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Abstract. *This article examines the implementation and effectiveness of anti-corruption frameworks across Central Asian nations, focusing on Kazakhstan, Kyrgyzstan, Tajikistan, and Uzbekistan. Based on the OECD’s 2024 Baseline Reports of the Fifth Round of Monitoring of Anti-Corruption Reforms under the Istanbul Anti-Corruption Action Plan, the research analyzes various aspects of anti-corruption efforts, including legislative frameworks, enforcement practices, and international cooperation mechanisms. The study reveals significant variations in progress and persistent challenges across the region. While some countries, notably Kazakhstan, have shown advancement in areas such as statistical transparency and high-level prosecutions, others struggle with fundamental issues in their legislative frameworks and enforcement capabilities. Common challenges include the problematic dual-track system of administrative and criminal liability, inadequate corporate liability mechanisms, and weak asset recovery frameworks. The analysis identifies particular concerns in areas such as immunity systems, international cooperation, and the prosecution of complex corruption cases. The research highlights the need for enhanced regional cooperation and standardized approaches to anti-corruption efforts, while emphasizing the importance of aligning national frameworks with international standards, particularly the United Nations Convention against Corruption. This comprehensive assessment contributes to understanding the current state of anti-corruption efforts in Central Asia and identifies crucial areas for future reform.*

Keywords: *anti-corruption, Central Asia, OECD, legislation, enforcement, reforms*

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Annotatsiya: Ushbu maqolada Markaziy Osiyo mamlakatlarida korrupsiyaga qarshi tuzilmalarning joriy etilishi va samaradorligi tahlil qilindi, bunda Qozog'iston, Qirg'iziston, Tojikiston va O'zbekistonga e'tibor qaratildi. Istanbulning korrupsiyaga qarshi kurash rejasi doirasida korrupsiyaga qarshi islohotlarni monitoring qilish beshinchi bosqichining 2024-yilgi IHTT asosiy hisobotlari asosida korrupsiyaga qarshi kurashning turli jihatlarini, jumladan, qonunchilik asoslari, huquqni qo'llash amaliyoti va xalqaro hamkorlik mexanizmlari tahlil qilindi. Tadqiqot butun mintaqada sezilarli rivojlanish farqlari va davom etayotgan muammolarni ochib beradi. Ba'zi mamlakatlar, xususan, Qozog'iston statistik shaffoflik va yuqori darajadagi odil sudlovni ta'minlashda ilgari ilgagan bo'lsa, boshqalari o'zlarining qonunchilik doiralari va ijro etish imkoniyatlaridagi asosiy muammolar bilan kurashmoqdalar. Umumiy muammolarga ma'muriy va jinoiy javobgarlikning muammoli ikki vektorli tizimi, korporativ javobgarlikning yetarli bo'lmagan mexanizmlari va aktivlarni qaytarishning zaif tuzilmalari kiradi. Tahlil immunitet tizimlari, xalqaro hamkorlik va murakkab korrupsiya ishlarini jinoiy javobgarlikka tortish kabi sohalaridagi alohida muammolarni ochib beradi. Tadqiqotda mintaqaviy hamkorlikni kengaytirish va korrupsiyaga qarshi kurashda standartlashtirilgan yondashuvlar zarurligi, shu bilan birga, milliy asoslarni xalqaro standartlarga, xususan, BMTning korrupsiyaga qarshi konvensiyasiga moslashtirish muhimligi ta'kidlandi. Ushbu keng qamrovli baholash Markaziy Osiyodagi korrupsiyaga qarshi kurashning hozirgi holatini tushunishga yordam beradi va kelajakdagi islohotlar uchun muhim sohalarni belgilaydi.

