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for 2025

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EXECUTIVE SUMMARY

The year 2025 was a period of new challenges and difficult decisions for the National Bank, driven by a commitment to the well-being of every citizen of Kazakhstan. We faced significant inflationary pressures and instability in global markets. Under these conditions, our main task was not merely to respond to changes, but to pursue a balanced policy that would preserve economic stability and safeguard citizens' savings. Ensuring price stability is not only our mandate; it is also an important component of public policy that serves as the foundation for the well-being of our fellow citizens.

To contain price growth and ensure the stable functioning of the financial market, throughout the year we made timely decisions regarding the base rate in response to emerging challenges and employed liquidity management instruments to cool excessive consumer demand. In replenishing international reserves, the principle of monetary neutrality was introduced to ensure that our domestic operations would not create additional pro-inflationary risks for the economy.

At the same time, we actively worked to make the financial market more modern and accessible. Money market instruments were enhanced and the government securities market continued to develop, attracting investors, including those from abroad. This entire process was carried out in close coordination with the Government: we joined efforts in the areas of macroeconomic and debt policy to ensure that the state system functioned as a unified and well-coordinated mechanism.

In 2025, a legal framework for the further development of the National Digital Financial Infrastructure (NDFI) was established, including the legal recognition of its core components and the conditions for interaction with financial institutions, while a new form of the national currency—the digital tenge—was introduced. As a result, the active implementation of the NDFI and the scaling-up of its infrastructure services across the country's financial market continue, contributing to the strengthening of Kazakhstan's payment sovereignty, enhancing the efficiency of interbank interaction, and fostering the development of innovative financial services for the benefit of households, businesses, and the state.

For the first time in the country, comprehensive legislative regulation of the digital assets industry was introduced, including the definition and classification of digital assets, requirements for the establishment and operation of the national digital asset infrastructure, requirements governing the activities of service providers, and regulation of the areas in which digital assets may be used. This new environment stimulates the development of innovative digital financial instruments and the formation of transparent digital asset circulation, while ensuring financial stability and the protection of users' rights.

The year 2025 marked an important stage in the implementation of the strategic course toward building a modern, technology-driven, and digital National Bank. Together with the Agency of the Republic of Kazakhstan for Regulation and Development of the Financial Market, a solid foundation was laid for the digital

transformation of the financial regulators. Key projects were launched in data management, ICT infrastructure modernization, platform solutions development, and the introduction of artificial intelligence. The results achieved confirm that the National Bank, jointly with the Agency of the Republic of Kazakhstan for Regulation and Development of the Financial Market, is consistently building an effective digital ecosystem aimed at improving data quality, optimizing processes, and strengthening the country's analytical and technological capacity.

Particular attention was paid to the resilience of the financial sector. Together with government agencies, the National Bank implemented measures to reduce systemic risks. The pace of retail lending growth was moderated in a controlled manner in order to prevent excessive household indebtedness and make the financial system more resilient to shocks.

The measures adopted have yielded results: by the end of 2025, inflationary processes had moderated. We created all the necessary conditions for prices to stabilize more firmly over the medium term.

The National Bank will continue to adhere firmly to its chosen course. Our objective is to strengthen confidence in the policies being pursued, the national currency, and the domestic financial system by creating predictable and transparent conditions for households and businesses. We work toward the sustainable and balanced development of our country's economy.

OVERVIEW OF THE MISSION, OBJECTIVES, AND STRATEGIC DIRECTION OF THE NATIONAL BANK

The National Bank is the central bank of the country and represents the upper tier of Kazakhstan's two-tier banking system. Its activities are governed by the Constitution and the Law of the Republic of Kazakhstan "On the National Bank of the Republic of Kazakhstan", as well as by acts of the President and the Government of the Republic of Kazakhstan and other regulatory legal acts of the Republic of Kazakhstan.

The primary objective of the National Bank is to ensure price stability. To achieve this objective, the National Bank formulates and implements monetary policy within the framework of the inflation-targeting regime. The objective of monetary policy is to maintain annual inflation close to 5% over the medium term.

In addition, to achieve its primary objective, the National Bank is entrusted with the following functions:

- formulating and conducting monetary policy;
- ensuring the functioning of payment systems;
- carrying out foreign exchange regulation and foreign exchange control;
- contributing to the stability of the financial system;
- conducting statistical activities in the areas of monetary statistics, financial market statistics, and external sector statistics.

1.ECONOMIC OVERVIEW AND MONETARY POLICY

1.1.Global Economic Trends

In 2025, the global economy demonstrated steady growth at 3.3%¹, maintaining the pace of the previous year despite escalating trade and economic tensions and persistent global uncertainty. Growth was supported by the front-loaded expansion of global trade in anticipation of new tariff restrictions by the US, the reconfiguration of global supply chains, easing financial conditions, as well as accelerated investment in infrastructure and artificial intelligence development.

In the US, economic growth slowed from 2.8% in 2024 to 2.1% due to weakening consumer demand and a temporary deterioration in the trade balance, partly driven by accelerated import purchases. Following two years of weak growth, the Eurozone² accelerated to 1.4% thanks to strong and more resilient domestic demand (compared to 0.9% in 2024). Supported by fiscal stimulus and strong exports, China's economic growth remained flat at 5.0%. The Russian economy slowed down to 0.6% compared to 4.3% a year earlier, amid the normalization of demand and a cooling economy.

Global inflation decelerated from 5.8% in 2024 to 4.1% in 2025, though it remains above target in many countries. In the US, inflation stood at 2.7% in December 2025 (December 2024: 2.9%)³. In the European Union, against the background of easing labor market tensions and a stronger euro against the US dollar, inflation slowed to 2.3% (2024: 2.7%). China experienced deflationary processes for most of the year due to weak consumer demand (inflation stood at 0.8% in December 2025). In Russia, driven by slowing food price growth and a stronger ruble, inflation fell from 9.5% in December 2024 to 5.6% in December 2025.

Amid the gradual decline in inflation, the US Federal Reserve lowered its key rate to 3.75% per annum⁴, the European Central Bank to 2.15% per annum, and Russia to 16.0% per annum.

On the whole, the impact of external factors on Kazakhstan's economy in 2025 was predominantly negative. Pressures were driven by significantly higher global food prices, primarily for meat and vegetable oils, which exerted upward pressure on domestic prices. Pro-inflationary pressure was also reinforced by Russia, where consumer prices remained high for a prolonged period and the ruble exchange rate remained relatively strong.

1.2. Macroeconomic Conditions in Kazakhstan

1.2.1. Current Economic Conditions and Key Indicators

In 2025, economic growth in the Republic of Kazakhstan accelerated compared to the previous year, driven by the expansion of goods and services production (Figure

¹ Actual and forecast GDP growth data, as well as global inflation data, are based on the International Monetary Fund's World Economic Outlook report published in January 2026.;

² Based on data for six economies (France, Germany, Ireland, Italy, the Netherlands and Spain), which together account for approximately 85% of euro area GDP;

³ Actual inflation data are sourced from the national statistical agencies of the respective countries;

⁴ Actual policy rate data are sourced from the official websites of the respective central banks.

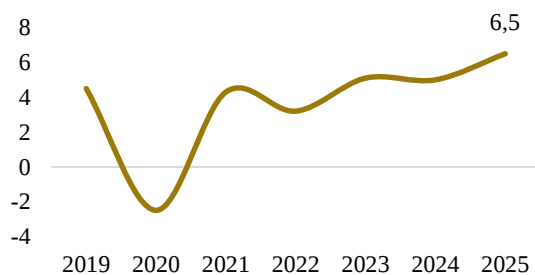
1). Industrial growth was propelled by increased manufacturing output, supported by investment activity and the implementation of infrastructure projects. The oil sector made a significant contribution to economic growth due to increased oil production at the Tengiz field, which also supported activity in trade and transport. Growth in construction and the services sector remained strong, supported by domestic demand and the development of logistics infrastructure.

From the expenditure-side perspective, consumer demand remained the main driver of economic growth in 2025, supported by stable employment and continued expansion in the services sector. Gross capital formation also made a substantial contribution to gross domestic product growth, driven by an acceleration in investment activity. Import growth reflected the strong dynamics of domestic demand, while exports showed a moderate increase. Retail trade maintained steady growth, driven primarily by the non-food segment, while high growth rates in food and beverage services reflected sustained consumer activity. However, inflationary pressure limited real income growth, and macroprudential measures contributed to a slowdown in consumer lending, while mortgage lending continued to support demand in the housing market.

Investment activity expanded significantly in 2025 supported by state infrastructure programs, rising residential construction, and an increase in private investment. The main contribution came from investment in housing and public utilities infrastructure, manufacturing, transport, and warehousing. Meanwhile, the mining sector remained modest (Figure 2).

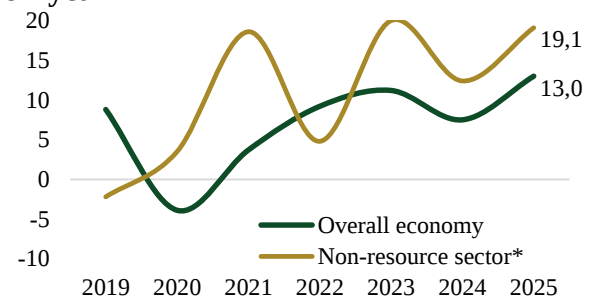
Labor market conditions remained stable, characterized by high employment. Employment growth was primarily driven by an increase in the number of employees.

Figure 1. Real GDP Growth Rates, % year-on-year



Source: Bureau of National Statistics of the Agency for Strategic Planning and Reforms of the Republic of Kazakhstan (BNS ASPR RK)

Figure 2. Fixed Capital Investment, % year-on-year



*investment in fixed capital of the non-resource sector, excluding investments from the state budget

1.2.2. Inflationary Processes and Factors of Their Formation

Annual inflation accelerated from 8.6% in December 2024 to 12.3% in December 2025. From January to September, inflation accelerated continuously, peaking at 12.9%, after which it began to slow down in the IV quarter due to the anti-inflationary measures of the Government and tightening monetary conditions (Figure 3).

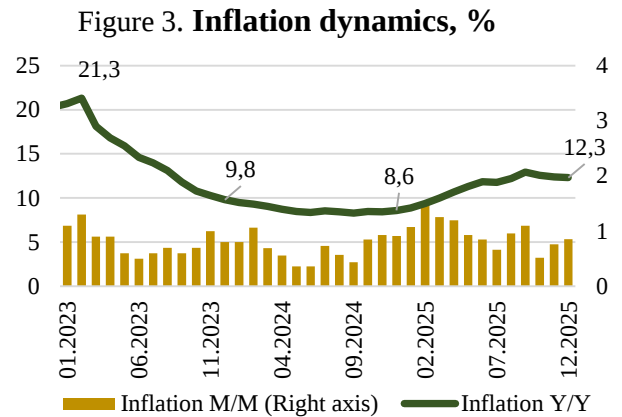
Food inflation accelerated from 5.5% at the end of 2024 to 13.5% in December 2025.

This acceleration was driven by rising producer costs, sustained high global prices, and increasing import prices, particularly due to the strengthening of the Russian ruble. Additional pressure on domestic prices was exerted by significant exports of certain food commodities.

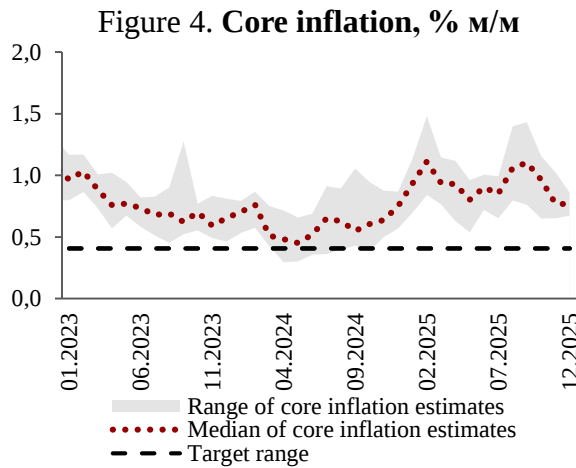
Non-food inflation accelerated from 8.3% at the end of 2024 to 11.2% in November 2025 due to the liberalization of the fuel and lubricants market, stable consumer demand, and fiscal stimulus. In the IV quarter of 2025, the growth rate of non-food inflation slowed down following the introduction of a moratorium on price hikes for RON-92 petrol and diesel fuel, as well as the strengthening of the tenge against the US dollar. As a result, non-food inflation stood at 11.1% at the end of 2025.

Paid services inflation accelerated from 13.3% at the end of 2024 to 15.3% in September 2025. This acceleration was caused by rising prices for market services under conditions of resilient demand and general inflationary pressure, alongside the implementation of the "Tariff in Exchange for Investment" program, under which tariffs for regulated housing and public utility services were raised to increase the investment attractiveness of the sector and renew fixed assets. In the IV quarter of 2025, the growth rate of service inflation began to slow down following a moratorium on tariff hikes for regulated housing and utility services. At the end of 2025, service inflation stood at 12%.

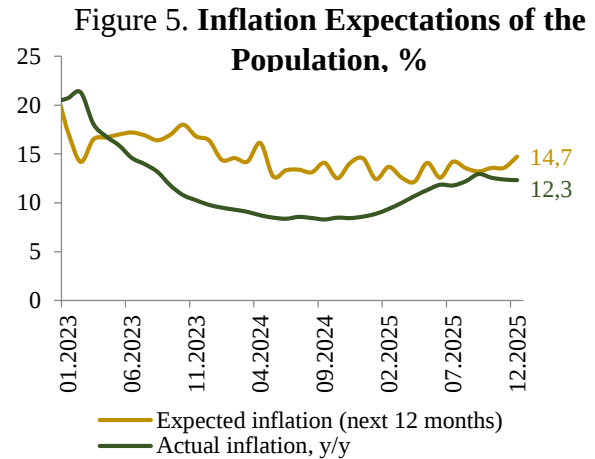
Core inflation⁵ remained elevated throughout 2025 (Figure 4). Two periods of significant price acceleration stand out—in February and September 2025. In the first instance, the rise in core inflation was driven by more expensive food products and services amid the announcement of tax reform and price regulation reforms in the housing and utilities market; in the second instance, it was driven by non-food goods. At the end of the year, this indicator began to decelerate under the influence of the anti-inflationary measures taken.



