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Research Article

**STATE REGULATION OF CORPORATE SOCIAL RESPONSIBILITY
IN KAZAKHSTAN: A QUALITATIVE AND QUANTITATIVE
ANALYSIS OF LEGAL AND POLICY FRAMEWORKS**

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ABSTRACT

The article presents an analysis of the content of key regulatory legal acts of the Republic of Kazakhstan governing corporate social responsibility (CSR) for business. The method of content analysis is used, combining a qualitative assessment of the content of strategically significant documents and a quantitative review of references to the main thematic categories. It has been established that there is no single specific law on CSR in Kazakhstan, but certain aspects of social responsibility are integrated into various legislative acts (labour, environmental, entrepreneurship, etc.). A comparative analysis of Kazakhstan's regulation with international standards and practices is conducted. The study delineates the strategic areas of state regulation of corporate social responsibility (CSR), including the protection of workers' rights, the promotion of social partnership, environmental conservation, and the encouragement of charitable activities and social investment, providing a comprehensive analysis of their qualitative and quantitative dimensions. Based on the identified gaps, recommendations are proposed for improving legislation in the field of CSR, taking into account advanced foreign experience and sustainable development goals. The main conclusions emphasize the need to adopt a comprehensive national strategy for CSR and strengthen government measures to stimulate responsible business.

Keywords: Corporate social responsibility, Regulatory legal acts, Sustainable development, Content analysis, Social partnership.

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INTRODUCTION

Corporate social responsibility (CSR) is a concept whereby businesses voluntarily assume additional obligations to society that go beyond the minimum legal requirements. The classic CSR model includes four main components: economic, legal, ethical, and philanthropic (Carroll, 1991). In other words, in addition to making a profit and complying with laws, companies are expected to behave ethically and contribute to solving social and environmental problems in society. In the context of the global sustainable development agenda and increasing stakeholder expectations, the importance of CSR is steadily growing. All over the world, there is a shift from voluntary initiatives to a more systematic integration of responsible business principles into company strategies and in some countries, to legislative consolidation of individual elements of CSR. For example, in India, since 2013, large companies have been required by law to allocate 2% of their profits to social projects (Companies Act, 2013, and the European Union has introduced an obligation for large enterprises to disclose non-financial reports on their activities in the field of ecology and society (EU Directive 2014/95/EU, 2014).

For Kazakhstan, the concept of CSR is also acquiring strategic importance in the context of sustainable development and economic modernization. Kazakhstan, following global trends, has officially supported the UN Sustainable Development Goals and declared its commitment to the principles of responsible and ethical business. The Kazakhstan-2050 Strategy proclaimed goals in the field of social modernization and “green” growth, which imply active participation of businesses in solving social problems and protecting the environment. Large companies in the country are gradually introducing international standards of corporate reporting and sustainable development practices. However, the role of the state in regulating CSR remains debatable. On the one hand, CSR is traditionally viewed as a voluntary business initiative. On the other hand, without certain coordination and incentives from the state, the development of CSR may be non-systemic.

The relevance of this study is due to the need for a comprehensive analysis of the current regulatory legal acts of Kazakhstan related to the field of CSR. The problem is that there is no single law on corporate social responsibility, and the elements of CSR are “scattered” across different branches of legislation. This complicates the formation of a holistic state policy in this area and the setting of strategic priorities. The hypothesis of the study is that the current regulatory framework covers the main aspects of CSR (social, environmental, economic) fragmentarily, mainly through related laws (labour, environmental, business legislation, etc.), and needs to be systematized and supplemented taking into account modern challenges and international standards.

The objective of the study is to provide a qualitative and quantitative description of the content of strategically significant regulatory documents of the Republic of Kazakhstan in the field of CSR in business, to identify priority areas of regulation and to develop recommendations for improving the legislation. To achieve this goal, the following tasks are solved in the work: (1) to determine the range of key regulatory acts directly or indirectly regulating aspects of CSR in Kazakhstan; (2) to conduct their content analysis, highlighting the main thematic categories and assessing the amount of attention paid to them; (3) to compare

the Kazakhstani approach to regulating CSR with international practices and standards; (4) to identify gaps and shortcomings of the current regulatory framework; (5) to suggest areas for improving state regulation of CSR.

LITERATURE REVIEW

The issue of corporate social responsibility of business has received considerable attention in the scientific literature over the past decades. Classic works (Carroll, 1991; Freeman, 1984) laid the theoretical foundations for the concept of CSR and the stakeholder approach, which emphasizes the responsibility of the company to a wide range of stakeholders – from employees and consumers to local communities and society as a whole. Over time, the focus of research has shifted from discussing the voluntary nature of CSR to studying effectiveness, measuring the impact on sustainable development, and the role of regulatory control.

There is a variety of approaches to regulating CSR in international practice. In most developed countries, legislation does not establish direct requirements for CSR, relying on voluntary standards and market mechanisms (Moon, 2004). However, certain elements have been formalized: for example, in France and the UK, laws oblige large companies to publish non-financial reports (on their impact on society and the environment), and a number of countries (India, Indonesia) provide for standards on minimum expenditure on social programs. There are also national CSR strategies and codes adopted by governments to coordinate the efforts of business and the state (for example, the National CSR Strategy in a number of EU countries). International organizations offer framework principles: the UN initiated the Global Compact, which contains 10 principles of responsible business conduct; the OECD approved the Guidelines for Multinational Enterprises, covering human rights, labour, the environment and anti-corruption. The ISO 26000 standard (2010) provides universal recommendations on social responsibility for organizations. These documents are not mandatory but serve as guidelines for the development of national policies.

