradual approach to the introduction of ESG disclosure practices for the financial entities in the AIFC, starting with a voluntary stage. This allows financial entities to familiarise themselves with best practices and adapt their operations and reporting processes accordingly.

REGIME FOR LOW-RISK FINANCIAL SERVICES FIRMS

The AFSA has introduced a dedicated regime for low-risk financial services firms in the AIFC. The new framework, grounded in AFSA's risk-based regulation approach, addresses the unique needs of boutique financial firms, offering them a streamlined regulatory process. It recognises that businesses with limited scope and complexity do not pose the same risks as larger entities. By easing governance and operational requirements, AFSA aims to support the growth

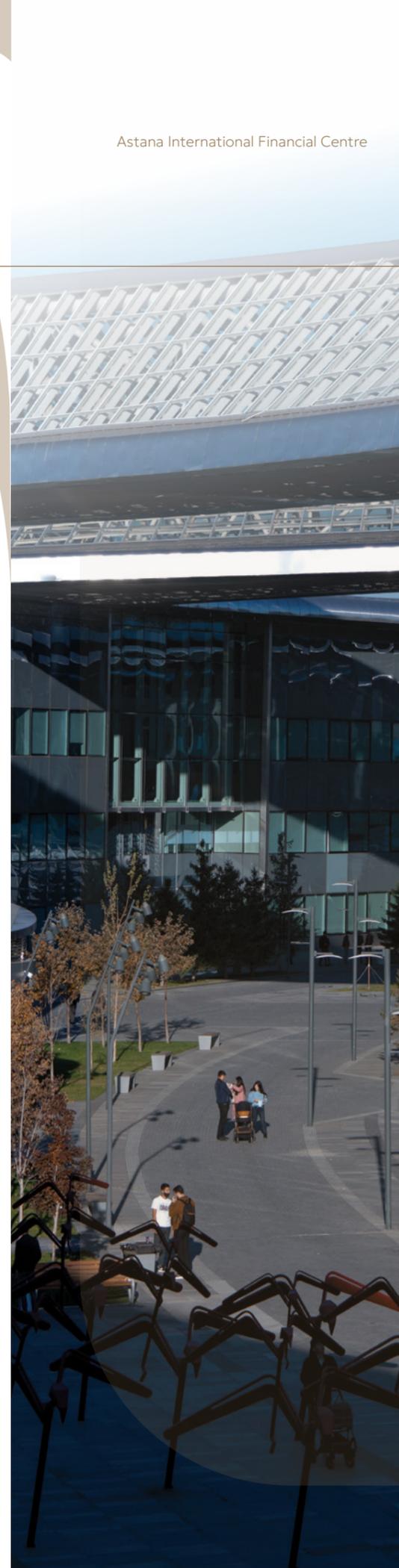
of these firms while maintaining robust oversight. The regime is designed to reduce the regulatory burden without compromising financial integrity, ensuring a more efficient, competitive financial ecosystem within the AIFC.

CAPITAL REQUIREMENTS FOR PROVIDING ISLAMIC FINANCE COMPANIES

AFSA has approved the Class modification for Islamic Finance Companies effective since of 1 October 2024 and valid for 5 years. The Class Modification introduced the approach for gradual fulfilling the capital requirements within 3 years after its authorisation up to USD 2 000 000.

STREAMLINING MARKET ENTRY FOR FOREIGN FUND MANAGERS (FFMS) AND ENHANCING THE ATTRACTIVENESS OF THE AIFC FUND ECOSYSTEM

In June 2024 AFSA recognised 12 jurisdictions as equivalent jurisdictions (Georgia, Qatar, UAE (DIFC and ADGM), UK, US, Singapore, European Union Member States, Switzerland, Australia, Malaysia, and Hong Kong). By recognising these jurisdictions as meeting the eligibility criteria, the AFSA aims to streamline the onboarding process for well-regulated FFMs, reducing the need for individual jurisdiction assessments and speeding up their entry into the AIFC market.