⁵ Estimates of core and seasonally adjusted inflation are based on the methodology described in Orlov K. and Yerzhan I., "Features of Seasonal Adjustment of the Consumer Price Index for Kazakhstan," 2019, and Orlov K. and Seidakhmetov A., "Different Measures of Core Inflation for Kazakhstan," 2023.



NBK calculations based on BNS ASPR RK data.



Source: Surveys by Fusion Lab LLP, BNS ASPR RK;

The population's inflation expectations remained volatile and elevated throughout 2025, increasing to 14.7% in December (14.6% in December 2024, Figure 5). Among the key factors for future price growth, respondents most frequently cited the rising cost of food products, as well as petrol and diesel fuel. By the end of the year, mentions of utility services decreased somewhat as their annual price growth rates slowed, while the significance of the exchange rate factor also declined amid the strengthening of the nominal tenge exchange rate. Concurrently, public concern regarding a potential VAT rate hike at the beginning of 2026 intensified. Given the prevalence of pro-inflationary factors, a high level of uncertainty persists in public assessments.

The inflation level of 12.3% recorded at the end of 2025 falls within the forecast range of 12–13% for 2025 published following the "November 2025" forecast round. Maintaining a moderately tight monetary policy will contribute to lowering and stabilizing inflation at the 5% target in the medium term.

1.2.3. Fiscal Policy and Its Impact on the Inflation Environment

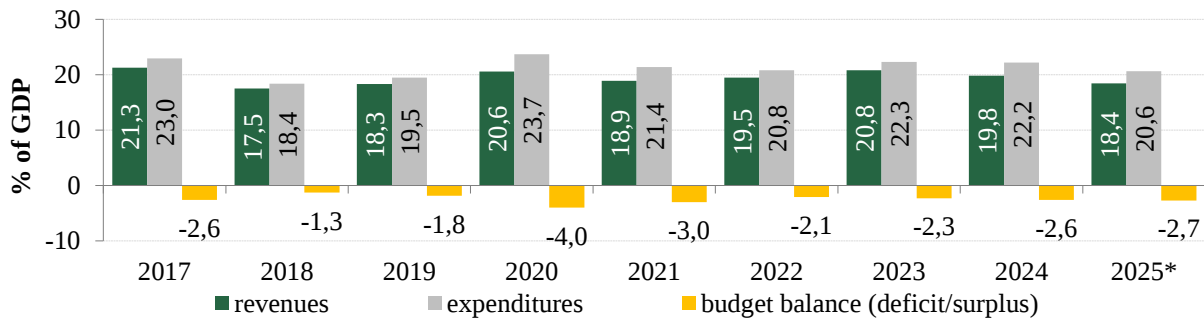
State budget revenue growth accelerated to 10.1% in 2025 after a slowdown in 2024. Among the aggregated groups, tax revenues made the largest contribution, growing by 17.7%. In the structure of taxes, double-digit growth was observed across all major categories due to increased economic activity. At the same time, transfers from the National Fund decreased from 6 trillion tenge (including the purchase of shares in JSC Kazatomprom) to 5.3 trillion tenge, which led to an increase in the share of non-oil revenues.

However, the republican budget recorded a shortfall in tax revenues amounting to 730 billion tenge. The largest shortfall was observed in corporate income tax from large companies and value-added tax on domestic production. The missing tax revenues were compensated by local budget revenues and above-target performance in other non-tax revenues.

State budget expenditures in 2025 grew by 10.3% in nominal terms compared to 2024. Out of all expenditure items, spending on agriculture and forestry rose noticeably by 25.7%, culture, sport, and tourism by 22.6%, and debt servicing by 19.2%.

At the end of 2025, the state budget deficit amounted to 4.4 trillion tenge, corresponding to 2.7% of GDP, while the non-oil deficit reached 11.4 trillion tenge or 7% of GDP (Figure 6).

Figure 6. General government budget execution



* GDP data represents an estimate by the NBK

Despite the improvement in the disinflationary dynamics of state budget indicators, economic stimulus is also provided through quasi-fiscal mechanisms. In 2025, the volume of support through quasi-fiscal institutions reached an all-time high, particularly through economic financing by “Baiterek” NIH” JSC. The implementation of these measures stimulates economic activity and, consequently, expands aggregate demand, sustaining pro-inflationary pressure.

1.2.4. Foreign Trade and Balance of Payments

In 2025, Kazakhstan's foreign trade maintained a positive surplus. The expansion of foreign trade turnover was primarily driven by import growth, while exports exhibited subdued dynamics due to the volatility of global commodity prices.

Amid volatility in global commodity markets and a decline in physical delivery volumes, goods exports fell by 1.2% to USD 77.3 billion, mainly due to a reduction in exports of ferrous and non-ferrous metals, their ores, and uranium. Simultaneously, imports grew by 9% to USD 66.3 billion across almost all product categories, reflecting strong domestic demand and investment activity. Consequently, the trade balance surplus fell by a third to USD 11.0 billion, down from USD 17.5 billion a year earlier.

These trends affected the status of the balance of payments. The current account deficit deepened to USD 12.5 billion (2024: USD 6.8 billion), driven by lower export earnings coupled with outstripping import growth. The deficit was financed through financial account transactions, including changes in residents' external assets and liabilities. Meanwhile, international reserve assets (excluding National Fund assets) amounted to USD 65.4 billion, providing 9.8 months of import coverage, which supports short-term external resilience. External debt stood at USD 181.8 billion at the end of 2025, compared to USD 164.7 billion a year earlier. Relative to GDP, it remains at 60%. In turn, public sector external debt stands at about 6% of GDP or USD 18.6 billion, reflecting a low debt burden on the public sector.

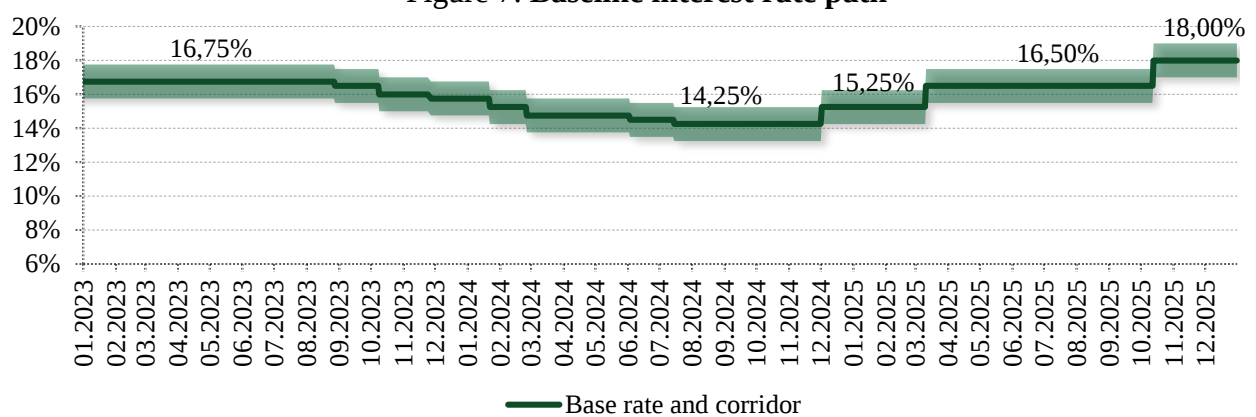
1.3.Primary Objective: Ensuring Price Stability

1.3.1. Monetary Policy

The primary objective of the National Bank is to ensure price stability by achieving the medium-term inflation target of 5%. To this end, the National Bank conducts monetary policy adhering to the principles of inflation targeting.

In response to rising inflation, the National Bank raised the base rate by 1.25 p.p. to 16.5% in March 2025, and by 1.5 p.p. to 18% in October 2025. These decisions helped reverse the upward trend in inflation and led to its gradual decline at the end of the year, shifting trends in market participants' inflation expectations. This was reflected in sustained attractiveness of tenge-denominated assets, increased investment by non-residents in government securities (GS), and the appreciation of the tenge.

Figure 7. Baseline interest rate path



In addition to interest rate policy, the National Bank initiated additional measures to absorb excess liquidity, including raising minimum reserve requirements (MRR) and conducting mirroring operations on gold purchases into foreign exchange reserves.

In particular, amendments to the MRR framework were introduced in 2025 providing for the refinement of the reserve base (clarifying liabilities included in the MRR), a reduction in the share of cash holdings within the structure of reserve assets, and the alignment of maturity-based ratios with global practice.

MRR ratios are being gradually brought to levels comparable with those applied in the EAEU, Central Asia, and the Caucasus (Figure 8):

from September 2025: 3.5% on tenge-denominated liabilities and 10% on foreign currency liabilities;

from April 2026: from 3.5% to 5% on tenge-denominated liabilities (depending on the liability category), and from 10% to 12% or 15% on foreign currency liabilities (depending on the liability category and bank group⁶);

from September 2026: an increase on foreign currency liabilities from 10% to 15% (depending on the liability category).

⁶ Resolution No. 118 of the Board of the National Bank of the Republic of Kazakhstan dated 2 July 2019 "On the Establishment of Minimum Reserve Requirements"

These changes contribute to improving the effectiveness of monetary policy. Following the introduction of the new requirements, the average volume of MRR increased from 0.8 trillion tenge to around 2.8 trillion tenge, while the average liquidity surplus in the money market decreased from 7.7 trillion tenge to around 6.0 trillion tenge. According to estimates, the volume of liquidity absorbed through the MRR under the third stage (September 2026) will amount to around 4.0 trillion tenge.

Comparison of Ratio Across Regional Countries

Figure 8. By liabilities in national currency, %

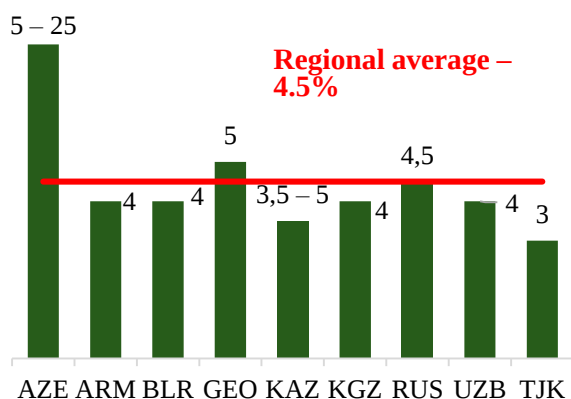
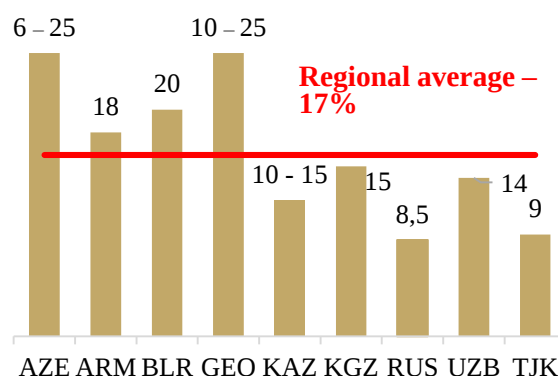


Figure 9. By liabilities in foreign currency, %



A set of micro- and macroprudential measures to cool consumer lending growth also contributed to reducing inflation and pro-inflationary factors.

To further enhance the transparency of communication policy, the National Bank began regular publication of a separate document in June 2025 disclosing the deliberations of the Monetary Policy Committee (MPC) during base rate decision-making. The Summary of Deliberation outlines the core arguments and factors considered by Committee members during decision-making.

The purpose of the publication is to enhance transparency in the monetary policy decision-making process, as well as to form better-informed expectations among market participants and the general public. In developing the document, the National Bank took into account the practices and approaches of leading central banks and IMF recommendations.

1.3.2. Transmission Mechanism and Assessment of Monetary Policy Impact on the Economy

In 2025, the implementation of the National Bank's monetary policy exerted a systemic influence on financial conditions through the interest rate, credit, and currency channels. The transmission of base rate signals into the economy occurred sequentially, encompassing the money market, the government securities market, credit and deposit rates, and exchange rate dynamics.

Interest Rate Channel. In 2025, the TONIA⁷ rate increased in line with the rise in the base rate and remained predominantly near the lower bound of the interest rate corridor (Figure 10).

Figure 10. **Base Rate and TONIA, %**

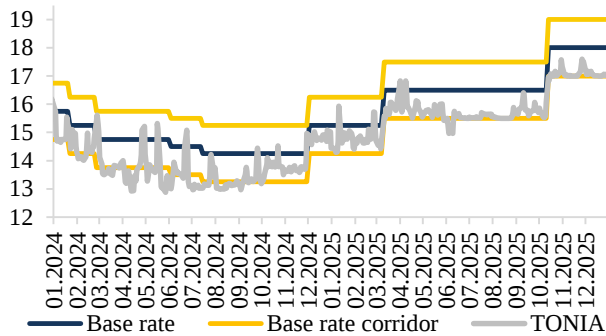
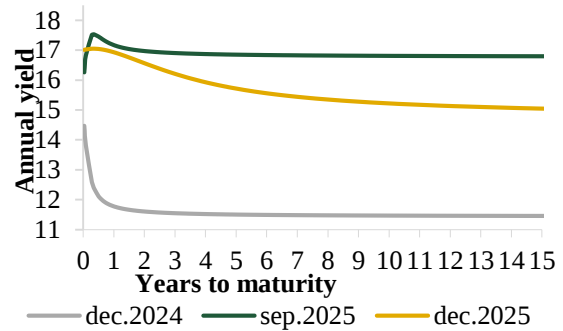


Figure 11. **Risk-Free Yield Curve, %**



The risk-free GS yield curve in 2025 was shaped by shifting inflation expectations, the monetary policy pursued, and the budget's ongoing borrowing needs to finance the deficit. The strongest impact of monetary policy was evident in the short-term and medium-term segments of the yield curve (Figure 11).

