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LEGAL REGULATION OF DIGITAL ASSETS WITHIN INTERNATIONAL ORGANIZATIONS

Abstract

The study explores the evolving international regulation of digital assets and the harmonization of global standards aimed at ensuring transparency and mitigating risks to the global financial system. Its main objective is to analyze the policies and legal frameworks developed by key international organizations – The Financial Action Task Force (hereinafter – the FATF), International monetary fund (hereinafter – IMF), The Basel Committee on Banking Supervision regulation (hereinafter – BCBS), The international organization of securities commissions (hereinafter – IOSCO), and Organisation for Economic Co-operation and Development regulations (hereinafter – OECD) – and to assess Kazakhstan's compliance with these standards. The research employs comparative legal analysis, synthesis, and normative methods to evaluate the interaction between international recommendations and national regulation. The paper highlights that the FATF focuses on AML/CFT measures, the IMF emphasizes financial stability and legal certainty, the BCBS introduces prudential standards for banking exposure to cryptoassets, IOSCO advocates investor protection and market integrity, while the OECD stresses taxation and information exchange. Through detailed comparative tables, the author demonstrates how Kazakhstan integrates these global standards, particularly through the AIFC framework, though national regulation outside the AIFC remains underdeveloped. The research is both scientifically and practically significant, offering a structured understanding of international approaches and their influence on Kazakhstan's digital asset regulation. Its contribution lies in mapping the convergence of global and national legal norms, providing policymakers and regulators with guidance to enhance compliance, stability, and investor protection in the digital asset market.

Keywords: international law, financial action, international monetary fund, digital assets, cooperation, development.

Introduction

The international regulation of digital assets is rapidly evolving, reflecting the dynamic nature of global financial innovation and the challenges it poses to traditional regulatory frameworks. The growing complexity of digital asset markets has prompted international organizations to develop unified standards aimed at ensuring transparency, mitigating systemic risks, and strengthening global financial stability. Harmonization of these standards has become a central priority, as inconsistencies between national regimes can lead to regulatory arbitrage and increase vulnerabilities in cross-border transactions. Institutions such as the FATF, IMF, BCBS, IOSCO, and OECD play a pivotal role in shaping the normative and institutional foundations for digital asset governance. Their coordinated efforts establish a framework upon which countries, including Kazakhstan, can build effective national regulations aligned with international best practices.

Materials and methods

In this article, official documents of international organizations such as FATF, IMF, BCBS, IOSCO, FSB were examined. These are the following documents: Guidance for a Risk-Based Approach to Virtual Assets and VASPs (2019, updated in 2023), IMF Policy Paper on Elements of Effective Policies for Crypto Assets (2023), Prudential treatment of cryptoasset exposures (2022), IOSCO Policy Recommendations for Crypto and Digital Asset Markets (2023) and Crypto-Asset Reporting Framework (CARF, 2022).

The following methods were also used in the research: comparative legal analysis, generalization and synthesis, analytical method, normative approach.

The comparative legal analysis was used to examine the approaches of international organizations (FATF, IMF, BCBS, IOSCO, OECD) to the regulation of digital assets, as well as to compare these approaches with the national legislation of the Republic of Kazakhstan. Within this method: definitions of digital assets and legal constructs used by different jurisdictions were compared; differences in AML/CFT requirements, supervision, licensing, prudential regulation, and disclosure obligations were examined; provisions of international documents were compared with Kazakhstani legislation, including the Law “On Digital Assets,” the Law on AML/CFT, the Tax Code, and regulatory acts of the AIFC. This analysis made it possible to determine the degree of harmonization between national legislation and international standards, as well as to identify existing gaps and inconsistencies. The methods of generalization and synthesis were applied to integrate information from various sources – international documents, national legal acts, academic research, and analytical materials. The analytical method was aimed at identifying cause-and-effect relationships in digital asset regulation, assessing the effectiveness of existing legal norms, and analyzing legal risks. The normative approach was used to examine the existing legal framework of the Republic of Kazakhstan and relevant international legal instruments. Within this approach, the following were analyzed: the Law of the Republic of Kazakhstan “On Digital Assets”; the Law “On Combating Money Laundering and Terrorist Financing”; the Tax Code (regarding taxation of income from digital assets and mining); acts of the National Bank and the Financial Monitoring Agency; AIFC regulatory acts (AFSA – Cryptoasset Framework); international standards and recommendations issued by FATF, IMF, BCBS, IOSCO and OECD.