For countries with transition economies and developing countries, the issue of adapting global CSR principles to the local context and determining the optimal degree of government intervention is relevant. Some studies note that in conditions of underdeveloped civil society and weak public pressure, the state plays a critical role in stimulating CSR (Jamali, Karam, 2018). On the other hand, excessive regulation can undermine the voluntary nature of CSR and lead to formal compliance with requirements without real impact.

In Kazakhstan, CSR research began to develop in the 2000s, reflecting the gradual spread of this concept among businesses. According to an early study, the perception of CSR by Kazakhstani managers in the early 2010s was limited primarily to charity and sponsorship, while systemic aspects (environmental responsibility, labour rights, business ethics) were on the periphery of attention (Smirnova, 2012). Smirnova noted that the key factors stimulating CSR in Kazakhstan were large foreign companies and international financial organizations that broadcast their standards rather than internal legislative requirements (Smirnova, 2012).

Over the past years, there has been an evolution of the approach to CSR in Kazakhstan. According to a recent study by Bulkhairova et al. (2023), the lev-

el of business awareness of CSR principles has increased significantly, with more and more companies implementing social reporting and sustainable development practices. However, the authors note that CSR is not developing fast enough, and one of the reasons is the lack of clear legislative guidelines and incentives. In particular, it is confirmed that there are still no special laws on CSR in Kazakhstan, although certain *prerequisites* have been created in the form of regulatory references and individual benefits. Baltabayeva et al. (2024) characterize the Kazakhstani model of CSR for large businesses as still emerging, representing a combination of government regulation and business initiatives. In their work, they identify the main CSR *stakeholders* in Kazakhstan (the state, business associations, NGOs, local communities, etc.) and emphasize the importance of partnership between them to promote CSR principles. The authors trace the evolution of public policy: from the first steps in the 1990s (the 1994 Presidential Decree on Social Partnership) through incentive measures in the 2000s (the establishment of the Paryz Prize in 2008) to current efforts to implement international initiatives (for example, localizing the principles of the UN Global Compact). It is noted that as early as 2013, at the initiative of the Eurasia Foundation of Central Asia, a draft National Concept of CSR in Business was developed; however, a unified concept has not yet been officially adopted at the government level. Nevertheless, a certain *system for promoting CSR* ideas is emerging, including both regulatory elements and institutional mechanisms (partnerships, forums, competitions).

A number of sector-specific analyses highlight the particular role of CSR in Kazakhstan's extractive industries, especially in the oil and gas sector. Large subsoil users are often major contributors to social development in the regions where they operate – supporting education, healthcare, and infrastructure. However, such initiatives are frequently not the result of a cohesive national CSR policy but rather stem from contractual obligations under subsoil use agreements or informal arrangements with local authorities. This contract-driven model reflects a limited view of CSR as a compliance mechanism rather than a strategic business philosophy.

A recent study by Tauyekelova et al. (2024) conducted a comparative analysis of CSR practices in Kazakhstan and developed countries. According to its results, compared to developed countries, where CSR is already an integral part of corporate strategy, Kazakhstan is still lagging behind in a number of indicators (level of transparency, stakeholder involvement), although it has positive dynamics. The authors conclude that *systemic efforts* are needed to accelerate the development of CSR in the country, including developing an understanding among businesses that long-term financial success depends on reputation and public trust. One of the ways to achieve this is the introduction of integrated reporting and the concept of “reasonable corporate egoism”, when social investments are considered as a contribution to the company's own competitiveness.

In addition to Kazakhstani and Western academic sources, it is important to consider research from the Turkic world, where corporate CSR is also actively developing. In Türkiye, the perception and practice of CSR have undergone significant changes under the influence of global trends and internal transformations, including political, economic, and social shifts. As Yelkikalan and Kose (2012) point out, the financial crisis also had a notable impact on the evolution of CSR in Türkiye, encouraging companies to integrate social responsibility as a stra-

tegic response to growing public expectations. In Azerbaijan, a study on CSR practices among small and medium-sized enterprises (SMEs) identified major barriers to CSR integration and highlighted the need for sustainable strategies (Gahramanova, 2022). In Uzbekistan, empirical findings suggest that brands offering socio-economic benefits through CSR positively influence consumer purchase intentions, underlining the growing importance of CSR in developing countries (Ataniyazova et al., 2022). Including this regional comparative perspective enriches the understanding of CSR trends and offers an additional foundation for evaluating Kazakhstan's legislative approach.

