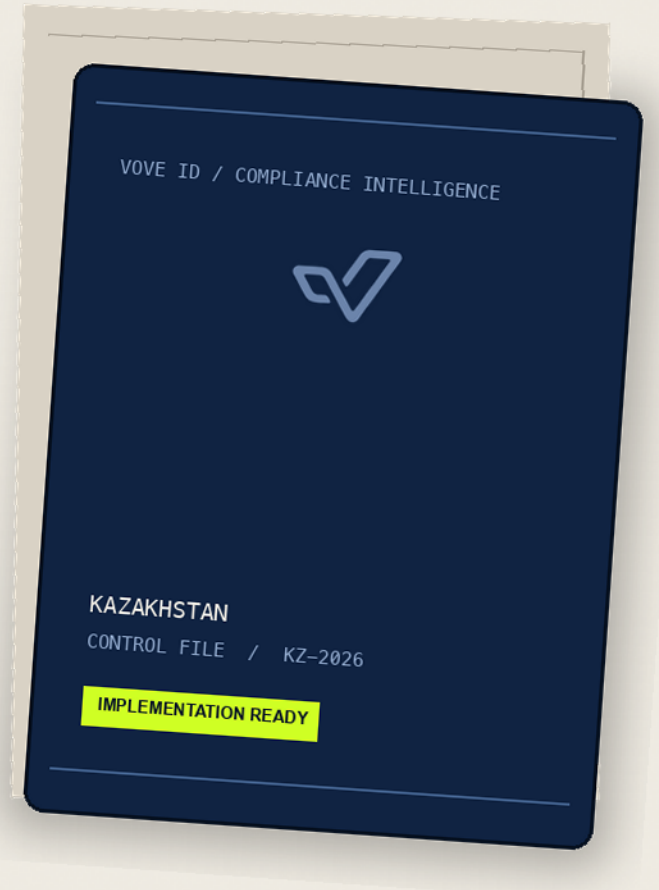
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VOVE COUNTRY CONTROL FILE
KYC / KYB / AML
2026 EDITION

KAZAKHSTAN



KAZAKHSTAN / KZ



KYC / KYB / AML

COMPLIANCE CHECKLIST

2026 EDITION

IMPLEMENTATION CHECKLIST / NOT LEGAL ADVICE

READ THIS FIRST

Kazakhstan KYC, KYB & AML Compliance Checklist

Implementation checklist for Kazakhstan customer due diligence, beneficial ownership, suspicious reporting, targeted sanctions, privacy, payments and digital-asset controls.

Primary AML law	**AML/CFT/CPF Law No. 191-IV of 28 August 2009, as amended**
FIU	**Agency for Financial Monitoring (AFM)**
Pre-transaction STR	**Immediately before conduct when recognized as suspicious**
Post-transaction STR	**By the next working day after recognition; special timing applies where suspension was impossible**
AML beneficial owner	**Natural person owning directly or indirectly more than 25%, then other control or benefit**
Records	**At least 5 years from transaction or relationship termination, as applicable**
Targeted sanctions	**Freeze immediately, no later than 1 working day after official listing**
FATF public lists	**Not listed at October 2026**

Scope and legal framework

The AML/CFT/CPF Law, sector internal-control requirements and AFM reporting rules form the core framework. Scope and detailed controls vary by the type of financial-monitoring subject and supervisor.

FATF context

Kazakhstan is an EAG member assessed under the FATF methodology. FATF published an EAG follow-up report in May 2026; Kazakhstan was absent from the FATF increased-monitoring and call-for-action lists issued in October 2026. Absence from a public list is not a low-risk classification.

IMPORTANT

General information, not legal advice. Reviewed 7 November 2026. Confirm the controlling Kazakh or Russian text, current sector rules, transaction-reporting categories, reporting channels, sanctions lists, privacy requirements and licensing conditions with AFM, the competent supervisor and qualified Kazakhstan counsel.

HOW TO USE THIS GUIDE

Turn each requirement into owned evidence

For every row, assign an owner, confirm whether the control applies, link the evidence, record gaps, and set a remediation date. A checked box is not evidence by itself.

01 / SCOPE	02 / DESIGN	03 / EVIDENCE	04 / REVIEW
Confirm institution, supervisor, product, customer and risk scope.	Map each obligation to a policy, system control or human review.	Retain the document, decision, timestamp, owner and rationale.	Test the control and update it when rules or risks change.