Results and discussion

In this paper, we will try to analyze the main players represented by international organizations in the field of digital asset regulation. One of the international associations that drew attention to and developed special standards in the field of digital assets was the FATF.

The FATF recommendations

The FATF’s framework for regulating digital assets is centered around the fundamental objective of preventing the misuse of virtual assets and the service providers that facilitate their use for money laundering and terrorist financing.

The FATF defines digital assets as «virtual assets». The authors agree with this position, since in reality digital assets do not have a material appearance, but exist only in the virtual world, but at the same time have their own value.

The FATF considers two key points: «virtual assets», which it defines as «a digital representation of value that can be transferred, stored, or exchanged digitally, and that is used for payments or investments» and «digital service providers» which are «legal entities and/or individuals who are directly involved in: exchange between virtual assets and fiat currencies; exchange between one or more forms of virtual assets; transfer of virtual assets; safekeeping and/or administration of virtual assets or instruments enabling control over virtual assets; participation in and provision of financial services related to an issuer’s offer and/or sale of a virtual asset» [1].

The FATF regularly reviews the implementation of these standards by States.

For example, FATF conducted mutual evaluation report of the Republic of Kazakhstan. Report evaluates Kazakhstan’s adherence to the FATF Recommendations and the overall effectiveness of its AML/CFT framework and offers recommendations for enhancing the country’s national system for combating money laundering and terrorist financing. In this Report FATF noted that Kazakhstan

undertakes significant efforts to identify, assess, and understand national risks related to money laundering and terrorist financing, as well as to develop appropriate mitigation measures [2].

As part of our commitment to comply with the recommendation regarding illicit activities, we also wish to draw attention to the methodological guidelines [3] for detecting illicit transactions involving digital assets. These guidelines outline the distinctive characteristics and indicators of illicit transactions involving digital assets for financial monitoring entities.

These guidelines were created to assist financial monitoring entities in identifying suspicious transactions involving digital assets. Financial monitoring entities are encouraged to analyze the online space, including platforms such as Instagram, Facebook, Telegram, YouTube, Instagram, Twitter, and other potential sources, to gather additional information about customers and digital assets.

The authors believe that these guidelines represent a significant step forward in identifying suspicious transactions involving digital assets. They provide financial monitoring entities with a valuable tool to rely on.

The Financial Action Task Force does not create its own legal framework, but its guidelines are mandatory for member nations. Failure to adhere to these guidelines can lead to:

1. being placed on the FATF's grey or blacklist,
2. imposition of restrictions on international transactions,
3. a decline in the investment environment and so on.

As Georgios Pavlidis asserts, and we concur that FATF regulations constitute an appropriate reaction to the dangers of money laundering and terrorist financing associated with digital assets. However, it is crucial that these regulations are implemented rigorously, uniformly, and efficiently at the national level [4].

In the Explanatory Note to FATF Recommendation 15 ("New Technologies"), it is emphasized that countries should treat virtual assets as "property," "income," "funds," "funds or other assets," or "other corresponding value" [5]. This approach is reflected directly in the legislation of Kazakhstan: pursuant to Article 115(2) of the Civil Code of the Republic of Kazakhstan (27 December 1994), digital assets are classified as "property" [6]. Thus, Kazakhstan demonstrates compliance with this component of the FATF standards.

A core FATF requirement aimed at mitigating and managing risks associated with the circulation of digital assets is the obligation to license and register virtual asset service providers (VASPs). Under Kazakh legislation, a comparable category is represented by "digital asset exchanges" as defined in Article 15 of the Law on Digital Assets of 6 February 2023 [7]. Accordingly, it is necessary to assess the extent to which the concepts of "virtual asset service provider" and "digital asset exchange" correspond to each other.

Pursuant to Article 1(1) of the Law on Digital Assets, a digital asset exchange is defined as a digital platform providing organizational and technical support for trading, issuance, circulation, and storage of digital assets [7]. By contrast, the FATF Glossary [5] defines a virtual asset service provider as any natural or legal person that, as a business, conducts one or more of the following activities on behalf of another natural or legal person:

- (i) exchange between virtual assets and fiat currencies;
- (ii) (ii) exchange among one or more forms of virtual assets;
- (iii) (iii) transfer of virtual assets;
- (iv) (iv) safekeeping and/or administration of virtual assets or instruments enabling control over virtual assets; and
- (v) (v) participation in and provision of financial services related to an issuer's offer and/or sale of a virtual asset.