A literature review shows that, despite the growing attention to CSR from the scientific community and the existence of individual initiatives, there remains a gap in Kazakhstan between the declared importance of CSR and the degree of its consolidation at the regulatory level. Many researchers directly point to the fragmentation of the legislative framework and the absence of a coordinating document (strategy, concept), which complicates the development of CSR (Bulkhairova et al., 2023; Baltabayeva et al., 2024). Similar challenges have been observed in other Turkic countries, such as Türkiye, Azerbaijan, and Uzbekistan, where interest in CSR is growing but regulatory frameworks often remain fragmented and inconsistent. At the same time, it is emphasized that Kazakhstan has all the necessary prerequisites for the active promotion of the principles of responsible business: there are basic laws regulating labour and environmental standards, the state declares its commitment to sustainable development, and the business elite is aware of reputational risks. Thus, the task of analysing current regulatory legal acts in terms of their content related to CSR is relevant in order to outline ways for further development of regulation.

METHODOLOGY

To achieve the objectives of the study, the method of content analysis of regulatory legal acts with elements of comparative legal analysis was chosen. Content analysis allowed us to identify how and to what extent topics related to corporate social responsibility are reflected in the text of official documents. The study is of a qualitative and quantitative nature: on the one hand, a qualitative interpretation of the provisions of legislative acts was carried out (highlighting semantic categories corresponding to aspects of CSR), on the other hand, a calculation of the conditional frequency of mentioning certain thematic categories or the volume of regulatory material devoted to them was performed to assess the emphases of state policy.

The object of the analysis was the strategically significant regulatory and legal acts of the Republic of Kazakhstan, which directly or indirectly regulate CSR issues. These include: The Constitution of the Republic of Kazakhstan; the Labour Code; the Entrepreneurial Code; the Tax Code; the Environmental Code; a number of special laws, such as the Law on Private Entrepreneurship (no longer in effect, but historically important), the Law on Public-Private Partnership, the Law on Public Procurement, as well as by-laws and government initiatives (for example, state programs or concepts affecting sustainable development). Some non-normative, but strategic documents were also taken into account – in particular, the Kazakhstan-2050 Strategy, and international commitments (accession to the UN Global Compact, the Paris Agreement on Climate), since they form the context for the development of CSR legislation.

Research procedure. In the first stage, a list of regulatory acts relevant to the topic of CSR was compiled. The following criteria were taken into account during the selection: (1) the act regulates the sphere that is a component of CSR (social and labour relations, ecology, charity, human rights, transparency and business ethics); (2) the act contains provisions addressing the responsibilities of business to society or stimulating the contribution of business to the public good; (3) the act is in force at the time of the study or has historical significance for the formation of CSR policy.

In the second stage, the text of the selected documents was coded into key categories. The following categories were identified for analysis: a) labour and social responsibility (employee rights, working conditions, personnel development, social partnership); b) environmental responsibility (environmental protection, sustainable use of resources, environmental standards for enterprises); c) economic and ethical responsibility (fair business practices, anti-corruption standards, consumer protection, transparency); d) charity and community development (stimulating voluntary social investments of companies, business participation in solving social problems of regions); d) government stimulation of CSR (tax incentives, subsidies, competitions, awards); e) reporting and disclosure of information (requirements or recommendations for non-financial reporting, public disclosure of CSR activities). This set of categories covers the main dimensions of CSR in accordance with international approaches and is adapted to the Kazakhstan context.

Each document was assigned a profile for these categories – i.e. it was noted whether the relevant topic was present in the text of the document, and if so, in what detail it was disclosed (for example, the number of articles or points devoted to it). For quantitative assessment, conditional points or percentages of content for each category within the document were introduced. Dynamics over time were also taken into account – for documents that have several editions or where new codes were adopted to replace old laws, changes were tracked that reflect the evolution of the approach to CSR.

The third stage is a comparative analysis. The results for Kazakhstan were compared with foreign examples and international recommendations. A comparison was made: which aspects of CSR are legislatively enshrined in Kazakhstan and in other countries, how strictly or, on the contrary, declaratively they are prescribed, whether there are any features unique to Kazakhstan (for example, an emphasis on social partnership) and what gaps are noticeable in comparison with best practices. For this, literature data, reviews of international organizations (for example, the OECD on responsible business in Kazakhstan) and regulatory acts of other countries were used.

The limitations of the study should be specified. Content analysis of regulatory acts allows us to identify only the presence or absence of certain provisions but does not measure the effectiveness of their implementation in practice. The existence of a CSR norm does not guarantee its implementation by businesses. In addition, the analysis covers formal legal documents and does not include corporate policies of companies (for example, internal CSR codes), which also influence the development of practices. Nevertheless, the focus on government regulation is justified by the purpose of the work – to assess the role and direction of government policy in the field of CSR. In the future, it is planned to

supplement the study with empirical data on the implementation of legislative requirements by companies and the perception of these requirements by stakeholders.

DISCUSSION

General characteristics of the regulatory framework for CSR in Kazakhstan

The analysis showed that there is no separate specialized law on corporate social responsibility in the legislation of Kazakhstan. This situation is similar to the practice of many countries where CSR is not allocated as an autonomous legal area. Instead, the principles of social responsibility are implemented in many acts of different industry affiliation, forming a mosaic regulatory picture. In Kazakhstan, such elements of CSR are primarily traced in labour, environmental, entrepreneurial and tax legislation, as well as in acts regulating the interaction of the state and business (for example, in the area of public procurement, partnership, investment in regional development). Below is a qualitative and quantitative description of key documents and their contribution to the overall regulatory picture of CSR.