Kalit so'zlar: korrupsiyaga qarshi kurash, Markaziy Osiyo, IHTT, qonunchilik, huquqni qo'llash, islohotlar

АНТИКОРРУПЦИОННЫЕ МЕРЫ В РЯДЕ СТРАН ЦЕНТРАЛЬНОЙ АЗИИ: СРАВНИТЕЛЬНЫЙ АНАЛИЗ

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Аннотация. В данной статье рассматриваются внедрение и эффективность антикоррупционных механизмов в странах Центральной Азии, включая Казахстан,

Кыргызстан, Таджикистан и Узбекистан. Исследование основано на базовых отчётах ОЭСР за 2024 год в рамках 5-го раунда мониторинга антикоррупционных реформ по Стамбульскому плану действий по борьбе с коррупцией. Проанализированы различные аспекты антикоррупционной деятельности, включая законодательные рамки, практику правоприменения и механизмы международного сотрудничества. Исследование выявило значительные различия в достигнутом прогрессе, а также сохраняющиеся проблемы в регионе. В частности, Казахстан демонстрирует значительные успехи в таких сферах, как прозрачность статистики и преследование высокопоставленных коррупционеров, тогда как другие страны сталкиваются с серьёзными проблемами в законодательстве и его реализации. К общим вызовам можно отнести двойную систему административной и уголовной ответственности, недостаточную ответственность юридических лиц и слабую систему возврата незаконно приобретённых активов. Особую озабоченность вызывают вопросы иммунитета должностных лиц, международного сотрудничества и расследования сложных коррупционных дел. Авторы подчёркивают необходимость усиления регионального взаимодействия и стандартизации антикоррупционных мер, а также важность приведения национальных антикоррупционных механизмов в соответствие с международными стандартами, в частности с Конвенцией ООН против коррупции. Настоящее исследование представляет собой всесторонний анализ текущего состояния борьбы с коррупцией в Центральной Азии и указывает на ключевые направления для будущих реформ.

Ключевые слова: антикоррупционные меры, Центральная Азия, ОЭСР, законодательство, правоприменение, реформы

Introduction

Corruption remains one of the most persistent challenges hindering economic development, governance effectiveness, and institutional trust in Central Asia. Despite numerous reform efforts and international commitments, corruption continues to undermine the rule of law, weaken public institutions, and distort economic competition. The OECD's Fifth Round of Monitoring Baseline Reports (2024) provides a timely opportunity to critically assess the progress, shortcomings, and future prospects of anti-corruption efforts in Kazakhstan, Kyrgyzstan, Tajikistan, and Uzbekistan.

This research aims to conduct a comprehensive assessment of the anti-corruption frameworks in Central Asian nations, focusing on legislative implementation, enforcement mechanisms, and international cooperation. While many studies have examined anti-corruption reforms in individual countries or specific aspects such as enforcement or compliance, there remains a lack of a holistic,

comparative regional analysis that identifies common challenges and areas for policy convergence. Addressing this gap is essential for strengthening national frameworks and fostering regional cooperation against corruption.

The study is structured around four key objectives:

- 1) Evaluating the alignment of national legislative frameworks with international standards, particularly the UNCAC requirements;
- 2) Assessing the effectiveness of enforcement mechanisms and prosecution patterns;
- 3) Analyzing the implementation of corporate liability frameworks and private sector regulations;
- 4) Examining the success of asset recovery initiatives and international cooperation mechanisms.

The existing literature on anti-corruption reforms in Central Asia has primarily focused on individual country [1] analyses or specific aspects of anti-corruption efforts [2]. For

instance, some papers analyzing legislation and enforcement in Kazakhstan consider anti-corruption reforms as part of global changes [3], while others focus solely on corruption issues [4]. Other studies examine specific aspects [5], or aspects relevant to anti-corruption measures [6].

It should also be noted that some research adopts a regional analysis methodology [7], while others focus on more detailed, country-specific analyses [8].

However, comprehensive research that evaluates the region's shared challenges—such as weak enforcement, legal inconsistencies, and the need for greater international cooperation—remains limited.