Throughout most of 2025, the GS yield curve maintained a predominantly inverted shape, reflecting market participants' expectations of a further reduction in inflationary pressure and potential monetary policy easing in the medium term. In September–October 2025, the yield curve assumed a near-linear shape while maintaining high yield levels, indicating the presence of inflation risks.

In December 2025, the risk-free yield curve shifted downward across all maturities amid increased demand for GS. A significant impact came from the easing of long-term inflation risks and increased activity among market participants, including non-residents of the Republic of Kazakhstan.

Deposit Rates. The base rate hikes during the year were accompanied by higher deposit rates in the national currency. A more immediate response was observed in the corporate segment, whereas retail deposits adjusted to changing interest rate conditions more gradually. The formation of deposit rates for individuals was also affected by the decision of the Kazakhstan Deposit Insurance Fund to discontinue, effective March 1, 2025, the practice of setting ceiling rates on tenge deposits for all second-tier banks, thereby strengthening the role of market forces in determining deposit yield. As result, rates on corporate deposits increased from 14.0% in December 2024 to 16.8% in December 2025, compared with 13.2% to 14.7% for retail deposits (Figure 12).

Credit Rates. In 2025, lending rates on loans to legal entities adjusted gradually following the changes in the base rate. In the retail segment, dynamics were driven primarily by conditions in consumer loans (Figure 13).

⁷ Tenge OverNight Index Average

Figure 12. Deposit Rates in National Currency

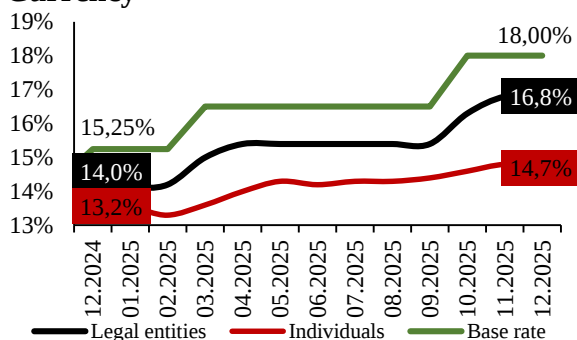
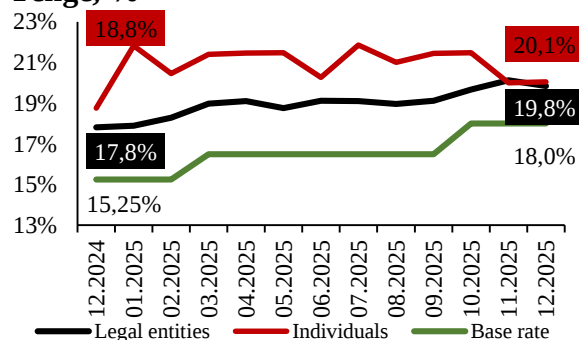


Figure 13. Weighted Average Credit Rates in Tenge, %



Credit Channel and Deposits (Wealth Channel)

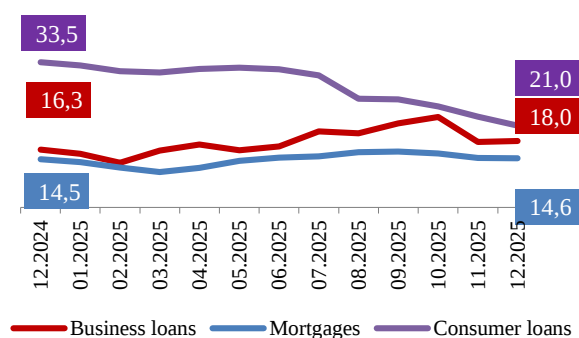
Under the broad definition⁸, loans to the economy reached 50.6 trillion tenge at the end of 2025 (a 20.9% increase). This growth was driven by loans from second-tier banks, JSC Development Bank of Kazakhstan, microfinance organizations, and other entities in the quasi-state sector.

In 2025, bank lending grew by 19.1% to 40.2 trillion tenge.

In the corporate segment, double-digit growth rates were recorded against the backdrop of rising business activity and the expansion of digital financial solutions (Figure 14). Significant growth was noted in the large and medium business segment, while lending to small businesses continued to grow at a more moderate pace due to the high base of previous years. Increased financing under preferential lending programs by development institutions also supported credit growth.

In the retail segment, the impact of the policy pursued and the regulatory measures adopted was reflected in a slowdown in consumer lending growth to 21.0% year-on-year (down from 33.5% a year earlier). Meanwhile, growth rates for unsecured consumer lending also slowed to 14.6% year-on-year from 29.2% a year earlier. Mortgage lending growth (14.6% year-on-year) was sustained by an increase in loans with preferential terms and the introduction of new mortgage products by individual banks, including joint initiatives with developers (Figure 14).

Figure 14. Growth Rates of the Loan Portfolio to Business and Population by Second-Tier Banks, year-on-year, %



⁸ Credits to the economy in a broad definition refer to the outstanding debt on loans provided by the banking sector, mortgage organizations, entities of the quasi-government sector (subsidiaries of Baiterek National Investment Holding JSC engaged in lending to the real sector), and organizations engaged in microfinance activities.

Deposits. In 2025, the volume of deposits in deposit organizations reached a record 48.0 trillion tenge, increasing by 16.3%. The expansion of the deposit base was driven by both tenge and foreign currency deposits (Figure 15). The high interest rate differential between deposits in national and foreign currencies supported the attractiveness of tenge savings, contributing to a decline in the share of foreign currency deposits to 21.1% in December 2025 (down from 22.5% in December 2024). The dollarization of individuals' deposits continued to decline, reaching an all-time low of 17.8% (down from 20.3%), while the dollarization of legal entities' deposits remained unchanged at 25.1% (Figure 16). The savings rate⁹ of the population, which reflects the savings behavior of economic agents, remains at a high level.

Figure 15. Deposits in Deposit Organizations, trillion tenge

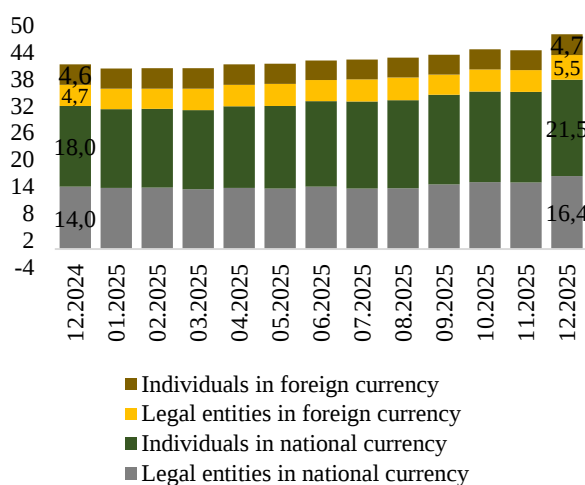
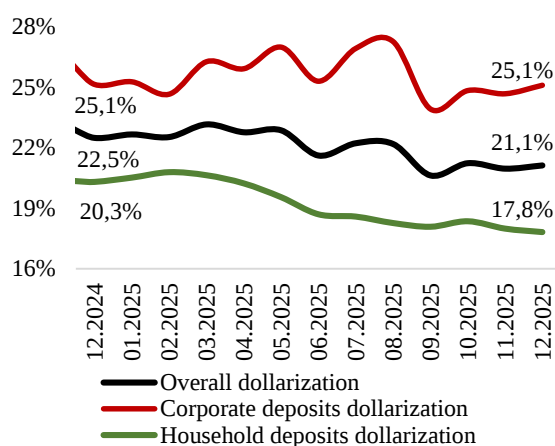


Figure 16. Deposit Dollarization Level



Currency Channel. Throughout 2025, the tenge exchange rate dynamics were shaped by external and internal factors.

In the first half of the year, the national currency appreciated against the backdrop of significant foreign currency sales from the National Fund to cover transfers to the budget. Additional foreign currency supply was provided by the introduction in 2025 of a mechanism to mirror gold purchase operations, which entails selling foreign currency for tenge to neutralize the impact of these operations on the currency market.

This dynamic reversed in the second half of the year. In July 2025, amid rising budget spending, growing import payments, and seasonal demand from the population, pressure on the currency market increased, raising demand for foreign currency. At the end of July 2025, the tenge exchange rate against the US dollar reached 540.7 tenge, weakening by 4.0% over the month (end of June 2025 – 519.7). Amid declining liquidity in the currency market and signs of mounting speculative pressure, the National Bank conducted foreign currency interventions amounting to USD 125.6

⁹ The following formula based on BNS ASPR statistics on the population's standard of living was used: Savings rate = (household monetary income – household monetary expenditures) / household monetary income.

million, which helped curb speculative activity, smooth excess volatility, and support the balance of the currency market.

At the same time, since October 2025, the tenge has been appreciating amid the ongoing monetary policy stance and as the base rate was raised. Specifically, a key role in strengthening the tenge was played by joint statements from the Government and the National Bank within the framework of the Joint Action Program of the Government of the Republic of Kazakhstan, the National Bank, and the Agency of the Republic of Kazakhstan for Regulation and Development of the Financial Market on Macroeconomic Stabilization and Increasing the Well-Being of the Population for 2026–2028. The moderately tight monetary policy pursued contributed to a revision of inflation expectations and an increase in the real yield of tenge instruments, significantly boosting their attractiveness, including for non-residents.

At the end of 2025, the tenge exchange rate against the US dollar appreciated by 3.7%, settling at 505.73 tenge per US dollar.

In general, the transmission mechanism functioned stably in 2025: base rate decisions were consistently reflected in the dynamics of market rates, credit and deposit activity, and exchange rate processes, creating financial conditions in the economy that matched inflationary challenges.

1.4. Financial Stability: Overview and Measures

In 2025, Kazakhstan's banking sector remained resilient, supported by a stable resource base, sufficient capital and liquidity levels, and acceptable loan portfolio quality. As of January 1, 2026, client deposits increased by 14.6%, reaching 48.7 trillion tenge. Capital adequacy ratios significantly exceeded regulatory standards (k1: 19.6%, k2: 20.8%), and the share of non-performing loans stood at 3.8%.

However, signs of overheating persisted in the retail lending segment. The most dynamic growth was observed in unsecured consumer lending (debt increasing by 14.6% to 11.6 trillion tenge) and auto lending (up by 42.1% to 4 trillion tenge). Simultaneously, the average consumer loan debt per borrower increased (by 18.3%), as did the number of borrowers with debts exceeding 1 million tenge (by 13%), indicating a growing debt burden on the population and heightened sensitivity of the segment to macroeconomic risks.

To cool retail lending, the National Bank, in cooperation with the Agency of the Republic of Kazakhstan for Regulation and Development of the Financial Market, implemented a package of macro- and microprudential measures. On the recommendation of the Financial Stability Council, a sectoral countercyclical capital buffer (SCCB) of 2% of risk-weighted assets was introduced for loans to the population, with a transition period until April 1, 2026. The required volume of additional capital is estimated at 500 billion tenge.

On the demand side, the key tool was the requirement to comply with a debt burden ratio (DBR) of no more than 0.5, limiting loan issuance to borrowers with excessive debt loads. Income verification requirements for DBR calculations were tightened in 2025. As a result of these combined measures, retail lending growth rates

slowed in the second half of the year: by year-end, the growth in loan issuances to the population stood at 8.7% year-on-year for consumer loans (compared to 21.9% in 2024 and 29.9% in 2023) and 10% year-on-year for auto loans (compared to 23.8% and 41.3%, respectively).

In parallel, initiatives were undertaken to encourage second-tier banks to expand corporate lending and utilize capital more efficiently. To eliminate tax arbitrage and reduce the attractiveness of investing in government securities, taxation was introduced on income from National Bank notes (effective March 2024) and on Ministry of Finance government securities at the initiative of the National Bank (starting from 2026, 50% of income received is subject to taxation, rising to 100% from 2031). Differentiated corporate income tax rates were introduced from January 2026: 20% on income from business lending and 25% on other activities.

An additional incentive was a smoother increase in minimum reserve requirements for banks that actively expand lending to the economy and increase their portfolio of securities issued by residents that are not financial organizations.

Together with the Agency of the Republic of Kazakhstan for Regulation and Development of the Financial Market, work continued to ensure the early repayment of funds allocated under the Bank Sector Financial Stability Enhancement Program and other state support measures. Restrictions on dividend payments were introduced, and provisions were made to place a portion of state support funds within minimum reserve requirements. As a result, banks have repaid early more than half of the allocated funds, and efforts to recover state assistance are ongoing.

Legislative amendments¹⁰ in 2025 strengthened the National Bank's institutional mandate in macroprudential policy, granting it powers to establish mandatory regulations and limits (including the countercyclical capital buffer, SCCB, and DBR), while the supervisory function remains with the Agency of the Republic of Kazakhstan for Regulation and Development of the Financial Market.