The Constitution of the Republic of Kazakhstan (1995) is a fundamental document that enshrines basic values, rights and obligations, and creates a foundation for socially responsible behaviour. The Constitution proclaims the highest values: man, his life, rights and freedoms (Article 1); recognizes the right of citizens to a favourable environment (Article 31); establishes the rights to work in safe conditions, to rest, social security (Chapter 2). These constitutional norms form a framework of responsibility: business, as part of society, is called upon to respect constitutional rights (for example, to ensure safe work, not to harm the environment). Although the Constitution itself is not directly addressed to the corporate sector, it plays an important role, influencing all industry legislation, determining the balance between economic freedoms and social responsibilities.

Labour legislation. In the social dimension of CSR, the Labour Code of the Republic of Kazakhstan is of key importance. The current Labour Code (as amended in 2015 with subsequent amendments) includes an extensive set of regulations aimed at protecting labour rights and the well-being of employees. Content analysis of the Labour Code revealed the following key components correlated with CSR: guarantee of safe and healthy working conditions (section on safety, industrial sanitation); employees' rights to association, collective bargaining, participation in management (social partnership institutions, collective agreements); prevention of discrimination and forced labour; employer's obligations to train personnel, improve skills; regulations on the employer's liability for damage to the life and health of an employee, etc. Quantitatively, more than 50% of the provisions of the code directly or indirectly relate to the social responsibility of business to its employees – this is a mandatory, legally enshrined part of CSR (in Carroll terminology – *the legal responsibility* of the company to society). The Labour Code thus establishes minimum standards below which the company's behaviour cannot fall (safety, wages not lower than the minimum, respect for workers' rights). It was revealed that the institution of social partnership (cooperation between employers, employees and the state) has also received legislative registration: The Republican Tripartite Commission on Social Partnership operates, and collective agreements are concluded at the enterprise level. Historically, the foundations of social partnership were introduced back

in 1994 by Presidential Decree No. 1593, later the Law “On Social Partnership” (2000), now repealed, was adopted. Its functions are largely integrated into labour legislation. Qualitatively, these standards contribute to the implementation of the principle of business responsibility to personnel and the stability of labour relations; quantitatively, labour legislation makes up a significant share (about 20-25%) of the entire array of regulatory provisions relevant to CSR in the Republic of Kazakhstan.

The Entrepreneurial Code of the Republic of Kazakhstan is one of the central acts defining the fundamental approaches to the interaction between business and the state. The version of the code adopted in October 2015 contains a special chapter (Chapter 6) entitled “Social Responsibility of Entrepreneurship”. This is an innovation compared to the previous law “On Private Entrepreneurship”, which also contained a definition of social responsibility. Article 75 of the Entrepreneurial Code provides a legal definition of CSR: “social responsibility of entrepreneurship is a voluntary contribution of business entities to the development of social, environmental and other spheres of society”. Important provisions include: the state creates conditions for the development of social responsibility of business; no one has the right to force entrepreneurs to implement CSR (i.e. participation remains voluntary); the areas of CSR implementation – employment and labour relations, environmental protection and charity – are listed in approximate order. Articles 76 and 77 specify the areas: in the sphere of labour, the partnership of the entrepreneur with employees, assistance in solving social issues of the work collective are emphasized; in the sphere of ecology – careful attitude to the environment, financing of environmental protection measures. Article 78 provides for measures of state support for voluntary charitable activities of business – for example, the establishment of awards and prizes for contribution to social development. Quantitatively, the section on CSR in the Entrepreneurial Code is small (4 articles), but qualitatively it has great symbolic significance: for the first time at the level of codified law, the principles of CSR are enshrined, voluntariness is emphasized and at the same time the interest of the state in business contributing to the public good is indicated. In essence, the state declares a kind of *social contract* with entrepreneurship: freedom and support for business, in return – the expectation of social responsibility.

It is worth noting that the definition of CSR in the Kazakh law largely corresponds to international approaches (the three-aspect model “people-planet-profit”). However, the emphasis is on voluntariness. This reflects the evolution of views: back in the 2000s, the concept of social responsibility of business was introduced through the Law “On Private Entrepreneurship”, and even then, it was interpreted as a voluntary contribution to the development of society. The amendments to the Entrepreneurial Code of 2015 clarified these ideas and strengthened their legal status.

Tax legislation is an important tool for stimulating CSR through economic methods. The Tax Code of the Republic of Kazakhstan (new version of December 25, 2017) contains a number of provisions providing benefits or deductions for companies engaged in socially significant activities. Content analysis showed that the code provides, for example, tax deductions for charity: amounts donated to educational, healthcare, social service organizations, as well as to support culture and sports, can be deducted from taxable income (within established limits). The code also stimulates the employment of socially vulnerable

categories: for employers employing disabled people, reduced rates of social contributions or tax preferences are provided. Analysis of the relevant articles shows a quantitatively small share (less than 5% of the text of the code) directly related to CSR, but their effect is significant – through the tax system, the state financially encourages corporate charity and social investments. For example, according to Article 288 of the Tax Code, an enterprise can deduct up to 4% of profits directed to charitable purposes. This creates an economic incentive for voluntary business activity in the social sphere. Additionally, tax benefits are provided for companies investing in environmentally friendly technologies and energy conservation (part of the environmental policy associated with CSR).