This study contributes to both academic discourse and policy development by providing a comparative analysis of anti-corruption efforts in Central Asia, identifying best practices, persistent challenges, and areas where greater regional and international collaboration is needed. The findings will be particularly relevant as these nations continue to refine their anti-corruption strategies in response to evolving threats, shifting political dynamics, and global accountability standards.

Materials and methods

The research methodology adopted for this study combines quantitative and qualitative approaches to examine the evolution and effectiveness of anti-corruption mechanisms in Central Asian states.

The primary data collection involved comprehensive examination of official documentation from four target countries: Kazakhstan, Kyrgyzstan, Tajikistan, and Uzbekistan. This documentation encompassed national anti-corruption laws, implementation reports from the OECD's Fifth Round of Monitoring (2024), enforcement statistics, and official records from anti-corruption bodies. Key performance metrics analyzed included

successful prosecutions, asset confiscation rates, and effectiveness of cross-border cooperation initiatives in corruption cases.

To provide deeper insights into implementation challenges and successes, the study incorporated detailed analyses of significant anti-corruption cases from each country. Case selection criteria emphasized diversity in corruption types, varying enforcement approaches, and different outcomes across jurisdictions. Special consideration was given to cases that demonstrated the practical application of legislative frameworks, particularly in areas such as corporate liability and international asset recovery.

This dual methodological strategy allows for both broad pattern identification and in-depth analysis of specific implementation challenges. The approach particularly illuminates the relationship between legislative frameworks and practical enforcement outcomes, while highlighting regional variations in anti-corruption effectiveness.

Research results

The Organization for Economic Co-operation and Development (OECD) published Baseline Reports of the Fifth Round of Monitoring of Anti-Corruption Reforms in 2024, analyzing anti-corruption reforms under the Istanbul Anti-Corruption Action Plan for Kazakhstan, Kyrgyz Republic, Tajikistan, and Uzbekistan.

Legislative Frameworks and Implementation

The foundation of regional anti-corruption efforts was established between 2003 and 2008, when Central Asian nations ratified the United Nations Convention Against Corruption (UNCAC) [9]. The research reveals a problematic dual-track system of administrative and criminal liability for corruption offenses across the region, which creates redundant legal provisions and undermines effective criminal prosecution.

In Tajikistan, Chapter 4 of the Law on Combating Corruption reveals significant legislative gaps [10]. While Article 24 explicitly indicates implementation through criminal or administrative legislation, Articles 25 and 26 remain unclear, with blanket references to “the legislation of the Republic of Tajikistan.” [10] Multiple conflicts exist between various legal instruments, notably between the Criminal Code [11] and Code on Administrative Offences [12], where provisions overlap in addressing bribe-taking. The Criminal Procedural Code [13] undermines corruption-related offense integrity by allowing non-corrupt interpretations of “Abuse of Official Powers,” while the Criminal Code lacks provisions for “offering” or “promising” of bribes as completed crimes.

Kyrgyzstan’s 2012 Law “On Countering Corruption” [14] demonstrates foundational weaknesses in legal definitions. The law adopts an unusually narrow approach to defining corruption, limiting it to situations where officials establish firm connections for illegal benefits. The framework’s treatment of bribery reveals significant limitations, particularly in addressing modern corruption challenges and non-pecuniary benefits.

Corporate Liability and Private Sector Framework

The research identifies substantial gaps in addressing private sector corruption across the region. Kazakhstan’s framework exemplifies this limitation: individual bribe-givers face criminal prosecution under Article 367 [15], while corporate entities receive only administrative penalties under Article 678 [16], falling short of international standards.

The Kyrgyz Republic’s approach to private sector corruption shows significant gaps in coverage and enforcement capacity [17]. The framework fails to adequately address crucial elements of modern business corruption, including the offer or promise

of bribes, their acceptance or solicitation, and non-material forms of corruption. Furthermore, the definition of liable persons within organizations lacks clarity and comprehensiveness.

