

WAVERLEY GATEWAY GUIDE

Connecting International Capital with Emerging & Frontier Markets

KAZAKHSTAN

Eurasia

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WHERE AND HOW TO ENTER

KEY INVESTMENT LOCATIONS

Location / Region	Strategic Importance	Priority Sectors
Astana	Capital; seat of government and a growing financial and administrative hub	Financial services, administration, construction
Almaty	Largest city and historic commercial/financial center; home to the Astana International Financial Centre's commercial activity base	Financial services, IT, retail, real estate
Atyrau / Tengiz (west)	Core oil-production region; Tengiz field and Caspian coast oil infrastructure	Oil and gas, oilfield services
Aktau / Caspian Sea coast	Westernmost Caspian port; central to trans-Caspian route diversification away from Russia-dependent export infrastructure	Port logistics, trans-Caspian trade, oil transshipment
Shymkent	Southern industrial hub and site of a refinery increasingly used to absorb redirected crude volumes	Refining, manufacturing, agro-processing
Special Economic Zones (18 nationwide) and industrial zones (67)	Dedicated zones hosting 586 active investment projects with tax and customs incentives	Manufacturing, logistics, light industry
Atasu-Alashankou corridor (east, China border)	Pipeline and rail corridor carrying growing crude and trade volumes to China, a key diversification route	Energy transit, cross-border trade and logistics

INVESTOR ENTRY ROUTES

- Kazakh Invest (national investment promotion agency) provides one-stop facilitation, incentives, and sector guidance for foreign investors
- Investment agreements under the Investment Policy Concept through 2030 offering legislative stability guarantees for up to 25 years
- Astana International Financial Centre (AIFC), operating under English common law with its own independent court, offering a distinct regulatory environment for financial-services and related investment
- Special Economic Zones (18) and industrial zones (67) offering tax holidays and customs exemptions for qualifying manufacturing and export projects
- National Bank of Kazakhstan oversight of currency and capital-account activity; the tenge is free-floating with no major repatriation restrictions
- Production-sharing and joint-venture arrangements with KazMunayGas for oil and gas sector participation

MARKET-ENTRY OBSERVATION

Kazakhstan in October 2026 combines genuinely strong and broadening economic fundamentals with a live demonstration of its most significant structural vulnerability. The non-oil economy continues to grow robustly: GDP expanded 3.7% in the first five months of 2026 following 6.5% growth in 2025, with construction (+13.4%), manufacturing (+9%), and transport and warehousing (+8.4%) leading real-sector growth, and foreign direct investment reaching \$20.5 billion in 2025, up 14.4% year-on-year, with greenfield

investment surging 266% to \$19 billion and capturing nearly 89% of all Central Asian greenfield flows. The government's Investment Policy Concept through 2030, offering legislative stability guarantees for up to 25 years alongside an expanding network of special economic and industrial zones, has materially improved the formal investment climate.

This progress has unfolded against a serious and recurring disruption to Kazakhstan's oil export infrastructure, which investors in any sector should understand given oil's continued role in export revenue and broader economic sentiment. The Caspian Pipeline Consortium (CPC), which carries up to 80% of Kazakhstan's crude exports and roughly 1% of global oil supply, has been repeatedly struck by attacks at its Novorossiysk, Russia terminal since a first strike in November 2025, with further attacks on CPC-related tankers in January and July 2026 forcing a full suspension of loading operations on July 21, 2026. Local experts estimated losses of up to \$1.5 billion in January 2026 alone, and December 2025 output ran roughly 14% below the 2025 annual average. Kazakhstan has avoided assigning blame while calling for the attacks to stop, has asked the US and EU for help securing Black Sea shipments, and has accelerated diversification toward the Atasu-Alashankou pipeline to China and increased shipments via Turkey, though neither route can yet absorb volumes comparable to the Novorossiysk corridor; CPC operations resumed within weeks of the July suspension, underscoring both the system's current resilience and its underlying fragility.