The Environmental Code of the Republic of Kazakhstan is a key document regulating environmental aspects of organizations' activities. The first version of the Environmental Code was adopted in 2007; a new, significantly updated version of the code has been in force since 2021. This code establishes mandatory environmental standards and norms for enterprises: requirements for the protection of air, water, soil, waste management, conducting an EIA (environmental impact assessment) before starting new projects, compliance with maximum permissible emissions and discharges, and liability for damage to nature. All these standards represent the implementation of environmental responsibility of businesses, mostly on a mandatory basis (legal requirements). Quantitatively, environmental legislation occupies a large array (the code contains hundreds of articles), but in terms of CSR, its contribution can be assessed through the share of standards addressed specifically to the activities of enterprises (and not to government agencies or citizens). Almost the entire Environmental Code is directly related to the regulation of companies' activities, so it is the cornerstone of the external (in relation to the company) side of CSR – responsibility to the environment and society for environmental consequences. Particular note are the provisions on the best available technologies, on public environmental reporting (enterprises are required to disclose information on significant accidents, environmental risks), and on the possibility of public participation in discussing environmental aspects of projects. Thus, environmental legislation forms the strategic direction of CSR – sustainable environmentally responsible business management – primarily through the mechanism of mandatory standards and sanctions for violations.

Special laws and programs. In addition to the above-mentioned codes, there are other regulations in the Republic of Kazakhstan that affect business participation in solving social problems. For example, the Law “On Public-Private Partnership” (PPP) (2015) establishes a legal framework for the joint implementation of infrastructure and social projects by the state and business. It provides that private companies can invest funds and management resources in social facilities (schools, hospitals, utilities) on the basis of partnership with the state, receiving certain guarantees and income in return. Although PPP is a commercial mechanism, its development allows for the involvement of business in socially significant initiatives, which is consistent with the spirit of CSR. The Law “On Public Procurement” contains provisions on preferences for domestic producers and goods in public procurement. This can be considered as an element of the economic responsibility of business: support for the local community (local enterprises, jobs). Also, government procurement introduces requirements for compliance with certain standards (for example, the absence of corrupt connec-

tions, compliance with labour laws by contractors), which indirectly promotes the principles of responsible business conduct among suppliers.

In the oil, gas and mining sectors of Kazakhstan, the practice of concluding agreements between investors-subsoil users and the government, including a section on “social obligations”, has historically been used. Companies assumed obligations to invest in the development of regional social infrastructure – to build schools, roads, medical institutions, and to finance social programs for the local population. These requirements were either enshrined in the subsoil use contract or followed from by-laws. For example, a standard subsoil use contract may provide for an annual allocation of a certain percentage of investments for social projects in the region. Quantitatively, such obligations vary, but in large projects (oil, uranium), social investments amounted to millions of dollars annually. Qualitatively, this is an important area of CSR – the development of local communities – although conditioned by contractual obligations. In recent years, the government has been moving to a new model, where social investments of subsoil users are voluntarily coordinated through memorandums with akimats (local executive bodies). For example, ERG annually signs agreements with several regions to finance social projects, the total volume of which amounted to more than 10 billion tenge in 2020. This mechanism effectively institutionalizes CSR at the regional level.

Initiatives and incentives. The Kazakh government has implemented a number of initiatives to stimulate the dissemination of CSR. One of the iconic programs is the annual “Paryz” competition, established by the Decree of the First President in 2008. The competition rewards enterprises that have achieved the greatest success in the field of social responsibility in several nominations (the best social program, environmental initiative, labour agreement, etc.). The “Paryz” award has become an important non-material incentive: it is prestigious for a company to receive recognition at the state level for its contribution to society. Analysis of the competition data shows that during the first decade of its existence, dozens of companies (both national and international) were recognized, which encouraged them and their competitors to expand their CSR activities. Another initiative is the creation of the CSR Leaders Club with the support of the Eurasia Foundation in 2013, which brought together various stakeholders (business, NGOs, experts) to exchange best practices. Kazakhstan also joined the UN Global Compact in 2008, and as of the late 2010s, approximately 15–18 Kazakhstani companies were listed as its participants, voluntarily committing to follow 10 principles in the areas of human rights, labour conditions, the environment, and anti-corruption (Baltabayeva et al., 2024).

A comparison of regulatory acts with the previously identified categories made it possible to determine the strategic directions of CSR regulation in Kazakhstan and give them a qualitative and quantitative description:

Protection of workers’ rights and social partnership. This area covers labour legislation, labour protection standards, employment guarantees and personnel development, collective bargaining relations. Kazakhstani legislation pays the greatest attention to this area (about 30-35% of the total content related to CSR). Qualitatively, the standards are mandatory and comply with international labour standards (ILO conventions). Strategically, the state sets the goal of ensuring social stability and decent working conditions, considering business as a partner

in achieving these goals through social partnership mechanisms. The documents (Labour Code, Constitution, previously the law on social partnership) trace the evolution from the declaration of general principles to detailed regulation of the rights and obligations of the parties.