It should be acknowledged that the definition set out in the Law on Digital Assets is relatively narrow and does not fully capture the substantive scope of activities performed by digital asset exchanges when compared to the FATF standards. Therefore, the authors consider it appropriate to amend Article 1(1) of the Law on Digital Assets to align it more closely with the FATF definition.

Overall, the FATF Recommendations largely correspond to the national legislation of the Republic of Kazakhstan; however, certain aspects require further refinement and harmonization.

IMF policy paper (2023)

The next equally important international organization is the International Monetary Fund.

The IMF has developed Policy Paper on Elements of Effective Policies for Crypto Assets (Feb 2023) [8].

The main 9 elements that the IMF is acutely aware of are that:

1. States should not recognize «crypto assets» as an official means of payment.
2. Transfers using crypto assets can circumvent currency controls by masking cross-border flows, so countries need to apply currency control measures even for digital assets.
3. States need to analyze and disclose financial risks and apply an unambiguous tax regime for «crypto assets» (The IMF also pays close attention to the legal classification and definition of the legal nature of digital assets and notes that this would significantly affect its further development).
4. States should establish legal certainty regarding crypto assets and eliminate legal risks (the IMF also calls for uniformity in defining the legal nature of digital assets between countries).
5. States should develop and enforce prudential, conduct, and oversight requirements for all participants in the digital asset space.
6. States should establish a joint monitoring system for various institutions and departments.
7. States should unite and create international cooperation mechanisms to strengthen oversight and ensure compliance with rules related to digital assets (the authors agree with this recommendation since the turnover of digital assets is transnational in nature, and international cooperation in this matter is indisputable).
8. States should monitor the impact of crypto assets on the stability of the International Monetary System.
9. States should strengthen global cooperation to develop digital infrastructure and alternative solutions for cross-border payments and financing.

The IMF does not recommend countries to recognize cryptocurrencies (for example, Bitcoin) as legal tender or official currency [8]. This approach is particularly clear in the assessment of the situation in El Salvador and the Central African Republic, where bitcoin has been recognized as legal tender. Some researchers emphasize that for a cryptocurrency to become a «real currency», it takes much more than giving it a legitimate status. Technological, social, and coordination barriers need to be overcome [9].

The formation of approaches to regulating digital assets in Kazakhstan was carried out considering the recommendations of key international organizations: FATF, IOSCO, IMF, BIS, as well as based on the best international practices – the provision of MiCA regulations in the EU.

Let us examine the case of Kazakhstan and assess its adherence to and implementation of the aforementioned aspects of the IMF (table 1).

Tabel 1 – Kazakhstan’s implementation of the IMF policy elements on crypto assets

№	IFM Elements	Kazakhstani approaches
1	1st element	Crypto assets are not officially recognized as a legal means of payment. The national currency is only tenge.
2	2nd element	Supervision of cryptocurrency transactions is mainly carried out within the framework of the AIFC (AFSA). The National Bank of Republic of Kazakhstan does not yet have sufficient tools to assess systemic risks outside the AIFC area.
3	3rd element	Digital Assets Law defines public and secured digital assets, as well as the status of miners, operators and platforms. However, there is no regulation of DeFi, NFT and stablecoins.
4	4th element	A tax on mining operations, calculated based on energy usage, has been implemented [10].
5	5th element	An advanced regulatory sandbox (FinTech Lab) operates within the AIFC. Outside the MFC, supervision is weak [11].
6	6th element	Proceeds from transactions with crypto assets, especially those involving foreign platforms, can bypass currency and tax controls.
7	7th element	The digital tenge is being piloted [12]. And it issued by National Bank of Republic of Kazakhstan.
8	8th element	Kazakhstan participates in the EAEU, FATF working groups and cooperates with BIS, but there is no direct agreement on data exchange with large jurisdictions (for example, the USA, the EU).
9	9th element	Participants in the digital market in the AIFC are required to comply with KYC/AML requirements, but outside the AIFC, the platform and users remain outside the scope of control.

Note: Compiled by the authors.

In the table above, it can be observed that the IMF standards have been implemented to a sufficient extent within the AIFC framework. However, oversight must also be ensured within the national legislation. When referring to Article 12 of the Law on Digital Assets [7], this provision is limited to stating that state oversight in the field of digital assets is carried out in the form of inspections in accordance with the Entrepreneurial Code of the Republic of Kazakhstan.

Nevertheless, Article 12 of the Law on Digital Assets could be expanded by providing more specific powers of the state authority in the area of oversight and monitoring.