Checklist legend

CONTROL tells you what outcome to cover. IMPLEMENTATION ACTION translates that outcome into operational work. EVIDENCE suggests what an auditor or reviewer should be able to inspect. SOURCE points back to the primary rule or regulator guidance.

Minimum review record

Keep a compact decision record for each checklist row so a later reviewer can reconstruct what applied, who decided, and what evidence was inspected.

APPLICABILITY	OWNERSHIP	TRACEABILITY
Applicable, not applicable, or pending legal confirmation, with a short rationale.	Named control owner, reviewer, approval date and next review date.	Evidence link, source version, test result, gap status and remediation ticket.

1. SCOPE, AUTHORITIES, AND LICENSING

Scope, authorities, and licensing

Classify the activity and supervisor before launch.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Determine whether each activity is a subject of financial monitoring.	Map banking, insurance, securities, payments, exchange, professional, digital-asset and other services to Article 3 and current sector rules; do not export one sector's requirements to another.	Perimeter memo, service map and source register.	AML/CFT/CPF Law, Article 3
Obtain every required licence, registration or permit.	Confirm National Bank, financial-market regulator, AFSA/AIFC, digital-development authority or other competent-authority requirements before operating.	Licence matrix, approvals and conditions.	Applicable financial, payments and digital-assets legislation
Use AFM and the correct sector supervisor.	Maintain a dated authority map and current electronic-reporting procedure for the entity type.	Authority map, portal access, procedures and acknowledgements.	AML/CFT/CPF Law, Articles 16-18

2. GOVERNANCE AND RISK ASSESSMENT

Governance and risk assessment

Controls must be risk-based, approved and tested.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Maintain an enterprise ML/TF/PF risk assessment.	Assess customer, geography, product, channel, technology, transaction and sanctions risks and update for material change.	Methodology, assessment, approval and change log.	AML/CFT/CPF Law; applicable internal-control requirements
Maintain internal-control rules and an accountable AML function.	Document governance, responsible officer, screening, monitoring, reporting, training, audit and escalation arrangements proportionate to the business.	Internal-control rules, appointment, training and test reports.	AML/CFT/CPF Law, Article 11
Apply current AFM risk indicators and sector rules.	Map official suspicious-transaction indicators and supervisor requirements into scenarios without treating indicators as exhaustive.	Rule inventory, scenario mapping and review record.	AML/CFT/CPF Law, Article 10; current AFM and sector rules

3. NATURAL-PERSON IDENTIFICATION

Natural-person identification

CDD applies at relationship start and other statutory triggers.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Identify and verify the customer before establishing a relationship.	Record identity-document data, individual identification number where assigned, address and other required fields using reliable sources.	Identity record, verification result and provenance.	AML/CFT/CPF Law, Article 5(2)-(3)
Identify and verify representatives and authority.	Confirm the representative's identity and powers before accepting instructions and retain the mandate.	Representative KYC, mandate and validation.	AML/CFT/CPF Law, Article 5
Re-perform CDD when statutory triggers arise.	Refresh CDD for reportable or suspicious activity and where prior customer or beneficial-owner information is doubtful; apply sector-specific periodic updates.	Trigger log, refreshed records and review outcome.	AML/CFT/CPF Law, Article 5(2)
Do not permit anonymous or inadequately verified use.	Restrict activation or activity where required data cannot be obtained and document refusal, termination and reporting decisions.	Restriction, rationale and report assessment.	AML/CFT/CPF Law, Articles 5 and 13

KYB, company information, and beneficial ownership

Verify legal existence, authority, ownership and ultimate control.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Verify the legal person or arrangement.	Obtain registration, legal form, address, governing documents, business purpose and authorized-person data and reconcile them with official records.	Registry extract, constitutional documents and validation log.	AML/CFT/CPF Law, Article 5
Identify natural-person beneficial owners through the statutory cascade.	Identify each natural person who directly or indirectly owns more than 25%; if ownership is doubtful or inconclusive, identify control by other means or the person in whose interests transactions are conducted.	Ownership chart, control analysis and verified identities.	AML/CFT/CPF Law, Articles 1 and 5
Understand legal-arrangement control.	Identify the natural persons occupying controlling or beneficial roles and document the legal basis and information sources.	Arrangement documents, role map and verification.	AML/CFT/CPF Law, beneficial-owner definition and Article 5
Resolve discrepancies instead of relying solely on registry data.	Compare customer evidence with the state legal-entities database and investigate inconsistent ownership, management or status information.	Registry results, discrepancy log and resolution.	AML/CFT/CPF Law, Article 5; state legal-entities database service