Responsibility for environmental protection. This is the second most important area, legally enshrined mainly in the Environmental Code and related acts (laws on environmental protection, on environmental audit, etc.). The share of environmental standards is about 25-30% of the “CSR field” in legislation. All major projects in Kazakhstan are subject to environmental assessment, permitting and control mechanisms are in place. The state strategically directs business to reduce the negative impact, introduce clean technologies. Qualitatively, the standards are quite strict; the problem is rather in ensuring the inevitability of their observance. The topic of climate change and reduction of greenhouse gas emissions is also beginning to enter the agenda (the Paris Agreement has been ratified, the CO₂ quota trading system has been introduced), which is gradually being integrated into the responsibilities of companies.

Social investment and development of local communities. This block is less formally enshrined, but is implemented through the above-mentioned mechanisms: requirements for subsoil users, public-private partnerships, voluntary charity and sponsorship. Its share is estimated at 15-20%. Direct legislative requirements for participation in the social development of localities are few (mainly in contracts and by-laws for subsoil), but indirect encouragement comes through tax breaks and public recognition (the “Paryz” competition). Strategically, the importance of business helping to solve social problems in the places where it operates, especially in single-industry towns and remote regions, is recognized. Content analysis showed that the texts of some state regional development programs contain sections on attracting private investment in the social sphere (for example, the agro-industrial complex development program provided for the participation of agricultural holdings in rural areas). In general, this area has not yet acquired the form of mandatory norms of a general nature, remaining at the level of voluntary incentives.

In developing a framework for public policy in the field of CSR, Kazakhstan needs to take into account its international legal obligations, especially those arising from membership in the World Trade Organization (WTO), participation in various bilateral and multilateral investment agreements, as well as regional free trade agreements. These documents enshrine the principles of non-discrimination, free market access, fair treatment of investors and legal predictability. The introduction of new mandatory CSR requirements that are not consistent with these obligations may lead to legal conflicts or even lawsuits from foreign investors.

This issue is especially acute in strategic sectors, such as subsoil use, where investment contracts are often closely linked to international law. According to practitioners in this field, attempts have already been made to promote voluntary CSR initiatives, but many of them have proven ineffective due to business concerns about violating the boundaries of legal regulation or contradicting the provisions of investment agreements. Business representatives are well aware of their rights under international treaties and, as a rule, refuse additional obligations if they are perceived as inconsistent with these documents.

In addition, the investment climate largely depends on stability and legal certainty. Investors expect clear rules and predictability in their application. Uncoordinated or poorly communicated measures to implement CSR can create a sense of regulatory risk, which can scare off foreign investors or lead to capital outflow from vulnerable industries. Therefore, any CSR measures in Kazakhstan should be developed with particular care to avoid unintended consequences. The principle of voluntariness should be preserved, but at the same time interdepartmental coordination should be strengthened, a system of incentives and transparency tools should be developed – all in accordance with the country's international obligations.

Ethical responsibility, transparency and consumer rights. This aspect includes anti-corruption measures, requirements for fair competition, consumer protection, and corporate governance. The Civil Code and laws on the protection of competition and consumer rights contain relevant articles (prohibition of unfair advertising, obligation to provide reliable information about goods, liability for low-quality products, requirements for disclosure of information by issuers in the securities market, etc.). For example, the Law “On Protection of Consumer Rights” obliges sellers and manufacturers to ensure the safety of goods and services for life and health – which is directly related to social responsibility. The share of such norms is about 10-15%. In addition, since the 2020s, the introduction of ESG (environmental, social and governance) standards in corporate governance has been actively discussed. Since 2016, the Kazakhstan Stock Exchange (KASE) has developed methodological recommendations for the disclosure of ESG information for issuers. In 2020, KASE updated the rules to include requirements (currently of a recommendatory nature) for the publication of data on environmental, social and governance indicators in companies' annual reports. Thus, transparency in the field of CSR is gradually becoming part of the “rules of the game” for public companies, although there is no national legislation on mandatory non-financial reporting yet.

In general, it can be stated that the strategic three priorities of Kazakhstan's CSR regulation are (1) social protection of employees, (2) environmental protection, and (3) stimulation of voluntary contribution of business to social development. The first two aspects are predominantly imperative (mandatory labour and environmental law), while the third is voluntary (through economic incentives and partnership). Ethical standards and transparency are also present but are more often implemented through general requirements for doing business (anti-corruption legislation, corporate law). Quantitative content analysis showed that labour and environmental aspects account for more than half of the regulatory provisions related to CSR, while voluntary social initiatives are mentioned less frequently and are mainly encouraged rather than required. This points to a CSR model in Kazakhstan where the basic level of business social responsibility is effectively set by law (labour and environmental compliance), while a higher level is encouraged but not required.

These considerations highlight the need to develop a balanced and legally sound approach to CSR regulation that will strengthen Kazakhstan's commitment to responsible business practices without compromising its investment attractiveness. In this context, it is useful to look to international experience and compare how similar issues are addressed in other countries in order to learn lessons and apply them to national policy.