To conclude, we would like to emphasize that Kazakhstan is committed to adhering to the standards set by the IMF and this commitment is not in vain.

BCBS policy

BCBS governs the circulation of digital assets by implementing a framework that emphasizes banks' ability to withstand risks related to crypto assets. This framework is achieved through the establishment of standards for capital requirements for digital assets.

BCBS' approach to crypto assets is based on the perspective of banking risk, rather than the overall market. It imposes strict capital requirements for high-risk assets and aims to minimize banks' exposure to them.

BCBS divides crypto assets into two main groups [13]:

Group 1 – Assets that meet recognition criteria (including stability, regulation), (tokenized traditional assets, certain stablecoins);

Group 2 – All other cryptoassets (high-risk, volatile, lacking intrinsic support), (Bitcoin, Ether, DeFi tokens, NFTs, etc.)

Banks in the Republic of Kazakhstan do not currently have permission to work directly with crypto assets outside of the AIFC. This makes it difficult to implement capital requirements currently.

But there are Rules and mechanisms of cooperation of Unbacked Digital Asset Exchanges and/or Centre Participants authorized to carry out digital assets-related activities with second-tier bank of the Republic of Kazakhstan, which sets the rules and mechanisms of interaction between digital assets exchanges and second tier banks [14]. It means that digital assets exchanges registered under AIFC may open bank accounts by second-tier banks of the Republic of Kazakhstan.

BCBS also pays attention to the issuance of stablecoins. Some states may grant authority to issue stablecoins to the banks as it did to issue banknotes [15].

The National Bank of Kazakhstan has announced the commencement of a pilot initiative to issue a tenge-backed stablecoin as part of its digital assets regulatory sandbox. The stablecoin was introduced by Intebix – a digital asset exchange licensed in the AIFC – in partnership with Solana, Mastercard, and Eurasian Bank.

The IOSCO regulations

IOSCO plays a significant role in establishing global standards for the regulation of securities markets, including digital assets.

IOSCO takes a balanced approach: not to ban, but to regulate. The main principle is the «same activity – same risk – same regulation» approach, meaning that digital assets and platforms should be regulated in the same way as traditional assets that carry similar risks. Recommendations are not mandatory, but they serve as a basis for the development of national regulatory regimes. They affect jurisdictions that are guided by international standards (for example, AIFC in Kazakhstan).

The main document in the field of digital assets developed by IOSCO is Policy recommendations on crypto and digital assets. IOSCO has presented 18 recommendations on the regulation of digital asset markets in Policy.

The 18 IOSCO recommendations focus on six main areas aligned with IOSCO's core standards:

1. Managing conflicts of interest that result from combining multiple activities or functions within the same entity.

2. Preventing market abuse, such as manipulation, insider trading, and fraudulent behavior.

3. Addressing cross-border challenges and enhancing cooperation among international regulators.

4. Safeguarding client assets and ensuring secure custody of digital holdings.

5. Mitigating operational and technological risks, including system failures and cybersecurity threats.

6. Protecting retail investors, with attention to product suitability, access controls, and distribution practices [16].

In Kazakhstan, these recommendations are partially implemented through the AIFC and pilot regimes, but national legislation is still lagging in many areas, especially outside the AIFC area.

But recently, the AIFC is regarded internationally as a frontrunner in adopting and applying IOSCO’s regulatory standards for digital assets [17].

The OECD regulations

The primary areas of control for digital assets within the OECD framework.

Taxation of digital assets. The OECD has developed guidelines and recommendations on taxation of crypto assets aimed at eliminating tax inequalities and preventing tax evasion. The key is to ensure transparency and exchange of tax information between countries (like the CRS – Common Reporting Standard project).

Anti-Money Laundering (AML) and Terrorist Financing (CFT). The OECD is working closely with the FATF (Financial Action Task Force on Money Laundering) to implement effective AML/CFT standards in the crypto industry. The FATF recommendations in the field of «Customer Travel» (Travel Rule) are actively supported and implemented by OECD members [18].

Regulatory cooperation and coordination. The OECD promotes the exchange of experience and the harmonization of approaches between states to develop a common line in regulating crypto assets, including licensing and supervision issues.

Investor and consumer protection. Recommendations are being developed to ensure the legal protection of users of cryptocurrencies and tokens, as well as to minimize the risks of fraud and market abuse.

Technological and operational sustainability. The need to implement security standards and risk management related to distributed ledger technologies and smart contracts is emphasized.