Under the new Law on Banks¹¹, the resolution mechanism for systemically important banks was revised in line with international principles. Requirements were introduced for total loss absorbing capacity instruments and the preparation of resolution plans. Conditions for state support were also clarified, prioritizing loss absorption by shareholders, providing emergency liquidity assistance subject to a state guarantee, and subsequent recovery of support from the industry.

During the year, the Financial Stability Council reviewed the results of the Asset Quality Review (AQR), bank stress testing, preliminary outcomes of the 2024 Financial Stability Report, and measures to ensure pension asset returns above inflation. Approaches for shaping the architecture of crisis management plans and additional measures to reduce risks in the consumer lending segment were approved.

¹⁰ Law of the Republic of Kazakhstan dated June 30, 2025 “On Amendments and Additions to Certain Legislative Acts of the Republic of Kazakhstan on the Development of the Financial Market, Protection of Financial Services Consumers’ Rights, Communications, and the Elimination of Excessive Legislative Regulation.”

¹¹ Law of the Republic of Kazakhstan dated January 16, 2026 No. 258-VIII “On Banks and Banking Activity in the Republic of Kazakhstan.”

The initiatives implemented achieved a strengthening of the banking system's resilience, an improved balance in credit activity, and reinforced inter-agency coordination within the financial safety net.

2. OPERATIONAL ACTIVITIES OF THE BANK

2.1. Management of the Gold and Foreign Exchange Assets of the National Bank

At the end of 2025, the gold and foreign exchange assets of the National Bank amounted to USD 65.9¹² billion, representing an increase of USD 20.2 billion or 44.2% compared to 2024 (Table 1).

In 2025, within the scope of exercising its priority right in the domestic market, the National Bank purchased 2.1 million troy ounces or 66 tonnes of refined gold bullion.

At the beginning of the reporting year, 6.5 tonnes of gold worth USD 605 million were sold on the external market to enhance the liquidity of gold and foreign exchange reserves. However, effective February 2025, given increased uncertainty in global precious metals markets and expectations of US Fed monetary policy easing, gold sales operations were suspended, and the National Bank resumed its accumulation within gold and foreign exchange reserves.

Furthermore, as part of implementing the Address of the Head of State to the People of Kazakhstan dated September 8, 2025, "Kazakhstan in the Era of Artificial Intelligence: Current Challenges and Solutions through Digital Transformation" (hereinafter the Address of the Head of State), in terms of the formation of the National Strategic Crypto Reserve for investment in digital assets, a digital asset portfolio was established within the alternative instruments portfolio.

Table 1. Structure of the Gold and Foreign Exchange Assets of the National Bank

Portfolio Name	as of Jan 1, 2025		as of Jan 1, 2026		2025 Return in USD
	Market Value (USD mln)	Share (%)	Market Value (USD mln)	Share (%)	
Gold Portfolio	23 982.7	52.5%	47 720.6	72.5%	65%
Liquidity Portfolio	6 816.2	14.9%	3 163.8	4.8%	5.5%
Strategic Portfolio	3 898.4	8.5%	4 297.7	6.5%	10.2%
Investment Portfolio	9 014.1	19.7%	8 291.1	12.6%	5.3% (in currency basket) 9.4% (in USD)
Alternative Instruments Portfolio	1 726.8*	3.8%	1 830.5 ¹³	2.8%	7.4% ¹³
Emerging Markets Portfolio	233.1	0.5%	562.4	0.9%	6.0%
Total	45 671.3*	100%	65 866.1	100%	

¹² The volume of international reserves at the end of 2025 amounted to USD 65.4 billion. International reserves include foreign currency assets, gold, and the net claims of the Republic of Kazakhstan on the IMF in SDRs.

¹³ Preliminary data. The annualized return since the adoption of the reference portfolio approach (01 July 2018 – 31 December 2025) amounted to 8.7%, while over the last five years it was 7.4%.

*For reference: Given the specifics of the private equity market, finalized data for the alternative instruments portfolio becomes available in the second quarter of the year following the reporting year. Thus, according to audited data for 2024, the market value of the alternative instruments portfolio stands at USD 1,726.8 million, with a return of 4.5%.

In the first quarter of 2025, to expand investments in Chinese government securities, under the Reserve Advisory & Management Partnership Program emerging markets portfolio assets worth around USD 300 million were transferred to the management of the International Bank for Reconstruction and Development.

To ensure monetary neutrality during gold purchases by the National Bank under its priority right, mirroring operations were executed throughout the year via foreign currency sales from the liquidity portfolio amounting to approximately USD 7 billion on the domestic market. The amount of currency sold is equivalent to the volume of tenge issuance generated by the National Bank to acquire gold from domestic gold mining enterprises.

Simultaneously, to maintain a sufficient liquidity level of gold and foreign exchange assets and cover fund outflows, the liquidity portfolio was additionally replenished by USD 1.5 billion in 2025.

2.2. Management of the Assets of the National Fund

The primary objectives of managing the assets of the National Fund are to ensure asset preservation, maintenance of a sufficient liquidity level, and ensuring long-term returns at an appropriate risk level. At the end of 2025, the market value of National Fund assets stood at USD 73.8 billion, including a foreign currency portfolio volume of USD 63.9 billion. For the reporting year, the return on foreign currency assets reached 15.1%, or USD 8.72 billion (Table 2).

Table 2. Results of Managing Foreign Currency Assets of the National Fund

Portfolio Name	as of Jan 1, 2025		as of Jan 1, 2026		2025 Return in USD
	Market Value (USD mln)	Share of Savings Portfolio (%)	Market Value (USD mln)	Share of Savings Portfolio (%)	
Stabilization Portfolio	3 450.0	-	4 716.3	-	4.3%
Savings Portfolio	56 054.0	100.0%	60 676.1	100.0%	16.1%
Equities	20 345.6	36.3%	22 390.5	36.9%	21.0%
Developed Countries Bonds	15 096.7	26.9%	15 372.5	25.3%	7.7%
Emerging Countries Bonds	10 579.3	18.9%	11 391.5	18.8%	10.2%
Corporate Bonds	5 131.6	9.2%	5 591.5	9.2%	11.3%
Gold	3 314.5	5.9%	4 223.8	7.0%	64.7%
Alternative Instruments	1 586.1	2.8%	1 706.3	2.8%	7.6%
Liabilities under "National Fund for Children"	(-) 664.9		(-) 1 497.9		
Total Foreign Currency Assets	58 839.0		63 894.5		15.1%

To refine National Fund management approaches based on long-term market expectations across asset classes, a new target strategic allocation for the savings portfolio was developed—50/50 (50% in high- return asset classes such as equities, gold, and alternative instruments, and 50% in bonds). This allocation involves increasing the

shares of the equity portfolio (by 5%) and the alternative instruments portfolio (by 5%), offset by a 10% reduction in the developed countries bonds portfolio.

Reflecting market trends and in accordance with amendments to the Rules for Investment Operations of the National Fund¹⁴, inflation-indexed developed countries government bonds were included in the structure of the developed countries bonds portfolio with a 10% allocation.

Pursuant to the Address of the Head of State, an open investment partnership program was developed to invest up to USD 1 billion from the alternative instruments portfolio into high-tech economic sectors. National Investment Corporation of the National Bank of Kazakhstan JSC, a subsidiary of the National Bank, will act as the program operator. International management companies are planned to be engaged to provide objective and independent expertise on the commercial potential and risks of investment projects. The participation of reputable international management companies will help stimulate interest among large foreign funds in co-investing in Kazakhstan and expand the program by attracting external investments.

In line with the Address of the Head of State, up to USD 350 million from the alternative instruments portfolio will be invested in digital financial assets and related instruments within the National Strategic Cryptoreserve.

In addition to the gold and foreign exchange assets of the National Bank and National Fund assets, it is planned to invest other state assets, including confiscated digital assets, into the National Strategic Cryptoreserve upon decision of the Government of the Republic of Kazakhstan.

2.3. Management of the Pension Assets of the Unified Accumulative Pension Fund

At the end of 2025, the total volume of pension assets of the Unified Accumulative Pension Fund under the trust management of the National Bank amounted to 25.1 trillion tenge, accounting for 99.6% of total pension accumulations. During 2025, pension assets managed by the National Bank increased by 2.7 trillion tenge, or 12.0% growth (Table 3).

¹⁴ Resolution of the Board of the National Bank of the Republic of Kazakhstan dated 21 October 2025 No. 61 “On Amending the Resolution of the Board of the National Bank of the Republic of Kazakhstan dated 25 July 2006 No. 65 ‘On Approval of the Rules for Conducting Investment Operations of the National Fund of the Republic of Kazakhstan’.”

Table 3. Structure of the Investment Portfolio of Pension Assets of the Unified Accumulative Pension Fund held under Trust Management by the National Bank

Name	Current Value as of Jan 1, 2025 (KZT bn)	Share as of Jan 1, 2025 (%)	Current Value as of Jan 1, 2026 (KZT bn)	Share as of Jan 1, 2026 (%)	Change over the period (%)
Government securities of the Republic of Kazakhstan	9 317.7	41.6%	10 923.0	43.5%	17.2%
Securities of issuers of the Republic of Kazakhstan and deposits in second-tier banks	3 333.3	14.9%	3 490.7	13.9%	4.7%
Securities of foreign issuers, including:	9 019.8	40.2%	10 215.9	40.7%	13.3%
Assets under external management	4 801.0	21.4%	5 252.4	20.9%	9.4%
Cash on investment accounts, NBK deposits, and "Reverse REPO" operations	744.2	3.3%	474.4	1.9%	-36.2%
Total	22 415.0	100.0%	25 104.0	100.0%	12.0%

During 2025, the pension asset portfolio acquired government securities of the Republic of Kazakhstan worth 2.5 trillion tenge on market terms, bonds of quasi-state sector issuers of the Republic of Kazakhstan worth 797.1 billion tenge, bank bonds worth 44.8 billion tenge, and bonds issued by an international financial organization worth 54.0 billion tenge. Additionally, 972.6 million US dollars was purchased to maintain the foreign currency allocation at 40%.

Throughout 2025, the foreign currency portfolio of pension assets remained within the established strategic allocation ranges. As of year-end, developed market bonds accounted for 25.8% of the foreign currency portfolio (target allocation: 25% $\pm$ 10%), emerging market bonds for 21.3% (target allocation: 25% $\pm$ 10%), corporate bonds for 17.8% (target allocation: 20% $\pm$ 10%), and equities for 26.2% (target allocation: 30% $\pm$ 10%).

The return on pension assets of the Unified Accumulative Pension Fund under the trust management of the National Bank amounted to 7.4% in 2025. The key factors weighing on returns were a negative foreign exchange revaluation of 378.4 billion tenge, driven by the appreciation of the tenge against the US dollar, as well as a negative mark-to-market revaluation of Kazakhstan's government securities amounting to 555.3 billion tenge amid rising bond yields. Consequently, investment income amounted to 1.8 trillion tenge as of year-end 2025.

2.4. Financial Risk Management

In 2025, the National Bank continued its efforts to enhance risk management mechanisms and approaches, with the objective of mitigating potential losses arising from investment processes.

Table 4. Core Risk Parameters across Portfolios

Portfolio Name	Risk Parameters	Established Levels	Actual Levels
Strategic Portfolio	Value-at-Risk (1 month, 95% probability)	10 %	1,75 %
Liquidity Portfolio	Weighted average maturity	1 year	0,004 years
Investment Portfolio	Portfolio Duration deviation from benchmark portfolio duration	+30/–40 %	-0,39 %
	Expected volatility of portfolio yield deviation from benchmark portfolio yield (Tracking error)	2 %	0,08 %

The actual Value-at-Risk of the aggregate gold and foreign exchange reserves portfolio, measured over a one-year horizon at a 95% confidence level, did not exceed 23.02%.

In compliance with International Financial Reporting Standard 9 Financial Instruments provisions for expected credit losses were constituted on a quarterly basis. As at year-end 2025, the total volume of such provisions amounted to 19.3 billion tenge.

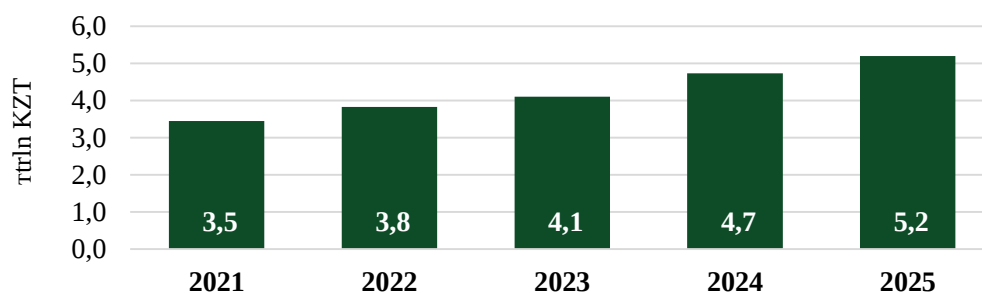
Internal credit ratings were assigned to banks quarterly in accordance with a methodology that entails a comprehensive evaluation of credit quality predicted upon key financial indicators – namely, capital adequacy, asset quality, profitability, and liquidity – while simultaneously incorporating ratings issued by international rating agencies. At the end of 2025, work was initiated to refine this methodology, providing for the implementation of a temporary assessment framework applicable to newly established banks and the integration of the accrued income collection ratio as an evaluative parameter.

2.5. Organization of Cash Circulation

2.5.1. Issue and Circulation of Cash

In 2025, the volume of cash in circulation increased by 10.9% and amounted to 5.2 trillion tenge (of which 97.9% consisted of banknotes and 2.1% of circulation coins) (Figure 17).

Figure 17. Cash in Circulation



To provide economic agents with cash, banknotes and coins of all denominations worth 3.3 trillion tenge with a total weight of around 1,312 tonnes were delivered to the regions.