COMPARISON WITH INTERNATIONAL STANDARDS

A comparison of the Kazakh situation with international standards and practices revealed both achievements and areas for improvement. On the one hand, the regulatory framework of Kazakhstan covers all the main elements of CSR: there is labour legislation (in line with key conventions of the International Labour Organization), developed environmental law, the concept of voluntary social responsibility of business is enshrined, and there are mechanisms for stimulating charity. In terms of the totality of these features, Kazakhstan looks comparable to many countries where CSR is also mainly voluntary. For example, in the United States and Canada there are no direct laws on CSR, but there are labour and environmental laws – an analogy with Kazakhstan can be traced. The Kazakh definition of CSR in the Entrepreneurial Code is essentially close to the definition of ISO 26000 and other international guidelines that emphasize the voluntary contribution of business to the sustainable development of society.

On the other hand, international trends of the last decade demonstrate a movement towards mandatory disclosure of information and responsibility of companies in some aspects. In this component, Kazakhstan is still lagging behind: there is no mandatory non-financial reporting, no requirements for transparency in the supply chain (like, for example, the Modern Slavery Act in the UK or similar EU regulations on human rights due diligence). There is also no legislative consolidation of such modern areas as gender equality in corporate bodies, climate reporting, etc., which appear in EU regulation. Kazakhstan participates in a number of global initiatives (for example, EITI – Extractive Industries Transparency Initiative, OECD Guidelines – joining as a partner), but the implementation of their provisions in national acts is not always complete. The OECD report (2014) on responsible business conduct in Kazakhstan recommended strengthening the practical application of labour and environmental legislation, as well as developing a national action plan for responsible business. As of 2023, such a CSR plan or strategy has not yet been approved, although concept papers have been discussed.

An interesting comparison with neighbouring countries and similar economies is that in Russia CSR is not regulated by law separately, but there are national standards and guidelines (GOST R ISO 26000-2012, National Council on CSR). In China and India, despite different political systems, the state is becoming increasingly involved: China issues guidelines for companies (including state-owned enterprises) on CSR, India, as noted, has introduced a direct standard on CSR costs. Kazakhstan currently occupies an intermediate position: the state supports CSR more indirectly and through *soft measures* (soft law) than through strict requirements. On the one hand, this corresponds to the principle of voluntariness, on the other hand, there is a risk that without a certain “kick” from the law, some companies will ignore their social obligations. The emerging markets literature suggests that a combination of measures – “the carrot and the stick” – is often more effective: voluntary action should be backed by at least a reporting obligation (to create publicity and reputational pressure) or minimum CSR standards (Khan et al., 2016).

An important international benchmark is the UN Sustainable Development Goals (SDGs) for the period up to 2030, which Kazakhstan has undertaken to achieve. Many of the 17 goals are directly related to business activities (for

example, decent work – SDG 8, industrialization and innovation – SDG 9, combating climate change – SDG 13, partnerships – SDG 17). The state expects the corporate sector to be a partner in implementing the SDGs. However, without building a system for monitoring the contribution of business to the SDGs, it is difficult to assess progress. In this regard, a number of countries are introducing mandatory ESG reporting, including indicators of compliance with the SDGs. Kazakhstan is still limited to voluntary reporting, although the largest companies (especially those listed on foreign stock exchanges) are already publishing ESG reports according to GRI standards. The strategic difference is that in international practice, the state increasingly requires transparency (disclosure) from companies, without imposing specific expenses, but obliging them to disclose information about risks and impacts. Kazakhstani legislation has yet to integrate this approach.

CONCLUSION

The conducted research showed that the legal framework of Kazakhstan in the field of corporate social responsibility is complex and fragmented. Complexity lies in the fact that all three classic components of CSR are covered – economic, social and environmental: compliance with labour rights and social partnership, minimization of harm to the environment, fair business practices and contribution to the public good are present in Kazakhstani laws. Fragmentation is expressed in the absence of a single codified act or strategy devoted to CSR: the relevant norms are “scattered” across different laws and codes (Labour, Environmental, Entrepreneurial, Tax, etc.). This complicates a unified understanding and application of CSR principles in practice. Nevertheless, the inclusion of a chapter on social responsibility in the Entrepreneurial Code (2015) is an important step that has designated the official status of CSR as a significant element of state policy.

A qualitative and quantitative analysis of the content of regulatory acts revealed that the priority areas of CSR regulation in Kazakhstan are: (1) ensuring social guarantees for employees and developing social partnership (the most fully and strictly regulated area); (2) environmental protection and environmental responsibility of business (comprehensive environmental legislation with requirements for companies); (3) stimulating voluntary social investments of business in the development of society (tax incentives, partnership projects, competitions). These areas correspond to the strategic objectives of the country – building a socially oriented economy, preserving the environment during industrial growth, consolidating society’s resources for sustainable development.

The analysis revealed several key gaps. Firstly, there is no single strategic document (national concept or plan) for CSR development, which leads to disunity of efforts. Secondly, the mechanism of transparency and reporting in the CSR sphere is not regulated: companies are not required to disclose information on their social and environmental activities, which deprives society and investors of the opportunity to objectively assess the contribution of business (with the exception of certain KASE initiatives, but they are advisory in nature). Thirdly, incentive measures are currently limited to tax breaks and bonuses, which is good for attracting volunteers, but may not be enough for the mass involvement of small and medium businesses. There are no targeted preferences, for example, for companies implementing “green” practices (except for certain

industries) or following international CSR standards. Fourthly, institutional coordination is poorly developed: different bodies are responsible for different aspects (the Ministry of Labour for social partnership, the Ministry of Ecology for environmental protection, the Ministry of National Economy for the Entrepreneurial Code, etc.), there is no single centre responsible for promoting CSR (in some countries there is a special council or agency for CSR). Finally, legislation does not keep up with new challenges: for example, digitalization and platform employment raise questions of business responsibility to freelancers; climate change requires stricter carbon reporting measures – these issues are not yet reflected in regulations.