Below is a table with an assessment of Kazakhstan’s compliance with the main areas of regulation of crypto assets according to OECD standards, indicating regulations and examples from practice:

Table 2 – Kazakhstan’s compliance with the main areas of regulation of crypto assets according to OECD standards

Regulatory Area	Status in Kazakhstan	Key Legal Acts and Initiatives	Comments and Practice Examples
Taxation of Digital Assets	Partially regulated	Tax Code of Kazakhstan [10]	A tax on mining operations; income of a person engaged in digital mining, a digital mining pool, a digital asset exchange; tax on income from value gains in the sale of digital assets [10]
AML/CFT Measures	Implemented with reservations	Counteracting Legalization of Criminal Proceeds Law [19]	Rules apply to crypto operators, but the sector is still partially covered and indirectly regulated [19]
Regulatory Cooperation	Active participation, limited domestic implementation	Kazakhstan’s participation in FATF, OECD, AIFC	AIFC has created an advanced special regime, but coordination at the national level remains weak [20]
Investor and Consumer Protection	Underdeveloped	Lack of specific laws protecting crypto investors	No mandatory disclosure or compensation requirements; fraud risk remains high
Technological Resilience	Early development stage	National cybersecurity standards, data protection projects	No comprehensive mandatory requirements for operational resilience and crypto service security
Overall	Partial compliance, further development needed	Active work by AIFC, evolving legal framework	Kazakhstan is moving in the right direction but needs a unified national strategy
Note: Compiled by the authors.			

The comparative assessment of Kazakhstan’s regulatory framework for digital assets against OECD standards demonstrates that the country has achieved partial compliance, with meaningful

progress in certain areas – particularly taxation and AML/CFT measures – yet still faces substantial gaps in investor protection, regulatory coordination, and technological resilience.

Kazakhstan has adopted several important legal instruments, including amendments to the Tax Code [10], the Law on Counteracting Legalization of Criminal Proceeds [19], and a number of sector-specific orders and methodological guidelines. Additionally, the AIFC has established a relatively advanced regulatory environment that aligns with international standards and promotes the development of crypto-asset markets. However, the national-level regulatory system remains fragmented, with overlapping competencies, limited enforcement mechanisms, and insufficiently detailed provisions defining the powers of state authorities, including oversight and supervision procedures.

Conclusion

The comparative overview of international organizations demonstrates that the regulation of digital assets remains a complex, multidimensional, and rapidly evolving field. Governance in this sphere is shaped through a combination of binding rules and soft-law instruments developed by leading international bodies. Each organization approaches digital asset regulation through its own institutional mandate: the FATF prioritizes anti-money-laundering and counter-terrorism financing; the IMF focuses on macro-financial stability and policy coordination; the Basel Committee develops prudential standards for banks' exposure to crypto assets; IOSCO promotes market integrity and investor protection; and the OECD concentrates on taxation, transparency, and cross-border information exchange. Collectively, these frameworks form an interconnected global regulatory architecture aimed at enhancing transparency, accountability, and legal certainty in the digital asset ecosystem.

While the scope and legal force of these standards differ, their cumulative influence drives member states – including Kazakhstan – to progressively align national regulatory mechanisms with internationally recognized principles. This process of harmonization is essential to building trust in digital markets, mitigating systemic risks, and ensuring the safe integration of digital assets into the global financial system.

However, the assessment of Kazakhstan's compliance with OECD and other international standards reveals that the country is still at a partial alignment stage. Although important progress has been made – such as taxation of mining activities, AML/CFT obligations for certain digital asset operators, and the development of inspection checklists, the national regulatory framework remains fragmented. Article 12 of the Law on Digital Assets provides only a narrow definition of state oversight, limiting it to inspections under the Entrepreneurial Code, without specifying broader supervisory or enforcement powers.

To enhance Kazakhstan's alignment with international best practices, especially OECD, FATF, and IOSCO standards, the following reforms are recommended:

Change article 12 of the Law on Digital Assets to clearly define: the full spectrum of supervisory tools (monitoring, thematic reviews, risk-based inspections), the authority to conduct compliance audits and request information, enforcement measures, including administrative penalties, temporary suspension of operations, and license revocation.

Strengthening investor and consumer protection. Implement mandatory risk disclosure, segregation of client assets, operational transparency requirements, and mechanisms of redress or compensation in cases of fraud or platform failures.

Enhance interagency coordination. Establish a unified national mechanism (or interagency council) to synchronize regulatory actions between the National Bank, Agency for Financial Monitoring, Ministry of Digital Development, and other bodies.