5. PEPS, EDD, AND REMOTE ONBOARDING

PEPs, EDD, and remote onboarding

Higher-risk relationships require enhanced controls.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Identify PEP exposure under current sector rules.	Screen customers, representatives and beneficial owners and apply approval, source-of-wealth, source-of-funds and enhanced-monitoring controls where required.	Screening, classification, approval and corroboration.	AML/CFT/CPF Law; applicable internal-control requirements
Apply enhanced due diligence to higher risk.	Obtain additional identity, ownership, purpose, wealth and funds evidence and increase monitoring and review frequency proportionately.	EDD checklist, evidence, approval and monitoring plan.	AML/CFT/CPF Law, Articles 5 and 11
Control non-face-to-face onboarding.	Use a method permitted by the competent supervisor, test impersonation and fraud controls, and preserve authentication and exception evidence.	Method assessment, session evidence and tests.	Applicable sector identification and internal-control rules

6. MONITORING AND SUSPICIOUS REPORTING

Monitoring and suspicious reporting

Monitoring must support AFM's event-specific reporting timelines.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Monitor transactions and relationships on a risk basis.	Detect threshold, complex, unusually large, unusual and suspicious activity; review scenarios and customer information periodically.	Scenario inventory, alerts, tuning and governance.	AML/CFT/CPF Law, Articles 4, 10 and 11
Report a suspicious transaction before conduct where required.	When an operation is recognized as suspicious before execution, report it to AFM immediately before conduct and follow AFM suspension instructions.	Recognition time, report, receipt and hold decision.	AML/CFT/CPF Law, Article 13(2)
Apply the correct timing where prior suspension is impossible or suspicion forms later.	For an operation that cannot be suspended, use the statutory three-hour-after-conduct or 24-hour-after-detection route as applicable; where recognized after conduct, report by the next working day.	Timeline, legal classification, report and acknowledgement.	AML/CFT/CPF Law, Article 13(2)
Prevent tipping off.	Restrict access and communications about reports, AFM requests and related assistance except where law permits.	Access controls, communication review and training.	AML/CFT/CPF Law, Article 10(5)

Threshold reporting, wires, payments, and digital assets

Do not reduce transaction-specific reporting categories to one universal amount.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Configure each current financial-monitoring category separately.	Maintain a legal table of Article 4 transaction types, amounts, aggregation and exemptions for the entity; report covered operations by the applicable deadline.	Threshold table, configurations, test cases and reports.	AML/CFT/CPF Law, Articles 4 and 10
Carry required wire-transfer information.	Apply current originator, beneficiary, missing-data, screening and intermediary controls for the institution's role.	Field matrix, samples, screening and repair queue.	AML/CFT/CPF Law; applicable sector rules
Classify payment and electronic-money services before launch.	Map payment initiation, processing, wallets, acquiring, transfers and electronic money to the Law on Payments and Payment Systems and National Bank requirements.	Product memo, registration or licence and control tests.	Law on Payments and Payment Systems
Use the correct digital-asset perimeter.	Classify secured and unsecured digital assets and obtain the required National Bank, digital-development authority or AFSA/AIFC licence before exchange or platform activity; do not rely on an in-principle approval as authority to operate.	Classification, licence, register check and AML programme.	Law on Digital Assets; current National Bank and AIFC rules

8. TARGETED FINANCIAL SANCTIONS

Targeted financial sanctions

Use the live official lists and act without delay.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Screen current terrorism, extremism and proliferation-financing lists.	Screen customers, owners, representatives and transactions at onboarding, continuously or periodically according to risk, and on list updates.	List version, screening logs and match decisions.	AML/CFT/CPF Law, Article 12
Freeze listed property immediately.	Implement the statutory freeze without delay and no later than one working day after official publication of the listing, subject only to express statutory exceptions.	Listing, freeze timestamp, asset inventory and report.	AML/CFT/CPF Law, Article 12(1-1)
Control releases and permitted access.	Release or permit access only on documented legal authority and preserve every condition and communication.	Authority decision, conditions and release record.	AML/CFT/CPF Law, Article 12