The National Bank continues the phased launch of the "Saka Style" banknotes. Banknotes in denominations of 1,000, 2,000, 5,000, and 10,000 tenge are already used in daily settlements, and the 500 tenge banknote will enter circulation in the first half of 2026 (subject to bank readiness for processing new banknotes).

The "Saka Style" banknote series reached the finals of the International Association of Currency Affairs (IACA) competition in Bangkok (Thailand) under the "Best New Banknote or Banknote Series" category.

2.5.2. Examination of Banknotes and Coins of the National Currency

Over 2025, the National Bank conducted examinations of 1,317 suspect currency units totaling 9.5 million tenge.

The total number of counterfeit currency notes detected by the National Bank and second-tier banks amounted to 158 pieces worth 807.0 thousand tenge, representing a 46.3% increase compared to 2024. Out of these, the National Bank detected 32 counterfeit currency notes worth 163.2 thousand tenge, which is 21.9% lower than the 2024 figure. The 5,000 tenge banknote was the most frequently counterfeited denomination—145 pieces (91.7% of total counterfeits detected).

2.5.3. Collectible and Investment Coins, Refined Gold Bullions

In 2025, the National Bank issued collectible coins using innovative solutions, such as the "MERCURY" coin made in the form of a convex hemisphere with a tantalum insert, the "TÁÑIRLIK KÚNTIZBE" (Tengrian Calendar) composite coin with rotating elements, and the "BAIKONUR – 70 YEARS" coin, made entirely of tantalum for the first time with hidden star elements visible under ultraviolet light.

The "AQ TUNǴIYQ" collectible coin won 3rd place in the "Best Commemorative Silver Coin" category at the Mint Directors Association Conference in Cape Town (South Africa), and the "AIY" coin won 3rd place at the XIX "Coin Constellation – 2025" International Coin Contest in St. Petersburg (Russia).

During 2025, 13 types of silver coins, 5 types of cupronickel coins, and 8 nickel-silver coins were put into circulation. In total, 30.1 million collectible coins were issued in 2025 (of which 18.7 thousand pieces were made of precious metals, and 30.1 million pieces were made of base metals and alloys). A total of 311.2 thousand collectible coins worth over 1.0 billion tenge were sold via the online store.

In 2025, the National Bank sold 27,750 refined gold bullions weighing a total of 0.9 tonnes to second-tier banks and non-bank exchange offices.

The 10-gram bullion was the most popular in 2025 (accounting for 33% of total sales volume), followed by 20-gram (20%), 5-gram (19%), 50-gram (14%), and 100-gram (14%) bullions. Demand for bullions was concentrated primarily in Almaty, Astana, and Shymkent.

2.6. Currency Regulation and Currency Control

2.6.1. Currency Regulation and Monitoring of Currency Operations

In 2025, the National Bank provided methodological support for the country's currency regulation system. Efforts were undertaken to improve currency legislation, providing for a reduction of deadlines for the submission and correction of foreign currency transactions reports, improving procedures for the purchase and sale of foreign currency, collecting comprehensive data on foreign currency transactions of professional securities market participants, and other amendments.

Furthermore, amendments¹⁵ related to currency regulation were made to the laws "On the National Bank of the Republic of Kazakhstan", "On the currency regulation and currency control", "On the securities market", and certain provisions of the new law of the Republic of Kazakhstan "On banks and banking activity in the Republic of Kazakhstan" were also revised. At the proposal of the National Bank, the new Tax Code provides for the taxation of non-repaid and doubtful financial loans.

Work on identifying suspicious foreign currency transactions continued, it included the refinement of financial monitoring procedures for transactions, which had signs of evasion of currency legislation requirements. In 2025, corresponding information regarding identified transactions was submitted to the Prime Minister, the Ministry of Finance, the Agency for Regulation and Development of the Financial Market, and the Financial Monitoring Agency.

As part of efforts to improve information exchange between government bodies, two joint orders of the Chairman of the National Bank and the Minister of Finance were adopted. Implementation of integration between inter-body information systems of the National Bank and the Ministry of Finance is going on.

In 2025, within the framework of the registration of foreign exchange agreements on capital movements and accounts held with foreign banks, 2,498 registration numbers were assigned.

Inspections of authorized banks (9 scheduled and 11 unscheduled) were conducted to assess compliance with currency legislation.

As a result of these inspections and other forms of supervision, 38 fines totaling 493.7 million tenge were imposed on authorized banks, along with 62 warnings, and 8 orders requiring the elimination of violation. Two fines amounting 0.9 million tenge were imposed on legal entities for the late submission of primary statistical data.

In 2026, the National Bank will continue its work analyzing the foreign exchange market, improving the regulation and control of foreign currency transactions, and ensuring compliance with currency legislation requirements.

2.6.2. Control over Operations with Foreign Currency Cash

As of January 1, 2026, the foreign currency cash market of the Republic of Kazakhstan comprised 2,125 exchange offices (compared to 2,078 as of January 1,

¹⁵ Law of the Republic of Kazakhstan № 259-VIII dated January 16, 2026 «On making amendments and additions to certain legislative acts of the Republic of Kazakhstan on regulation and development of the financial market, communications, and bankruptcy issues.

2025), of which bank branches and JSC Kazpost accounted for 1,533 (72.14%) (compared to 1,514 units as of January 1, 2025), and non-bank exchange offices accounted for 592 (27.86%) (compared to 564 units as of January 1, 2025).

Over the year, the total number of exchange offices increased by 47 units, with bank exchange offices increasing by 19 units and non-bank exchange offices by 28 units.

In 2025, net sales of foreign currency cash to the population through exchange offices amounted to approximately 1.7 trillion tenge (compared to 2 trillion tenge in 2024). Out of this total, bank exchange offices and JSC Kazpost accounted for 1 trillion tenge (compared to 1.6 trillion tenge in 2024), and non-bank exchange offices accounted for 0.7 trillion tenge (compared to 0.4 trillion tenge in 2024).

In 2025, 222 inspections of authorized organizations were conducted, including 128 scheduled, 13 unscheduled, and 81 documentary reviews.

In 2025, 874 administrative offense cases were initiated against authorized organizations for violating requirements on exchange operations with foreign currency cash. Of these, 336 resulted in penalties in the form of fines totaling 174.2 million tenge (National Bank: 37.7 million tenge; courts: 136.5 million tenge); 528 warnings were issued, 1 case was dismissed for lack of offense components, 3 were dismissed as minor infractions, and 6 remain under review.

A total of 318 supervisory response measures and 1 sanction in the form of license suspension were applied to authorized organizations.

Alongside this, inspections of 5 second-tier banks were carried out in 2025. Twenty administrative offense cases were initiated, resulting in penalties: 13 in the form of fines totaling 3 million tenge; 6 in the form of warnings; 1 case was dismissed for lack of offense components, and 1 requirement was issued to remedy the causes and conditions that contributed to the currency legislation violation of the Republic of Kazakhstan.

To prevent speculative operations through the establishment of unjustified spreads between buying and selling cash currency rates in exchange offices, deviations limits for cash foreign currency buying and selling rates conducted through exchange offices were established on February 28, 2025, at 7 tenge for the US dollar and 10 tenge for the euro.

Effective March 13, 2025, the Code of the Republic of Kazakhstan on Administrative Offenses was supplemented with a new article establishing administrative liability for failing to maintain daily cash availability of at least 100% of the minimum authorized capital, as well as for violating requirements on exchange operations execution.

3. REGULATION AND SUPERVISION OF THE PAYMENT MARKET AND DIGITAL ASSETS INDUSTRY

3.1. Payment Systems

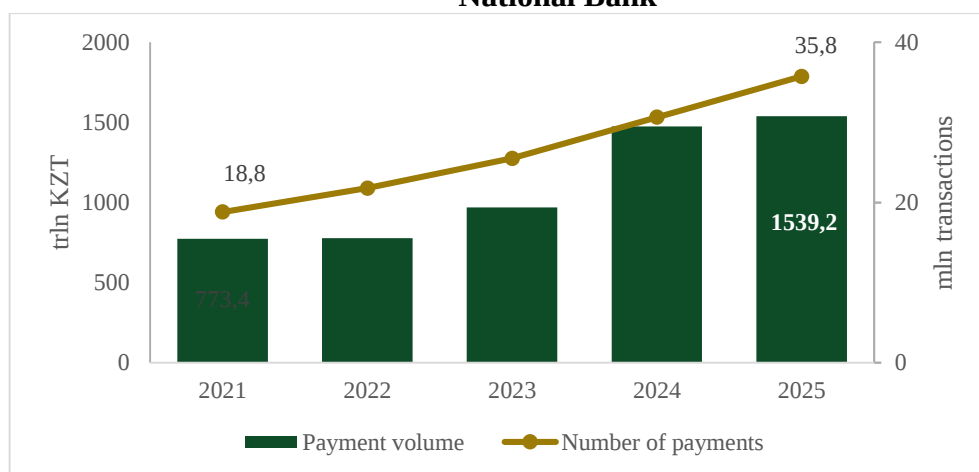
Seventeen payment systems operate within the territory of the Republic of Kazakhstan, among which the Interbank Money Transfer System, the Interbank

Clearing System, the Mass Electronic Payment System, and the Interbank Payment Card System are payment systems owned by the National Bank. These systems focus on processing payments in national currency within the Republic of Kazakhstan and handle a significant share of cashless payments in the country. Private payment systems, represented by card payment systems and money transfer systems, also operate in the market.

At the end of 2025, the Interbank Money Transfer System is designated as a systemically important payment system, while the Interbank Clearing System and the Interbank Payment Card System are designated as important payment systems.

As of January 1, 2026, 33 financial organizations participated in the Interbank Money Transfer System, including all infrastructure entities of the financial market. The number of participants in the Interbank Clearing System stood at 23.

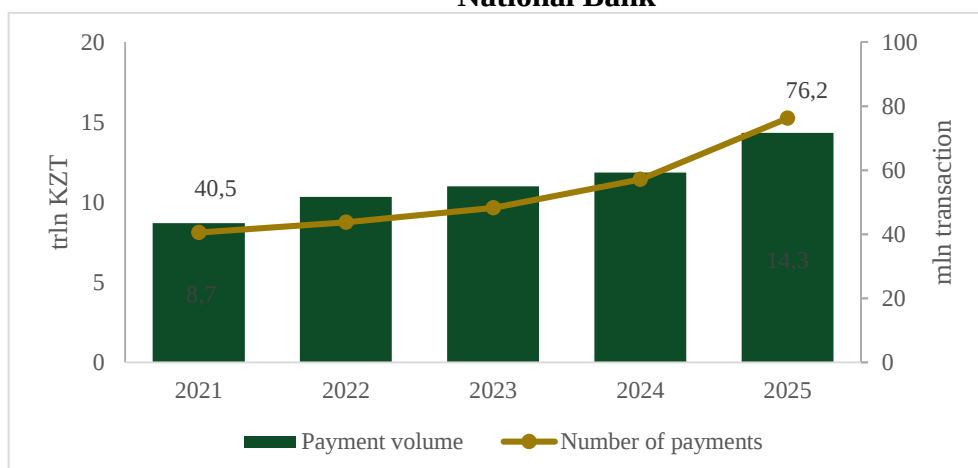
Figure 18. Dynamics of Payment Flows in the Interbank Money Transfer System of the National Bank



In 2025, the number of payments in the Interbank Money Transfer System increased by 16.7% (or by 5.1 million transactions), and the amount of payments grew by 4.3% (by 63.6 trillion tenge) (Figure 18). On average per operational day, 145.3 thousand transactions worth 6.3 trillion tenge were processed through this payment system.

In the Interbank Money Transfer System, over 57% of payment documents are processed during the peak period from 15:00 to 18:00, representing about 39% of the total payment volume. Payments up to 3 million tenge account for the largest share by payment count (83.4%), whereas payments exceeding 1 billion tenge account for the bulk of the volume (87.9%).

Figure 19. **Dynamics of Payment Flows in the Interbank Clearing System of the National Bank**



In 2025, the number of payments in the Interbank Clearing System increased by 33.4% (or by 19.1 million transactions), and the amount of payments grew by 21.0% (by 2.5 trillion tenge) (Figure 19). On average per operational day, 309.9 thousand transactions worth 58.3 billion tenge were processed through this clearing system.

The availability coefficients of the National Bank's payment systems, which demonstrate a high level of operational continuity, stood at 99.78% for the Interbank Money Transfer System and 99.85% for the Interbank Clearing System.

The Interbank Payment Card System ensured the domestic processing of card operations using Visa, Mastercard, and UnionPay payment cards within the national perimeter. In 2025, 1.04 billion transactions were processed through the Interbank Payment Card System.

International Money Transfer Systems. At the end of 2025, 4 international money transfer systems operating without opening a bank account functioned in Kazakhstan: Golden Crown, Western Union, MoneyGram, and UPT.

At the end of 2025, the volume of transfers sent abroad via international money transfer systems fell by 8.8% and amounted to 718.9 billion tenge. However, the average amount per outbound transfer rose by 14% and amounted to 426.2 thousand tenge. The primary recipient countries were Russia, Uzbekistan, Turkey, Georgia, and Kyrgyzstan.

The volume of transfers received from abroad into Kazakhstan in 2025 fell by 4.3% and amounted to 226.4 billion tenge. However, the average amount per inbound transfer rose by 26% and amounted to 377.6 thousand tenge. The primary sending countries were Russia, the USA, Uzbekistan, Turkey, and Germany.