Immunity Systems and International Cooperation

The immunity regimes across Central Asian nations demonstrate broad protection for officials, with arrest possible only in flagrante delicto cases [18]. The procedures for lifting immunities typically lack specificity and transparency, relying on parliamentary procedures or constitutional court decisions. International cooperation [19] faces significant challenges through dual criminality requirements and minimum imprisonment thresholds for extradition. The absence of specific mutual legal assistance legislation for corruption proceeds further complicates international cooperation [20], with countries largely relying on bilateral agreements rather than comprehensive multilateral frameworks.

Analysis of the research results

Comprehensive Legislative Assessment

The findings highlight critical legislative deficiencies across the region, indicating that while all four Central Asian nations have made efforts to comply with international anti-corruption commitments, significant gaps remain in both substantive and procedural legal frameworks. Tajikistan’s framework demonstrates multiple critical gaps in its alignment with UNCAC requirements, particularly in areas such as illicit enrichment criminalization, asset declaration mechanisms, and provisions for trading in influence [21]. The private-sector bribery regulations also fall short of international standards. Similarly, Kyrgyzstan’s system reveals structural weaknesses through its narrow interpretation of corruption and limited coverage of modern corruption forms, while its mechanisms for corporate liability

and addressing indirect forms of corrupt practices remain insufficient [22].

The lack of alignment with UNCAC standards in private-sector bribery regulations across the region is particularly concerning, as it hinders efforts to combat corruption in commercial transactions and foreign investment. These legislative shortcomings not only impede enforcement but also create loopholes that allow corruption to persist despite formal legal prohibitions.

Enforcement Patterns and Effectiveness

The analysis of enforcement practices reveals significant disparities between statutory provisions and practical implementation across the region. Kazakhstan has demonstrated relative strength through successful prosecution of high-ranking officials, including three vice-ministers in 2023 [23], while maintaining regular publication of detailed enforcement statistics. Uzbekistan shows mixed results with a high rate of imprisonment for high-level corruption convictions but faces challenges in autonomous money laundering prosecutions and demonstrates inconsistent sentencing patterns [24].

Tajikistan continues to face significant challenges with a low rate of high-level corruption investigations and declining public confidence in anti-corruption initiatives [25]. Meanwhile, Kyrgyzstan has shown focused but limited enforcement, emphasizing active and passive bribery cases while struggling with illicit enrichment prosecution and foreign bribery cases [26]. This variation in enforcement effectiveness across the region suggests that without stronger political commitment and institutional capacity, even the best-designed legal frameworks will fail to deliver meaningful results.

Asset Recovery and International Cooperation Analysis

The inability of Central Asian nations to recover assets from corruption-related

crimes, particularly in cross-border cases, underscores fundamental weaknesses in financial investigation capabilities and international cooperation. Kazakhstan has shown success with basic confiscation but struggles with more complex cases involving derivative proceeds and third-party assets [27]. Kyrgyzstan's system requires substantial strengthening in both identification and recovery processes [28], while Tajikistan's confiscation practices raise effectiveness concerns [29]. Given the global nature of corruption networks, regional governments must prioritize the strengthening of mutual legal assistance frameworks and adopt international best practices for asset tracing and recovery.

Statistical Transparency and Monitoring Assessment

Kazakhstan leads the region in statistical reporting through its monthly published statistics and comprehensive central-level data collection system [30]. Other countries show varying degrees of commitment to transparency, with Uzbekistan maintaining central collection but limiting public access [31], Kyrgyzstan lacking comprehensive documentation [28], and Tajikistan requiring significant improvements in both collection and publication practices [29]. Without reliable and publicly accessible enforcement data, it becomes difficult to assess progress, identify systemic weaknesses, and ensure that anti-corruption measures are not merely used as political tools. The absence of detailed statistical monitoring in several countries suggests a deliberate effort to control the narrative around corruption rather than genuinely address it.