INVESTOR RISK & MARKET ACCESS

KEY ENTRY BARRIERS

Issue	Potential Impact	Possible Mitigation
CPC pipeline vulnerability to Black Sea conflict spillover	Repeated attacks on CPC infrastructure since November 2025 have forced export suspensions and caused estimated losses up to \$1.5 billion in a single month	Monitor Black Sea security developments closely for any investment with oil-export-revenue sensitivity; factor temporary disruption risk into financial planning
Heavy continued reliance on Russia-transit export infrastructure	Despite diversification efforts, the CPC route via Russian territory remains Kazakhstan's dominant oil-export channel with no comparable near-term alternative	Treat trans-Caspian and China-corridor diversification as a multi-year trajectory, not a near-term substitute
Landlocked geography and logistics costs	Kazakhstan's distance from open seas raises costs and complexity for all trade, compounding the pipeline-security issue	Factor logistics costs into competitiveness assessments relative to coastal-market peers
Governance and rule-of-law variability	Kazakhstan has made genuine reform progress but still ranks behind top-tier peers on independent rule-of-law and corruption indices	Favor AIFC-structured transactions and internationally-financed project structures where feasible
Currency volatility tied to oil-revenue swings	The tenge has shown sensitivity to oil-export disruption and broader regional volatility	Hedge tenge exposure appropriately for projects with meaningful local-currency revenue or cost bases
Regional security spillover from the Russia-Ukraine war	Kazakhstan has sought to remain neutral but has faced direct infrastructure attacks and reconnaissance-drone incidents linked to the conflict	Monitor the broader regional security environment as a factor in logistics and infrastructure planning
Capacity constraints on diversification routes	China-bound pipeline capacity (roughly 146.6 million barrels/year) represents only about 28% of CPC's total capacity, limiting how quickly alternative routes can scale	Do not assume rapid full substitution of CPC capacity; plan around a multi-year diversification timeline

INVESTOR RISK NOTE

Kazakhstan's risk profile reflects a country with increasingly credible non-oil economic fundamentals operating a critical piece of global energy infrastructure that sits uncomfortably close to an active regional conflict. The government's investment-climate reforms, legislative stability guarantees, and the AIFC's common-law framework represent genuine and sustained improvements that have driven record foreign direct investment. The CPC pipeline disruptions of late 2025 and 2026, however, demonstrate that Kazakhstan's energy-export architecture remains structurally exposed to Black Sea conflict dynamics entirely outside its control, with real, quantifiable economic cost when disruptions occur. Kazakhstan's careful diplomatic balancing, avoiding direct blame of any party while quietly accelerating diversification toward China and Turkey, reflects a pragmatic but inherently limited response given current infrastructure constraints. Investors in oil-adjacent sectors or anything sensitive to Kazakhstan's export-revenue and currency stability should treat recurring CPC disruption as a plausible, recurring scenario rather than a one-off event.

MARKET ACCESS

Kazakhstan is a member of the Eurasian Economic Union (EAEU), providing tariff-free access to Russia, Belarus, Armenia, and Kyrgyzstan, and participates in the China-led Belt and Road-linked Middle Corridor trans-Caspian trade route, which has grown in

strategic importance as a Russia-bypass option since 2022. The country maintains a WTO membership and has pursued enhanced partnership agreements with the EU, which remains the destination for roughly 60% of Kazakhstan's crude and petroleum product exports. Oil exports continue to flow predominantly via the CPC pipeline to Novorossiysk despite its vulnerability, with growing but still-limited volumes diverted to China via the Atasu-Alashankou pipeline and to Turkey via increased tanker shipments. Kazakhstan's dual EAEU membership and Western-oriented trade diversification give it a genuinely multi-directional market access profile, though its practical export flexibility remains constrained by existing pipeline infrastructure.

WHO SHOULD THE INVESTOR MEET?

INSTITUTIONAL LANDSCAPE

Actor	Why It Matters	Waverley Engagement Angle
Office of the President (Kassym-Jomart Tokayev)	Sets overarching economic reform and energy-diversification policy, including the CPC crisis response	Primary reference point for understanding Kazakhstan's strategic direction
Kazakh Invest	National investment promotion agency; principal facilitation body for foreign investors	Standard first point of contact for market entry and incentive guidance
Astana International Financial Centre (AIFC)	Independent, English-common-law-based financial and commercial jurisdiction with its own court system	Preferred structuring venue for financial-services and cross-border transactions
KazMunayGas (national oil and gas company)	Dominant state energy company and central counterpart for oil and gas sector investment and CPC-related matters	Essential partner for any energy-sector engagement
National Bank of Kazakhstan	Monetary authority; manages the free-floating tenge	Relevant for currency and banking-sector matters
Caspian Pipeline Consortium (CPC)	International consortium (including major global oil companies) operating the critical Novorossiysk export pipeline	Key counterpart and risk-monitoring point for any oil-sector or export-logistics investment
Ministry of Foreign Affairs	Manages Kazakhstan's careful diplomatic balancing between Russia, Ukraine, China, and Western partners amid the CPC crisis	Relevant for understanding Kazakhstan's geopolitical positioning and its limits

CURRENT INTERNATIONAL BUSINESS CHANNELS

The American Chamber of Commerce in Kazakhstan and the EU-Kazakhstan Business Council are the leading Western business associations, alongside the National Chamber of Entrepreneurs "Atameken" for domestic business liaison. Kazakh Invest runs regular investor forums and maintains active sector-specific outreach. Major international oil companies with Tengiz and CPC stakes maintain substantial in-country presence and are a useful source of practical intelligence on energy-export logistics. The World Bank, EBRD, and Asian Development Bank maintain active country programs supporting infrastructure, energy transition, and private-sector development, and the AIFC itself increasingly functions as a networking and dealmaking hub for regional financial-services investment.