Based on the results of the study, a number of measures are proposed to improve the state policy and legislation of Kazakhstan in the field of CSR:

1. Develop and adopt a National Strategy (Concept) for CSR Development. Such a document could be approved by the government or a presidential decree and contain general principles, goals and indicators for CSR development in the medium term (5–10 years). The strategy should define priorities (e.g., increasing transparency, stimulating CSR in SMEs, supporting social start-ups), distribute responsibility between government agencies and provide for monitoring mechanisms. The experience of developing the draft National CSR Concept in 2013 can be taken into account and updated in accordance with current realities and the UN SDGs.
2. Introducing non-financial reporting requirements for large companies. It would be appropriate to legally oblige companies of a certain category (e.g. joint-stock companies, companies with state participation, large subsoil users) to annually publish a report or section in the annual report on the implementation of sustainable development and CSR principles. Such requirements could be introduced by amendments to the Law “On Joint-Stock Companies” or to the Entrepreneurial Code. At the first stage, it would be possible to limit ourselves to “compliance or explain” – i.e. the obligation to either prepare a report according to the adopted standard (GRI, integrated report), or explain why this was not done. Mandatory reporting will increase transparency and create soft pressure on companies to pay attention to CSR, fearing reputational losses.
3. Expanding economic incentives. It is recommended to review tax legislation to increase incentive standards for responsible business. For example, increase the deduction limit for charitable expenses from the current level, provide tax holidays or accelerated depreciation for companies implementing “green” projects, establish reduced rates of income tax for enterprises undergoing independent certification according to CSR standards (SA 8000 – social responsibility, ISO 14001 – environmental management, etc.). It is also possible to introduce state grants or co-financing of social business projects (according to the “matching” principle – the state doubles the company’s contribution to an important social project).
4. Strengthening the role of business associations and self-regulation. The legislation on self-regulatory organizations could stipulate that industry business associations develop codes of ethics and CSR for their members. The state could encourage industries (through subsidies or priority in public procurement) for having such codes and control mechanisms. For example,

in the mining industry, an association could monitor the fulfilment of social investment obligations by members. This would create an additional level of peer-to-peer responsibility (of a company to its industry colleagues).

5. Integration of new aspects of responsibility. It is recommended to initiate the development of amendments that take into account modern challenges: include in labour legislation the norms on the protection of workers on platforms (gig economy), in environmental legislation – the requirements of ESG risks and climate reporting. It is also possible to consider introducing the concept of sustainable (responsible) financing into financial legislation – to encourage banks and investment funds to take into account ESG indicators when lending, which will indirectly motivate businesses to improve CSR practices.
6. International cooperation and exchange of best practices. To consolidate in regulatory documents (for example, plans of the Ministry of Economy) the task of Kazakhstan's participation in international initiatives – OECD, UN Global Compact (increasing the status of participation), Global Reporting Initiative. Perhaps the conclusion of partnership agreements with the EU on the convergence of non-financial reporting standards, which will help gradually harmonize Kazakhstan's legislation with global trends, facilitating companies' access to external capital markets.
7. Enhancing inter-agency coordination and avoiding duplication of CSR efforts. It is recommended to conduct an inventory of current CSR-related programs and initiatives at the national and regional levels and to create a coordination mechanism such as an interministerial working group, a council on CSR under the government, or a unified digital platform for CSR monitoring. This would help prevent fragmentation, streamline policy implementation, and ensure consistency across different sectors and levels of government.

The implementation of these recommendations will allow for the formation of a more systematic and modern CSR regulation regime in Kazakhstan. This does not mean a departure from the principle of voluntariness – on the contrary, the proposed measures mainly create infrastructure and incentives for voluntary responsibility, supplementing them with targeted obligations (in terms of reporting and transparency). As a result, businesses will retain the freedom to choose specific forms of CSR, but will act within the framework of clear guidelines and public expectations supported by the state.

Corporate social responsibility is becoming an integral part of Kazakhstan's sustainable development. The state plays an important role in directing and accelerating this process. The analysis of regulatory legal acts showed that Kazakhstan has a good basis in the form of labour and environmental legislation, as well as the first elements of direct mention of CSR in the law. The next step is to transform this basis into a strategic system in which legal norms, economic incentives and voluntary business initiatives will work synergistically. Increasing transparency requirements, developing a national CSR strategy, stimulating best practices all this can take corporate responsibility to a new level, making its contribution significant and measurable. In the context of global challenges – environmental, social, economic consolidation of the efforts of the state and business on the principles of CSR will be the key to Kazakhstan's successful movement along the path of sustainable and inclusive development.

Ethical Commission Approval

This study did not require approval from an ethics committee as it did not involve human participants, animals, or sensitive personal data. All data used in this research were obtained from publicly available sources.

Conflict of Interest Statement

There is no conflict of interest with any institution or person within the scope of this study.

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