APPENDIX 3:

AIFC COMPLEX

Pavilion C4:
AIFC participants
and partners

Pavilion C3:
AIFC bodies and
organisations

AIFC CONTACTS:

 **Authority**
authority.aifc.kz/en
info@aifc.kz

 **AFSA**
afsa.aifc.kz/en
info@aifc.kz

 **Court**
court.aifc.kz/en
info@aifc-court.kz

 **IAC**
iac.aifc.kz/en
info@aifc-iac.kz

 **Expat Centre**
expatcentre.aifc.kz/en
expat@aifc.kz

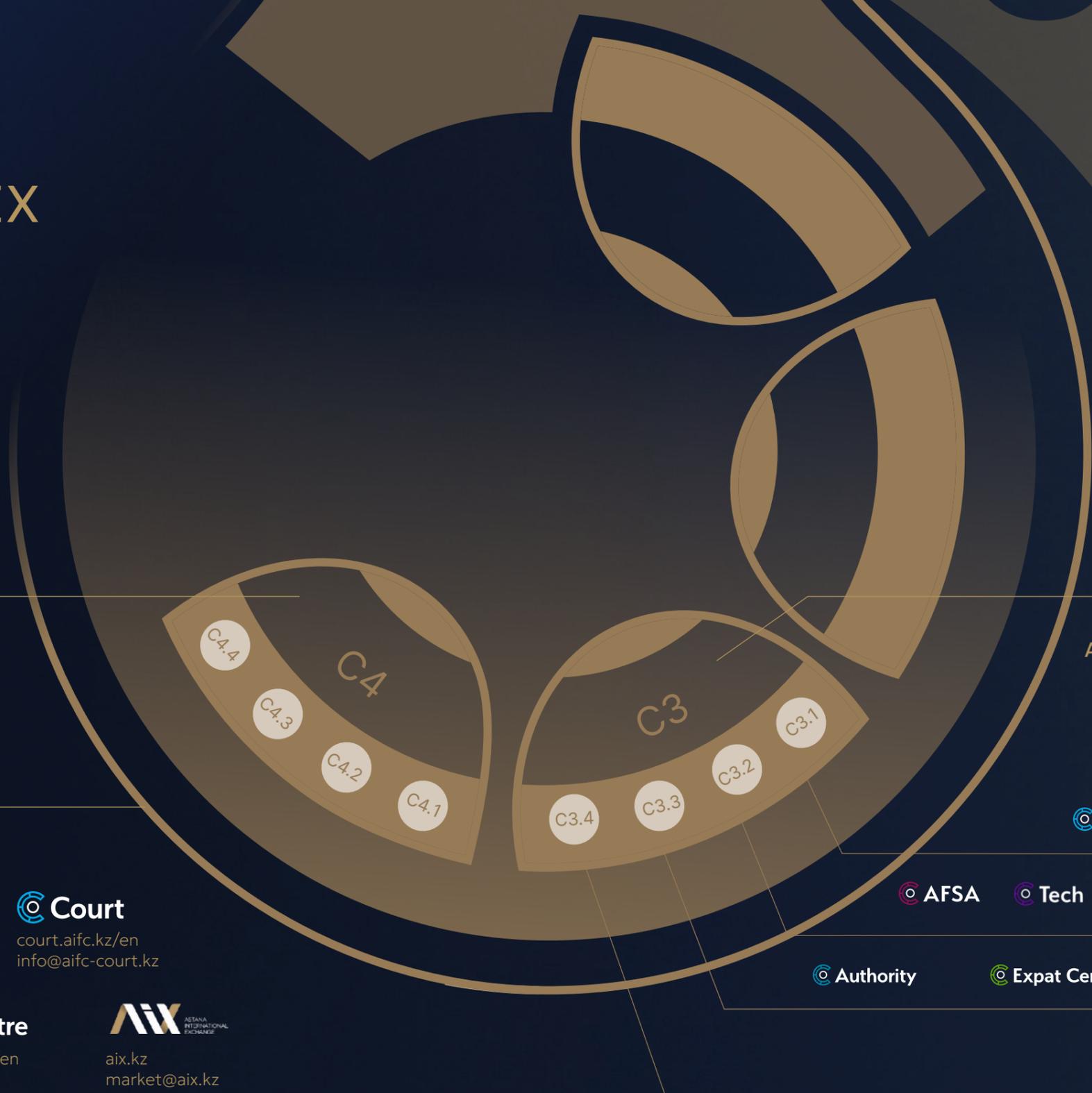
 **AIX**
ASTANA
INTERNATIONAL
EXCHANGE
aix.kz
market@aix.kz