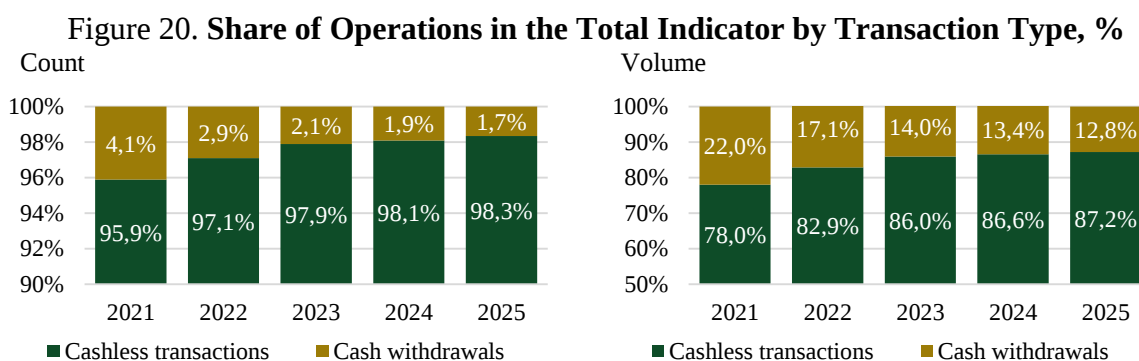
3.2. Payment Services Market

Payment services are provided by banks, organizations executing selected types of banking operations, and non-bank payment organizations.

At the end of 2025, there were 42.6 million active payment cards in circulation (a 3.4% increase). The issuers are 17 banks and JSC Kazpost.

In 2025, 14.2 billion transactions (an 8.6% increase) worth 216.0 trillion tenge (a 12.5% increase) were executed using payment cards and electronic banking services of Kazakhstani issuers.

Throughout 2025, an increase in the share of cashless operations and a decline in cash withdrawal operations were observed (Figure 20).



The count and volume of cashless operations using payment cards grew by 8.8% and 13.3%, respectively, amounting to 14.0 billion transactions totaling 188.4 trillion tenge. Cashless operation growth was primarily driven by transactions using internet and mobile banking (a 12.9% increase, representing 89.9% of total cashless transaction volume).

Concurrently, alongside the ongoing expansion of cashless transactions into the daily lives of the population, a reduction in the number of cash withdrawal operations was observed (a 2.6% decline).

Furthermore, payment infrastructure is expanding: the number of entrepreneurs accepting cashless payments increased by 6.6% to 944.9 thousand entities, and the number of retail outlets rose by 5.5% to 1.2 million points.

Payment Services of Payment Organizations. As of January 1, 2026, 135 payment organizations providing selected types of payment services to clients (payments via payment terminals, distribution of electronic money and processing transactions using them, internet and mobile application processing for payment cards) were registered in the registry of payment organizations.

At the end of 2025, the number of transactions processed through payment organization services contracted by 0.5% compared to 2024, standing at 914.1 million transactions. Transaction volume reached 9.2 trillion tenge, increasing by 16.2% compared to the previous year.

Payment organizations act as operators for 39 out of the 43 electronic money systems operating in Kazakhstan, while second-tier banks and JSC Kazpost serve as operators for 4 electronic money systems. At the end of 2025, electronic money operations worth 1.0 trillion tenge were executed through payment organization services, representing 81.7% of the total turnover across all operating electronic money systems.

3.3. National Digital Financial Infrastructure (NDFI)

To ensure the further development of the National Digital Financial Infrastructure, a legislative framework was established regulating the legal status of the infrastructure and its components (the National Payment System, the Interbank Mobile Payment System, the Digital Tenge and Open Banking platforms, the Biometric Identification System, and the National Bank's Anti-Fraud Center), alongside NDFI principles, tasks, and the National Bank's powers as the NDFI operator.

All NDFI components have been launched into commercial operation.

Within the framework of Open API platform development in 2025, the Interbank Mobile Payment System was launched jointly with banks, featuring functionality for interbank transfers via telephone number and QR payments. At the end of 2025, 10 banks were connected to the phone number transfer service and 7 banks to the interbank QR payment service, with remaining banks conducting business process analysis to upgrade their information systems.

In 2025, upgrades to the services of the Identity Data Exchange Center (IDEC) continued. Measures were implemented to expand IDEC service functions for legal person identification, integrate IDEC with the National Bank's Anti-Fraud Center to verify physical persons, and integrate IDEC with state services for access to citizens' personal data. As of the end of 2025, 146 organizations (18 banking entities and 128 non-banking entities) were connected to the IDEC service.

As of January 1, 2026, 80,871 incidents regarding transactions with fraud characteristics were registered within the National Bank's Anti-Fraud Center, alongside 19,810 incidents linked to drug trafficking, illegal gambling, and financial pyramids. A total of 2.8 billion tenge was blocked in a timely manner, and over half a billion tenge was returned to victims. Within the scope of further Anti-Fraud Center development, initiatives are underway to enhance the platform's analytical capacity for advance detection of suspicious client operations. Ongoing pilot projects will deploy artificial intelligence tools for behavioral analysis and forecasting fraud threats.

In 2025, work continued jointly with the Government to introduce the digital tenge into the public finance sector. More than 10 projects were launched covering scenarios for farmer lending and subsidization, road construction, tax administration, and the implementation of infrastructure projects from the National Fund, totaling more than 330 billion digital tenge.

The National Digital Financial Infrastructure forms the foundation for market participants to create and develop digital financial products and solutions, ensuring reliability, security, and continuity in financial services provision while guaranteeing effective interaction among all financial market participants.

3.4. Crypto-Fiat Infrastructure

In 2025, a comprehensive state regulation model for digital assets was implemented in Kazakhstan. The adoption by the Parliament of the Republic of Kazakhstan of the new edition of the Law "On Banks and Banking Activity in the Republic of Kazakhstan" and the Law "On Amendments and Additions to Certain

Legislative Acts of the Republic of Kazakhstan on Issues of Regulation and Development of the Financial Market, Communications, and Bankruptcy" enabled the formation of a cohesive legal framework for the systemic development of the national crypto-industry.

The overhaul of sector regulation was carried out taking into account recommendations from the international community and leading financial organizations—the International Monetary Fund, the International Bank for Reconstruction and Development, the European Bank for Reconstruction and Development, and the Eurasian Group on Combating Money Laundering and Financing of Terrorism. It is based on the principles of technological neutrality and balanced, proportionate regulation.

At the legislative level, a new class of financial instruments was introduced—digital financial assets (DFAs). Legal mechanisms for the tokenization of real assets were created, and the status of new regulated market participants was defined—DFA platform operators and other digital asset service providers. Requirements were established for their capital, risk management system, compliance control, and adherence to anti-money laundering and counter-terrorist financing standards, ensuring the integration of digital instruments into the financial system under regulatory oversight.

Simultaneously, the legal circulation of unbacked digital assets (cryptocurrencies) was expanded through providers licensed by the National Bank—crypto-exchanges and crypto-exchange offices. Conditions were established for the formation of crypto-fiat channels that ensure controlled interaction between digital platforms and the banking sector.

Legislative changes also provided second-tier banks with the opportunity to participate in the digital asset market infrastructure—enabling them to build platforms for DFA circulation, as well as acquire and issue their own digital financial instruments.

3.5. Regulatory Sandbox of the National Bank

In 2025, the National Bank implemented a special regulatory regime for digital assets—a regulatory sandbox designed for testing and phased deployment of fintech innovations within a controlled environment. The legal framework for this mechanism was established by Law of the Republic of Kazakhstan No. 205-VIII dated June 30, 2025, "On Amendments and Additions to Certain Legislative Acts of the Republic of Kazakhstan on Issues of Financial Market Development, Protection of the Rights of Financial Services Consumers, Communications, and Elimination of Excessive Legislative Regulation."

Since July 2025, 22 innovative projects across 10 strategic directions have been launched via the regulatory sandbox mechanism. They encompass:

- 1) issuance and circulation of cash-backed digital assets—"fiat" stablecoins denominated in tenge;

- 2) issuance and circulation of digital assets certifying rights to real estate property—real estate tokenization;
- 3) issuance and circulation of digital assets certifying rights to tangible assets;
- 4) organization of unbacked digital asset exchange;
- 5) acceptance of unbacked digital assets (cryptocurrency) with conversion into tenge during payment processing (crypto-QR);
- 6) organization of digital asset custody, issuance, and DFA registration;
- 7) issuance and circulation of digital assets representing shares in bond loans—tokenized bonds;
- 8) organization of a digital asset exchange;
- 9) provision of crypto-brokerage services;
- 10) issuance and circulation of digital assets backed by refined gold.

Thus, a practical foundation has been shaped for the development of a fully functional digital finance ecosystem in Kazakhstan.

As of the end of 2025, 5 pilot projects have been launched, the scaling of which will continue, while the implementation of the remaining projects is scheduled for 2026.

The practical execution of projects within the regulatory sandbox allows for the issuance, acquisition, sale, transfer, and custody of digital assets within a controlled environment. This also contributes to the diversification of investment portfolios through the emergence of more accessible, transparent, and convenient digital asset-based instruments, while expanding opportunities to attract financing under simpler and more flexible conditions. As a result, a more open and accessible market for digital financial instruments is taking shape.

The aggregated results of the regulatory sandbox pilot projects were factored into the development of subordinate normative legal acts in the digital asset industry development sector and will be used for further refinement of industry regulations.

4. INFORMATION AND ANALYTICAL SUPPORT FOR ACTIVITIES

4.1. Statistical Activity

The National Bank actively implements modern IT solutions for effective data management, improving data quality, and expanding statistical information dissemination tools. Concurrently, efforts continue to update the methodological framework in line with international standards.

Within the scope of implementing the National Bank's Digitalization and Data Management Strategy for 2025–2029, a concept was developed for a Unified Portal for Interaction with the External Perimeter. This portal proposes a comprehensive approach to shaping business processes for building information and data flows from external entities based on data typology classification, which separates and distributes data flows into similar technological and methodological segments for data receipt and processing. This will enable the unification and optimization of similar data collection and processing activities, lower the administrative burden on respondents, and improve data quality for statistical, analytical, and supervisory purposes.

Statistical data dissemination was carried out on an ongoing basis through publication on the official internet resource and in the Open Data Repository of the National Bank, alongside the transmission of information to international organizations (IMF, World Bank, Eurasian Economic Commission [EEC], OECD) and rating agencies.

Monetary and Financial Sector Statistics. In 2025, efforts continued to expand the publication of analytical indicators on financial market statistics on the National Bank's internet resource, resulting in the publication of 13 additional datasets covering the loan portfolio, banking conglomerates, the insurance sector, and collection agencies.

Within the framework of developing the Unified Database of Financial Market Entities, the implementation of data-centric formats for data collection continues for statistical, analytical, and supervisory purposes. This optimizes reporting preparation and submission processes, reducing the administrative burden on respondents.

In connection with the transition from aggregated to granular data, a new reporting form for bank accounts (deposits) was developed, namely – the Deposit Registry. Information regarding physical persons is provided without disclosing their personal data, with all collection processes executed in full compliance with data protection and cybersecurity requirements. The introduction of this new reporting format, effective July 1, 2025, aims to create a comprehensive database of bank accounts and deposits as a unified data source for statistical, analytical, and digital development purposes, thereby supporting operational decision-making, ensuring financial stability, and strengthening the deposit insurance system.

The National Bank actively cooperates with international organizations in the field of statistics, including the IMF, the EAEU EEC, and the Organisation for Economic Co-operation and Development (OECD). Within the framework of the concluding session of the Review of the National Statistical System of Kazakhstan for 2023–2025, conducted by the OECD jointly with the Bureau of National Statistics, the National Bank presented the section on short-term financial statistics.

Furthermore, the National Bank participated in the Inter-agency Working Group on the Harmonization of Macroeconomic Statistics, which analyzed public sector institutional units in 2025 to determine unified approaches to their sectoral classification to achieve comparability across macroeconomic statistics sections.

External Sector Statistics. In 2025, operations continued to improve the quality of statistics and forecasting for external sector indicators. Measures were implemented aimed at enhancing the accuracy and consistency of data for the balance of payments, international investment position, and external debt.

Amendments were introduced to active statistical reporting forms, and new statistical forms were developed for conducting departmental statistical observations.

A more timely assessment of the country's external sector positions was ensured through the compilation and regular publication of a preliminary external debt estimate. Following interaction with an IMF mission, the presentation of public sector external

debt was expanded by isolating the external debt of organizations under indirect state control.

Indicators for gross and net inflows of foreign direct investment were refined, including their breakdown by participants of the Astana International Financial Centre across economic sectors.

Measures were carried out to automate key stages of compiling summary data on portfolio investments using a programming language.

An analytical publication on the balance of payments, international investment position, and external debt, alongside preliminary and actual statistical data, is published on a regular basis.

In 2025, the National Bank participated in the technical assistance program of the Bank of Korea—the Bank of Korea Knowledge Partnership Program, aimed at exchanging knowledge and experience in external sector statistics compilation and dissemination.

Throughout 2025, interaction continued with experts from the IMF, EEC, and foreign central banks to improve methodological approaches for compiling monetary, financial, and external sector statistics in line with IMF recommendations.

4.2. International Cooperation

In 2025, the National Bank continued its cooperation with foreign partners – central banks, international financial organizations, and regional integration associations.

The leadership of the National Bank took part in the Spring and Annual Meetings of the International Monetary Fund and the World Bank Group (April, October 2025), meetings of IMF advisory bodies, and collegial discussions with central banks and financial regulators of the Caucasus, Central Asia, the Middle East, and the Persian Gulf. On the sidelines of the Spring Meetings, a Framework Agreement was signed by the National Bank and the International Bank for Reconstruction and Development, establishing conditions for studying the international experience, World Bank's methodology, and analytical tools, and for exchanging experience to support the National Bank's strategic projects.