INVESTOR PROFILE BEST SUITED

Kazakhstan currently suits investors who can engage with a genuinely improving non-oil economy while maintaining clear-eyed awareness of recurring energy-export infrastructure risk: manufacturing and logistics investors benefiting from the Special Economic Zone incentive framework and Middle Corridor positioning, financial-services investors leveraging the AIFC's distinctive common-law structure, and agriculture and food-processing investors building on strong recent growth in that sector are all reasonably well-positioned. Oil and gas investors need particular comfort with CPC-related disruption risk and should build contingency planning into project economics. Investors requiring complete insulation from regional Black Sea conflict spillover, however indirect, should size Kazakhstan exposure accordingly and monitor the security environment on an ongoing basis.

FROM INTELLIGENCE TO ENGAGEMENT

STEP 1: Engage Kazakh Invest and assess current incentive terms

Open direct dialogue with the national investment promotion agency to understand sector-specific incentives under the Investment Policy Concept through 2030.

STEP 2: Evaluate AIFC structuring for financial and cross-border transactions

Consider the Astana International Financial Centre's common-law framework for transactions benefiting from greater legal predictability.

STEP 3: Build CPC disruption scenarios into any oil-sector or export-revenue-linked planning
Model the financial impact of recurring CPC suspension scenarios, informed by the January and July 2026 precedents, for any investment with oil-revenue sensitivity.

STEP 4: Monitor diversification-route capacity growth

Track progress on China-corridor and Turkey-route capacity expansion as an indicator of Kazakhstan's reducing, but still significant, CPC dependency.

STEP 5: Leverage Special Economic Zone incentives for manufacturing and logistics entry

Engage the relevant zone authorities directly to secure tax and customs incentives for qualifying export-oriented projects.

WAVERLEY'S ROLE

- Independent due diligence and incentive structuring support through Kazakh Invest and the relevant Special Economic Zone authorities
- Energy-sector risk assessment and CPC disruption-scenario modeling for clients with oil-export-revenue exposure
- AIFC structuring advisory for financial-services and cross-border transaction clients
- Ongoing geopolitical monitoring of Black Sea security developments and their implications for Kazakhstan's export infrastructure

INVESTOR CALL TO ACTION

Engage Waverley for a tailored assessment of CPC disruption risk and diversification-route capacity before finalizing any oil-sector or export-revenue-sensitive investment in Kazakhstan.

Request a briefing on Special Economic Zone and AIFC structuring options suited to your sector's entry strategy.

WAVERLEY INVESTOR INTELLIGENCE & OPPORTUNITY PIPELINE

Kazakhstan's clearest near-term opportunity lies in manufacturing and logistics investment within its expanding network of Special Economic Zones, which hosted 586 active investment projects as of 2026 and offer genuine tax and customs incentives alongside improving legislative stability guarantees. Financial services structured through the Astana International Financial Centre represent a second, increasingly credible opportunity given the AIFC's distinctive common-law framework and growing regional role. Agriculture and food processing, which saw investment up 36.4% in 2025 and food-manufacturing investment nearly tripling, offer a third, underappreciated opportunity. A fourth, longer-horizon opportunity lies in trans-Caspian and China-corridor logistics infrastructure, which stands to benefit structurally from Kazakhstan's accelerating, CPC-crisis-driven diversification push, regardless of how the underlying Black Sea security situation resolves.

POSITIONING

Waverley views Kazakhstan as a country whose underlying investment-climate reforms are genuinely substantive and increasingly reflected in record foreign direct investment, even as its oil-export infrastructure has demonstrated real, recurring vulnerability to Black Sea conflict spillover entirely outside its control.

For investors able to engage with Kazakhstan's broadening non-oil economy while building appropriate contingency planning for periodic CPC-related disruption, Kazakhstan offers a genuinely attractive opportunity across manufacturing, financial services, agriculture, and logistics, structured with the risk-monitoring safeguards this briefing sets out.

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