9. RECORDS AND AUTHORITY ACCESS

Records and authority access

Records must reconstruct the complete customer and transaction lifecycle.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Retain CDD and relationship records for at least five years.	Run the period from relationship termination and preserve customer files, correspondence, ownership analysis and review results.	Retention schedule, source records and retrieval test.	AML/CFT/CPF Law, Article 11
Retain reportable, suspicious and unusual-operation records for at least five years.	Run the period from transaction completion and preserve analysis, decision and reporting evidence.	Case archive, schedule and integrity controls.	AML/CFT/CPF Law, Article 11
Respond to AFM requests within the applicable deadline.	Operate controlled production procedures for the general three-working-day deadline and the next-working-day deadline for suspicious-transaction analysis requests, subject to any lawful extension.	Request log, production, approval and receipt.	AML/CFT/CPF Law, Article 10

10. PRIVACY, BIOMETRICS, BREACHES, AND TRANSFERS

Privacy, biometrics, breaches, and transfers

AML processing remains subject to Kazakhstan privacy and security law.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Document the lawful basis and purpose for personal-data processing.	Map collection, processing, notices, consent or statutory authority, access rights, correction, blocking, destruction and retention.	Data map, notices, legal-basis register and rights log.	Law on Personal Data and their Protection
Protect identity and biometric data.	Minimize collection and apply security, access, accuracy, liveness and deletion controls proportionate to sensitivity and permitted purpose.	Assessment, architecture, tests and approvals.	Law on Personal Data and their Protection
Control transfers and third parties.	Confirm consent or another lawful basis, destination protection, contracts and localization requirements before third-party or cross-border transfers.	Transfer map, legal assessment, safeguards and notices.	Law on Personal Data and their Protection, cross-border-transfer provisions
Use applicable incident and sector reporting rules.	Maintain an incident workflow that identifies the competent authority, affected systems, notification triggers and deadlines without inventing a universal breach deadline.	Incident chronology, legal assessment, notices and remediation.	Personal-data law and applicable sector cybersecurity rules

11. PRACTICAL EVIDENCE PACKS

Practical evidence packs

Evidence must reconstruct decisions end to end.

CONTROL	IMPLEMENTATION ACTION	EVIDENCE	SOURCE
Maintain an onboarding pack.	Bundle identity, authority, KYB, beneficial ownership, PEP, sanctions, purpose, risk, privacy and approvals.	Complete sample and retrieval result.	Operational control supporting AML/CFT/CPF Law, Article 5
Maintain reporting and sanctions case packs.	Link trigger, classification, decision time, report, receipt, confidentiality, freeze and authority communications.	Case pack, timeline and access record.	AML/CFT/CPF Law, Articles 10, 12 and 13
Maintain a launch and legal-change pack.	Record perimeter, licences, transaction categories, reporting, sanctions, privacy, vendors, source versions and tests.	Signed pack, source register and approvals.	Official sources listed below

SOURCES AND FURTHER READING

Verify against current official material

Primary law and regulator guidance control. Contextual VOVE ID reading is included to help teams operationalize the requirements and is not legal authority.

AML/CFT/CPF Law No. 191-IV
Agency for Financial Monitoring · Primary legislation - official English text
Open official source

AML/CFT/CPF Law - current official repository record
Adilet Legal Information System · Primary legislation - official English text
Open official source

Agency for Financial Monitoring
Government of Kazakhstan · Official FIU and regulator portal
Open official source

Internal-control requirements for banking-operation and microfinance organizations
Agency for Financial Monitoring · Official sector requirements
Open official source

State database - Legal entities
Ministry of Justice · Official registry service
Open official source

Law on Personal Data and their Protection
Adilet Legal Information System · Primary legislation - official English text
Open official source

National Bank of Kazakhstan
National Bank of Kazakhstan · Official financial and payments regulator
Open official source

Law on Payments and Payment Systems
Adilet Legal Information System · Primary legislation - official English text
Open official source

Digital asset industry framework
Government of Kazakhstan · Official regulatory overview
Open official source

AFSA public register
Astana Financial Services Authority · Official licence register
Open official source

Kazakhstan 2023 mutual evaluation
FATF / EAG · Authoritative mutual evaluation
Open official source

Kazakhstan EAG follow-up report 2026
FATF / EAG · Authoritative follow-up assessment
Open official source

FATF increased-monitoring statement - October 2026
FATF · Authoritative current public-list status
Open official source

FATF call-for-action statement - October 2026
FATF · Authoritative current public-list status
Open official source

Law and rules on State Symbols
Government of Kazakhstan · Official flag-use law and rules
Open official source

Document control

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