The IMF conducted consultation missions (May, November), providing a comprehensive assessment of the macroeconomic situation and economic policy prospects of Kazakhstan. The IMF noted steady economic growth rates driven by robust domestic demand and the development of non-resource economic sectors. IMF recommendations contribute to strengthening macroeconomic stability and send a positive signal to international partners and investors regarding Kazakhstan's commitment to sustainable economic development.

Within the scope of implementing the Memorandum on the Establishment of the Council of Central (National) Banks of the Member States of the Organization of Turkic States, the inaugural meeting of the Council was held in Astana under the chairmanship of the Governor of the National Bank. The event was attended by the heads of the central banks of the OTS members - Azerbaijan, Kyrgyzstan, Uzbekistan,

and the Republic of Türkiye - alongside a representative of the Central Bank of Hungary as an invited guest from an observer state and the Secretary General of the OTS (May).

The leadership of the National Bank participated in meetings of the Advisory Council on Currency Policy, one of which was hosted in Almaty under the chairmanship of the National Bank. The National Bank participated in a meeting of the Financial Stability Board Regional Consultative Group for the CIS (July) and the Regional Meeting on Payment Systems Development in Central Asian Countries (September).

To discuss current economic and financial conditions, the National Bank participated in the Annual General Meeting of the Bank for International Settlements and discussed the development and regulation of digital financial assets with the leadership of the Bank for International Settlements Innovation Hub (June).

The National Bank also held a series of meetings with the leadership of the World Bank, the European Bank for Reconstruction and Development, the Asian Development Bank, as well as foreign central banks and financial regulators (Armenia, Belarus, China, Hong Kong, Hungary, Indonesia, Italy, Oman, Poland, Russia, South Africa, South Korea, Switzerland, Thailand, the UAE, the USA, France, and Uzbekistan). To strengthen cooperation, Memorandums of Understanding were signed by the Kazakh side between the National Bank, the Agency of the Republic of Kazakhstan for Regulation and Development of the Financial Market, and the Central Bank of the UAE and the UAE Securities and Commodities Authority, alongside a Cooperation Agreement with the Bank of Korea.

Under the co-chairmanship of Deputy Governors of the National Bank and the People's Bank of China, with the participation of banks, financial organizations, and government bodies of both countries, the 13th meeting of the Financial Cooperation Subcommittee of the Kazakhstan-China Cooperation Committee was held (March). To deepen bilateral cooperation, a Memorandum of Understanding was concluded by the National Bank, the Agency of the Republic of Kazakhstan for Regulation and Development of the Financial Market, and the National Financial Regulatory Administration of China.

The National Bank continues to reinforce expert dialogue and technical consultations with foreign central banks and international financial organizations, including on refining monetary policy, forecasting systems, implementing regulatory tools, statistical compilation, fintech development, and central bank digital currencies. Technical assistance was provided by the National Bank to the central banks of Azerbaijan, Belarus, the Republic of Türkiye, and Uzbekistan. Activities were carried out within the framework of the Roadmap for Bilateral Cooperation Development with the National Bank of Georgia for 2025-2026, alongside efforts to update the international legal framework.

Work on Enhancing the Investment Attractiveness of the Republic of Kazakhstan

The National Bank regularly participated in consultations with international rating agencies and initiated efforts to systemize inter-agency cooperation between Kazakhstani government authorities and international rating agencies. This work resulted in an upgrade of Kazakhstan's sovereign credit rating outlook by S&P Global Ratings to "positive," which contributes to the growth of investment attractiveness, lowers borrowing costs, and reinforces confidence in the economy.

To expand economic and investment cooperation, meetings with institutional investors, as well as business and financial sector representatives from the US, were organized within a Roundtable format chaired by the Head of State K.K. Tokayev (September). Within the framework of the Roundtable and the "Central Asia – US" summit in the "C5+1" format (November), strategic cooperation agreements were concluded with Cerberus Capital Management, Brookfield Asset Management, and Ashmore Investment Advisors, alongside a Memorandum of Cooperation with Visa.

On the sidelines of the 37th plenary session of the Foreign Investors Council (June), meetings were held with Citigroup, JPMorgan, and VEON LTD. To increase foreign investment inflows into the domestic market and diversify the investor base, the National Bank organized the Roundtable "Investment Opportunities in Kazakhstan" in the US (April) and co-organized the KASE forum "Kazakhstan Capital Markets Day" (November).

4.3. Research Activity

Research is an integral and foundational element of the National Bank's operations, providing analytical support for the decision-making process. In 2025, National Bank employees conducted a series of research studies, some of which were published as articles on the official website of the National Bank and in peer-reviewed academic journals, including the Economic Review of the National Bank of the Republic of Kazakhstan.

The scope of research encompassed issues related to monetary policy, its long-term strategy and applied instruments, alongside the interaction and coordination of monetary, fiscal, and macroprudential policies, financial market development, the real sector of the economy, and economic process modeling that reflect the reaction of key indicators to changes in economic conditions and interrelationships between economic phenomena.

Research on monetary policy covered parameter estimation for a DSGE model, international experience with integrating DSGE models into the analysis and forecasting system, monetary and non-monetary inflation factors, and the drivers of perceived inflation and inflation expectations. It also examined monetary policy instruments, including minimum reserve requirements and the base rate, as well as the impact of monetary policy on consumer behavior in Kazakhstan.

Within the scope of studying macroeconomic coordination, research was conducted on evaluating the impact of the resource sector and state support on the economy, fiscal policy and its impact on inflation levels, external asset structures, and currency regimes, while a DSGE model with an expanded fiscal block was developed.

Financial system stability and financial sector development issues of Kazakhstan were reflected in studies on banks' retail portfolios, credit determinants and conditions, sectoral structures of lending, the pension system, and term premium modeling. International experience in natural disaster insurance, the use of grain receipts, the operations of insolvent companies, and trading strategies in the currency market were examined, while risks in the microfinance segment and the micro-structure of household debt burdens were analyzed. Analytical work was performed to study international standards and foreign practices in the resolution and maintenance of the resilience of systemically important financial institutions.

Amid digitalization and artificial intelligence (hereinafter – AI) development, the relevance of research focused on analyzing cash circulation and application of AI tools in Kazakhstan's financial sector has increased.

A number of papers were published covering factors of economic development, the financial condition of economic agents, and quality of life in Kazakhstan. Specifically, the impact of the early pension withdrawal program on residential real estate price dynamics was investigated, along with the key constraints on new investment inflows. Research was conducted in the fields of communication and the internal corporate culture of the National Bank.

As part of efforts to improve modeling techniques used by the National Bank in developing forecasts, the methodological and computational components of the SSCIF model (short-term inflation forecasting system) were refined, and short-term GDP forecasting via the final use method and its components was upgraded (the KOMPAS model).

In 2025, the National Bank continued publishing analytical materials on inflation and monetary policy, including the Monetary Policy Report, Inflation Trends, Inflation Expectations, and Inflation Trends in Regions. Surveys of real sector enterprises formed the basis for business cycle and sectoral overviews.

The National Bank hosted the V International Scientific and Practical Conference "Monetary Policy and Financial Stability amid Global and Domestic Shocks." The event was attended by academic community representatives, analysts from the National Bank and the central banks of Uzbekistan and Azerbaijan, and independent economic and financial experts. Conference proceedings were published in a special issue of the Economic Review of the National Bank of the Republic of Kazakhstan. Cooperation with the expert community also continued within an expert-analytical club format. Three club meetings were held over the year, where the Financial Stability Report, along with a series of research papers and analytical materials on current issues of monetary policy and financial stability, was presented and discussed with academics, experts, and market representatives.

Throughout the year National Bank employees participated as speakers at scientific and practical conferences organized by universities and international organizations.

Within the framework of the National Bank's research grant program for priority operational directions, two research grants were awarded in 2025: one to study the

impact of integration processes within the EAEU on Kazakhstan's economic structure, and another to conduct a legal analysis of lending to individuals in Kazakhstan.

To evaluate the feasibility of introducing a digital currency, the National Bank engaged an international organization to conduct analytical work in the field of digital assets, aiming to study international experience, regulatory and technological aspects, and potential risks and effects of introducing digital assets and a digital currency.

To evaluate pension savings adequacy and identify areas for the further development of Kazakhstan's pension system, an agreement was concluded with an international organization to conduct a study on expanding mandatory pension system coverage among the population and its further refinement.

The National Bank implemented a series of technical assistance projects. Specifically, with the support of IMF, efforts continue to strengthen analytical capacity and develop forecasting tools aimed at improving the monetary policy decision-making efficiency. Measures are also being implemented to enhance monetary policy execution, including the evaluation of the current toolkit and refining transmission mechanisms. In terms of external sector statistics compilation practices, technical assistance was received from the Bank of Korea.

The National Bank continues studying foreign central banks' experiences regarding the organization of research and analytical activities, including the institutional structure of research units, mechanisms for integrating scientific research into economic policy formulation, and cooperation practices with academia and internal structural units.

4.4. Communications Policy

Throughout 2025, the National Bank continued its efforts to inform the general public, financial organizations, and the expert community about its activities through various communication channels, adhering to the principles of openness and transparency.

In total during the reporting period, more than 300 information materials of various formats were published as part of the media plans, including press releases, official announcements, and interviews with the National Bank's leadership.

To explain the National Bank's base rate decisions, press releases and statements by the Governor of the National Bank were published. Furthermore, a summary of the base rate decision discussions by the Monetary Policy Committee has been published since June 2025. Base rate decisions were accompanied by briefings by the National Bank leadership for media representatives, which were conducted in a hybrid format and broadcast on the National Bank's YouTube channel.

During the year, systematic efforts were made to develop the National Bank's official social media pages. New formats and columns were introduced, such as "100 Questions to the National Bank," "Myth and Fact," and "One Minute for Economics."

To improve the National Bank's communication with professional audiences and the expert community, discussion meetings were held with the media and financial experts.

The National Bank continued active cooperation with the media: during the year, the National Bank's press service received over 400 inquiries from Kazakhstani and foreign media, with official comments provided in both written and video formats.

To ensure maximum openness and transparency, the National Bank will continue to adhere to its transparency standards in communications, maintain a presence in the country's information agenda, and inform the public about ongoing work across its core operational areas.

5. CORPORATE GOVERNANCE AND DIGITALIZATION OF THE NATIONAL BANK

5.1. Organizational Structure and Governing Bodies of the National Bank

The structure and total staff headcount of the National Bank are approved by Presidential Decree No. 1271 dated December 31, 2003, "On Approving the Regulations and Structure of the National Bank of the Republic of Kazakhstan."

The total staff headcount is set at 2,161 positions.

At the end of 2025, the National Bank's structure included:

24 head-office units (23 departments and 1 independent division);

The Permanent Representative Office of the National Bank in Almaty;

20 territorial branches and the Cash Operations and Valuables Storage Center (branch);

2 subordinate republican state enterprises (Figure 21).

In accordance with the Digital Transformation Strategy, whose main priority is the creation of a digital central bank, the organizational digital structure of the National Bank was partially transformed (existing digital units were adapted) within the limits of the total staff headcount (2,161 positions).

Under the new Law on Banks, additional functions were assigned to the National Bank regarding the development and regulation of the digital assets market and financial infrastructure, necessitating institutional adjustments and reinforcement of the National Bank's organizational structure for the effective development of Kazakhstan's crypto-industry. In this regard, the Payment Systems Department was transformed into the Department of Payment Systems and Digital Financial Technologies, reflecting its expanded mandate and strategic focus on developing a digital financial ecosystem, including Kazakhstan's crypto-industry.

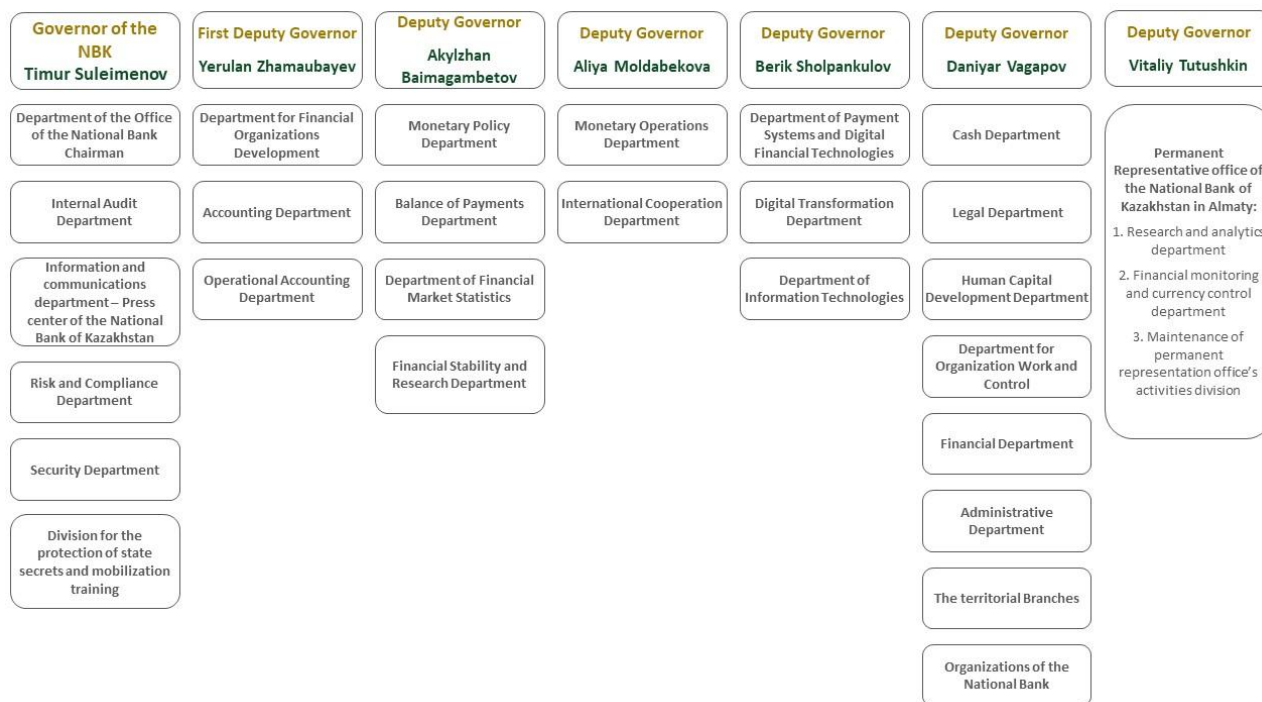
The governing bodies of the National Bank are the Board, the Monetary Policy Committee, and the Board of Directors. The powers of these governing bodies are defined by the Law "On the National Bank of the Republic of Kazakhstan" and the Presidential Decree "On Approving the Regulations and Structure of the National Bank of the Republic of Kazakhstan."