 **AFSA**  **Tech**  **Academy**

 **Authority**  **Expat Centre**  **GFC**

 **Court**  **IAC**

Authorisation and Registration enquires: bcsc@aifc.kz
Post-registration enquires: psbd@aifc.kz



GLOSSARY

ADX	Create an attractive environment for investment in financial services, and assist in attracting investment a Abu Dhabi Securities Exchange	GIP	Green Investment Principles
AFSA	Astana Financial Services Authority	GRI	Global Reporting Initiative
AI	Artificial Intelligence	GSS	Green, social, and sustainability bond
AIFC/CENTRE	Astana International Financial Centre	GSS+	Green, social, sustainable, and sustainability-linked bonds etc.
AIFCA	Astana International Financial Centre Authority	IAC	International Arbitration Centre
AIX	Astana International Exchange	IAIS	International Association of Insurance Supervisors
AIX CSD	Astana International Exchange Central Securities Depository	IFSB	Islamic Financial Services Board
AML/CFT	Anti-Money Laundering and Combatting of Terrorism Financing	IMF	International Monetary Fund
ARDFM	Agency of Kazakhstan for Regulation and Development of Financial Market	IOSCO	International Organization of Securities Commissions
AUM	Assets under management	IPO	Initial Public Offering
BHB	Bahrain Bourse	ISSB	International Sustainability Standards Board
BRI	Belt and Road Initiative	KASE	Kazakhstan Stock Exchange
CBI	Climate Bond Initiative	KISS	Keep It Simple Security
CDP	Carbon Disclosure Project	KYC	Know your customer
CENTRAL ASIA	Kazakhstan, Kyrgyzstan, Tajikistan, Turkmenistan, Uzbekistan	KYT	Know your transaction
CIBAFI	Council of Islamic Banks and Financial Institutions	KZT	Kazakhstani tenge
CIS	Commonwealth of Independent States	MENA	Middle East and North Africa region
CIT	Corporate Income Tax	MSX	Muscat Securities Market
EAEU	Eurasian Economic Union	MTF	Multilateral trading facility
EAG	Eurasian Group on Combating Money Laundering and Financing of Terrorism	OECD	Organisation for Economic Co-operation and Development
ESG	Environmental, Social, and Corporate Governance	OTS	Organisation of Turkic States
ESMA	European Securities and Markets Authority	PPP	Private-public partnership
ETN, ETF	Exchange-Traded Note, Exchange-Traded Fund	REIT	Real estate investment trust
ETS	Emissions Trading System	REMS	Regional Equity Market Segment
EU	European Union	RMB	Renminbi
FATF	Financial Action Task Force	RNAM	Recognised Non-AIFC Member
FC4S	Financial Centres for Sustainability	SAFE	Simple Agreement for Future Equity
FDI	Foreign Direct Investment	SASB	Sustainability Accounting Standards Board
FTSE	Financial Times Stock Exchange	SDG	Sustainable Development Goal
GCC	Gulf Cooperation Council	SLB	Sustainability-linked bond
GDP	Gross Domestic Product	SME	Small and Medium-Sized Enterprises
GDR	Global Depositary Receipt	SPO	Secondary Public Offering
GFC	Green Finance Centre	TCFD	Task Force on Climate-Related Financial Disclosure
GFCI	Global Financial Centres Index	UN	United Nations
GGFI	Global Green Finance Index	VAT	Value-added tax