Implications and Future Directions

The analysis underscores the need for comprehensive reform across several critical areas. Legislative reforms must focus on harmonizing administrative and criminal liability systems while implementing effective corporate liability

frameworks. Enforcement mechanisms require enhancement through standardized sentencing practices and improved international cooperation procedures [32]. The development of specialized expertise in complex cases and enhanced statistical monitoring would strengthen regional anti-corruption efforts.

The divergence in success rates among Central Asian countries suggests that greater regional cooperation and knowledge-sharing could be highly beneficial. Kazakhstan's relatively advanced enforcement and transparency mechanisms could serve as a model for neighboring states, while countries with weaker systems must prioritize capacity-building and institutional reforms. However, without sustained political commitment, anti-corruption reforms risk remaining superficial or selectively enforced. Ultimately, the success of anti-corruption efforts in Central Asia will depend not only on formal legal changes but also on the willingness of governments to implement and uphold these reforms in practice.

Conclusion

The analysis of anti-corruption frameworks in Central Asia highlights both significant progress and persistent structural deficiencies. While countries like Kazakhstan have demonstrated relative success in prosecution transparency and enforcement reporting, fundamental challenges remain across the region, particularly in corporate liability, asset recovery, and international cooperation. The dual-track administrative and criminal liability system continues to create complexity, and private-sector bribery remains insufficiently addressed in national legislation. These shortcomings hinder the effective prosecution of corruption and the recovery of illicit assets.

To strengthen anti-corruption efforts and align with international standards, the following recommendations should be prioritized:

1) Harmonization of Legislative Frameworks:

- Align national anti-corruption laws with UNCAC and OECD standards to ensure consistency in definitions, criminalization of offenses, and liability mechanisms.
- Address gaps in illicit enrichment criminalization, trading in influence, and private-sector bribery regulations.
- Reform dual-track administrative and criminal liability systems to enhance clarity and efficiency in enforcement.

2) Enhancing Corporate Liability and Private Sector Regulations:

- Establish clear and enforceable corporate liability provisions to hold legal entities accountable for corruption-related offenses.
- Expand liability beyond high-ranking officials to include all employees, agents, and consultants involved in corrupt activities.
- Strengthen mechanisms for detecting and preventing corruption in private sector transactions.

3) Improving Asset Recovery Mechanisms:

- Develop specialized financial intelligence and investigation units to track illicit financial flows and recover proceeds from corruption.
- Strengthen international cooperation agreements on asset tracing, confiscation, and repatriation of stolen assets.
- Introduce mechanisms to facilitate mutual legal assistance (MLA) and reduce bureaucratic barriers in cross-border corruption cases.

4) Enhancing Enforcement and Transparency:

- Improve judicial and prosecutorial independence to ensure corruption cases are handled impartially.
- Strengthen data collection and public reporting on anti-corruption enforcement, ensuring transparency in prosecution statistics and asset recovery outcomes.
- Standardize sentencing practices to avoid inconsistencies and selective enforcement.

5) Strengthening Regional Cooperation:

- Develop unified regional anti-corruption strategies to facilitate cross-border investigations and information exchange.
- Establish joint anti-corruption task forces and regional training programs for investigators and prosecutors.
- Encourage mutual recognition of legal frameworks to enhance cooperation in corruption-related legal proceedings.

Effective anti-corruption reform in Central Asia requires a multi-faceted approach that integrates legislative improvements, institutional capacity-building, and enhanced

regional collaboration [33]. While certain countries have made strides in enforcement transparency, the region as a whole must address systemic weaknesses that allow corruption to persist. The success of these efforts will ultimately depend on sustained political commitment, effective implementation, and continuous monitoring. Greater alignment with international standards, coupled with improved intergovernmental cooperation, will be critical in fostering long-term institutional integrity and reducing corruption across Central Asia.

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