The Board of the National Bank is the highest governing body, making decisions on strategic issues concerning monetary policy, financial stability, and the functioning of the country's financial system. The Board comprises 9 members:

- The Governor of the National Bank of Kazakhstan;
- 4 officials of the National Bank of Kazakhstan;

- A representative from the President of the Republic of Kazakhstan;
- 2 representatives from the Government of the Republic of Kazakhstan;
- A representative from the authorized body for regulation, control, and supervision of the financial market and financial organizations.

Figure 21. Structure of the National Bank at the End of 2025



The Monetary Policy Committee of the National Bank is responsible for making decisions on monetary policy issues. The Monetary Policy Committee:

- 1) sets the base rate;
- 2) sets interest rates for core monetary policy operations;
- 3) makes decisions on other monetary policy issues that do not fall under the exclusive competence of the Board of the National Bank.

Currently, the committee comprises:

- The Governor of the National Bank;
- Deputy Governors of the National Bank supervising monetary policy, monetary operations, and financial stability issues, as well as financial stability issues regarding financial market development, interaction with the financial regulator, and conducting research;
- Directors of the departments for monetary policy, monetary operations, and financial stability;
- The directors of the Balance of Payments Department and the Research and Analytics Center also serve as Committee members.

The Board of Directors is the operational management authority of the National Bank, comprising the Governor of the National Bank, his deputies, and the heads of structural units.

5.2. Human Capital Development

The National Bank operates a system of key performance indicators and competency assessments aimed at effective operational planning and the formation, development, and career advancement of high-performance human capital as a key factor in successfully achieving the central bank's strategic goals.

In 2025, 184 people were hired by the National Bank, including: 1 to a political state position, 117 to National Bank employee positions (including 1 reservist from the Presidential Youth Personnel Reserve, 19 with international education, 1 PhD holder, 16 Masters of Science, and 22 Master's program graduates who studied under National Bank grants), alongside 66 technical staff units.

The National Bank integrates ESG social dimensions by enhancing employee well-being, ensuring equal opportunities, and reinforcing corporate social responsibility through:

- achieving the National Bank's strategic tasks via performance evaluations;
 - improving working conditions, incentive systems, and employee reward structures, alongside implementing social support measures based on the employee well-being index (Well-Being);
 - maintaining a gender balance (women account for 58% of the total headcount) and a high representation of women in leadership roles (47%), including political appointments (1 employee), alongside generational diversity (average age: 42 years);
 - refining internal processes through staff engagement, satisfaction, and commitment surveys;
 - analyzing staff turnover causes and strengthening institutional continuity.
- The staff turnover rate stood at 5.3%.

Comprehensive efforts are underway to train qualified personnel for the National Bank, government agencies, and financial organizations. A total of 19 grants were allocated for Master's program training within cooperation frameworks with higher education institutions (Nazarbayev University, Kazakh-British Technical University, and Narxoz University); 17 employees participated in MBA programs at Astana IT University, 2 employees at Nazarbayev University (EMBA), 1 employee at Asia School of Business (MCB), and 1 employee at Coventry Kazakhstan (MBA).

The total number of trained individuals, including online seminars, reached 1,945, of whom 1,237 completed training in Kazakhstan (including at the National Bank base) and 708 participated in international training courses.

Competency assessments of National Bank employees were conducted and individual development paths were defined, with initiatives implemented to enhance core competencies and professional skills.

5.3. Digitalization, Implementation of Artificial Intelligence, and Development of the Information and Communication Technological Infrastructure of the National Bank

In 2024, the National Bank, in conjunction with the Agency of the Republic of Kazakhstan for Regulation and Development of the Financial Market, approved the high-level Financial Market Regulators' Digital Transformation Strategy for 2025–2029 (hereinafter the Strategy), alongside the internal Digitalization and Data Management Strategy of the National Bank for 2025–2029 (hereinafter the National Bank Digitalization Strategy).

The Strategies outline core goals: building a sustainable national digital financial ecosystem, developing a tech-driven regulator, establishing a modern data management infrastructure, and developing technological platforms and ICT infrastructure. At the end of 2025, the Strategy initiatives scheduled for the reporting period were executed in full. Within the framework of implementing the National Bank Digitalization Strategy, 47 projects across 9 portfolios were executed in 2025.

The technological landscape of the National Bank was significantly modernized, backup mechanisms for services were ensured for a transition period until the creation of proprietary data processing centers, the integration circuit was updated, and a series of operational processes was automated.

Development commenced on the Unified Portal for Interaction with the External Perimeter (EPIEP), which introduces a new unified, conceptual, comprehensive approach within the National Bank for shaping business processes to construct data and information flows from external entities based on data typologies (strata). This isolates and distributes data flows into similar technological and methodological segments for data receipt and processing, enabling the unification and optimization of similar data collection and processing activities, lowering the administrative burden on respondents, and improving data quality for supervisory, statistical, and analytical purposes.

An analytical platform for processing and analyzing financial market data—the Data Factory—was launched into operation, accelerating analytical preparation times by up to 80%.

In 2025, the National Bank's corporate AI platform was developed, providing centralized access to AI services and agents. To support AI solution deployment, a local GPU cluster was rolled out. A series of pilot AI solutions was implemented on the platform base, including automatic translation services, a digital HR assistant, and audio-to-text and video-to-text transcription services. Furthermore, the Concept for AI Development within the National Bank was formulated during the reporting year, aimed at building a sustainable, secure, and governed AI application system.

Development of the Open Data Repository project continued, focusing on creating a modern platform for data provision in machine-readable and structured formats, including the use of APIs. Comprehensive (100%) coverage of indicators published on the official website of the National Bank was achieved within the Repository.

5.4. Data Protection and Corporate Security

An information security management system is established and continuously refined within the National Bank, aimed at enhancing the cyber-resilience of digital infrastructure and proactive security for processed data.

In 2025, the National Bank recorded zero corporate security or anti-terrorist protection incidents that caused damage or disruptions to information objects' functioning.

Throughout the year, comprehensive work was carried out by the National Bank to increase public awareness regarding cyber-fraud. Thirteen informational announcements and 11 videos on preventing internet fraud were published in the media and on official resources, and digital resources showing signs of fraud were blocked within inter-agency cooperation frameworks.

To reinforce international ties, National Bank representatives participated in the cross-border cyber-exercises "Eurasia – 2025" at Innopolis University, demonstrating a high level of competency, professionalism, and coordinated teamwork.

In 2025, to exchange experience and refine professional knowledge, a seminar on corporate security was organized and hosted at the National Bank for EAEU central bank representatives.

Within the scope of the "Central Asia Fintech Summit 2025" forum, a panel session titled "Cybersecurity in the era of global digital transformation" was conducted with the participation of state bodies and quasi-state sector representatives to discuss current information security issues and trends.

To improve cybersecurity communications, expert-level meetings were held on a regular basis with foreign central bank representatives to expand cooperation and discuss industry development prospects.

The National Bank engaged with government bodies to coordinate and submit proposals for 10 draft normative legal acts in the civil protection sector that directly affect the National Bank's interests.

5.5. Operational Risk Management and Compliance Control

In 2025, the National Bank implemented a package of measures aimed at strengthening operational resilience, increasing data security levels, and developing internal control and compliance systems.

Within the framework of operational risk management, a large-scale risk re-evaluation across core business processes was conducted. This involved detailed process mapping, structured interviews with process owners, and incorporation of internal audit findings. Consequently, the operational risk map was updated, business processes were prioritized by criticality, and elevated risk zones were identified, with specific response measures formulated. This enhanced risk profile transparency and strengthened preventive control across the most significant operational directions.

Special attention was dedicated to sensitive data protection. A comprehensive analysis of confidential information management systems within subsidiaries was

conducted, spanning the entire data processing life cycle—from collection and classification to storage, usage, and erasure. Information system architectures, adherence to corporate information security standards, and access differentiation mechanism efficiencies were analyzed. Additionally, an audit of employee access rights was performed to verify compliance with job functions. Based on the results, a comprehensive evaluation of the current data security level was formed, and proposals were developed to harmonize sensitive information management standards, aimed at mitigating leakage and unauthorized access risks.

To ensure business continuity, stress testing of the Data Processing Center was conducted, simulating a critical failure scenario. Automatic switchover mechanisms to backup capacities, data replication systems, and staff readiness to execute continuity and disaster recovery plans were verified. Target indicators for recovery time objectives (RTO) and recovery point objectives (RPO) were confirmed for each critical information system. Identified bottlenecks were eliminated, increasing infrastructure recovery speeds and IT environment resilience to emergency situations.

Within anti-corruption compliance frameworks, an internal analysis of selected units was conducted to identify and minimize corruption risks. Based on the outcomes, targeted recommendations to strengthen control procedures were issued. Work continued on fostering a culture of integrity: employees were systematically briefed on anti-corruption legislation requirements and behavioral standards. Feedback channels remained operational (the email address anticorruption@nationalbank.kz and the helpline: +7 717 277 56 37) for reporting ethics violations, corruption offenses, and conflicts of interest. No inquiries regarding employees were received via these channels during the reporting year.

In 2025, regular monitoring of procurement procedures on the specialized portal was executed, contributing to increased transparency in procurement activities and the early identification of potential violation risks. Advisory support was provided to workers on anti-money laundering and counter-terrorist financing issues, while internal mechanisms to minimize protected information leakage risks were simultaneously refined. Within public service quality control frameworks, audits of selected territorial branches were conducted, resulting in recommendations to unify practices and elevate service standards.

In combination, the measures implemented achieved a significant strengthening of operational resilience, an increase in data security levels, and the further development of an effective internal control system.

5.6. Internal Audit

In 2025, the National Bank commenced the implementation of a three-year audit review cycle within the Medium-Term Plan for 2025–2027, with the 2025 audit plan fully executed.

Internal audit recommendations contributed to increasing operational efficiency, internal control system maturity, and risk management refinement within the National Bank.

Maintaining a commitment to a risk-oriented approach, foundations were laid for further internal audit development amid the National Bank's digital transformation, aiming to position it as a model central bank and a leader in digitalization.

Internal audit focused attention on evaluating the efficiency and compliance of digital systems with established standards, cybersecurity control, ensuring data integrity, and digital infrastructure development. Concurrently, support to units in adapting to new business models and executing digital transformation projects was reinforced, including data management development, advanced IT solution deployment, and application architecture modernization.

Within advisory activity frameworks, a transformation of the internal audit role into a strategic consultant commenced, providing independent expert support to the National Bank's business processes.

Systemic efforts continued to enhance the internal audit institution and corporate governance within the National Bank's subsidiaries, including through conducting synergistic audits and hosting an annual seminar on internal audit IT transformation, information security auditing, and the deployment of new International Internal Audit Standards, engaging experts from OECD and EAEU central banks.

Furthermore, training on HR process auditing was conducted for EAEU central banks, focusing on modern HR audit approaches and tools, including automation and application of AI.

Within international professional cooperation frameworks, the National Bank's internal auditors participated in the 13th meeting of the Advisory Council on Central Bank Audit of the EAEU, held in the Kyrgyz Republic, alongside an event organized by the Joint Vienna Institute.

GLOSSARY OF TERMS AND ABBREVIATIONS

ICT Infrastructure – Information and Communication Technological Infrastructure
 JSC – Joint-Stock Company
 US – United States of America
 UAE – United Arab Emirates
 Media – Mass Media
 Banks – Second-Tier Banks
 UAPF – Unified Accumulative Pension Fund
 b.p. – basis points (1 b.p. = 0.01 percentage point)
 WB – World Bank
 EAG – Eurasian Group on Combating Money Laundering and Financing of Terrorism
 EAEU – Eurasian Economic Union
 EBRD – European Bank for Reconstruction and Development
 AI – Artificial Intelligence
 GDP – Gross Domestic Product
 South Africa – Republic of South Africa
 RF – Russian Federation
 EPIEP – Unified Portal for Interaction with the External Perimeter
 CIS – Commonwealth of Independent States
 OTS – Organization of Turkic States
 National Bank / NBK – National Bank of the Republic of Kazakhstan
 National Fund – National Fund of the Republic of Kazakhstan
 Fed – US Federal Reserve System
 IMF – International Monetary Fund
 IBRD – International Bank for Reconstruction and Development
 OECD – Organisation for Economic Co-operation and Development
 AI Agents – Artificial Intelligence Agents
 IT Environment – Information Technology Environment
 AI Platform – Artificial Intelligence Platform
 AI Services – Artificial Intelligence Services
 AI Solutions – Artificial Intelligence-based Solutions
 API – Application Programming Interface
 GPU Cluster – Graphics Processing Unit cluster