In summary, Kazakhstan is progressing toward the international regulatory mainstream but requires a more robust, coherent, and forward-looking framework to fully comply with evolving global standards. Strengthening state oversight powers, enhancing national coordination, and adopting comprehensive consumer protection and technological resilience measures will position Kazakhstan to regulate digital assets effectively and sustainably within the global regulatory architecture.

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ХАЛЫҚАРАЛЫҚ ҰЙЫМДАР ШЕҢБЕРІНДЕ ЦИФРЛЫҚ АКТИВТЕРДІ ҚҰҚЫҚТЫҚ РЕТТЕУ

Андатпа

Бұл зерттеу цифрлық активтерді халықаралық реттеу жүйесінің даму үрдісін және жаһандық стандарттарды үйлестіру процесін қарастырады. Зерттеудің негізгі мақсаты – FATF, ХВҚ (IMF), Базель комитеті (BCBS), IOSCO және ЭЫДҰ (OECD) сияқты жетекші халықаралық ұйымдар әзірлеген саясат пен құқықтық негіздерді талдап, олардың Қазақстан Республикасындағы іске асырылу деңгейін бағалау. Зерттеу барысында салыстырмалы-құқықтық талдау, синтез және нормативтік тәсіл әдістері қолданылды. Мақалада FATF ұйымының ақшаны жылыстатуға және терроризмді қаржыландыруға қарсы іс-қимылға (AML/CFT) бағытталған шаралары, ХВҚ-ның қаржылық тұрақтылық пен құқықтық айқындықты қамтамасыз етуге назар аударуы, BCBS-тің банктерге арналған пруденциалық стандарттарды әзірлеуі, IOSCO-ның инвесторларды қорғау және нарықтың тұтастығын қамтамасыз етуге бағытталған ұсынымдары, ал ЭЫДҰ-ның салық салу және ақпарат алмасу мәселелеріне мән беруі көрсетілген. Авторлар салыстырмалы кестелер негізінде Қазақстанның осы халықаралық стандарттарды, әсіресе АХҚО аясында, қалай енгізіп жатқанын көрсетеді. Зерттеудің ғылыми және практикалық маңызы – халықаралық тәсілдерді жүйелеу және олардың Қазақстандағы цифрлық активтерді реттеу жүйесіне ықпалын анықтау. Бұл жұмыс жаһандық және ұлттық нормаларды жақындастыруға үлес қосып, реттеу мен инвесторларды қорғауды жетілдіруге бағытталған ұсыныстар ұсынады.

Тірек сөздер: халықаралық құқық, қаржылық шаралар, халықаралық валюталық қор, цифрлық активтер, ынтымақтастық, даму.

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ПРАВОВОЕ РЕГУЛИРОВАНИЕ ЦИФРОВЫХ АКТИВОВ В РАМКАХ МЕЖДУНАРОДНЫХ ОРГАНИЗАЦИЙ

Аннотация

В исследовании рассматривается развитие международного регулирования цифровых активов и процесс гармонизации глобальных стандартов, направленных на обеспечение прозрачности и снижение рисков для

мировой финансовой системы. Основная цель работы – проанализировать политику и правовые рамки, разработанные ключевыми международными организациями – ФАТФ, МВФ, Базельским комитетом (BCBS), IOSCO и ОЭСР, а также оценить степень их внедрения в Республике Казахстан. В исследовании применяются методы сравнительно-правового анализа, синтеза и нормативного подхода для изучения взаимодействия международных рекомендаций и национального регулирования. В статье отмечается, что ФАТФ сосредоточена на мерах по борьбе с отмыванием денег и финансированием терроризма (AML/CFT), МВФ акцентирует внимание на финансовой стабильности и правовой определенности, BCBS разрабатывает пруденциальные стандарты для банков в отношении криптоактивов, IOSCO продвигает защиту инвесторов и целостность рынка, а ОЭСР – вопросы налогообложения и обмена информацией. На основе сравнительных таблиц авторы показывают, как Казахстан внедряет эти международные стандарты, особенно в рамках МФЦА, при этом национальное регулирование за его пределами требует дальнейшего развития. Научная и практическая значимость исследования заключается в систематизации международных подходов и их влияния на регулирование цифровых активов в Казахстане. Работа вносит вклад в сближение глобальных и национальных норм, предлагая практические рекомендации для повышения соответствия, стабильности и защиты инвесторов.

Ключевые слова: международное право, финансовые меры, международный валютный фонд, цифровые активы, сотрудничество, развитие.

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